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Kerr Brown,
The Planning Inspectorate,
Temple Quay House,
2 The Square,
Temple Quay,
Bristol,
BS1 6PN

Date: 3rd June 2022

Dear Mr. Brown,

TOWN AND COUNTRY PLANNING ACT 1990

APPEAL UNDER SECTION 78

APPEAL BY: Mr Simon Wheeler

SITE: Land North Of Butterfly Lane, Land Surrounding Hilfield Farm and Land West of Hilfield Lane, Aldenham.

DESCRIPTION OF DEVELOPMENT: Installation of renewable led energy generating station comprising ground-mounted photovoltaic solar arrays and battery based electricity storage containers together with substation, inverter/transformer stations, site accesses, internal access tracks, security measures, access gates, other ancillary infrastructure, landscaping and biodiversity enhancements.

REFERENCE: APP/N1920/W/22/3295268

APPEAL START DATE: 3 May 2022

Re: Development Proposals by Elstree Green Limited, Reference 21/0050/FULEI

One of the stated aims of the Radlett Society and Green Belt Association (RSGBA) is *'to improve, protect and preserve for the benefit of the public, the countryside and the country around the village of Radlett, the village of Radlett and the green belt around Radlett.'* And, for many years, our defence motto for the Green Belt is *'Fields once lost – will never return.'*

It is with this objective in mind that we, the committee members of the RSGBA, continue to be deeply concerned about the above proposals for a solar farm on Metropolitan Green Belt land near Radlett.

This Appeal is made, no doubt with the full consent of the landowner of 'inherited' farmland who has seen an apparently better business opportunity not to farm it, instead preferring to hand over the site to a non-agricultural power-generation company, regardless of the substantial harm to the soil, the landscape and the enjoyment of visitors.

The scheme would not be a 'localised' one. Because of the nature of national grid electricity distribution, there would be absolutely no guarantee that any energy produced would be exclusively for the benefit and use by Hertsmeere residents.

The proposals comprise two main areas of development, labelled E and W, covering over 300 acres of land, all of which is entirely in the Metropolitan Green belt. The land is in regular agricultural production. Defra rates the land quality in both parcels as Grade 3, 'Good to Moderate'; other fields, between the application site and Radlett, are Grade 2 – 'Very Good'.

MEMBER:



The proposed sites are covered by a network of established rights-of-way, public footpaths and bridleways.

We have produced a draft map- showing, in the eastern area in particular, the substantial impact on rights-of-way, public footpaths, which, in many cases would be completely surrounded by fences and solar panels.

The paths through the open countryside are kept open and regularly walked by local people and others from further afield, from Bushey and Shenley, who enjoy the year-round easy access to open countryside with distant views.

The eastern fields also enjoy a real sense of peace by virtue of not being close to any busy roads or railway. In particular, during the Covid-19 pandemic of 2020-22, the paths have provided a valuable place for exercise for walkers, runners and joggers that complements gyms, pools and sports halls.

All of these users, each in their own way, derive a much-needed feeling of well-being from the openness afforded by the undeveloped, open Green Belt countryside.

In all, 12 rights-of-way would be detrimentally affected in both the E and W zones of the application.

If allowed, the proposed development of a Solar Farm with its vast expanse of 3 metre high solar panels, plus noise-producing AC-DC inverters, 2m high metal fences, CCTV cameras and barriers would, at a stroke, lead to the loss of any semblance of openness, freedom and any health-giving and well-being benefits that the network of paths currently offers.

While RSGBA appreciates the obvious benefits of harvesting solar energy, particularly in view of the government's 2050 target for zero carbon, it does not have to be achieved in this way. Nor does it have to be achieved on this site, which seems to have been selected by chance, that the landowner preferred not to continue with agriculture rather than its inherent suitability. Such installations would be much better located on sites that are affected by noise, e.g. near motorways or main roads, railways or main airports. Also, many buildings with flat roofs might also be able to contribute to local electricity generation and install solar panels, especially now that the resale value of electricity has risen so sharply.

We would question the applicants' claim that the development is to be 'temporary' and that it would mitigate the loss of Green Belt, without citing very special circumstances. To many people, this period of time would be tantamount to permanence: they would not see and enjoy this countryside again in their lifetimes. Also, the expectation that future generations would be expected to de-commission the site is hardly an argument for sustainability.

Other negative impacts of the proposed development:

1. **Food Security:** At a time when the UK needs to maximise the percentage of food grown locally, the loss of agriculture would be contrary to achieving those goals.
2. **Noise:** The likelihood of noise generated by inverters and associated generating equipment
3. **Dazzle:** There are concerns over the safety of flying activities at the nearby Elstree Airfield, due to upward reflection of the sun by the mirror-like solar panels. As it is understood that the proposed solar panels would be movable, in order to track the sun's movement, this factor could aggravate the hazard of dazzle for pilots, both professional and trainees. With so many variables at play, it's almost inevitable that pilots will encounter glint and glare near Elstree Airfield.
4. **Fire:** Any installation involving batteries needs to be very carefully located in order to minimise the potential risks of a very serious fire; which can result in the generation of a number of organic chemicals, including some highly toxic gases such as carbon monoxide and hydrogen cyanide.



5. **Biodiversity:** There would be a detrimental impact on the biodiversity in the land covered by solar panels. The growth of grass and other plants would be inhibited by the shade beneath the solar panels and, in turn, this will impact any wildlife living off of the plant life.

Overall, the Society remains opposed to these proposals. The application for development in the Green Belt is not included in Hertsmere's SADM24 [Key Green Belt Sites] nor part of a village envelope SADM23 nor safeguarded land. The proposals would not comply with any of the terms of SADM26, Development Standards in the Green Belt.

In the Draft Local Plan, Reg18, 2021, the Council stated 'Larger, commercial low carbon or renewable energy source developments will need to be considered on their merits including their impact on the local landscape and green belt.'

The NPPF says: 'elements of many renewable energy schemes will comprise inappropriate development and it will be incumbent on applicants to demonstrate very special circumstances.'

We therefore argue that the application is a totally inappropriate development in the Metropolitan Green Belt and there are no special circumstances to mitigate the long-term harm that would arise. There would be a far-reaching loss of openness in the landscape, the harm to plant life, flora and fauna, and a highly detrimental impact on the public's enjoyment of local health-giving outdoor activities. We urge you to dismiss this appeal.

Yours sincerely

Rosamund Gray

Chairman

APPENDIX

Hertsmere Draft Local Plan 2021 Regulation 18, September 2021

references to **ENERGY GENERATION**

Strategic Objective 12: Reduce greenhouse gas emissions and promote the building of greener, more energy efficient, net zero greenhouse gas emission homes, offices and commercial buildings to help minimise the impact of climate change.

Creating Sustainable Development:

viii .**Design for climate change resilience,** Enhanced energy efficiency and the increased use of renewable sources, secure real reductions in greenhouse gasses and minimise/reduce pollution (including air, water, soil, light and noise) and waste;

x. Ensure mitigation from and adaptation to climate change is secured through design and construction methods through a comprehensive Sustainability and Energy Strategy which details how the development will achieve net zero carbon operation;

Policy CC1 - Climate change mitigation

For developments meeting the carbon scheme threshold required under Policy CC2, applications should be supported by a site-specific Climate Change and Energy Strategy

Given the adverse consequences of greenhouse gas emissions, all development should be designed with measures which contribute towards energy de-carbonisation, energy conservation or reduction. In order to help achieve that, applications above the carbon scheme threshold will be expected to provide a *Climate Change and Energy Strategy (CCES)* to accompany their planning application in order to provide a baseline of the energy considerations and devise proposals for enhancement above that baseline. This should be separate from any *Design and Access Statement* and the council intends to update its validation list to embed the need for a CCES to be included within the required suite of supporting documents which accompany a planning application.

Energy consumption and generation

It is preferable for carbon emissions to be reduced through sustainable design and construction, before requirements for on or off-site renewable energy generation are considered. The transmission of energy across large distances can be inefficient and expensive, leading to difficulties in matching supply and demand. However, the provision of sustainable, renewable and localised energy sources is expected to become much more commonplace as the economy is decarbonised and alternative technologies become more feasible and viable.

Stand-alone and localised district energy (or heating) networks can help overcome those issues, which can be a more efficient way of providing and distributing low carbon heat; smaller-scale and community-based schemes are most likely to be permissible in the majority of locations.

Larger, commercial low carbon or renewable energy source developments will need to be considered on their merits including their impact on the local landscape and green belt.

The NPPF recognises that elements of many renewable energy schemes will comprise inappropriate development and it will be incumbent on applicants to demonstrate very special circumstances. Localised and stand-alone energy generation and distribution schemes will be assessed against a range of considerations including:

i. their scheme viability, safety and efficiency;

ii. usability, choice and affordability to residents or other end users; and

iii. benefits derived from the scheme when measured against any local environmental and amenity impact. Further details will be set out in a supplementary planning document.

Policy CC2 - Greenhouse gas reductions

A tiered approach will be applied to secure reductions in greenhouse gas emissions dependent upon the scale of development proposed.

Policy CC3 – Energy generation

Proposals for stand-alone sustainable or renewable energy facilities, energy storage, heat recovery systems, or decentralised energy networks will be supported, subject to schemes being responsive to and appropriate for the site and locality incorporating suitable mitigation to manage potential impacts on local amenity and on the environment.

The on-site generation of affordable renewable energy will be subject to the same requirements as stand-alone facilities.

On-site energy generation should be undertaken within the site, or where it can be demonstrated that this is not feasible, efficient or viable to do so, in accordance with the following approach:

- i. adjacent to, or in close proximity to the development site;
- ii. next to, or in close proximity to the settlement or locality accommodating the development; or
- iii. in another area identified by the council or other statutory body. Where appropriate, schemes should include passive design measures for future connections to decentralised energy networks.

Policy ENV1 – Environmental impact of development

The council will identify and support proposals which protect and enhance the environment, working with statutory bodies and other relevant organisation to ensure that development proposals do not create an unacceptable level of risk to occupiers of a site, the local community and the wider environment.

- i. Lighting installations should be appropriate for the area in which they are situated and not harm the amenity of residents or the natural environment.
- ii. Well-designed lighting installations are considered to be those that use the minimum lighting intensity and hours of operation for security purposes, minimise light spillage and glare and do not cause harm to local ecology or dazzle drivers.