



Fiona Dunning
Development Management
East Herts District Council
Wallfields
Pegs Lane
Hertford SG13 8EQ

Our Ref:

Your Ref:

9th September 2022 (by email)

Dear Fiona Dunning,

Application no. 3/21/2601/FUL (Amendments)

**Land at Wickham Hall Estate, Hadham Road, Bishops Stortford, CM21 1JG
Erection of a solar photovoltaic farm with an output capacity not to exceed 49.9MW of
energy, with supporting infrastructure and battery storage, inverters and transformers,
fencing and landscaping works**

I write with regard to the above amended application following our representation to the original proposal under the above application number. We note that the principal amendment to the application is the reduction in extent of the solar installation, from 78.26 hectares to 59.08 hectares. We also note that the area removed from the application is land designated as Green Belt.

The amended application includes the relocation of additional buildings and battery storage units. Notwithstanding our firm support for renewable and sustainable forms of electricity generation, CPRE Hertfordshire maintains its strong objection to this amended proposal. Certain renewable energy sources, if not properly controlled, can have serious consequences for our natural environment and we maintain our objection for the following reasons.

1. A proportion of the land identified for this proposed development within East Herts District Council area is located within land identified as Rural Area Beyond the Green Belt (RABGB) within the adopted East Herts District Plan which confers similar protection to the Green Belt for rural character and countryside.
2. Policy GBR2 in Part 1 of the East Herts District Plan identifies RABGB as "a valued countryside resource" and states that only exceptional development will be permitted. Policy GBR2 covers large areas of highly valued open countryside and landscape where only limited exceptions are accepted for specific types of development.
3. The land proposed for this development performs vital functions as open countryside, both for agriculture and recreation, and for the conservation and enhancement of the natural



environment. National Planning Practice Guidance (Renewable and Low Carbon Energy) is clear that the promotion of renewable energy: “does not mean that the need for renewable energy automatically overrides environmental protections and the planning concerns of local communities.

4. With regard to Policy GBR2, the original Planning Statement prepared by DLP Planning for the Applicant states in para. 8.4 that the lack of specification of ‘solar farms’ as exceptional developments in RABGB means that the Council should “defer to the specific policy, Policy CC3 and the tests it contains.” This is wilful misinterpretation of Local Plan policies in this area and it is clear that protection of the rural character in RABGB is paramount.

5. The Planning Statement Addendum states that Policy CC3 of the adopted Local Plan “is now the principal policy as it addresses specifically the Council’s approach on renewable energy matters”. This is clearly wrong due to the significance of Policy GBR2 and in any case, the proposed development fails three of the five tests listed in Policy CC3, that is: “impacts upon ...a) environmental and historic assets; b) visual amenity and landscape character; d) the amenity of neighbouring residents and sensitive uses”. It is entirely misleading to suggest that these tests are satisfied by 46 hectares of ground-mounted solar panels and associated installations.

6. The industrial nature of the photo-voltaic panels and associated infrastructure will change the nature of the countryside in this area for a generation. The presence of large areas of glass and metal are entirely inappropriate for designated areas of rural character.

7. As noted above, national Planning Policy Guidance (PPG) provides specific guidance on solar farms (Renewable and Low Carbon Energy) and notes that factors to consider include “the effect on a protected area such as an Area of Outstanding Natural Beauty or other designated areas.” PPG also states that “the deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes.”

8. Ministerial statements of April 2013 and March 2015 are also quoted in PPG, noting that the need for renewable energy should not automatically override environmental protection. The large extent of this proposal will make a very considerable impact on the area, by virtue of both the solar panels themselves, and the associated infrastructure.

9. Ground-mounted solar installations are not locationally constrained as they require only direct sunlight. It is neither appropriate nor necessary to locate such installations on valued open countryside which has been designated to be maintained through the Local Plan process.



10. As the very significant public and institutional response to this application notes, the proposed development will be highly visually prominent in the landscape. It is situated close to Bishops Stortford to the north-west of the town and will be easily seen from all directions.
11. The area is very extensively used by the public and a number of public rights of way cross the land affected, the most prominent of which is The Hertfordshire Way, which runs alongside the western boundary of the site. This will further increase visibility and impact to an unacceptable extent.
12. Safety concerns are being increasingly raised with regard to the safety aspects of the battery storage facilities connected with solar energy installations, including the fire risks connected with lithium-ion batteries. These are not susceptible to traditional fire-fighting techniques and we understand that the Hertfordshire Fire and Rescue Service is not equipped to deal with such risks.
13. The present use of the land for agriculture should be maintained. The Applicant states the land is categorised as Grade 2 and 3a which are defined as Best and Most Versatile (BMV) land by DEFRA. BMV land should clearly be used for food production to maintain and enhance domestic UK food security and this requirement will only increase in the future.
14. The importance of open countryside has been constantly emphasised throughout the recent pandemic, and the beneficial aspects of maintaining such areas are likely to be increasingly recognised. Recent legislation such as the Environment Act emphasises the importance of maintaining and enhancing biodiversity.
15. Contrary to the Applicant's assertions, the 40 year timeframe proposed is not "temporary" for wildlife and habitats which would be irreparably harmed. Birds become injured or killed by mistaking the glass panels for water, small mammals get trapped in the fencing, and pollinators and other insects have their habitats compromised by extensive areas of solar panels.
16. CPRE Hertfordshire is also concerned by the negative screening decision with regard to the requirement for Environmental Impact Assessment and would ask the Council to reconsider its position on similar matters in the future due to the undeniable environmental impacts of proposals of this magnitude.
17. At present, in Hertfordshire, there is a proliferation of similar applications for solar energy installations across both the Green Belt and similarly designated areas. The



cumulative effects of these proposals will have a significant and damaging impact on wide areas of highly valued open countryside and agricultural land.

18. CPRE Hertfordshire reiterates its support for renewable energy and notes that Solar Energy UK estimates there are over 617,000 acres of suitable, south-facing commercial rooftops available for solar panels. We believe that rooftops and previously developed land should be utilised for solar energy and we urge the Council to refuse permission for this damaging proposal.

Yours sincerely,

Chris Berry
Planning Manager