



David Lamb
Development Management
East Herts District Council
Wallfields
Pegs Lane
Hertford SG13 8EQ

Our Ref:

Your Ref:

29th January 2025 (by email)

Dear David Lamb,

Application no. 3/24/2245/FUL
Land to the West of the A507 between Cottered and Cromer
Installation and operation of a solar farm including co-located energy storage facilities,
onsite substation, ancillary infrastructure and landscaping

I write with regard to the above application, to which CPRE Hertfordshire objects strongly for the following reasons.

1. The Planning Access and Design Statement prepared by consultants RPS Group for the developer is entirely inadequate in addressing the wide range of planning and related issues raised by the proposed development. Principally, this is identification of the land affected as Rural Area Beyond the Green Belt (RABGB) according to Policy GBR2 of the adopted East Herts District Plan and the significance of the countryside, landscape and heritage implications of the proposal.
2. Paragraph 4.6.1. of the East Herts District Plan states:
"It (RABGB) is a considerable and significant countryside resource which Policy GBR2 seeks to maintain by concentrating development within existing settlements".
3. This proposal does not comply with any of the exceptions permitted by Policy GBR2. It would introduce development which is deeply injurious to the rural character of the area.
4. The proposed development is also in conflict with Paragraph 187b) of the National Planning Policy Framework (NPPF) which states that:
"Planning policies and decisions should contribute to and enhance the natural and local environment by:



b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services..."

5. CPRE Hertfordshire is fully supportive of the Government's objectives towards the achievement of net zero emissions by 2050 and the promotion of all forms of renewable energy generation. In principle however, land covered by policy affecting the rural area should not be used for development which is highly damaging to the landscape and rural character, effectively industrialising the landscape in the area which would be covered by glass and metal panels and associated infrastructure.
6. It is clear that the land affected has a particularly rural feel. The land is primarily arable farm-land, and although electricity lines and pylons are present, they are commonly encountered in rural areas.
7. The land is free from traffic and other noise and there are relatively long views of undulating land framed by trees, hedges and woodland within and beyond the site boundaries, contributing to the essentially rural feel. The site is accessible via two Public Rights of Way (PROWs) which cross or adjoin the site from the surrounding settlements including Cromer and Cottered.
8. The proposed development comprises the installation of an unspecified number of solar panels up to 3.5 metres above ground level at their high end, twelve inverter buildings 3 metres high, an unspecified number of transformer buildings 3 metres high on concrete hard-standings measuring 15 by 15 metres across the site. Together with 24 energy storage enclosures measuring 12 metres by 2 metres and 3 metres high, together with a primary sub-station 7 metres high, the installation and associated infrastructure will jeopardise seriously the rural character of the area.
9. The impact will be further increased by 2.4 metre-high boundary deer fencing comprising galvanised mesh on wooden posts, incorporating 3.5 metre high CCTV poles. The qualities of the site, in particular the rural feel, are perceived during the changing seasons, reflected in the growing and harvesting of the arable crops, and the views both within and beyond the site contribute to the enjoyment of the users of the PROWs.
10. Public enjoyment of the area is entirely informal and this would be prejudiced by the continuous noise emitted by the inverters and transformers associated with ground-mounted solar installations, and also by cooling fans attached to transformers.



11. The ongoing maintenance of the solar installation site can be expected to have a substantial impact on the users of the PROWs crossing and adjoining the site and the residents of surrounding settlements. Grass and hedges as well as the equipment will require constant and regular maintenance which cause additional nuisance.

Agricultural use

12. We believe that the present use of the land for agriculture should be maintained. The Appellant indicates that the land affected is categorised as Best and Most Versatile (BMV) land for agriculture and there should be a full detailed survey of the land affected to determine its true quality and potential use for agriculture.
13. The CPRE has recently published a key report entitled “Building on our food security“ (July 2022) which identifies the dangers in losing BMV agricultural land and the requirement to balance the competing needs of renewable energy and food security. Increasing attention is being paid to the issue of food security and the need to use agricultural land for food production.

Community use and amenity

14. As is clearly apparent due to the huge public response to this application, the area affected is extensively used by walkers and the local communities for recreational purposes. The proposed development will be highly visible over a wide area and from public rights of way.
15. The extensive security fencing and associated infrastructure will be visually intrusive, particularly at close quarters, especially where footpaths cross fields and where it is proposed to provide security fencing to both sides. Ground-mounted solar energy installations should not be sited where they are directly overlooked by housing or where they would detract from important views.

Public rights of way

16. As already noted, the site proposed for this development is crossed by Public Rights of Way (PRoW) Cottered Footpath 028 and Ardeley Footpath 049. Both these PRoWs will be directly impacted by the proposal with the views from them, particularly Cottered 28,



radically altered along most of their lengths and it is not acceptable for PRowS to be reduced to what are effectively narrow alleyways between either fencing or hedging as proposed.

17. The adopted East Herts District Plan notes in Policy CFLR3 Public Rights of Way that: *“Proposals for development must not adversely affect any Public Right of Way and, where possible, should incorporate measures to maintain and enhance the Rights of Way network”.*
18. A substantial part of the amenity enjoyed by these PRowS is the views across open landscape.

Wildlife and biodiversity

19. Notwithstanding our preference for maintaining the agricultural use of appropriate land, we recognise that taking land out of agricultural use can have benefits for wildlife in those cases where the monoculture of crops is removed, allowing an element of biodiversity. The absence of ploughing increases the earth worm population and insects to flourish where grass is left to grow but these advantages are directly compromised by the damage to traditional habitats through development of the industrial plant and infrastructure associated with solar energy generation.
20. However, security fencing surrounding large areas of land remove traditional pathways for transitory animals and bird deaths are a common occurrence as large areas of glazing are mistaken for water. Grass has to be mown and the land is essentially changed from rural to industrial use; chemicals are used to control weeds and pests and habitats and the nature of local wildlife is consequently altered.
21. Large ground-mounted solar installations inevitably destroy wildlife corridors and nesting and feeding habitats especially of ground nesting birds such as larks and lapwings. Once gone, such habitats cannot be easily recovered.

Solar energy options

22. Cumulatively, photo-voltaic (PV) panels can make a significant contribution to our electricity supply but much more should be done through the planning process to promote appropriate roof-top energy generation on domestic, commercial and agricultural buildings, as well as on public and community buildings.

23. Roof-top PV associated with buildings has the added benefit of providing generation at the point of use, thereby reducing transmission and distribution losses, and the impact of associated infrastructure. Local authorities can support roof-top PV generation through planning conditions to mandate it on new build and major refurbishments, where practicable.

Cumulative impact

24. CPRE Herts acknowledges that each planning application will be decided on its own merits. However, as important context to the current appeal, CPRE Hertfordshire is aware of at least ten further large-scale ground-mounted solar installations within the County.
25. Taken together, these will have devastating impacts on large areas of open countryside. We would suggest that the present system of consideration of individual planning applications by Local Planning Authorities is entirely inadequate to assess the overall implications identified in this submission. CPRE Hertfordshire believes that a broader approach to the assessment of impacts is required to ensure that the cumulative effects of proposals are adequately taken into account.

Heritage impact

26. The presence of the historic Cromer Windmill which is Listed as Grade II* and immediately adjacent to the site is of direct relevance to the rural character of the area. NPPF Paragraph 212 states that:
“when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation”
27. Paragraphs 213 and 214 continue to note the significance of designated heritage assets including Listed buildings and their settings. Harm to such assets should be “wholly exceptional” in the case of Grade II* Listed buildings.
28. The detrimental impact of the proposed development on the enjoyment of the ancient monument will be very considerable. Cromer Windmill is the last remaining historic windmill in Hertfordshire and as such is a particularly important heritage asset in the County.



29. We support fully the concerns expressed by Historic England (HE) with regard to the significance of the harm caused to the setting of the Cromer Windmill. HE notes specifically the relevant legislation (The Planning (Listed Buildings and Conservation Areas) Act 1990 which states:
- “local planning authorities shall have special regard to the desirability of preserving the building or its setting”. (paragraph 66.1)*

River Beane valley

30. A critical implication of the proposed development will be the impact on the upper reaches of the River Beane which is a globally recognised chalk stream with rare ecological significance. The disruption caused by construction and the ongoing operation of the solar installation will jeopardise the survival of the streams in the River Beane catchment.
31. The continued survival of the unique chalk stream environment in this area has been jeopardised by over-abstraction in the past. It is now recognised by the Upper Lea Catchment Partnership and Affinity Water amongst others, that urgent work needs to be undertaken to protect this rare ecosystem which is threatened by the proposed development.

We note the wide range of concerns expressed by local residents and would urge the Council to refuse permission for this hugely damaging proposed development.

Yours sincerely,

Chris Berry
Planning Manager

NOTE: We would request that this letter is published on the Council’s website as a document relating to this application and should be grateful if you would notify us of the date of the appropriate meeting if it is to be determined by planning committee.