

North Hertfordshire District Council  
PO Box 10613  
NG6 6DW

16<sup>th</sup> September 2025

Dear Sir/Madam

Reference: 25/01947/FP

Address: Land South Of A507 Near Cumberlow Green, Clothall Road, Clothall,  
Hertfordshire

Proposal: Battery Energy Storage System (BESS), ground mounted solar farm, associated  
infrastructure, access and landscaping.

Walkern Parish Council wishes to formally object to the proposed development of the Munches Farm Solar Farm at Cumberlow Green, within the Westfield Energy Conservation Park. While we recognise the importance of renewable energy initiatives, we believe this proposal raises significant concerns across several critical areas that must be addressed before any approval is considered.

### **Landscape and Visual Impact**

The proposed solar farm would dramatically alter the character of the local landscape, which is predominantly rural and agricultural. The scale and industrial nature of the installation would be visually intrusive, particularly from public rights of way and nearby residential areas. The site lies within proximity to the East Hertfordshire Green Belt, and the visual encroachment undermines the openness and aesthetic value of the countryside.

### **Impact on Agricultural Land**

The development would result in the loss of productive agricultural land, which has historically contributed to local food production and rural employment. At a time when food security and sustainable land use are increasingly vital, converting viable farmland into industrial energy infrastructure is deeply concerning. The long-term implications for soil health and future agricultural use need to be taken into consideration.

Developers and local planning authorities are legally bound to uphold national policies and legislation that safeguard agricultural land and soils. Central to these policies is the protection of the best and most versatile (BMV) land—grades 1, 2, and 3a—from inappropriate, unsustainable, or excessive development. In this case, the developer's own land classification report confirms that out of 208.3 hectares:

- **74.5 hectares** are classified as BMV land (grades 2 and 3a)
- **99.3 hectares** fall under grade 3b—moderate quality land still capable of producing a range of crops

This means **nearly 175 hectares** of productive agricultural land would be lost, including a substantial area of BMV land. Such a loss directly contravenes government policy and undermines long-term food security, soil sustainability, and rural economic resilience.

A recent CPRE report found that an area of England's prime agricultural land—the size of 1,300 football pitches—has been lost to mega solar farms and it has called for 60% of the UK's solar energy to be generated on rooftops and a ban on solar farms on the highest two grades of farmland.

### **Biodiversity and Ecology**

The proposed site is home to a variety of flora and fauna, including protected species and important ecological corridors. The disruption caused by construction, fencing, and ongoing maintenance poses a threat to local biodiversity.

The application is accompanied by a Biodiversity Net Gain (BNG) Metric Assessment, which appears to demonstrate that the site will achieve an increase of 73.3% BNG in habitat units, 16.57% BNG in hedgerow units and 22.34% in watercourse units. However, the BNG metric is a model-based tool and because it relies heavily on subjective inputs its reliability is questionable. BNG requires many years of habitat management to ensure gains are sustained. However, without robust, enforceable plans and funding mechanisms there is no guarantee that this long-term stewardship will be maintained. The Parish Council would like to see clear plans for who will monitor and enforce compliance over the lifetime of the solar farm.

### **Cumulative Impact**

This proposal must be assessed not in isolation, but in the broader context of escalating energy development across this area of Hertfordshire. The cumulative impact of multiple large-scale solar farms and associated infrastructure now threatens to overwhelm the rural landscape, erode community character, and undermine strategic planning objectives.

This application by Lightrock Power Ltd sits directly beside the already controversial proposal from RES Energy for an 80-hectare solar farm and battery energy storage system (BESS) between Cromer and Cottered (the Beane Valley Solar Farm). This land is designated as Rural Area Beyond the Green Belt (RABGB) under the East Hertfordshire Local Plan, which explicitly seeks to preserve its open and undeveloped nature.

If approved, together these would form one of the largest energy zones in Hertfordshire, transforming open countryside into a sprawling industrial complex. Without a coherent regional energy strategy, piecemeal approvals risk irreversible environmental degradation.

These applications together represent a tipping point. If permitted, they will set a precedent for unchecked industrialisation of East Hertfordshire's rural heartland. The absence of strategic coordination, disregard for local policy, and scale of environmental intrusion demand firm rejection. The countryside is not a blank canvas for speculative energy infrastructure—it is a finite and valued public asset that must be safeguarded.

### **Heritage Concerns**

This area of Hertfordshire is rich in historical and cultural heritage, including listed buildings, ancient hedgerows, and archaeological sites. The proposed development lies in close proximity

to several heritage assets, and its visual and environmental impact risks undermining their setting and significance.

The parish council is particularly concerned about the harm the proposal may cause to the Grade II\* listed Cromer Windmill, located very near the site. The windmill's heritage value is intrinsically linked not only to its physical structure but also to its setting. It is currently surrounded by open fields that continue to produce grain—reflecting the mill's original function and historical context.

If the solar farm proceeds, the windmill will lose its meaningful relationship with the surrounding landscape, eroding both its visual integrity and its cultural significance.

### **Traffic and Infrastructure**

The construction and maintenance phases of the solar farm are expected to place additional strain on local roads, many of which are narrow and unsuitable for heavy vehicles. Increased traffic, noise, and potential damage to infrastructure pose risks to both residents and road users.

The Construction Traffic Management Plan correctly identifies that the B1037 is a single carriageway and as it heads away from the site towards Walkern it narrows with sections that cannot accommodate an HGV passing a car without the use of designated passing places, and that for most of its length, the road is flanked by hedgerows, which restrict visibility—particularly on bends. The plan indicates that given these constraints, vehicle movements on the local highway network will be kept to a minimum and as such the impact on local roads during the construction period is expected to be limited. However, in order to ensure road safety and avoid additional congestion through the village Walkern Parish Council would like to see the Construction Management Plan strengthened to restrict any construction vehicles using the B1037.

### **Conclusion**

In light of the above, Walkern Parish Council respectfully requests that this application be refused or significantly revised to address the outlined issues. We remain committed to supporting sustainable energy solutions that are appropriately scaled, sensitively located, and developed in consultation with local communities.

Yours faithfully  
*on behalf of Walkern Parish Council*

Abi Brown  
Clerk to Walkern Parish Council