

Cottered & Throcking Parish Council

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Planning
North Herts Council

By email only:
planning.control@north-herts.gov.uk

21 October 2025

Dear Planning

Re: PLANNING APPLICATION: 25/01947/FP: Battery Energy Storage System (BESS), ground mounted solar farm, associated infrastructure, access and landscaping. Land South Of A507 Near Cumberlow Green Clothall Road Clothall Hertfordshire

Cottered and Throcking Parish Council strongly objects on the following grounds:

Inappropriate scale: Site development would be in direct conflict with paragraph 187 a) and b) of the National Planning Policy Framework, revised 12 December 2024 (NPPF) and SP5 and CGB1 of the North Herts Local Plan and would neither enhance the local characteristics of the area, improve its distinctiveness or respect the intrinsic value of the countryside. This proposal should be considered together with the immediately adjacent proposal for solar installation currently being considered by East Herts District Council when considering the cumulative effects of size and proportion. The appearance of the proposed development would be incompatible with the character and appearance of this rural area, creating an industrial element in land designated as green belt and rural area beyond the greenbelt.

Traffic and road safety: Local road access is inadequate for HGV and the inevitable construction traffic for a project of this magnitude. The A507 weight restriction highlights its unsuitability for large, heavy vehicles. Paragraphs 115 and 116 of the NPPF refer, in terms of suitable access and highway safety, as ongoing maintenance of the plant and initial construction will require constant traffic passing through the hamlets and small village settlements along the narrow road network of country lanes.

Agricultural landscape: The proposed site is 38% 'best and most versatile' (BMV) land, with the remainder in constant agricultural use. Development would conflict with guidance set out in the National Policy Statement for Renewable Energy Infrastructure, April 2025 (NPSRE) which identifies suitable sites for development as mainly brownfield, industrial or contaminated land avoiding BMV agricultural land where possible.

Biodiversity: The development would result in the loss of arable land, neither contributing to or protecting the valued landscape or providing habitats to support functioning ecosystems and native species such as the prominent deer population. Ground-mounted solar installations damage wildlife corridors affecting nesting and feeding habitats. In its response to the Office for Environmental Protection's Progress in Improving the Natural Environment in England report, the government highlighted the importance of nature-based solutions (NbS) to tackle climate change and protect habitats to comply with Environment Act 2021 requirements. The potential harm to species or loss of biodiversity would be of material concern and conflict with guidance in paragraphs 192-195 of the NPPF.

Inappropriate site: The proposed site is valued by residents and visitors alike for its views and open quality, the Landscape Character Assessment of North Hertfordshire area 221 notes the 'expansive open areas of arable farmland'. Site development would be at odds with strategies outlined which

focus on promoting hedgerows along historic field boundaries to create visual links to woodland, managing species-rich grassland, expanding rights of way, preserving sunken lanes, verges and hedges. Public Rights of Way (PROW) 019 and 020 and byways cross and connect to the site from surrounding settlements such as Cromer, Cottered and Clothall and development should protect and enhance the strategic green infrastructure network in accordance with Policy NE1 of The North Herts Local Plan. Rights of way routes and enjoyment of the environment are likely to be affected by high deer fences and equipment.

Conservation: National Character Assessment (NCA) 86 highlights the strong rural sense of place and high levels of tranquility which characterise this area of East Anglian chalk which features globally rare chalk streams. If changes are considered to the land, this location may be more appropriate as a site for Local Nature Recovery Strategy (LNRS). The upper sections of the River Beane, a unique chalk river of rare global significance, will be negatively affected by construction and the ongoing operation of a solar plant. This rare river system is already adversely affected by over-abstraction and identified by the Upper Lea Catchment Partnership, Wildlife Trust, Affinity Water and the Environment Agency as an ecosystem to restore and maintain, with aims to achieve the highest possible level of legal protection for its rare environment, encouraging public access and an appreciation of the resource. Currently a long-term project, (due for completion in 2035), of improvements to stop 'combined sewer overflows' polluting sections of the river is underway. This ecosystem should be recognised on an international level following guidance in paragraph 192 of the NPPF on conservation.

Lithium-ion battery safety: There are legitimate concerns over the sufficiency of UK Government health and safety guidance and lack of clear regulation of Lithium-ion battery energy storage systems (LiBs) as well as the suitability of LiBs for longer-term storage. Fire, as a result of thermal runaway, remains a credible worst case scenario; difficult to extinguish; releasing toxic gases; and firewater run-off containing toxic compounds flowing into watercourses. The safety of Battery Energy Storage, debated in Parliament on 5 June 2025 voiced concerns; "There is a strong case for mandating water-based suppression systems, off-gas detection, ventilation systems and thermal runaway mitigation as design conditions. Unfortunately, that is far from the case today". "[...]fire and rescue services have not been made statutory consultees for planning applications". The UK Government's Planning Inspectorate website features a BESS briefing note prepared by Professor Peter Dobson OBE, Oxford University, February 2025, which states; "Given the known risks, and potentially disastrous consequences of LiB failures, it is essential that the Government applies appropriate safety regulations to LiBs as a matter of urgency. Until they do this, such installations are being installed without adequate safety measures in place and in unsuitable locations".

Alternative sources of Solar production: Planners should be looking to promote domestic and local roof-top energy generation from residential, commercial, agricultural, public and community buildings. Roof-top solar generates energy with far less impact on the natural environment as the associated infrastructure is much smaller, confined to roofs on existing buildings.

If permission is granted, consideration should be made regarding section 106 payments, and making permission subject to funding local nature recovery.

Yours faithfully



John Wiblin Chairman Cottered & Throcking Parish Council

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