

**Parknasilla, Southern Green, Rushden, Nr Buntingford, Hertfordshire,
SG9 0SP**

4th October 2025

To: NHDC Planning Department

Planning Application: 25/01947/FP

Proposal Land South of the A507 near Cumberlow Green, Clothall Road, Clothall, Herts for Installation and Operation of a solar farm including co-located battery energy storage (BESS), ground mounted solar panels, access and landscaping

I am writing to strongly oppose the above-mentioned planning application for the following reasons:

Impact on Local Amenity and Damage to the Rural Character

In May 2024 the Energy Secretary told Parliament that the best arable land must be protected in the interests of food security. Sites designated as “Best and Most Versatile” (BMV) should be protected by local planning authorities by ensuring this quality land is not developed and if significant development of farmland is necessary “areas of poorer quality land should be preferred to higher quality” (NPPF section 15, footnote 65).

Government guidelines exist stating the prioritisation of non-agricultural sites for renewable energy such as either brownfield land, contaminated land, industrial land and rooftops.

The site in question consists of productive arable farmland, including 38% (according to developers’ survey) BMV in grades 2 and 3 – at circa 200 hectares this represents an industrial size development – however, its necessity on this farmland has not been demonstrated.

I have lived in the area for 30 years and this field has always been highly productive arable land for the entire time, a haven for wildlife and an important part of the local rural landscape.

The application undermines the principles of sustainable development as per the National Planning Policy Framework (NPPF) by causing significant harm to the areas rural character, landscape and visual amenities.

The Government advise Local Authorities to only grant planning permission to project whose “impacts are, or can be made acceptable” by considering the impact on local amenity and landscape, impact on protected areas and to ensure the need for renewable energy does not override environmental protection.

The proposed 187.3 hectare solar farm will feature extensive rows of panels, security fencing, over 850 battery storage units and huge transformers will industrialise a vast swathe of open countryside. This is in contradiction of the NPPF, chapter 15 which requires planners to recognise “the intrinsic character and beauty of the countryside” and the North Hertfordshire Local Plan policy NE2.

I note the applicant refers to “grey belt” land. I understand that NHDC has a general policy of restraint for the “Rural Area Beyond The Green Belt (RABGB) and I hope this policy will be brought to bear on this application.

When combined with the adjacent Beane Valley proposal in East Herts and other speculative adjacent developments the cumulative effect will fundamentally degrade the visual amenity of the area due to the proximity of the 2 sites.

Impacts on local amenity, landscape and heritage assets will be far reaching and will impact the Grade 2 Cromer Windmill, 4 local conservation areas with many listed buildings within the proposed developments 2km search area and the Old Roman Road which runs through the middle of the proposed development.

Guidance states the best solar sites are located on flat, open land where they do not dramatically affect the landscape. The site is located in gently rolling terrain clearly visible from public roads and footpaths, this elevated and sloping nature of the site would render the proposed mitigation proposals insufficient to provide adequate screening. It would cause significant harm to landscape character and visual amenity which could not be adequately reduced by planting.

The application is described as a 40 year proposal, it is in fact a generational loss of a landscape. The East Herts Landscape Officer observed a 40 year period is “considered a substantial portion of a generation’s experience” and that the long-term blighting of the views and character of the countryside cannot be justified by claiming the development is temporary.

Removing vast swathes of agricultural land for decades threatens local and national food security which is not a sustainable solution. As both food security and renewable energy are national priorities it is not sustainable to sacrifice one for the other – rather than seeking a balanced approach ie using non-agricultural land, rooftops, etc.

The harm to agricultural interests is not justified as renewable energy can be installed on many alternative sites without the loss of valuable farmland.

The application is in direct conflict with Policy NE12 of the North Herts Local Plan which requires solar farm applications on BMV land to be considered in line with National Policy ie only if **absolutely necessary**

Ecological Impact

Biodiversity will be negatively impacted through the construction and maintenance of the solar farm through the construction works, ground clearance, hedge removal, soil disturbance and installation of infrastructure.

The erection of 8ft high perimeter fences around the entire site will have an extremely detrimental impact on wildlife which is currently thriving in the long-established fields, hedgerows and woodland.

There is a well-established population of Roe deer using ancient, historical grazing routes across the entire area. This development will fragment habitat, concentrate populations and

force them onto the adjacent road network – creating a significant risk to both motorists and animals.

There is no mention of deer management in the application.

There is an abundance of Red List (ground nesting) birds on the proposed site: breeding skylarks and yellowhammers, also Greenfinch, which were moved to the Red List in 2021. Their habitat is protected. Recently it was noted in a North Herts solar farm case that the development of the site would displace skylarks. The council imposed a condition to provide foraging and nesting areas for them. This application provides mitigation fields; however, these are described as poor condition grassland which are unlikely to meet ecological requirements without intensive management (for which there is no plan).

No detailed Habitat Management and Monitoring Plan is included in the Biodiversity Gain Plan. RSPB guidance recommends annual rotation, no mechanical weeding during breeding season and monitoring in years 2, 5 and 10.

Herds of sheep have been introduced to the fields for the first time in 30 years. This is to keep grass in check – therefore, not a farming use but maintenance policy. Sheep added to the adjacent land does not meet the developers' statement on current land use.

The cumulative effect of 2 solar farms in such close proximity poses significant risks to local biodiversity. The sheer scale of the development and the measures offered are not sufficiently robust to convincingly offset the harm. This is in direct conflict with Local Policy NE4 which requires development to “appropriately protect, enhance and manage biodiversity”.

Watercourses

The proposed site sits on the banks of the River Beane Valley and is approximately 10m higher than the river itself, just to the south of the site. Nearby is a chalk stream, classified as a “Globally Rare Habitat” with very few surviving in the UK and one of only 200 left in the world.

Chalk streams support a specific range of wildlife, many of which are endangered species protected under The Wildlife Act. It is the responsibility of Government to preserve these habitats and the wildlife reliant upon them.

Critically, this site forms part of the Drinking Water Safeguard Zone (Surface Water), catchment areas that influence water quality for their respective area. Safeguard Zones are the main tools to ensure drinking water protection objectives are met -Water Environment (Water Framework Directive England and Wales Regulation 2017).

As the site is naturally sloping, run-off will inevitably increase flood risk in the area by exceeding local absorption and increasing flow to local water courses.

The river will be changed forever by pollution from the construction process, with waste leaching into the river. The associated run off caused by replacing semi-permeable arable land with a vast swathe of impenetrable surfaces will increase the risk of flooding.

What is of greater concern is the possibility of fire associated with battery plants. In this event, the products used by firefighters are known to contain PFA's – manmade chemicals which are also referred to as "forever chemicals" which cannot be eradicated.

These accumulate in soil, crops and plants – entering the food chain in the ecosystem. There is a public health risk that run-off will enter the surface water and contaminate drinking water.

There is growing concern regarding PFA's in surface water and their possible impact on the human body.

This represents a genuine threat to Public Health and more information is urgently needed.

Terrain

This is a totally inappropriate site being a vast area of open, rolling hills – this presents huge problems in relation to drainage/water run-off, flood risk and the impact of glare and glint on neighbouring residential properties and passing traffic on all sides of the proposed site.

The roads adjacent to the site are heavily used, especially during rush hour and the glare presents a risk to drivers and increases the likelihood of accidents.

Due to the terrain, screening the site is impossible which will further impact issues concerning glint and glare.

The A507 is a very busy, fast road and accidents often occur – glint and glare will become a significant factor for motorists and increase the accident risk due to the unsuitable terrain of the site in general.

Construction Access/Road Damage/Traffic Density

Access to the site for construction vehicles is already very restricted and largely unsuitable. It is impossible for large HGV's to reach the site without using single lane country roads, which by their nature are not suitable for this type of traffic. Any traffic would be concentrated into very few routes as HGV access is already restricted on the A507 between Baldock and Cottered.

The number and frequency of vehicles will cause further damage to our already degraded roads.

Noise, Traffic, Disturbance

The introduction of an industrial facility into the rural landscape will bring huge amounts of noise and disturbance for communities, both during and after construction. The character of the local hamlets is quiet and tranquil. The ambient noise is birdsong.

The operational noise generated by the BESS and inverters will be incessant, during the day and night, impacting local residents and their quality of life.

There are concerns over the methodology used for the Noise Impact Assessment and a notable omission from the applicant is any firm commitment to noise limits, leaving residents with no safeguards or protection if noise levels exceed predictions.

There is a real threat this development will bring a constant industrial noise into a rural community resulting in loss of tranquillity, sleep disturbance and health issues associated with lack of sleep.

The World Health Organisation (WHO) carried out a 10 year investigation into the burden of disease from environmental noise over a 10 year period. Results were published in 2011 and included planes/city sources, trains and vehicles.

Overwhelming evidence confirmed that prolonged exposure to noise is linked to serious health outcomes and concluded that noise is the 2nd largest environmental threat to public health, the No1 risk being air pollution.

Auditory channels remain open even when you are in a deep sleep, noise continues to be processed and the body will react via nerves that travel to all parts of the body and hormones are released. Therefore, even if you don't wake up the continual noise sets off the bodies acute stress response, which raises blood pressure and heart rate.

The health risks associated with constant exposure to noise have been examined by the WHO and the symptoms range from: Mental fatigue, impaired judgement, sleep disruption, reduced morale.

In addition, the physical stress responses trigger the production of hormones adrenaline and cortisol which account for the development of cardiovascular and heart disease.

The WHO used their findings to calculate the number of healthy human years of life lost to unwanted human-induced noise and concluded "there is overwhelming evidence that exposure to environmental noise has adverse effects on the health of the population".

Lack of Specific Regulations

The Environment Agency have identified unacceptable environmental risks associated with this development in their consultation response dated 15th September 2025.

At present, there are no specific regulations relating to the installation of battery storage systems (BESS) and limited information is available. The (BESS) is deemed to introduce an unacceptable risk of fire and pollution which could endanger local residents, first responders and the environment.

Ground water vulnerability, firewater containment risk, surface water drainage concerns and unconfirmed battery chemistry viewed against the background of the drinking water catchment area, represents an unacceptable level of public health risk.

The responsible decision under safety grounds alone is to refuse the BESS and solar farm application as public safety must be paramount. The unresolved safety risks mean the application fails the NPPF's stipulation that planning should prevent development that cannot be operated safely.

Policy Conflict and Conclusion

It is clear this proposal conflicts with multiple development planning policies and national guidance:

North Herts Local Plan 2011-2031 Policy SP5 (Countryside) seeks to protect the intrinsic value of the countryside, section 46 states “for rural proposals, the need is to protect the countryside for its own sake, with aspects such as nature conservation, archaeology, landscape and agricultural land in mind”

The scale of this development amounts to the industrialisation of the countryside, contravening Policy NE1/NE4, Policy NE12, NPPF footnote 65

Taking a balanced view, the pursuit of renewable energy is essential to address climate change – however, there are many alternative sites which could be utilised without the loss of a treasured rural landscape, destruction of biodiversity, impact on ecosystems and the blight to residents of incessant noise nuisance and the public to unnecessary/unknown risk.

The application infringes many national and local planning guidelines and amounts to a shamefully opportunistic attempt by the developer to profit under the umbrella of “renewable energy” while totally disregarding environmental and social responsibilities.

It will adversely affect every single resident of Cottered, Sandon, Rushden, Cromer, Ardeley, Buntingford and Walkern. There is no meaningful local benefit – the power generated will feed into the National Grid, not specifically to our local communities, while we continue to pay increased energy prices – as the strike price metrics are based on gas, not renewables.

Thank you for taking the time to read my objection. I trust the Council will give full weight to the concerns of residents and the wider public.

I respectfully urge NHDC to refuse planning permission for this application. We are custodians of our rural areas and I hope these will be protected in perpetuity for future generations to enjoy.

Yours faithfully

Debra J Stapleton