

Comments for Land south of A507 Solar Clothall Westfield Energy 25/01947/FP application

Thank you for the opportunity to comment on this application.

I am commenting on behalf of the British Horse Society, the UK's largest equestrian charity with over 125,000 members and representing 3.2 million horse riders and horse carriage drivers nationwide and contributes over £9 billion per year to the UK economy. I am also a member of the Hertfordshire Local Access Forum and member of the National Ridgeway Trail Delivery Group.

Specifically here, I am commenting as one of the British Horse Society **Herts** Access Officers (volunteer) and object to this application as it fails to consider equestrian access, highway safety for all vulnerable road users, and national and county policies.

It should be noted that the DEFRA Horse Passport Agency has around 600 horses registered in the area of this application. Using the British Equestrian Trade Association figure of around £6,000 pa per horse, this equates to £3,600,000 to the local economy. The equestrian industry includes vets, stable and livery yards, instructors and trainers, feed merchants, farriers, tack shops, saddlers and harness makers, farmers, agricultural and farming contractors, etc. It is in this context that the following comments are made relating to some of the key documents published for this application.

1. Planning and Access Statement

The Site Location Plan shows three public rights of way impacted by this development.

Paragraph 2.2.8 states 'Two Public Rights of Way (PRoW) (HD|CLOTHALL|019 and HD|CLOTHALL|020) cross the Site from east to south and north to south. There are various other PRoWs, and a national cycle network in the immediate surroundings of the Site.' It fails to mention Byway Open to ALL Traffic (BOAT) Weston 039 along the western boundary which will be affected by the development.

Weston 039 is a common thread running through this part of Hertfordshire. This application provides an opportunity to link several applications together in a significant way instead of a piecemeal approach, something the NPPF encourages. Including it in this application will provide a safe off road route for all vulnerable road users – walkers, cyclists, wheelers, horse riders, carriage drivers and those with disabilities.

There is little to no information on the plans for these three prout. It is noted that under **Statement of Community Involvement** there is reference to the discussion with the BHS, and will be seen later, our suggestions have been excluded. This is direct conflict with the National Planning Policy Framework (NPPF) December 2024:

105. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

116. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on **highway safety**, or the residual cumulative impacts on the road network would be severe.

It is also noted that the BHS was not listed in Section 3 Pre-application Engagement even though we met via Zoom with Chris Sowerbutts and Andy Fewins. We discussed the opportunities to link with other proposed developments in this area, specifically Beane Solar Farm, improved access with the BOAT Weston 039, and alleviating the safety aspects of the A507 with off road alternatives.

We also requested upgrades to footpaths Clothall 019 and 020 to bridleway to offer alternatives horse riding routes off road from the A507. This would be a significant improvement to the safety of all vulnerable road users.

**** We encourage that our suggestions are reviewed and introduced into the application to support these NPPF requirements.**

2.4.4 The search identified the following development under consideration that may result in cumulative impacts with the Proposed Development.

- Beane Solar Farm, Ref. 3/24/2245/FUL - Installation and operation of a solar farm including co-located energy storage facilities, onsite substation, ancillary infrastructure and landscaping at Land to the West of the A507 between Cottered and Cromer, Hertfordshire, SG9 9PU. Awaiting decision (validated: 20 December 2024). The proposed Beane Solar Farm is directly southeast of the Site.

As above, this is an opportunity for significant improvements in the prowl network as required by the NPPF paragraph 105.

5.1.14 NPPF Paragraph 8(b) outlines that part of the social objective of sustainable development is to support strong, vibrant and healthy communities by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

**** The suggestions made by the BHS will contribute to the above paragraph around healthy communities, safe built environments and future needs. We recommend these suggestions are included.**

2. Statement of Community Involvement

As above, it is noted that the BHS was not listed in Section 3 Pre-application Engagement but was included in this Statement.

Nor is a response from HCC Countryside and Rights of Way or reference to the requirement to access the HCC Rights of Way Improvement Plan (RoWIP).

As requested, we provided a 'wish list' following our meeting which we believe are worthy of consideration. Therefore it is disappointing to note:

- 6.10 Better connectivity of byways and bridleways. The British Horse Society were keen to see new and upgraded bridleways and the addition of a "park and ride" car park on-site. While Lightrock Power appreciate how important these routes are, they are unable to introduce any new access. All available options are being considered.

Unfortunately, it doesn't explain why they were unable to introduce them. However, we are encouraged by the statement 'All available options are being considered', and the NPPF requires this – paragraph 105 'Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails'.

We strongly encourage consideration of some or all of our suggestions to meet this NPPF requirement, plus the enhancement of safety for all vulnerable road users. In this context, access from the site onto BOAT Weston 039 linking to the existing site prows will be a significant improvement.

Additionally, there is no reference in any of the documentation that there has been any consideration of the HCC Rights of Way Improvement Plan. This offers suggestions of improvements across the wider area.

**** We suggest that an approved Public Rights of Way Plan is a condition of planning approval.**

3. National Policies

3(a) The Equality Act 2010

The following statistics are noted:

- Walkers about 50:50 male female
Cyclists about 70-75% male
Equestrians about 80-90% female
Stats from Ramblers, Cycling UK and BHS
- Horse riders can only access 32% of the Hertfordshire prowl network
Horse carriage drivers can only access 4% of the network
Walkers can access 100%

As the BHS 2025 Policy Statement makes clear:

“Equestrian access is too often seen as a luxury or an afterthought. In fact, it is a matter of safety, inclusion, and legal equality.”

**** Our suggestions can alleviate this discrimination against equestrians and females in particular.**

3(b) National Planning Policy Framework

- **NPPF para. 96** (supporting healthy lifestyles);
- **NPPF para. 105** (protecting and enhancing PROW).
NPPF para. 116 (highway safety and cumulative impacts of road network)

In our view, this application fails to meet the requirements in the above NPPF.

3(c) Section 106 Obligations (s106) and Community Infrastructure Levy (CIL)

There appears to be no reference to s106 obligations and/or CIL contributions. Many, if not all of our suggestions could be delivered with s106 and/or CIL contribution, which we encourage. History demonstrates that without clear and enforceable Section 106 and CIL conditions, equestrian provision will again be overlooked in practice, even where it is referenced in planning documents. It should be clear which of our suggestions have been included in either of these.

**** We suggest an agreed s106/CIL should be a condition of approval of this application.**

4. Local Policies

4(a) Hertfordshire County Council's LTP 4 travel plan:

The most relevant policies of Hertfordshire's Local Transport Plan 4 (2018) are as follows:

g) Resist development that would either severely affect the rural or residential character of a road or other right of way, or which would severely affect safety on rural roads, local roads and rights of way especially for **vulnerable road users**.

**** This development fails to support HCC LTN 4 policy and our suggestions should be reconsidered to help alleviate this.**

4(b) North Herts Local Plan (2011 – 2031)

- 4.78 However, our general expectation is that existing rights of way should be incorporated into the green infrastructure of development proposals. Wherever possible, existing routes and alignments should be maintained.
- 4.79 The nature of planned growth in the District is such that new facilities and infrastructure will be required. Our strategic policy seeks to ensure that the necessary infrastructure and appropriate mitigation is provided.

This application fails to support the Local Plan

**** Our suggestions would support both these Local Plan requirements.**

In conclusion, we respectfully request that this application is refused until:

- (a) adequate equestrian provision is secured via planning conditions including s106 and/or CIL contributions.
- (b) a Public Rights of Way Plan is approved
- (c) our suggestions are reviewed and some or all are included

We are very willing to engage with the developer and council planners and re-visit the opportunities presented by this application to:

- (a) improve the path network,
- (b) improve safety for all vulnerable road users,
- (c) improve the health and well-being of the local community
- (d) meet NPPF and Equality Act 2010 requirements.

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11th September 2025