

# Cottered & Throcking Parish Council

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Planning  
East Hertfordshire District Council

By email only: [planning@eastherts.gov.uk](mailto:planning@eastherts.gov.uk)

23 January 2025

Dear Planning

Re: PLANNING APPLICATION: 3/24/2245/OUT: Land To The West Of The A507 Between Cottered And Cromer Hertfordshire SG9 9PU

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

**Inappropriate scale:** Site development would be in direct conflict with paragraph 187 of the National Planning Policy Framework, revised 12 December 2024 (NPPF) and DES2 and DES3 of the East Herts District Plan (EHDP) and would neither enhance the defining local characteristics of the area, improve its distinctiveness or respect the intrinsic value of the countryside. The open quality of the land, which is an important characteristic of East Hertfordshire's rural settlement pattern is recognised in chapter 10 of the EHDP where scale of development of an appropriate size in relation to settlement and loss of significant open space are conditions to be considered, specifically in VILL2 and VILL3 policies. The appearance of the proposed development would be incompatible with the character and appearance of this rural area, particularly the effects of solar glare into the homes of residents.

**Traffic volume and road safety:** Local road access is inadequate for HGV and construction traffic, the weight restriction on the A507 recognises this unsuitability for use by large, heavy vehicles and its safety generally with its history of fatalities and accidents. The winding and hazardous nature of both the A507 and B1037 combined with the additional screening that will be required to avoid solar reflections for drivers, poses concerns for overall driver visibility and Policy TRA2 of the EHDP and paragraphs 115 and 116 of the NPPF refer, in terms of suitable access and highway safety. The route of construction traffic will pass through the same hamlets and small village settlements along the narrow road network of country lanes, particularly the B1037 which is unsuitable for HGVs and prone to flooding.

**Unsuitable valley landscape:** The proposed site is graded between 1-3 'best and most versatile' (BMV) land and development would conflict with the guidance set out in UK Government's National Policy Statement for Renewable Energy Infrastructure (NPSRE) which identifies suitable sites for development as mainly brownfield, industrial, avoiding BMV agricultural land where possible. The NPSRE also favours an 'uncovered or exposed site of good elevation', which is questionable in a valley setting such as this. Appendix B Topographic Survey, (together with all appendices), is missing from the Flood Risk Assessment and Sustainable Drainage Strategy. There is concern, in this Flood Zone 2 area, that pre and post development surface water run-off will exacerbate flooding on local roads which already become impassable during flooding.

**Biodiversity:** The development would result in the loss of agricultural 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. 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 EHDP policy NE3 and guidance in paragraphs 192-195 of the NPPF.

Inappropriate site: The proposed site in the rural area beyond the greenbelt is highly valued by residents and visitors alike and policy GBR2 of the East Herts District Plan (EHDP) highlights its open and largely undeveloped nature as an important characteristic of the district. Site development would be at odds with strategies outlined in Local Character Assessments 221, 140 and 39 which focus on conservation, resisting extensive development and promoting and managing species-rich grassland, ancient woodland, expanding rights of way, linking habitats (which would include deer herds) and preservation of sunken lanes, verges and hedges. 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, this location may benefit as a Local Nature Recovery Strategy (LNRS) site. The 'winterborne' section of the River Beane which bisects the northern section of the site is a unique chalk river and its value cannot be understated. This ecosystem should be recognised on an international level following guidance in paragraph 192 of the NPPF on conservation and NE1 of the EHDP. Adversely affected by over-abstraction and identified by the Upper Lea Catchment Partnership, Wildlife Trust, Affinity Water and the Environment Agency, this river is identified 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 this section of river is underway.

Historic setting: The development will affect the historic agricultural and rural setting of the grade II\* listed Cromer Windmill, exceptional as 'Hertfordshire's only surviving windmill', restored and open to the public. Chapter 16 of the NPPF lists the importance of heritage assets in maintaining the character and historical context of a place.

Objections from residents: The parish council has received written objections from local residents raising concerns including; the legacy of the site once the solar farm reaches end of life; visual impact on neighbouring homes; loss of green, open space; losing the isolated, undeveloped character of the area; among a number of other issues.

If permission is granted, consideration should be made regarding section 106 payments, and making permission subject to the improvement of the highway infrastructure and to fund local nature recovery.

Yours faithfully



John Wiblin Chairman Cottered & Throcking Parish Council

pp Clerk Cottered & Throcking Parish Council