

With reference to Section 62A Planning Application: S62A/22/0006 Berden Hall Farm, Ginns Road, Berden

We object to this application on the basis that it does not meet the following requirements:

- **Ref UDC Policy ENV15** - Small scale renewable energy development schemes to meet local needs will be permitted if they do not adversely affect the character of sensitive landscapes, nature conservation interests or residential and recreational amenity.

The proposed development is not small scale and is not aimed at meeting local needs. It would introduce a sizeable industrial development to a valued area of good quality farmland and would swamp the adjacent residential communities of Berden and Stocking Pelham. There would be significant adverse effects on the historic agricultural landscape and on its' value as a natural amenity for ramblers, cyclists and horse-riders.

- **Ref UDC Policy GEN1** –Development will only be permitted if, among other criteria:

b) The traffic generated by the development must be capable of being accommodated on the surrounding transport network.

The Traffic Impact Assessments of the proposed route for Construction Traffic are inadequate and simply conclude that 'Ginns Road and the surrounding local highway network are of a reasonable standard' In fact, those who live adjacent to Ginns Road and those who use this road on a regular basis are the people who are most qualified to comment on the standard of the local highway network. Yet there has been no consultation of local communities.

The standard of the highway and current level of HGV and agricultural traffic on the proposed route is already of serious concern for the following reasons:

1. *There are no pavements on these mostly unmarked roads and pedestrians, cyclists and horse riders are frequent users of the highway along the proposed route.*
2. *Excessive speeds by HGVs and agricultural vehicles are common, even within 30mph limit and public efforts to draw attention to this have so far been ineffective. In Albury, lorries and tractors regularly travel at speed past roadside housing. Speed limiting signage at this location is insufficient. In Stocking Pelham, Ginns Road passes right in front of Pelhams Preschool, with parents using this section of highway, on a daily basis for park and drop off purposes.*
3. *The road from Stocking Pelham to the A120 has several sections that are only one vehicle wide, with inadequate passing places. Where cars are parked on the road, space for traffic is also limited.*
4. *Visibility along the same highway is poor in certain places, particularly when verges are overgrown.*
5. *Road surfaces along the proposed route have been severely damaged by the current level of HGV traffic. Edges of the road have been eroded of tarmac and have sunk to dangerous levels.*

The owner (farmer) of the site, who stands to gain significant financial benefit from the proposed development, is offering monetary incentives to the community of Berden, but not to that of Stocking Pelham or the villages impacted by the construction and ongoing maintenance traffic. This is despite the planned route for construction traffic being through the centre of Stocking Pelham (not Berden) and the noise of the hazardous battery storage unit for this proposed Solar factory is located at the Stocking Pelham village side of the site. A financial 'bribe' is unethical and even more so when it is being offered unfairly.

Furthermore, potential improvements to the transport infrastructure and to highway safety along Ginns Road do not feature in the Construction Traffic Management Plan.

- **Ref UDC strategy for Renewable Energy** - in terms of cumulative developments, the proposal would need to be considered in relation to similar applications that are currently being assessed for solar farms by the Local Planning Authority. Similar applications for nearby battery storage and solar farms are being assessed by the neighbouring local authority (East Herts). These should also be taken into consideration, with reference to:

1. *The cumulative loss of Grade 2 agricultural land (this land is known to produce a good crop yield).*
2. *The cumulative effect of all construction traffic for these developments using the same route (Ginns Road).*
3. *The cumulative loss of recreational amenity.*
4. *The cumulative effect on hedgerows bordering arable fields.*
5. *The cumulative visual impacts from the public rights of way.*
6. *The cumulative loss of traditional open spaces, groups of trees and fine individual tree specimens.*