

Dear Inspector,

We are contacting you in respect of the section 62a (Ref. S62A/2024/0045) which is for:

Erection of a Solar Photovoltaic Farm with supporting infrastructure and battery storage, inverters and transformers, fencing and landscaping works and connecting cable.

As per your request below and in respect of the proposed changes to the NPPF which is open for consultation we have the following comments in respect of the above application:

- We consider that our Regulation 19 emerging Local Plan will provide sufficient sites to meet the districts housing and employment needs. This is supported by a review of our Green Belt (prepared by LUC, June 2024) which we consider there is no need to release any land within the Green Belt for housing and/or employment as there is sufficient sites across the district to provide land to meet our housing and employment targets.
- We support the principle of the concept of the 'grey belt'. We understand that the definition of grey belt as per the NPPF consultation is land in the Green Belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework) but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt).
- We support the changes to new paragraph 135 in respect of Uttlesford's new District Wide Design Code SPD that this should be the primary means of assessing and improving the design of developments in line with national guidance. This will help to ensure high quality schemes and help to provide guidance to refuse proposals which are not high quality. This includes the requirement to undertake public engagement which it is not clear to what level of engagement has taken place with this proposal.
- Within our assessment of what the applicant considers 'very special circumstances' we consider that the applicant has not considered other sites which are not within the Green Belt, sites with a lower agricultural land classification and sites that are closer to the Bishop Stortford sub-station. We support in principle the changes to paragraph 144 over the requirement for applicants to provide a sequential test over other sites that maybe more acceptable than a site within the Green Belt.
- We support in principle the proposed changes to paragraphs 147 and 155 that an applicant will need to demonstrate further information to justify the proposal within the Green Belt and that benefits cannot just be an increase in biodiversity net gain. It should be noted that there is in principle support to renewable energy schemes in the district in accordance with the Council's Interim Climate Change Policy and the site is close to Bishop Stortford sub-station which the applicant states has capacity for this proposal.
- We support the in principle changes to the NPPF to support the delivery of new renewable schemes and draft Core Policy 25 in our emerging Local Plan reflects our revised policy direction.

We would be grateful if you could confirm receipt of this email.

Thanks

Tim Cakebread
Principle Planning Officer