

St. Ippolyts Parish Council

P.O. Box 287, Hitchin, Herts. SG4 7WT Tel. 01462 421409

Email clerk@stippolyts-pc.gov.uk

Website www.stippolyts-parishcouncil.org.uk

Ben Glover
Senior Planning Officer (Major Projects)
NHC
PO Box 10613
Nottingham
NG6 6DW

10 December 2024

Dear Mr Glover,

Application Reference 24/02455/FP: Objection to proposed solar farm measuring 35.5 hectares with associated battery storage and ancillary infrastructure Land to The South of Wymondley Substation and South of Sperberry Hill, St Ippolyts, Hertfordshire.

St Ippolyts Parish Council submitted an objection to the previous application to build a solar farm on this site (22/00709/FP) (the 2023 Scheme) and has considered carefully the revised proposal as referenced above (the Revised Scheme).

St Ippolyts Parish Council is fully committed to renewable energy generation and supports solar energy generation on buildings and other structures such as car parks as well as previously developed land.

Whilst we acknowledge the climate challenges facing our planet and the need to increase renewable energy generation capacity across the UK, this application for a huge 90-acre solar farm will engulf the open area around our Parish and undermine Britain's food security whilst making very little contribution to its energy security and we continue to object to the proposal.

The Parish Council objects to the proposal for the following reasons:

1. Loss of Best and Most Valuable agricultural land

The present use of the land for agriculture should be maintained. The entire site is categorised as Grades 2 and 3a, constituting Best and Most Versatile land as defined by DEFRA. Having in mind likely global shortages of grain in the coming years, the loss of this high-quality agricultural land will be detrimental to Britain's food security and contribute to even higher food costs due to increasing the need for importing grain that is lost from taking this land out of production. We do not consider the proposed development is an effective use of land in line with planning guidance which encourages the siting of large-scale solar farms on previously developed and non-agricultural land¹.

¹ Paragraph 180b and footnote 62 of the [National Planning Policy Framework](#) (NPPF)

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2. Cumulative impact of other approved solar farms, loss of greenbelt between Hitchin and Stevenage

Since the 2023 Scheme was submitted two very large solar PV farms have been granted planning permission in North Hertfordshire: the Priory Farm Solar Array to the east of Great Wymondley (50MW over 85Ha) and the Tophams Solar Farm north east of Bygrave (40MW over 54Ha). Furthermore the Priory Farm Solar Array is located in Wymondley Parish and is only about 1,500m from the northwest boundary of the Revised Scheme proposal – most of which is taken up by the settlements of Todd's Green and Lower Titmore Green, leaving hardly any green space between the Priory Farm and the Revised Scheme. The Priory Farm project will be one of the largest PV farms in the country (currently only 3 solar PV farms in the UK are larger) and will in itself have a very substantial impact on the parish of Wymondley and the neighbourhood. The combined capacity of both the Priory Farm and Revised Scheme proposals at 75MW over a combined area of 120Ha would exceed the capacity of the largest operating solar PV farm in the UK which is 72MW over 101Ha (Shotwick Solar Park at Flintshire, Wales)².

By any reasonable measure this is gross over-development within two small rural parishes. The cumulative impact of both these projects combined would consume a very large part of the greenbelt between the south eastern rural villages of Hitchin (St Ippolyts and Wymondley) and Stevenage amounting to a major onslaught on a highly valued and dwindling resource of open countryside.

This will have a profound negative impact on the open and rural characteristics of these parishes (in respect of which a 40-year duration is no comfort for the current and next generation of residents) and their relationship with Stevenage from which a substantial greenbelt buffer must be maintained to preserve the separate nature and space of the Hitchin/Letchworth and Stevenage urban areas.

This factor is further exacerbated by the recent granting of planning permission to the West Stevenage development comprising 1,500 new homes as phase 1. The north west boundary of this development will be approximately 800m from the Revised Scheme proposal, which will be all that is left of the green wedge between Hitchin and Stevenage.

3. Amendments from the 2023 Scheme

The Developer describes a small number of amendments from the 2023 Scheme. Essentially these are to:

- Remove solar panels along one side of Hertfordshire way on the southeastern boundary
- Remove the bund to the south of Redcoats Farmhouse and move the boundary of solar panels further back from Redcoats Farmhouse

² [Solar Farms](#)

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- Replacement of a small number of solar panels on the northwestern boundary with woodland planting.

It is accepted that these measures will reduce somewhat the impact on Redcoats Farmhouse, although there will still be a significant adverse impact. However the removal of solar panels on one side the of Hertfordshire Way will still cause very significant harm to the character and appearance of the surrounding area in which the site is located. Similarly the proposed screening along the northwestern boundary will only have a limited impact and will anyway also cause harm itself due to the obstruction of the open views in that location.

Overall the removal of approximately 9% of the area of solar panels will have a negligible effect. This will not materially mitigate the overall impact of the proposed development which will still result in very substantial damage to the local environment and amenity of the surrounding area.

4. Climate Emergency and Net Zero

The latest government data published in September 2024 indicates that the total ground mounted solar capacity installed in the UK was approximately 6,542MW, out of total solar PV capacity of 16,738MW³, or 39.1%.

In the year to June 30, 2023, UK Government data shows that solar PV installations generated 4.6% of all UK electricity generation⁴. As ground mounted solar PV accounts for about 40% of total solar PV capacity this suggests the contribution of ground mounted solar PV farms to total UK generation was about 1.8%. By contrast offshore wind contributed 17.6% of total UK generation and onshore wind 12.3% (combined 30%). Both these wind technologies, and in particular onshore wind⁵, are now the top renewable energy priorities for the current government. Total renewable energy generation during the period contributed 49.4% of all UK electricity generation.

It is noted that the developer indicates that a total of 770Ha of land would be needed to construct enough solar farms to fully meet the energy needs of North Herts into the future. This is an area very approximately the same size as Hitchin, which is clearly not realistic and simply serves to demonstrate that ground mounted solar will not solve the energy crisis on its own nationally or in North Herts and is likely to play only a relatively minor role next to wind and rooftop solar.

Indeed that analysis highlights that in the context of North Herts' declaration of a climate emergency its top priorities must be to :

³ [Solar photovoltaics deployment - GOV.UK](#)

⁴ [Energy Trends: UK renewables - GOV.UK](#)

⁵ [Policy statement on onshore wind - GOV.UK](#)

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- (i) support substantial expansion of rooftop solar of which there is a negligible amount in North Herts (in particular on properties or infrastructure owned by North Herts Council). According to Government estimates, a very significant proportion of solar generation could be provided on roofs, particularly on industrial land and the large-scale warehousing and large floor plate distribution buildings increasingly being provided for new economic activity. Roof-top solar has negligible local environmental impact and has the advantage of being generated at the point of use which requires no grid infrastructure and avoids energy losses in transmission and distribution. And the economic benefits go straight to the user; and
- (ii) support the development of onshore wind projects, of which there are currently none at all in North Herts.

The Developer states in its PDAS that North Herts currently generates 51 GWh of renewable electricity per annum and in 2022 consumed 451 GWh of electricity (Section 4.2.2). The amount of renewable energy generation noted by the developer is not a valid comparison because it ignores the renewable electricity that will be generated by the Wymondley and Bygrave projects noted above which will be approximately 53GWh and 49GWh per annum respectively. Taking these into account means that North Herts would generate 153GWh from renewable resources, which is about 34% of consumption. It is accepted that this figure is not enough but as stated herein the only prospect of bringing this anywhere close to 100% is through development of more roof-top solar and wind projects.

Without implementation of these priorities North Herts will be unable to meet its net zero target and should avoid being distracted by developers seeking to take our greenbelt out of agricultural and public utility use for their own financial gain without offering any realistic prospect of solving the climate crisis.

5. Impact on setting and local amenity

The area within and around the proposed development is noted for its beauty and openness and is extensively used by walkers and the local communities for recreational purposes, with three footpaths crossing the site. The proposed development will be highly visible over a wide area and from several public rights of way. Removing some of the solar panels along one side of the Hertfordshire Way will not materially alter this impact.

The importance of open countryside has been constantly emphasised throughout the recent pandemic, and the beneficial aspects of maintaining such areas are likely to be increasingly recognised and required. The proposed development will turn this area into an industrial landscape which will ruin the amenity of the local environment, deprive the public of their right to walk on public paths in beautiful countryside and damage an immensely valuable public asset helping to support all our mental health

This amenity has been recognised by Natural England which considers the area meets the criterion for designation as an Area of Outstanding Natural Beauty (AONB) and may be included

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within a boundary variation to the Chilterns Area of Outstanding Natural Beauty. We understand that it is anticipated that a decision on this will be taken in 2025.

Natural England considers the Chilterns to be a valued landscape in line with paragraph 180 of the National Planning Policy Framework (NPPF). Furthermore, paragraph 182 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas.

We are extremely concerned that if the proposed development goes ahead it will not only result in a direct and significant loss of amenity to the parishes of St Ippolyts and Wymondley and the surrounding area, but also undermine the possibility of being included within a boundary variation of the Chilterns AONB, and with that losing all of the benefits of enhancement and protection which go with that status.

6. Site selection exercise

The Applicant has submitted a report summarising its site selection exercise. Most of the report sets out generic selection criteria created out by the solar PV industry itself, which are largely self-serving and do not take into account a balance of other views, nor the fact that costs for solar PV farms continue to fall which makes sites further than 4km from their connection point increasingly viable.

It is also clear from the map of Opportunity Areas provided as an Appendix to the PDAS that there are alternative sites for solar PV development, including within Rush Green Farm itself.

The only conclusion that can be drawn is that the exact location for the proposed solar PV farm has been chosen due to its very close proximity to the connection point in the Wymondley substation in order to maximise profits for the developer, notwithstanding this is at the expense of everyone else who will lose the amenity of this critical area of greenbelt.

Whilst it is accepted that the planning evaluation process is not required to identify alternative sites for a proposal it is respectfully suggested that if planning permission for this application is declined, as it should be, the developer will be easily able to identify other nearby land which is available and suitable for a solar PV development and which will not have the negative impacts of the Revised Scheme as proposed.

7. Public consultation

The developer has submitted a Statement of Community Involvement in respect of the Revised Scheme. In fact there has been hardly any community involvement for the Revised Scheme and the statement simply repeats the previous developer's account of its own pre-application consultation for the 2023 Scheme. This contained questions that were so generic that they cannot legitimately be used as supporting evidence for this application. For example the first question: "Do you agree with the need to generate more of our energy from renewable sources?" is not related in any specific way to the application in question so the 89% positive response rate is irrelevant. By the developer's own admission the feedback received by the previous applicant via email was 95% against the proposal (57 objections of 60 comments received).

Whilst there has not been time to conduct extensive public consultation for this application, for which we have less than 30 days to submit comments, there was extensive public consultation by local residents for the 2023 Scheme. This included holding several public meetings to raise local

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awareness and launching a petition with the proposition “I support renewable energy, but not on green belt or our best, most valuable, agricultural land, such as the proposed scheme at Sperberry Hill, St Ippolyts.” The petition gained 1,039 signatures of which 64% lived within 3 miles of the project and 75% within 5 miles.

As stated in the planning officer’s report for the 2023 Scheme, a total of 409 comments were received in respect of that planning application of which 236 (58%) objected to the application. We note that as at the time of writing (9 December 2024), 85 public comments were received in respect of the Revised Scheme of which 80 (94%) were objections and 4 (5%) were supporting.

8. Planning Balance

The table below sets out the planning balance considerations as assessed by the planning officer for the 2023 Scheme (see section 4.7.2 of the planning officer’s report) in column 3 against the assessment by the developer as set out in its design and access statement for the Revised Scheme (see section 5.9.1) in column 4.

Issue	Effect	Weight: Planning Officer 2023 Scheme	Weight: Revised Scheme PDAS
Green Belt Openness	Harm	Significant	Not assessed
Green Belt Purposes	Harm	Moderate	Not assessed
Overall effect on the Green Belt	Harm	Substantial	Substantial
Landscape and visual impact (duration)	Harm	Significant	Moderate
Heritage	Harm	Great	Great
Loss of BMV agricultural land	Harm	Limited	Not assessed
Renewable Energy Generation	Benefit	Substantial	Very substantial
Urgent Local Need	Benefit	Substantial	Very substantial
Economic impact	Benefit	Significant	Significant
Biodiversity	Benefit*	Moderate	Substantial
Landscape and visual (post decommissioning)	Benefit*	Moderate	Moderate
Flood Risk/Drainage	Benefit*	Limited	Limited
Noise/residential amenity	Neutral*	None	None
Highway impacts	Neutral*	None	None
Archaeology	Neutral*	None	None
Noise	Neutral*	None	Not assessed
Fire Risk	Neutral*	None	None
Soil contamination	Neutral*	None	None

Row 3 on ‘Overall effect’ on the greenbelt is highlighted in orange as it was by the planning officer reviewing the 2023 Scheme, presumably reflecting the critical weight given to this

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consideration in assessing the overall planning balance. It is noteworthy that the developer assesses the harm to the greenbelt caused by the Revised Scheme as Substantial - the same as the planning officer found for the 2023 Scheme, so there is no change. This was highlighted by the planning officer as being a critical factor in assessing the Planning Balance and so it should be assumed must also be a critical factor in the assessment of the Revised Scheme.

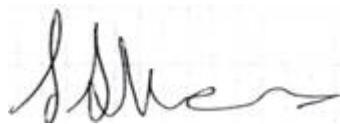
The rows highlighted in green are where the developer's assessment for the Revised Scheme differs from the planning officer's for the 2023 Scheme. These are that the issues of renewable energy generation and urgent local need are assessed by the developer to be Very substantial rather than Substantial and biodiversity gain has been increased from Moderate to Substantial.

In respect of renewable energy generation, there has been no major change in government policy since the 2023 Scheme was assessed. Furthermore the net zero analysis above demonstrates that ground mounted solar will not play a dominant role in solving the climate crisis, nationally or locally. Therefore there is no basis to agree that anything has changed to cause the weight attributed to 'Renewable Energy Generation' to go from Substantial to Very Substantial, and we consider this should not be accepted. This is critical in the context of the developer's argument that planning balance has changed in favour of approving the Revised Scheme.

The developer proposes that Substantial weight should be given to the net biodiversity gain which it states will be 95.8% for habitat units, 86.44% for hedgerow units and 17.65% for watercourse units. However the stated biodiversity gains for the 2023 Scheme – which were prepared by the same consultancy firm as was used for the Revised Scheme, were 131.6% for area derived units and 155.56% for linear derived units. Whilst the evaluated parameters differ, there seems to be little basis to conclude that the biodiversity gain for the Revised Scheme should merit being considered Substantial compared to the 2023 Project which was rated Moderate with a higher score.

The proposed solar array scheme is ill considered use of good agricultural land and local community assets which the Parish Council strongly objects to and asks that the District Council refuse planning permission because the test requiring 'very special circumstances' to outweigh damage to the local environment is not met.

Yours sincerely,



Susan L. Mears (Mrs)
Clerk to St Ippolyts Parish Council

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