

24/02455/FP: Proposed solar farm measuring 35.5 hectares with associated battery storage and ancillary infrastructure.

I am writing to set out my objection to the proposed solar PV farm reference 24/02455/FP.

I believe this application is inappropriate development on agricultural green belt land which will diminish the UK's food security and cause very substantial harm to this unique landscape on the edge of the Chilterns. This damage will not be outweighed by the renewable energy benefits which will not make a material contribution to North Hertfordshire District Council's net zero target.

My considerations leading to this conclusion are set out below:

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. I do not believe 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.

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

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

² [Solar Farms](#)

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. Climate Emergency and Net Zero

The latest government data published in September 2024 indicates that all ground mounted solar PV installations in the UK generated about 1.8% of our electricity.³ 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 wind⁴, 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.

Without supporting wind energy and roof top solar projects 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.

4. 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.

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

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

⁴ [Policy statement on onshore wind - GOV.UK](#)

included within a boundary variation to the Chilterns Area of Outstanding Natural Beauty. I 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.

I am 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.

5. 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.

6. 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 included questions that were so generic that they cannot legitimately be used as supporting evidence for this application. 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 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. The petition

statement is not affected by the minor adjustments to the Revised Scheme and remains valid.

7. Amendments from the 2023 Scheme and Planning Balance

The removal of approximately 9% of the area of solar panels will have a negligible effect and 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.

It is noteworthy that in its Planning Design and Access Statement for the Revised Scheme the developer assesses the harm to the greenbelt caused by project 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 developer also assessed the Landscape and visual impact of the Revised Scheme as moderate compared to the planning officer finding this to be significant for the 2023 Scheme. The minor changes introduced for the Revised Scheme do not justify the impact being reduced from substantial to moderate.

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.

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. This is critical in the context of the developer's argument that planning balance has changed in favour of approving the Revised Scheme.

For all the above reasons I believe this enormous ill-conceived development is wholly unacceptable and the (understandable and fully accepted) requirement for renewable energy production does not form a Very Special Circumstance in relation to this specific planning application given the Significant Green Belt location and BMV agricultural use. I therefore urge North Herts Council to refuse planning permission.