

Mr Simon Ellis
Development and Conservation Manager
North Hertfordshire District Council
PO Box 10613
Nottingham

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N.H.C.
22 NOV 2024
NORTHGATE

November 2024

Dear Mr Ellis

OBJECTION TO PLANNING APPLICATION Ref: 24/02455/FP

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

I wish to register my objection to this planning application in the strongest possible terms.

Whilst I acknowledge the climate challenges facing our planet and the need to increase the sustainability of our energy production in Hertfordshire and across the UK this application for a huge 90 acre solar farm will engulf the area and cause demonstrable harm to our countryside, heritage assets, greenbelt and agriculture. It proposes very little by the way of community benefit to mitigate this harm.

I therefore **OBJECT** for the following reasons:

1. Loss of good quality agricultural land

I refer you to the Government Written Ministerial Statement (UIN HCWS488) dated 25th March 2015 which says in the light of continuing concerns about the unjustified use of high quality agricultural land, "... we want it to be clear that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence."

The entirety of the proposed site is categorised as Best Most Versatile Agricultural Land (BMV) with 53% being Grade 2 and 47% being Grade 3a and, importantly, produces 200 tonnes of wheat per annum.

Losing good to very good quality agricultural land is not the most efficient use of this site and wholly contrary to paragraph 123c of the NPPF. Paragraph 5.10.8 of the Overarching National Policy Statement for Energy (EN-1) says applicants should "preferably use land in areas of poorer quality (grades 3b, 4 and 5)".

Paragraph 170 of the NPPF states "Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality". This 90 acre development is neither necessary nor is it situated on poorer quality land.

Using BMV agricultural land for sheep grazing (as proposed by the applicant) is not a suitable alternative use for this grade of land.

2. Inappropriate Development on Greenbelt

The development is exclusively sited on Greenbelt land, which subject to review in the Emerging North Hertfordshire Local Plan 2011-2031, has been re-affirmed as adding Significantly to the Green Belt.

There is sufficient land outside the greenbelt to place solar farms and this location has been chosen simply to maximise the profits of the developer due to the location's proximity to the local sub-station.

The development will have a significant visual impact on the local area and the proposed planting and bund schemes are not sufficient to be a suitable substitute to the current vista. This is direct contrast to national policy which states that solar farms are able to blend naturally in to their environment with sufficient planting. This scheme does not achieve this.

This application contravenes the following local and national policies:

a) The National Planning Policy Framework

- i. **Paragraph 151** – *"When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed."*

There has been no demonstration of very special circumstances in the planning application for this location.

b) North Hertfordshire District Local Plan No. 2 with Alterations (Adopted 1996, updated 2007)

- i. **Policy 2** – *"In the Green Belt, as shown on the Proposals Map, the Council will aim to keep the uses of land open in character. Except for proposals within settlements which accord with Policy 3, or in very special circumstances, planning permission*

will only be granted for new buildings, extensions, and changes of use of buildings and of land which are appropriate in the Green Belt, and which would not result in significant visual impact."

There has been no demonstration of very special circumstances in the planning application for this location and there would be significant visual impact.

c) Emerging North Hertfordshire District Local Plan 2011-2031

- i. **Policy SP5 - Countryside and Green Belt** – *"Will only permit development proposals in the Green Belt where they would not result in inappropriate development or where very special circumstances have been demonstrated"*

The proposed development is inappropriate, will lead to substantial harm and very special circumstances have not and can not be demonstrated.

- ii. **Policy SP11 - Natural resources and sustainability** – *"Support proposals for renewable and low carbon energy development in appropriate locations"*

The proposed development is not in an appropriate location given it is sited on a significant parcel of greenbelt and the land is classed as BMV agricultural land.

- iii. **Policy NE12 - Renewable and low carbon energy development** – *"Proposals for decentralised energy schemes associated with development of the strategic sites allocated in the Plan will be encouraged subject to an assessment of the impacts."*

The proposed developed is not located on an allocated strategic site.

"Proposals for solar farms involving the best and most versatile agricultural land and proposals for wind turbines will be determined in accordance with national policy."

As outlined above there are several national policies to which this proposal does not comply.

d) Wymondley Neighbourhood Development Plan 2011-2031 (Adopted 2019)

- i. **Policy GB1 - Green Belt** – *"Development proposals should not impact negatively on Wymondley Parish - particularly in terms of visual impact on the openness of the Green Belt landscape and its important contribution to the character of our villages/hamlets."*

The proposed development will impact significantly on the visual amenity and openness of the Green Belt landscape.

- ii. **Policy SLBE1 - Business development** – *"Any proposed business development within Wymondley Parish should be appropriate in terms of location, scale and type; in keeping with the character and environment of our parish."*

The proposed commercial development is not in keeping with the environment or character of the parish.

3. Impact on setting of nearby housing and businesses and other local amenity

Whilst generally there is no right to a private view in planning, where the scale of the development is so big, as is the case with this 90 acre proposal, the overall impact on the attractiveness of the area for the occupiers of these homes and the general public is a material planning consideration.

To have adjacent fields filled with hundreds of solar panels will dominate their environment and render the homes unattractive places to live.

4. Wildlife and Ecology impact.

No mention is made of the fact these vast open fields are used these fields by Red Kites. Kites are protected under the Wildlife and Countryside Act 1981 and the loss of such a large area of their natural hunting ground will impact on their numbers. The biodiversity improvements, most of which are in connection with attempts to green over the high perimeter fencing, does not mitigate the harm the solar farm will cause to the local Kite population. This is contrary to Wymondley Neighbourhood Development Plan 2011-2031 (Adopted 2019) - Policy NHE2 – Biodiversity and Policy NHE3 - Wildlife and Ecology.

5. Impact during construction

During construction, over 3,000 tons of materials need to be trucked onto the site, creating significant disruption for the local community for 8 months.

Sperberry Hill and surrounding lanes are very narrow with single lanes and several pinch points.

Some parts are unable to take two way traffic. 40 trips a week generated by 16.5m articulated lorries plus over 80 ancillary vehicle movements, per day, for the workforce over an 8 month period is likely to damage the local roads and increase the risk of accidents.

The Transport Statement submitted by the Applicant is wholly inadequate with an entirely unrepresentative, borderline disingenuous, location chosen for the Automatic Traffic Count (ATC).

In addition no real-world consideration has been given to key junctions on the transport plan such as the B656 / Sperberry Hill junction which is highly constrained for even the smallest of vehicles, let alone significant movement from HGV vehicles.

6. Risk of the farm land not being reinstated

The reinstatement of the land will be a costly exercise and an enormous risk should the company fail. It is imperative the works to remove all the equipment is costed and put into a bond so the council can ensure the land is reinstated should the company go into liquidation or not have the finances after the planning consent expires. Without this the removal of the equipment will be unenforceable.

Finally the pre-application consultation that was undertaken 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. Question 3 allowed for a more free-form set of responses, and this is the one area where the applicant has not provided an indication or numerical breakdown of the supportive vs objection responses received. The feedback received by the application via email was 96% against the proposal.

For all the above reasons 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 the Council to refuse planning permission.

Yours sincerely,

Name: Phone Number:

Address: eMail Address:

Signature: Date:

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