

Mr Peter Bull
North Herts Council Offices
Gernon Road
Letchworth Garden City
SG6 3JF

16 January 2023

Dear Mr Bull

OBJECTION Re: 22/00741/FP Ground mounted solar photovoltaic (PV) farm including battery storage; continued agricultural use, ancillary infrastructure, security fencing, landscaping provision, ecological enhancements and associated works. Land West of Ashwell Road Bygrave Hertfordshire SG7 5EB

To reflect the views and sentiment of local parishioners we wish to object to the above application. While we support the principle of investment in renewable energy and the national expansion of solar energy the proposed site is entirely unsuited and its selection unjustified.

1. Landscape Character

The proposed development would be contrary to Policy NE2: 'Landscape' of the NHC Local Plan 2011-2031.

National Policy requires the protection and enhancement of valued landscapes. The proposed development falls within the Landscape Character Area 224 of the North Herts and Stevenage Landscape Character Assessment. The assessment of Area 224 (North Baldock Chalk Uplands) classes the particular landscape as at moderate to strong sensitivity / risk with a safeguarding and management plan requiring 'conservation and restoration to maintain character'.

Page 151a of the Landscape Character Assessment state *'the openness of the North Baldock Chalk Uplands would make it more difficult to accommodate large scale 'open' uses without significant visual impacts. This would not be in keeping with the rural character of the area and could introduce new elements that would conflict with the current open sweeping views.'* So development of a large and prominent solar farm on this land would be inconsistent with and contrary to the Local Plan policy NE2 and to the management guidelines for Landscape Character Area 224.

2. Historic Environment

The proposed development would be contrary to Policy SP13: 'Historic Environment' of the NHC Local Plan 2011-2031.

This policy states that *'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight will be given to the asset's conservation and the management of its setting'*.

The proposed development would be visible from and conflict with SAM 20759 Arbury Banks Iron Age Hillfort, and should therefore not be permitted. The Icknield Way Association has

noted the ‘very significant detrimental implications’ on this ancient trackway that runs alongside the site in their objections to the application.

3. Loss of high grade agricultural land

The statement that this does not lead to an “irreversible loss of any agricultural land” is unfounded and concerning given this is Grade 2 agricultural land, the second highest grade.

It must also be shown to be necessary to permit development of agricultural land, and poorer quality land should be used unless it can be justified. Where the justification is built on national energy needs, and it is admitted that “demonstrating specific local needs is not possible”, national provision of land must be taken into account. While it may be the case that most of the land in North Herts is high quality, that is not true of agricultural land across the UK. Local authority boundaries should not be used as a limiting factor in the search for alternative options.

An argument is advanced that this is a “temporary development” and that the agricultural land will be restored at the end of its life. Due to the relative newness of the technology, it is not possible to ascertain what state the land will be in after 40 years of use. Having previously been developed, it may well be developed in other ways, or maintained for a further solar farm. In this context, the possibility that this will allow the soil to regenerate is of questionable value.

As the then Secretary of State said in the appeal in respect of a solar farm at Imolands Farm, Lymington, Hampshire: *“The Secretary of State takes the view that 30 years is a considerable period of time and the reversibility of the proposal is not a matter to which he has given any weight. He considers that a period of 30 years would not be perceived by those who frequent the area as being temporary and that the harmful effect on the landscape would prevail for far too long*”*

This is particularly important in the context of the Government’s emphasis that great importance should be placed upon our agriculture and food production. This is particularly in light of increasing concerns over food security. Land is being taken out of cultivation at a rate of almost 10,000 acres per annum.

Footnote 58 of the NPPF notes that *“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.”*

4. Absence of local need to justify the site

There is a need for more renewable energy capacity at a national level but it cannot justify development in wholly unsuitable sites such as this. This is admitted in the PACE site selection document: “Demonstrating specific local needs is not possible” (p9).

The developer is trying to make the case that this development will “help North Hertfordshire to meet its ambition to become net zero by 2030”, and enhance local “energy security for homes and businesses in North Hertfordshire and beyond”, and to “reduce reliance” on fossil fuels. These statements are prominent in PACE documents, and justified by suggestions that

the site will generate “enough to power the equivalent of Bygrave, Ashwell, Baldock and three quarters of Letchworth Garden City”.

Similarly in the site selection document, dated 11 March 2022, PACE states: *“On 21 May 2019, North Hertfordshire District Council (NHDC) declared a Climate Emergency to achieve zero carbon emissions in the district by 2030. To deliver on this extremely challenging objective, it is essential to develop suitable sites for renewable energy generation and battery energy storage, to ensure the smooth transition from a fossil fuel to a net-zero economy.”*

Linking the selection of this site to the District Council’s target and strategy, is deeply misleading and designed to persuade local residents of local benefit when none accrues.

First, it should be noted that the Net Zero 2030 target is in relation to the District Council’s own estate.

Second, a commitment to the expansion of solar farms in the District has never been put to resident voters. Nor were solar developments mentioned when the Council passed a motion in 2019 to declare a Climate Emergency, nor in its Climate Strategy, for 2021-26, nor the proposed actions for 2022-26.

The Cabinet meeting of March 2021 did NOT discuss solar. Nor is solar mentioned – other than in the context of on-site solar for Council buildings - in the proposed actions for 2022-2027 to deliver the Council’s Climate Change Strategy, published on 2 December, for the Council Cabinet meeting on 19 December 2022.

Third, and most importantly, the applicant in its proposal documents offers deliberately misleading statements – it is not possible to ringfence for local use electricity generated from commercial sites such as these. The connection is to the national grid and the electricity can be bought by a particular supplier, but it cannot be directed to local homes or businesses. For these reasons, when considering the generation of commercial renewable energy it must be in the national context, with an eye to the national provision.

If the goal is local energy security then this can only be boosted through community schemes, rooftop solar and other renewable energy sources such as wind power.

5. Access and safety

The new route is along Bygrave Road, which is very narrow in places, with only a small number of informal passing bays, leading into Ashwell Road. It is likely to compromise the safety of other road users.

The applicant states that the construction phase will last for approximately 30-35 weeks, *subject to constructors’ timescales*. For the better part of a year, residents will deal with on average 8 to 10 vehicle trips per day, and during the peak delivery period 30 vehicle trips per day.

207 dwellings are directly affected by the route, as are all users of Bygrave Road, who include school children, cyclists, motor cyclists, and horse riders. It is a key route for c2000 residents of Ashwell travelling to Baldock.

The road is too narrow to easily accommodate a HGV passing another large vehicle or even an ordinary car, and will force vehicles on to the verge causing significant damage. This is particularly relevant as there is a heritage verge near to the Baldock end of Bygrave Road. The sharp bend near Half Way Farm has been the site of numerous accidents. A similar sharp bend exists for the exit from lower Bygrave. In situations where traffic is suddenly confronted by a large HGV the risk to road users is significant.

The turn into Bygrave Road is evidently too tight for Low loaders and HGVs, and the road weight limit is 7.5 tonnes. The road surface is likely to be heavily impacted – it is not designed for significant numbers of large heavy goods vehicles.

It is a further concern that the Highways Agency has flagged that users of Ashwell Road to the east of the site and users of the bridleway to the west of the site could be highly impacted by glare. The Agency further notes that while a hedgerow “is likely to be sufficient in the long term, no indication is given as to when the mitigation works will be implemented and how long it will be before they are able to effectively reduce the impact of glare. The photo montages make the comparison ten years after installation”.

Finally, were the development to go ahead, the delivery times take no account of local residents needs and the impact on school bus and school runs, and residents going to and from work. It is not acceptable for there to be Saturday working further negatively impacting local residents.

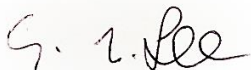
6. Noise impact

Noise impact has said to be limited but inverters can overheat in extremely hot weather requiring the use of noisy fans to provide cooling. Given the increasing temperatures, making hot weather much more prevalent, modelling needs to be done to ensure that Bygrave residents will not be affected throughout the lifetime of the operation of the site.

We trust that NHC will give due consideration to all of the above arguments when determining their decision on this application.

With regards

Yours sincerely



Graham Lee
Chairman on behalf of Ashwell Parish Council.