

Agenda

- 19:00 – Arrival (tea and coffee)
- 19:30 – Welcome and Introduction (CN)
- 19:40 – Planning application overview (AH)
- 20:05 – Alternatives to solar (PH)
- 20:15 – How to register your view (MD)
- 20:20 – Open Forum Q&A (All)

Presentation to the public meeting at The Farmhouse at Redcoats

Alternatives to Solar Farms that encroach on the Greenbelt

Monday 4th April 2022

Object to Sperberry Hill Solar Farm – it is the only way to prevent it



About me

I have lived in, and around Hitchin for over 50 years.

I live at The Wyck.

I own a 14 acre parcel of land next to the proposed development.

I was approached to include our land in the application. I was offered £1000 per acre, per year for 30 years - I refused because of the reasons I will explain to you during this presentation.

Professionally I have:

- Worked for the office of the deputy prime minister advising on construction methodology;
- Been a director and senior executive board member of Keller Group PLC, turnover £2 billion – Constructing many high-profile projects around the World;
- Grown a small business to reach £100 million turnover, specialising in social housing improvements and specialist repair in the UK;
- Grown a local business producing construction related software products and providing construction consultancy services. We have helped companies secure over £10 billion of construction projects.
- Developed brown field land in Hitchin into Burton Gardens.

The proposed location of the site

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Why has it been selected?

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Reason

Proximity to a sub station - **lower construction costs**

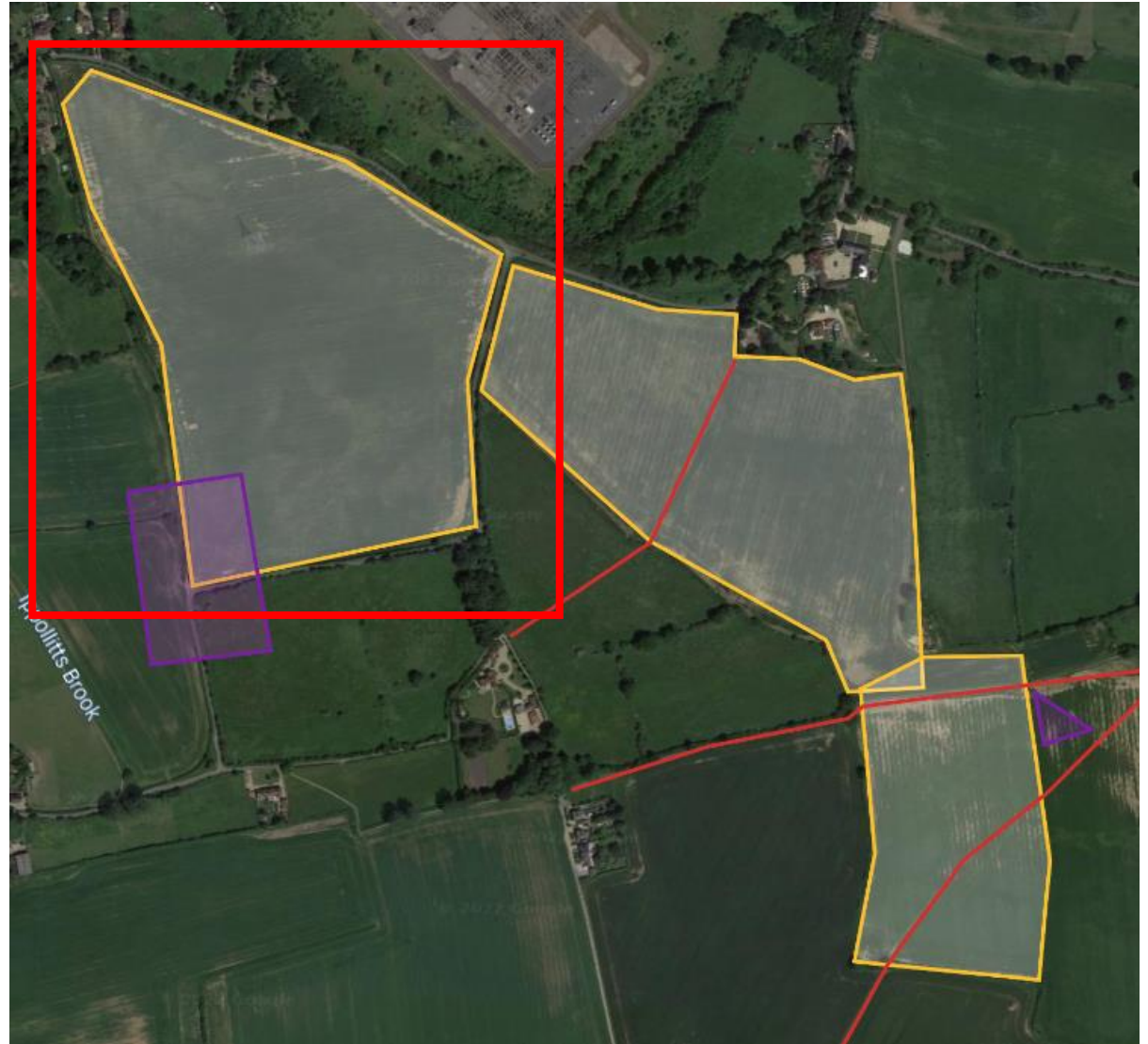


Great Wilbraham solar development (which is connected to a sub-station 11km from the site) demonstrates that there is no technological barrier to connecting sites at a range of locations.

Previous Application

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ITEM NO:	<u>Location:</u>	Land opposite Wymondley Grid Station and to the south of, Sperberry Hill, St Ippolyts
	<u>Applicant:</u>	Mr P McKeown GEUK Direct
	<u>Proposal:</u>	Solar farm of approximately 5 Mega Watts of electricity generating capacity, comprising the installation of solar photovoltaic panels and associated infrastructure, including electrical inverter and transformer buildings, substations, communications and storage buildings, new access, access tracks, fencing and landscaping
	<u>Ref. No:</u>	15/01532/ 1
	<u>Officer:</u>	John Chapman



Reason why the 2015 application was refused

That permission be REFUSED for the following reasons:

The proposal would cause harm to the purpose of safeguarding the countryside from encroachment. In the opinion of the Local Planning Authority the applicant has not demonstrated **Very Special Circumstances** which are sufficient to **outweigh the substantial weight that should be given to any harm to the Green Belt** that is required under paragraph 88 of the NPPF. The proposal therefore conflicts with saved Policy 2 'Green Belt' of the North Hertfordshire District Local Plan No. 2 - with Alterations and Section 9 'Protecting Green Belt Land' of the NPPF.

What has changed since 2015 to create special circumstances?

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North Herts District Council

On 21 May 2019, the council passed a **climate emergency motion** which pledged to do **everything within the council's power to achieve zero carbon emissions** in North Herts by 2030.

This declaration asserted the council's commitment toward climate action **beyond current government targets and international agreements.**

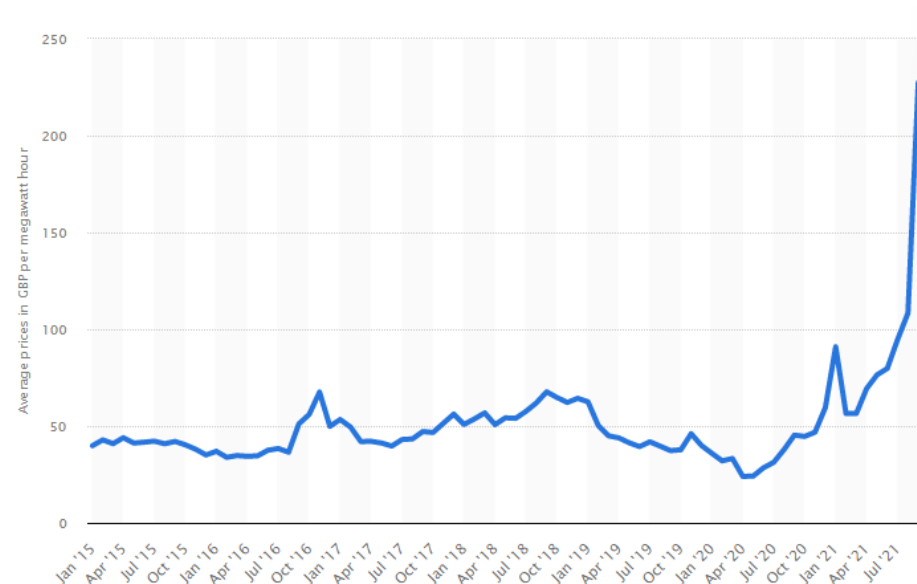
Developers

Energy prices have risen considerably since 2015. **The higher the wholesale price of electricity, the greater the return for the developer.** The Solar farm **will not** reduce the cost of electricity anywhere.

Solar panels have reduced in cost. **The developer will make more money.**

If approved it will develop over **£100,000,000** of revenue, equivalent to **6 - 7% compound interest** on investment. This profit will increase if the cost of electricity increases.

This application is about **making money, not providing environmental benefits**



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The reasons why it should be refused

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1. The purpose of the Greenbelt is to protect the countryside from urban sprawl and industrial development – **this application is within the greenbelt, is industrial, and is substantial;**
2. This agricultural land produces 200 tons of wheat a year – **food production is important;**
3. There is sufficient land outside the greenbelt to place solar farms –**this one has been chosen because it maximises profit for the private developer;**
4. The government is already spending our taxes on renewable energy projects that achieve the UK climate change commitments and to overcome the energy crisis. This project would make big profits for Spanish investors, **but It would not reduce our energy bills;**
5. Reducing carbon emissions could be better achieved by properly insulating housing, **saving money for residents and reducing greenhouse gas emissions;**
6. Solar generation would be better suited to the **roofs of industrial buildings, low-grade agricultural land, the side of roads, and land outside of the greenbelt;**
7. If approved, this development will propagate further applications to extend the ‘solar power station’ **because a principle has been established, and the cost of connecting to it is cheap;**
8. During construction, over **3,000 tons of materials** need to be trucked onto the site, creating significant disruption for the local community for a year. **Who removes it at the end?**

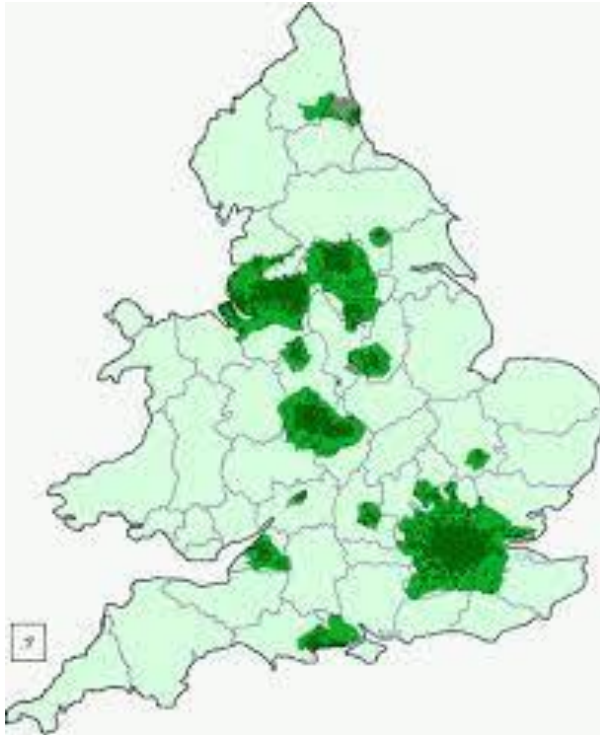
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The Greenbelt and the quality of the land

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The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land **permanently** open.

— Cabinet Office December 2014

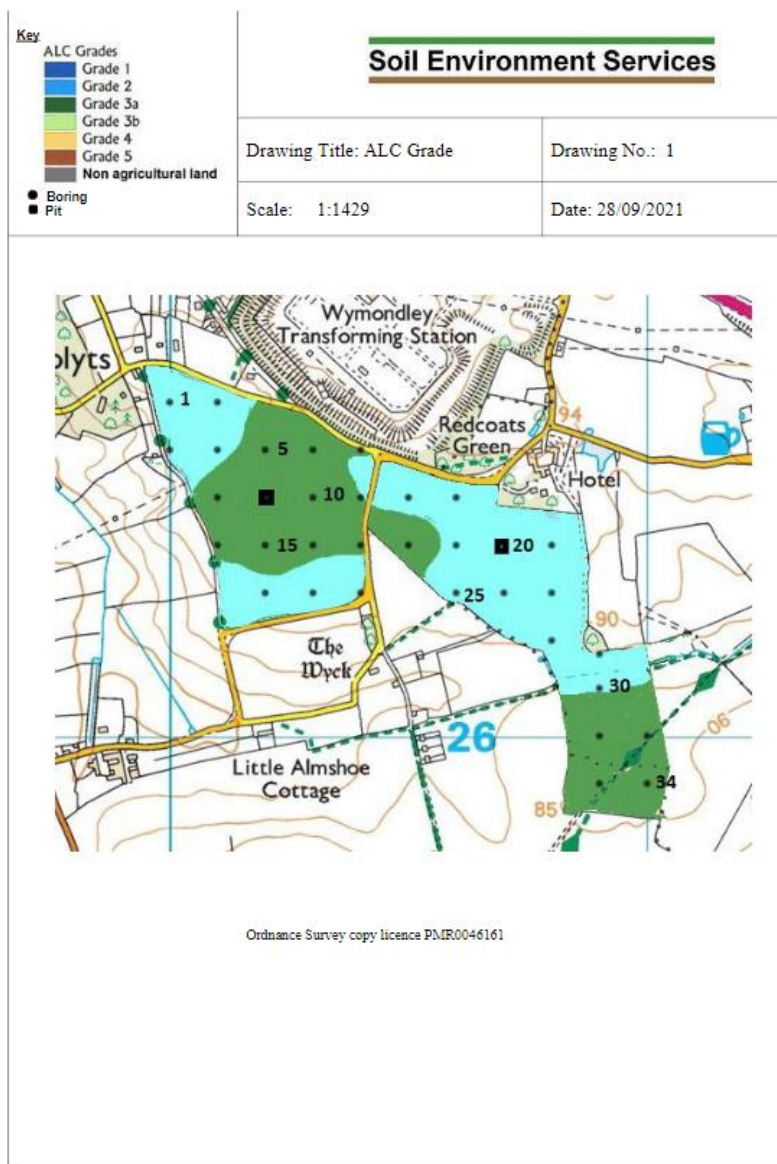


National Greenbelt -15% of land



London Greenbelt – our area marked by red square

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Grade 2 – very good quality agricultural land

Land with minor limitations that affect crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown. The level of yield is generally high but may be lower or more variable than grade 1.

Subgrade 3a – good quality agricultural land

Land capable of consistently producing moderate to high yields of a narrow range of arable crops, especially cereals.

“ Meeting our energy goals should not be used to justify the wrong development in the wrong location and this includes the use of high-quality land. Protecting the global environment is not an excuse to trash the local environment. ”

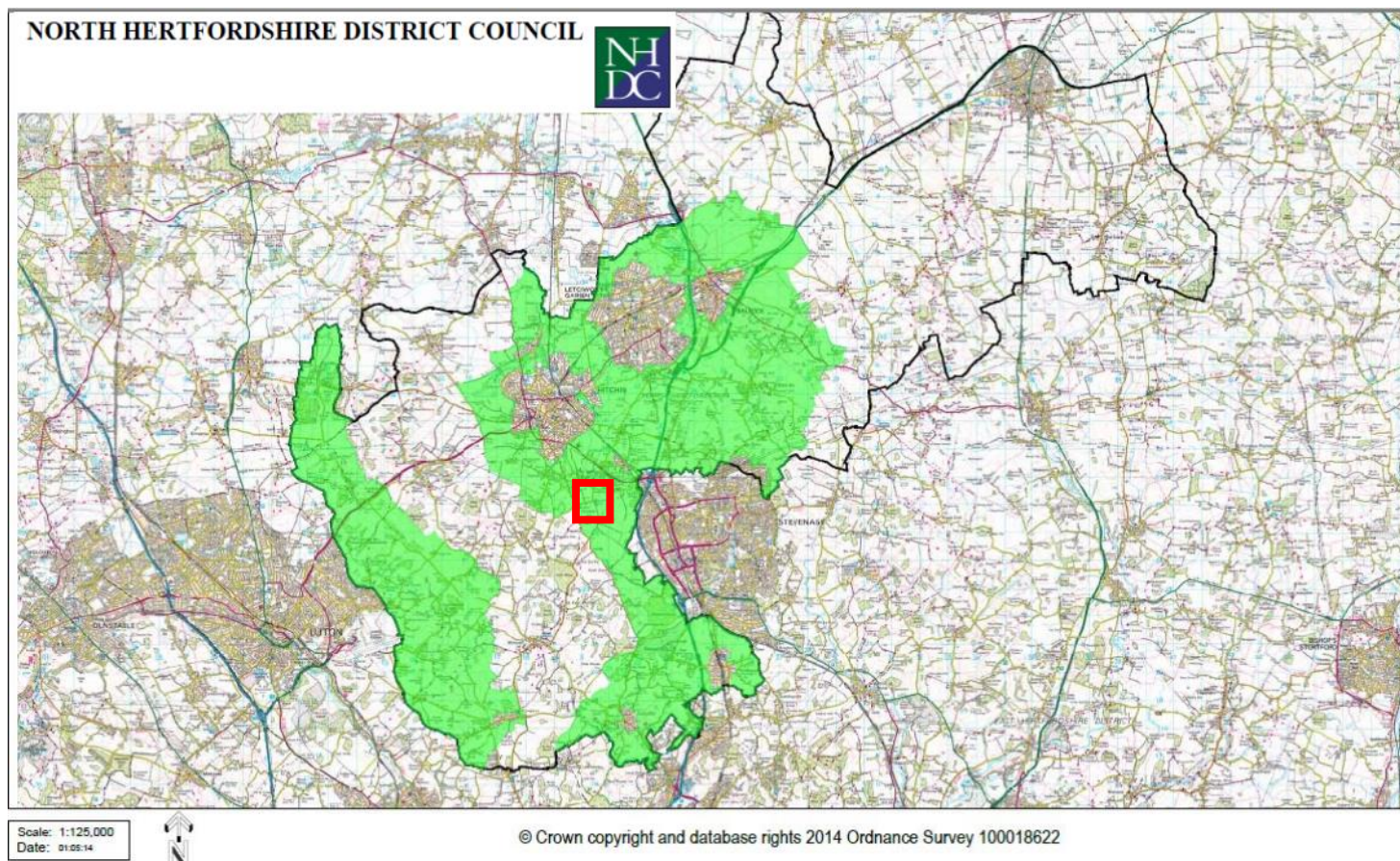
“ Where high-quality agricultural land is involved, this would need to be justified by the most compelling evidence. ”

Eddie Hughes MP, Ministry of Housing, Communities and Local Government
(in a letter dated 2nd June 2021 to Kemi Badenoch, MP)

<https://questions-statements.parliament.uk/written-statements/detail/2015-03-25/HCWS488> Eric Pickles, Secretary of State, Communities and Local Government

Commercial scale Solar PV projects, **should ideally utilise previously developed land, brownfield land, contaminated land, industrial land or agricultural land preferably of classification 3b, 4, and 5 (avoiding the use of ‘Best and Most Versatile’ cropland where possible)**. Land selected should aim to avoid affecting the visual aspect of landscapes, maintain the natural beauty and should be predominantly flat, well screened by hedges, tree lines, etc and not cause undue impact to nearby domestic properties or roads,
BRE Planning guidance

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What the planners say

- Development should be limited to brownfield land and poorer quality unproductive land.
- BMV land **should be avoided**. The 'most compelling evidence' would be required if it was to be used.
- The fact that BMV land happens to be available from a farmer who wants to abandon farming is not compelling evidence.
- The fact that it is difficult to find poorer quality land within the district is not compelling evidence.
- Local authority boundaries are not to be used as a limiting factor in the search for alternative options. If there is no poor quality land within a district **the only logical conclusion is that industrial scale solar plants are not the right renewable solution for that area.**
- **Sequential testing is required** in relation to the use of agricultural land.

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Energy Generation UK

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The Ten Point Plan for a Green Industrial Revolution

Building back better, supporting green jobs, and accelerating
our path to net zero

November 2020

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Offshore wind is a critical source of renewable energy for our growing economy, with the UK already leading the world. **By 2030 we plan to quadruple our offshore wind capacity so as to generate more power than all our homes use today**, backing new innovations to make the most of this proven technology and investing to bring new jobs and growth to our ports and coastal regions.

Government plan for renewable energy November 2020

Taxpayer investment £12,000,000,000

[illegible]

The Daily Telegraph says thousands of onshore wind turbines may be built in a bid by the government to treble capacity. Seven thousand new wind turbines could

There is no mention of solar farms because:

By comparison with off-shore wind, **solar farms are hugely inefficient.**

A 90 acre solar park is said to be capable of supplying electricity to **about 6,500 homes**. One wind turbine in the North Sea has the **capacity to power about 16,000 homes**.

In terms of efficiency rating i.e. the amount of power exported to the grid, **solar's rating is between 11 and 15%** whereas for **off-shore wind the figure is 50%+.**

On one day in 2020 it has been reported that 78% of the UK's electricity came from off-shore wind.

Industrial scale solar farms **use up valuable arable land for no real benefit.**

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Are they good for biodiversity?

Grazing sheep and bee-keeping **are token gestures** and in no way compensate for the lost potential of the land.

Transitory animals have their traditional routes blocked. Deer are often diverted onto roads.

Bird and bat deaths are common as they mistake the glass for water.

The land is degraded with **little potential for biodiversity** as half of it will be in permanent shadow and rain water run-off creates set channels without proper dispersal.

Topsoil is removed and **cleaning materials** can contaminate the soil.

There is the possibility of toxic chemicals leaching out from the panels.

Lithium-ion battery storage represents a **huge fire risk.**

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Wind Generation

Total Output from Windfarms today – 75,610 GWh

Total Output from Windfarms 2026 - 274,945 GWh

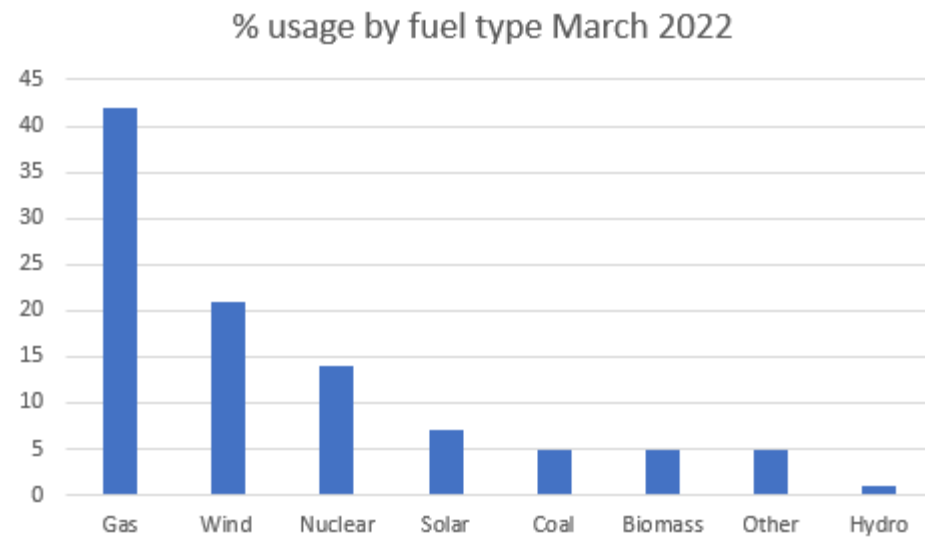
Total electrical requirement for the UK – 318,000 GWh

Office of National Statistics

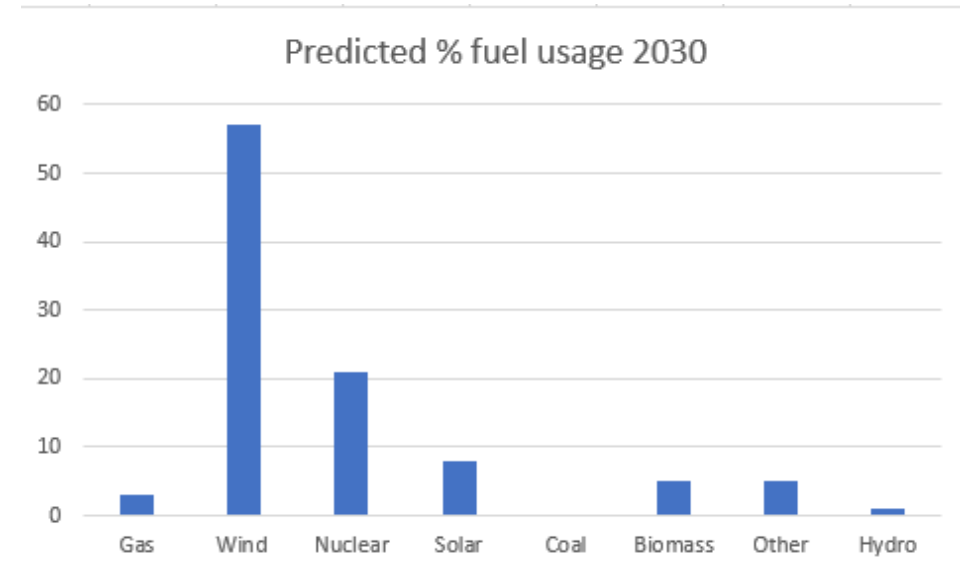


Worlds largest offshore wind farm – Dogger Bank

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Figures supplied and abstracted from Gridwatch



Figures abstracted from government forecasts contained within the government document:
Ten point plan for a green industrial revolution, the Office of National Statistics and www.Doggerbank.co.uk

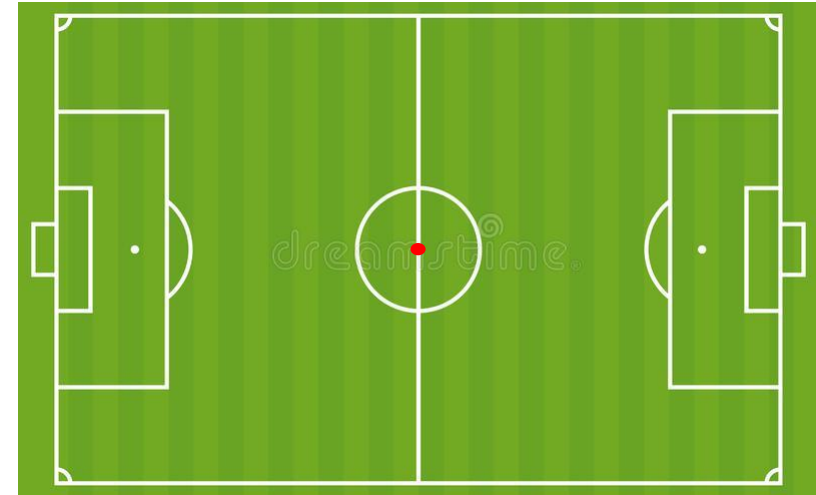
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Sperberry Hill Solar Farm



If constructed, Sperberry Hill will be **contributing 0.0097%** of the energy requirement of the UK.

Sometimes it's difficult to understand how much that is so:



The energy from it will be sold at the wholesale rate and will make **no difference to consumer prices**.

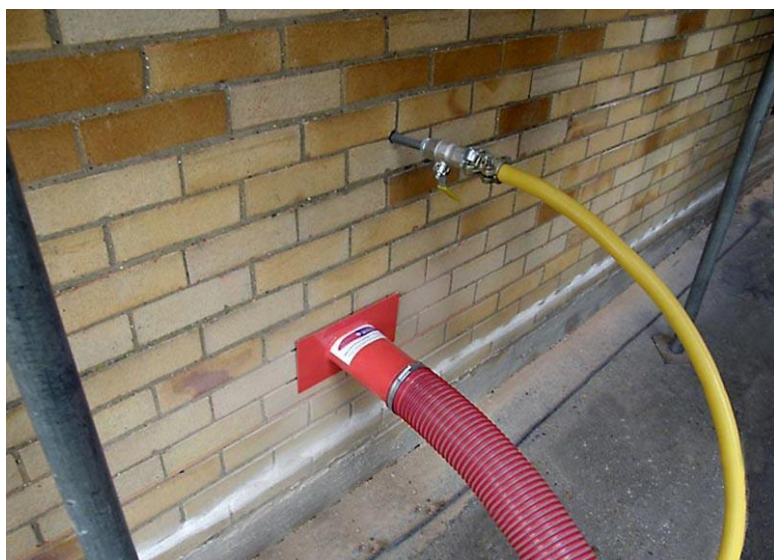
Improving Insulation

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You can lose 25% of heat through the roof of an uninsulated home, so **insulating your loft or roof is a great way to lower your heating bills.**

A home can **lose as much as 35% of its heat** through uninsulated external walls. By investing in cavity wall insulation, you can significantly reduce the heat loss from your home.



FREE £1,500 HOME INSULATION Voucher

Homeowners Qualify For a **FREE** £1,500 **Insulation** Voucher.
Save Up To 50%* On Your Energy Bills.

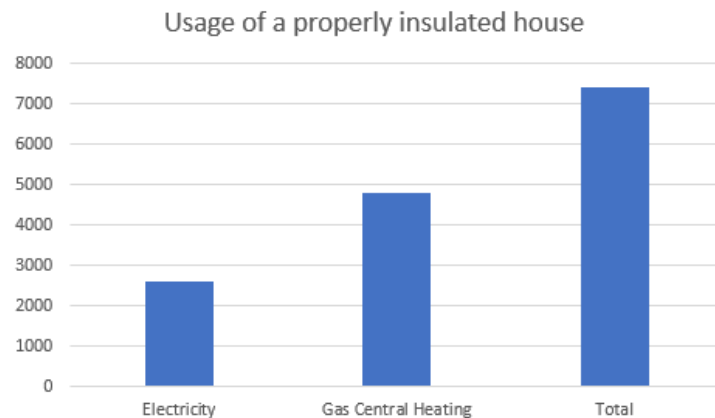
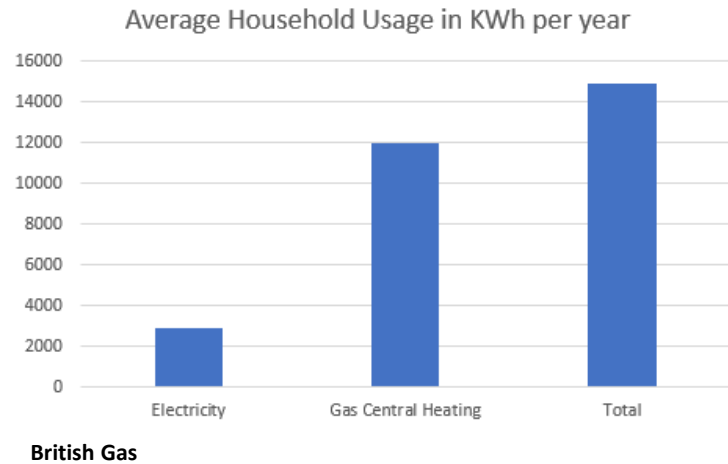
Are you a **Homeowner** living in the UK? Find out if you qualify by entering your **postcode** below, the process takes just **60 seconds**:

Find out if you qualify by entering your postcode below, the process takes just 60 seconds:

ENTER POSTCODE

CHECK MY ELIGIBILITY 

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Overall, you can reduce your heating bills by up to 50% - Other grants are available up to £10,000 for windows and doors.

The total of funds set aside by government for this is £2,000,000,000

The saving in energy per house is up to 7490 KWh per year.

The work is easy to undertake and does not significantly disrupt people's lives.

It increases the value of their houses.

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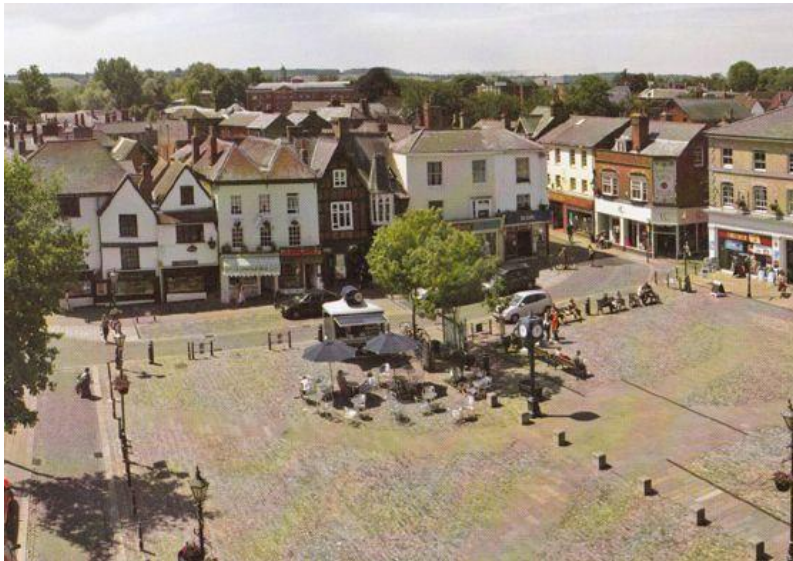


There are around 20,000 houses in Hitchin.

Most were built before the 1980's when cavity walls were mandatory under planning regulations.

Let's say that half of them would benefit from better insulation.

This would **save 74.9 KWh** of energy per year.



The output of the proposed solar farm is around **50 KWh of energy per year.**

Insulation would save more energy and have a direct benefit of reducing peoples electric and gas bills without changing the historic character of the greenbelt in the area.

Other Locations

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The former Department of Energy and Climate Change estimated that there were **600,000 acres of south facing commercial roof-space** in the UK.

North Herts can make a major contribution to carbon reduction by **introducing policies** requiring new developments to have **solar panels on their roofs, heat pumps or district heating systems.**

Districts with high grade land and outstanding countryside (such as North Herts) are **not suited to industrial scale solar plants** on green field and greenbelt sites.

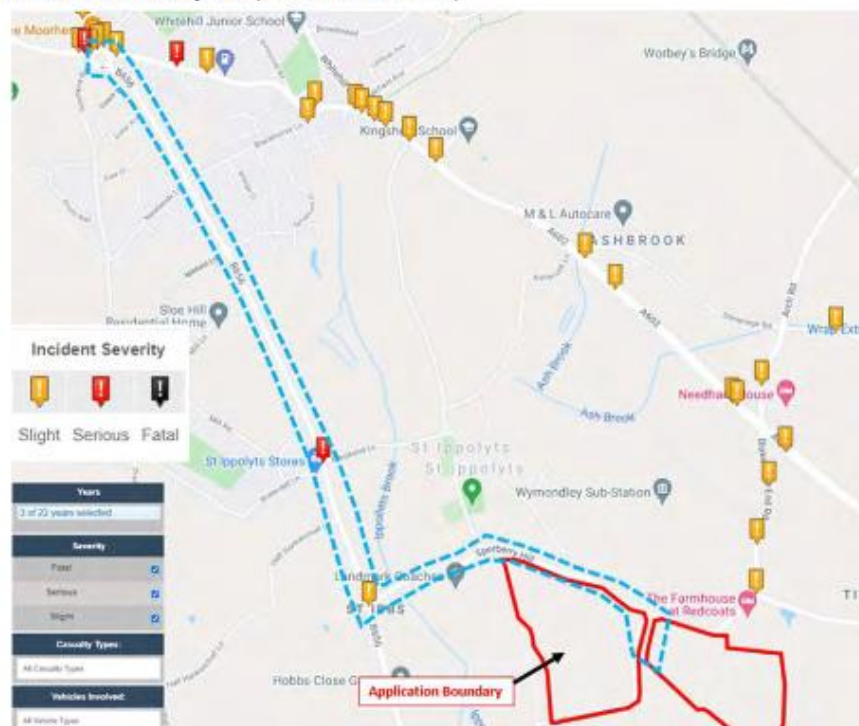
Motorways and Trunk Roads offer viable alternatives.

If solar farms are to be built, they should be positioned **outside of the greenbelt** on **poor quality land** so as not to **reduce our capacity to grow crops and vegetables.**

Resident Disruption and Decommissioning

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Plan 2.2 – Road Safety Plan (Local Access to A602)



The development will require:

- Photovoltaic Solar Panels and associated support frames,
- String Inverters,
- 5 no. Transformer Stations,
- 8 No. Battery Storage Containers and associated inverter/transformers,
- 1 No. DNO Substation,
- 1 No. Switchroom Building,
- 1 No. Control Room Building,
- Grid Connection Cable to National Grid's Wymondley Substation,
- c.1.3km of new/resurfaced internal access tracks (3.5m wide and constructed using compacted Type 1 stone),
- 2 No. improved access points off Little Almshole Lane, and an access point from Stevenage Road,
- Ditch culverts for track crossings,
- c. 5.1km deer/stock fencing,
- c.34 No. 4m High CCTV cameras,
- c. 170m long 2.5m high earth bund,
- c. 2,650m² woodland planting, and
- c. 1,058m hedgerow planting (new and gapping up of existing).

At least 3000 tons transported to the site via single carriageway roads

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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 articulated lorries;
- Over **80 ancillary vehicle movements** per day;
- **36 week construction period**;

This will damage local roads, increase the risk of accidents and cause considerable inconvenience to the local community.

Construction activities would **take place 7 days per week**, during the following hours:

Monday to Friday 07:30 – 18:00;
Saturday - Sunday 08:30 – 18:00.

Source – Planning application

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Who removes it when it is no longer financially viable after 30 years?

UK Energy production will evolve considerably by 2050

- Wind Generated Power
- Nuclear Power
- Hydrogen transportation
- Electric Vehicles
- Domestic and Industrial Solar Energy
- Fusion power

As the cost of removal and reinstatement will be large there will be **no financial incentive** to return it **to arable use**.

However, there will be a strong case that this is now a **brown field site**, attracting further development of **housing and industry**.

The historical character of this area will be lost forever.

Thank you for listening

Registering your view

Getting your view in ASAP is critical!

**What do you want to say
about this specific scheme?**

“I object”

“I am neutral”

“I am supportive”



How do you want to say it?

eMail

Letter

Online

Suggested policy-based reasons for objection:

1. Loss of good quality agricultural land
2. Inappropriate development on Green Belt
3. Impact on setting of nearby housing and businesses and other local amenity
4. Wildlife and Ecology impact.
5. Impact during construction
6. Risk of the farm land not being reinstated

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We have drafted a template letter you are free to use, or customise as you see fit

Mr Simon Ellis
Development and Conservation Manager
North Hertfordshire District Council
PO Box 10613
Nottingham
NG6 6DW

April 2022

Dear Mr Ellis

OBJECTION TO PLANNING APPLICATION Ref: 22/00709/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 100 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:

**If you agree with the content, all you need to do is
fill in this section.**

Yours sincerely,

Name:

Phone Number:

Address:

eMail Address:

Signature:

Date:

Object to Sperberry Hill Solar Farm – it is the only way to prevent it

We also have a second, simplified, template available for you.

Mr Simon Ellis Development and Conservation Manager North Hertfordshire District Council PO Box 10613 Nottingham NG6 6DW		April 2022
Dear Mr Ellis		
PLANNING APPLICATION Ref: 22/00709/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 view on this planning application:		
<input type="checkbox"/>	I OBJECT to this planning application	
<input type="checkbox"/>	I am NEUTRAL on this planning application	
<input type="checkbox"/>	I am SUPPORTIVE of this planning application	
Yours sincerely,		
Name:	Phone Number:	
Address:	eMail Address:	
Signature:	Date:	

Recommended Next Steps:

Fill in your details **TONIGHT** on one of our two templates and we will post them for you

or

Download the templates, customise them as you see fit (or write your own) and then:

eMail: planning.control@north-herts.gov.uk

Post to: Mr Simon Ellis, Development and Conservation Manager, North Hertfordshire District Council, PO Box 10613, Nottingham, NG6 6DW

Online: <https://pa2.north-herts.gov.uk/>

Note: There are reports about the unreliability of this portal, with the site suggesting eMail as an alternate option

No matter how you have your say, please ensure you include:

The application reference number:

22/00709/FP

Your:

Name, Address, eMail Address & Phone Number

(If sending by post, please also **sign** and **date**)

Important Note:

Your name and address will be shown online,
but your email, phone number and signature (if appropriate) will not be.

All info from tonight (and more):

<https://bit.ly/sperberry-solar>



General questions/thoughts/comments/etc:

sperberrysolar@outlook.com

Important:

Please submit your views
on or before 8th April 2022.

Submissions submitted after this date may still count, but it's important we work to the published dates at this stage