

**From:** David Thomson [REDACTED]

**Sent:** 23 August 2022 08:59

**To:** Section 62A Applications <section62a@planninginspectorate.gov.uk>

**Subject:** Section 62A Planning Application: S62A/22/0006 Berden Hall Farm, Ginns Road, Berden

## **Section 62A Planning Application: S62A/22/0006 Berden Hall Farm, Ginns Road, Berden**

Dear Sir

I wish to object to the proposal by Statera to construct a solar farm on 177 acres of prime arable farmland at Berden Hall Farm.

There are numerous reasons for my objection:

The size of the development is simply too big!

- Uttlesford's Policy ENV15 says that small scale renewable energy development schemes to meet local needs will be supported providing it can be demonstrated that they do not adversely affect i) The character of sensitive landscapes; ii) Nature conservation interests; or iii) Residential and recreational amenity
- This is not a "small scale" scheme.
- The area covered by solar panels is even larger than the area which was contemplated at the time of the application to Uttlesford District Council for a Screening Opinion.
- The land identified by Statera as the site for Berden Hall solar Farm extends to 177 acres of productive farm land.
- The visual impact of such a huge solar farm would fundamentally change the character of the area.
- The scheme will not contribute to the energy needs of local residents.

Statera have not demonstrated that the use of high quality agricultural land is necessary

- Eddie Hughes MP, a Minister at the Ministry of Housing, Communities and Local Government confirmed in June 2021 that the statements made by Eric Pickles in 2015 are still applicable. Therefore, Uttlesford must consider whether the use of agricultural land has been shown to be necessary.
- Uttlesford's Policy ENV5 also says that development of the best and most versatile agricultural land will only be permitted where opportunities have been assessed for accommodating development on previously developed sites or within existing development limits. Where development of agricultural land is required, developers should seek to use areas of poorer quality except where other sustainability considerations suggest otherwise.
- As the land identified for development is high-quality agricultural land its use must be justified by the most compelling evidence.
- In the FAQ document published by Statera on their development website: [REDACTED] the developer says the following:

Question: What other locations did you consider? Answer: None!

- 19 October 2014, , Liz Truss (then a DEFRA Minister) said the following:

“English farmland is some of the best in the world and I want to see it dedicated to growing quality food and crops. I do not want to see its productive potential wasted and its appearance blighted by solar farms. Farming is what our farms are for and it is what keeps our landscape beautiful.

I am committed to food production in this country and it makes my heart sink to see row upon row of solar panels where once there was a field of wheat or grassland for livestock to graze. That is why I am scrapping farming subsidies for solar fields. Solar panels are best placed on the 250,000 hectares of south facing commercial rooftops where they will not compromise the success of our agricultural industry”.

The solar farm is inappropriate development in the countryside

- The development proposed by Statera can only be described as industrial.
- In addition to large numbers of solar PV panels (the exact quantity is not specified) the development will include containerised inverters and a substation.
- National policy includes an environmental objective - to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a Statera economy.
- I do not understand how a massive solar farm which is an industrial development can possibly enhance the natural environment.
- The site is very close to the numerous listed buildings and scheduled monuments I do not accept that it can possibly enhance the historic environment.
- The development is not compatible with Uttlesford’s policy S7 which says that the countryside will be protected for its own sake

The land will not remain in agricultural use

- Paragraph 170 of the Planning Guidance on renewable and Statera energy says where a proposal involves greenfield land it must proposal allows for continued agricultural use.
- Statera have not provided any assurance on this point.

Farmland should be used for farming!

- Statera suggest that the majority of the land on the site is Grade 2 or Grade 3a agricultural land which is “best and most versatile” agricultural land.
- This is productive farm land which should be used for farming.

- We currently import more than 40 per cent of our food, and recent threats by countries to ban exports of vaccinations have highlighted the threat that similar bans could be imposed on food if countries are themselves short of supplies in the future.
- It is predicted that we will need to produce 56 per cent more food by 2050 due to increasing populations. We have not increased food production by 56 per cent in the last 30 years, and if we continue to build on farmland we have no hope of achieving it in the next 30 years either.
- New research from the CPRE has found almost 14,500 hectares of the country's best agricultural land has been permanently lost to development in just 12 years. The research has found that there has been a huge rise in BMV agricultural land set aside for housing and industry between 2010 and 2022, from 60 hectares to more than 6,000 hectares per year.

There is no benefit to the local community

- There is no benefit of this development to the local community. Residents do not wish to be "bought off" by the offer of modest amounts of funding. The loss of the countryside is irreplaceable.
- Local residents will not get cheaper solar energy
- There will be a loss of rural amenities such as footpaths with open views

The Noise associated with the development has not been fully considered and is not acceptable

- Statera claim that the noise generated from the development will be minimal. However, the inverters will be noisy and will add to the noise from the substation and the current battery plant. This will be even worse if the Crabb's Green battery is built.
- When there are periods of exceptionally hot weather, it is necessary to install temporary cooling equipment to prevent overheating of inverters. This is extremely noisy. Statera make no mention of this equipment.

There has been no meaningful consultation with local residents

- The only consultation with residents has been in the form of an "exhibition" held for a single afternoon in March. The MAJORITY of residents who will be affected by the development were not invited to the exhibition. A review of the mailing list used by Statera demonstrates that only 71 properties in Stocking and Berden were contacted (of which 22 were in Stocking Pelham and just 49 were in Berden). Stocking Pelham has approximately 70 properties and Berden has very close to 200.
- Statera claim that they have made changes in response to feedback from residents. This is nonsense. The overwhelming feedback was that the development should not go ahead. This has been ignored.

The Government does not support large scale solar development of this sort

- In October 2021 (in the run up to COP 26), the Government published its Net Zero Strategy (Build Back Greener). This Strategy does NOT support the construction of industrial scale solar farms. It's focus on renewable energy is almost entirely on off-shore wind energy with a commitment to generate 40GW of energy from offshore wind by 2030. This target was first set in 2020 in the Government's 10 point plan for a Green Industrial revolution which said that this quadrupling in offshore wind capacity would generate enough energy to power every home in the country.

- The focus on wind power explains why there are very few references to solar power in the Net Zero Strategy. Where solar is referenced, the focus is on “unsubsidised rooftop solar”, retrofitting solar on houses and small scale community solar projects.
- The East of England (including Uttlesford) has a key role to play in National renewable energy plans because 60% of the current offshore wind projects will come onshore along the East Coast. In fact, National Grid’s Electricity 10 year Statement (published in 2020) says that the large amount of generation to be connected in the East of England means that power generation in the East of England will exceed local demand; so the East of England will be a power exporting region. We do not need more renewable energy in Uttlesford!
- The fact that Uttlesford DC declared a climate emergency in 2019 is irrelevant. This is not a planning policy and is not relevant for the purposes of determining planning applications.

regards

David Thomson