

To: section62a@planninginspectorate.gov.uk



Dear Sir or Madam

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

I write on behalf of Stocking Pelham Parish Council. Stocking Pelham borders the proposed development. However, Stocking Pelham is in East Hertfordshire and I note that the consultees are largely focussed on the impact in Essex as the land involved reaches but not cross the Essex border with East Hertfordshire. I would therefore be grateful if you would give this correspondence your particular attention as we are impacted by this proposal in many ways more significantly than other villages.

To ensure there is adequate representation for Stocking Pelham and East Hertfordshire, I would also like to request formally that the Stocking Pelham Parish Council is represented at any hearing.

**Cumulative local impact**

Paragraph 155 of the National Planning Policy Framework makes it clear that the adverse impacts of solar farms must be addressed satisfactorily and that the **cumulative** landscape and visual impacts of the proposed development must be considered. VILL3 of the East Herts District Plan states that in a Group 3 village such as Stocking Pelham any development must “be of a scale appropriate to the size of the village having regard to the potential cumulative impact of development in the locality, and Uttlesford’s Policy S7 states that “the countryside will be protected for its own sake.”

The Stocking Pelham village curtilage is around 75 hectares. Though this proposed development is not within the village curtilage, it is adjacent to it and at 71 hectares is of equivalent size to the entire village curtilage. The cumulative impact of this proposed development together with the existing electricity substation and Battery Energy Storage System (BESS) is that much of the area in and around Stocking Pelham area would be turned over to industrial use. The existing BESS covers two hectares of land, while the existing substation within the village curtilage covers 8 hectares of land. A new proposed BESS (under formal review currently by East Herts - 3/22/0806/FUL) would add another 2 hectares of industrial land within the village curtilage. Sadly, additional BESS plants and solar “farms” are in various stages of unofficial planning in and around the village including plans at Wickham Hall, Violet Lane, and Battles Farm, so this proposed development is just the latest in a cumulative process of industrialisation that started with the substation and was extended by the existing BESS plant.

**Specific local impact**

When the existing electricity substation and BESS were built, Stocking Pelham was promised various mitigation measures. They included a nature reserve around the substation, and tree planting around the BESS. An initial effort was made for the substation, but the “nature reserve” is now overtaken by brambles, and the ponds are full of reeds and rubbish. There was no serious attempt to fulfil the mitigating obligations around the BESS. Some trees were planted but the BESS is now surrounded by a few twigs: nothing is growing, and the two-meter-high white walls of the BESS are visible from miles around. The Parish Council’s experience is that mitigating action promised by developers is ineffective either immediately or after some time. This industrial array of solar panels

would dominate the views between Berden and Stocking Pelham for 40 years or more, while of course eliminating treasured walking and rambling trails.

We note that the proposed development is on a slope. Following initial compaction during the construction of the solar “farm,” the topsoil and nutrients beneath the panels will likely be washed away over the planned life of the development. The chances that the land could be returned to agricultural use after this point seem remote, even in the unlikely event that a Section 106 order requiring the return of the land could be enforced.

The roads in and around Stocking Pelham are narrow. A particular pinch point is outside the nursery in the village hall. Mothers drop their children after a blind corner, where two cars can barely pass each other. These are the roads the construction traffic would need to use, causing severe disruption and in the Parish Council’s view endangering the children and parents attending the nursery.

### **Public interest assessment**

It might be argued that there is an “over-riding public benefit” to the proposed development, given the current energy crisis. However, this view fails to take account of the coincidental food emergency with many staples in short supply leading to soaring food inflation. This is one of the major reasons agricultural land is protected, for example by Uttlesford’s Local Plan Policy ENV5. While both food and energy are critical to national security, food is the more important: we can live without energy, but not without food. Removing agricultural land in favour of energy production is against the national interest.

Solar “farms” are not part of the renewable energy strategy recommended by the government, with the likely (at the time of writing) next prime minister Liz Truss describing them in 2014 as a “blight on the landscape” and on 11 August 202 she stated: “I’m not against solar panels per se. There are plenty of commercial roofs in Britain where we could be putting solar panels. But where they shouldn’t be is on agricultural land that should be used for food production.” Wind farms, particularly offshore, are favoured by the government along with hydro and nuclear power.

Food and energy do not need to be in conflict. There are many places where solar panels can be mounted, that do not require agricultural land to be taken out of use. The developer has made no effort to find alternative locations, in violation of Local Plan Policy ENV5. While other locations such as brownfield sites, on warehouse roofs, and other similar locations may be less profitable, they are practical and do not remove best and most versatile land from use for two generations or more.

It could be argued that there is an environmental benefit to having the Solar “Farm” next to the substation to reduce energy loss in transmission. In fact, many solar “farms” are built miles from a substation: there is a cost to running the cables to the nearest substation, but the loss of energy is minimal. After all we run electricity cables all around the country.

### **Policy violation by Berden Solar**

Uttlesford’s Policy ENV5 states that development of the best and most versatile land will only be permitted where alternative opportunities have been assessed. This is in line with common sense. Berden Solar appears to have made no effort to consider alternatives to this site. The mode of operation for Berden Solar directors appears to be to set up multiple companies to request planning permission in many sites that offer favourable economics, in the hope that one or more local or

government authorities will allow the development. Many better solar sites exist. Solar panels can be erected in many places and many of our villagers have elected to erect solar panels on their houses. Brownfield sites are also suitable. There is simply no case for erecting these panels on land that should be used for food.

### **Recommendation**

This project should be disallowed due to the cumulative impact on Stocking Pelham and the surrounding area. In addition, the development is against the national interest removing best and most versatile farmland for the food chain. Finally, if allowed the project would be open to appeal because alternatives have not been considered.