

From: Planning <planning@uttlesford.gov.uk>
Sent: 31 August 2022 03:30
To: Section 62A Applications <section62a@planninginspectorate.gov.uk>
Subject: FW: Comments for Planning Application UTT/22/2046/PINS

From: donotreply@uttlesford.gov.uk <donotreply@uttlesford.gov.uk>
Sent: 30 August 2022 22:02
To: Planning <planning@uttlesford.gov.uk>
Subject: Comments for Planning Application UTT/22/2046/PINS

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 30/08/2022 10:02 PM from Mrs Emma Clark.

Application Summary

| | |
|---------------|---|
| Address: | Land At Berden Hall Farm Dewes Green Road Berden |
| Proposal: | Consultation on S62A/22/0006 - Development of a ground mounted solar farm with a generation capacity of up to 49.99MW, together with associated infrastructure and landscaping. |
| Case Officer: | Laurence Ackrill |

[Click for further information](#)

Customer Details

| | |
|----------|----------------|
| Name: | Mrs Emma Clark |
| Email: | [REDACTED] |
| Address: | [REDACTED] |

Comments Details

| | |
|-----------------|--|
| Commenter Type: | Neighbour |
| Stance: | Customer objects to the Planning Application |

Reasons for comment:

Comments:

Application number on S62A/22/0006 (and UTT/22/2046/PINS)

I am writing to object to the proposal by Statera to construct a solar farm on 177 acres of land at Berden Hall Farm.

My name is Mrs Emma Clark

[REDACTED]

The reasons for my objection is as follows:

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. The cumulative effect of the solar farm and the adjacent industrial battery storage facility is unacceptable.

- 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.

- The cumulative impact of the hugely visible and poorly screened WHITE battery storage facility (built by Statera) and the proposed solar farm will completely industrialise this rural area.

- The size of the proposed solar farm is excessive. The location (i.e. next to the battery storage facility) has not been chosen because of its suitability but because it will be an easy way to profit for the developer.

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.

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 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.

- How can a massive solar farm which is an industrial development possibly enhance the natural environment?

- The site is very close to the numerous listed buildings and scheduled monuments I do not accept that it has been considered fully of the impact on our 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.

The local roads are not suitable for such large construction vehicles

- I note that the construction period will run for 6-months and an average of up to 50 construction workers are forecast to be on site during peak times.
- The supporting text for Uttlesford Policy ENV15 states development will only be permitted in locations where the local road network is capable of handling any additional traffic generated by the proposal.
- Statera state that construction traffic will travel west on the A120 up to Little Hadham, and through Clapgate and Patmore Heath on Albury Road and that vehicles will turn onto Ginns Road and travel through Stocking Pelham before arriving at the site access point just before the entrance to Berden. There could be up to 20 lorries per day arriving and departing during the peak construction period. These road as not suitable for large numbers of lorries.
- This is EXACTLY THE SAME access route that it proposed for the construction of (i) a new battery storage plant at Green's Farm (see the application to East Herts DC 3/21/0969/FUL) and (ii) a new battery storage plant at Crabb's Green (see the application to East Herts DC 3/22/0806/FUL).
- The road between Little Hadham and Berden is a small country road. At some points, it is barely wide enough to accommodate two regular cars. Cars currently need to stop in order to allow tractors to pass. It is completely unsuitable for articulated lorries or large HGVs.
- Access point off the road is simply not suitable for vehicles of this size.
- All vehicles will pass directly in front of the pre-school in Stocking Pelham - I am concerned about the safety of primary school children

Statera deliberately down-play impact on the listed buildings beside the solar farm

- Section 16 of the NPPF is concerned with 'Conserving and enhancing the historic environment'. It identifies heritage assets as 'an irreplaceable resource' and notes that they should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
 - Paragraph 199 of the NPPF states that where development proposals are likely to affect a designated heritages asset, great weight should be given to the asset's conservation and any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justifications.
 - The impact on the heritage significance of the Berden Hall (Grade 2* Listed) will be significant. Tithe maps dating from 1838 show that the land which is included within the solar farm site used to belong to the owner of Berden Hall (Nicholson Calvert) and that it was farmed
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by Isaac Hodges who lives in Berden Hall. There is clearly a close connection between the buildings and the land.

- The development will be visible from the bell tower in Berden Church (St Nicholas') which is a Grade 1 listed building. English Heritage have already raised concerns about the impact on this (and other) important historical assets in close proximity to the proposed development.

- The Scheduled monument at The Crump, the Grade II Listed The Crump and former barn (now room) adjoining to north-west will also be impacted by the development which will be visible from first floor windows of the Crump which looks West.

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.

Yours faithfully

Mrs Emma Clark



Kind regards