

From: Will Cooper [REDACTED]
Sent: 18 August 2022 18:22
To: Section 62A Applications <section62a@planninginspectorate.gov.uk>
Cc: [REDACTED]
Subject: Berden Hall Farm (Pelham Solar)

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 William Cooper
[REDACTED]

The reasons for my objections are as follows:

1. The size of the development 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.

2. The site is not flat and is not suitable for a solar farm

- The majority of the site is sloping and it is not possible to "hide" the solar farm.
- There is a significant slope which rises up from Ginns Road to the top of the site. The OS Map shows the contours of the Northern boundary of the site (parallel to Ginns Road) to be 111m above sea level. However, the top of the site is 125m above sea level i.e. around 12m higher. As the panels are over 3m high, it follows that the panels will be completely visible to walker, cyclist, rider or road user as they travel along Ginns Road. It will be impossible to mitigate the significant visual impact of this industrial development by planting hedges adjacent to Ginns Road. Hedges do not provide adequate screening in winter.

3. I am keen walker – I don't want to walk through a solar farm

- There are multiple local Public Rights of Ways within and immediately adjacent to the site.
- I occasionally walk along footpath 25 which runs along the top of the site from Park Green to Crabb's Green and eventually connects with Ginns Road. This path forms part of a popular walk published by the 100 Parishes organisation

[REDACTED] If the solar farm is built, the path will run between solar panels and fencing to the west and the east.

- I occasionally walk from the top of the site (near Park Green Common) along footpath 26. This path follows the hill all the way down to the track that runs parallel to Ginns Road (and to the South of Berden Hall). If the solar farm is developed it will mean walking this path with a fence and solar panels on all of its western side and some of its eastern side. The solar farm will be visible from this footpath at all times of year.
- As a local resident I walk along these footpaths which will now be surrounded by solar panels and border by fencing. I do not want to walk along a corridor!
- The planting adjacent to the existing battery plant adjacent to the Substation at Stocking Pelham demonstrates that hedges do not provide adequate screening.
- The corridors proposed between solar panels will prevent me from seeing the countryside and enjoying the countryside as I currently experience it.

4. 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 battery storage facility 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 cheap for the developer.

5. The plans 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”.

6. Roof tops have not been considered

- The Building Research Establishment announced in 2016 there were around half a million acres of rooftops facing in the right direction for solar panels. Why haven't these been considered?
- It is no longer credible to argue that solar panels on industrial roofs can't be used because they are too heavy
- Solar panels thinner than a pencil have now been invented and which will revolutionise renewable energy.
- These ultra-thin, lightweight panels are made by Singapore-based company Maxeon Solar Technologies, and are predicted to take over the European market very soon.
- Why not place solar panels on the rooftops of the huge terminal buildings owned by Stansted airport?
- Clearly Stansted airport don't think that there is a problem with this because they have just applied for planning permission to put solar panels on their own land (see S62A/22/0000004)

7. The solar farm is inappropriate development in the countryside

- The development proposed in the plans 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.
- 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

8. The land will not remain in agricultural use

- Paragraph 170 of the Planning Guidance on renewable energy says where a proposal involves greenfield land it must proposal allows for continued agricultural use.
- the plans provide no assurance on this point.

9. The visual impact of this huge development cannot be satisfactorily mitigated

- The land to the South of Ginns Road (between Berden and Stocking Pelham) slopes upwards.
- The majority of the site comprises 3 huge open fields – there are no existing hedgerows and the visual impact will be stark!
- The Planning Inspector must visit the site to understand the full impact that this development will have
- The proposed development cannot be effectively integrated and assimilated into the surrounding landscape.
- The pictures submitted as part of the planning application were taken when there were still leaves on hedges and trees. These plants are deciduous – they will not provide effective screening in winter.
- The planting around the existing battery plant adjacent to the Substation at Stocking Pelham demonstrates that hedges do not provide adequate screening.
- The RHS says that it will take between 20 and 50 years for hawthorn hedges to achieve their full height – this is more than half of the life of the solar farm
- It is unrealistic to expect hedgerows to thrive where low quality plants are planted and then left. Young plants need to be watered in case of prolonged dry spells and/or heat waves, especially during the 2-3 first years after planting.
- During the second year of planting, between February and March, hard pruning of hedges is required to encourage new growth
- Weeding is needed around the base of new plants for the first couple of years to encourage growth

10. Farmland should be used for farming

- It is suggested in the development plans and associated documents themselves 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.

11. 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.
- 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

12. 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 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.

13. 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

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

- 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.

15. 40 years is not temporary

- 40 years is not temporary.
- There are several planning appeal decisions where the Secretary of State has rejected this argument. For example, in an appeal against a solar farm at Five Oak Green near Tonbridge (ref 2226557) the SoS said that 25 years was a considerable period of time and the reversibility of the proposal was given no weight. There is another appeal which relates to Huddleston Farm near Horsham (ref: 2218035). In this case the Secretary of State commented that just 30 years was a considerable period of time and he gave no positive weight to the claimed reversibility of the development.

16. 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 application and would fail the Wednesbury Test grounds of reasonableness if used for the purposes of determining planning applications.

Many thanks and kind regards
William Cooper