

From: Justine Buckley [REDACTED] >

Sent: 04 September 2022 12:40

To: Section 62A Applications <section62a@planninginspectorate.gov.uk>; Lackrill@uttlesford.gov.uk

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 Justine Buckley.

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The reason for my objection is as follows:

- This proposal comes at a time when the need for producing our own food has never been more clear, not least with existential threats to global trade but also predictions that we will need to produce 56 per cent more food by 2050 due to increasing populations. We've 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. The land identified by Statera as the site for Berden Hall solar Farm extends to 177 acres of productive farm land. 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. Uttlesford's Policy ENV5 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. But by its own admission (in its FAQ document on its development website), in answer to the Question: What other locations did you consider? Statera's answer: None. Paragraph 170 of the Planning Guidance on renewable and Statera energy says where a proposal involves greenfield land it must allow for continued agricultural use. Statera have not provided any assurance on this point.

It would be reckless to allow for this change of use of farming land.

- This is anything but 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.
- Uttlesford's Policy ENV15 says that small scale (see point above) 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. The scheme will *not* contribute to the energy needs of local residents - there is no benefit of this development to the local community. Trying to 'buy' residents off by the offer of modest

amounts of funding is cynical when there is such a significant longterm cost - the loss of the countryside, which is irreplaceable, those rural amenities that exist, such as footpaths with open views. will be gone for good.

- The visual impact of such a huge solar farm would fundamentally change the character of the area.

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 – the planting adjacent to the existing battery plant adjacent to the Substation at Stocking Pelham clearly demonstrates that hedges do not provide adequate screening.

- Forty years is not ‘temporary’ and indeed this kind of argument has previously been rejected by the Secretary of State. 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.

- The Government does not support large scale solar development of this sort – its 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. 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.

Yours faithfully
Justine Buckley