

**From:** Michael Phillimore-Brown [REDACTED]  
**Sent:** 31 August 2022 08:28  
**To:** Section 62A Applications <section62a@planninginspectorate.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 Michael Phillimore-Brown [REDACTED],  
[REDACTED]

Government guidance is very clear on this. On 29 June George Eustice, secretary of state for Environment, Food and Rural Affairs, reiterated the current guidance that "create[s] a strong presumption against solar farms on Best and Most Versatile land". He notes that "planning authorities seem to have either forgotten or started to disregard that advice".

[https://www.solarpowerportal.co.uk/news/eustice\\_says\\_local\\_authorities\\_disregarding\\_guidance\\_around\\_solar\\_developme](https://www.solarpowerportal.co.uk/news/eustice_says_local_authorities_disregarding_guidance_around_solar_developme).

On this specific point, the Public Document Pack is misleading, and conflates 3a/b as 'subgrade' land, stating "the majority classification of agricultural land of the application site is classed as subgrade 3a/b". However Grade 3a is classified as BMV therefore it would actually be correct to say that "the majority classification of agricultural land of the application site is classed as Best and Most Versatile".

The Green Party's position is this: "*It is Green Party policy to avoid reliance on solar farms and instead support small scale, community-led schemes.*" [Councillor Adlington-Stringer \(Green Party\) says Solar Farms are not the future for Derbyshire...](https://www.savealfretoncountryside.co.uk/solar-farms-are-not-the-future-for-derbyshire) <https://www.savealfretoncountryside.co.uk/solar-farms-are-not-the-future-for-derbyshire>

Friends of the Earth's position is this: "*Use the best farmland for food –not energy crops*" <https://policy.friendsoftheearth.uk/insight/nine-principles-using-our-land-wisely-time-climate-and-nature-crises#-use-the-best-farmland-for-food--not-energy-crops>

It's clear that this scheme runs contrary to all the above advice, and that alone should be sufficient for the project to be rejected. Unfortunately it seems this is not the case.

Although we must build renewables, and build them fast, this development will ultimately have a negative impact on the climate. I am personally extremely worried about the potential for [ecological](#)[1], and even [societal](#)[2] collapse if we do not effectively counter the threat of climate change now. I initially welcomed the plans to increase the availability of renewable energy via a local solar farm. You will be aware that the Climate Change Committee (CCC) have recommended a balanced pathway to Net Zero which includes adding [3GW of solar capacity per year](#)[3] to complement the main offshore wind generation. On the face of it, this and other solar farms in the area help to achieve that goal, which I support wholeheartedly. However, there is a major issue which needs to be taken into consideration.

Solar farms require a considerable amount of land. The benefits of the low-carbon electricity they provide must therefore be set against any additional carbon emissions that would be incurred by changing the usage of the land. This is effectively impossible to calculate as a member of the public, but we may refer again to the CCC and their reports [Sector-summary-Agriculture-land-use-land-use-change-forestry.pdf \(theccc.org.uk\)](#)[4] and [Land use: Policies for a Net Zero UK - Climate Change Committee \(theccc.org.uk\)](#)[5]. Here there is no specific mention of solar farms, but they do address options to release land for uses other than agriculture generally, whilst maintaining a strong food production sector. They are also very clear that *"Achieving emissions reduction should not be at the expense of producing less food in the UK and increasing imports"*.

These reports indicate that only *"15% of UK agricultural land area was used to grow crops that are directly grown for human consumption"* with the rest as grassland or livestock feed crops. Given that the CCC's balanced pathway includes a reduction of 20% per capita of all meat and dairy products, it follows that the land being freed up for solar farms should come from that 85% of the land area used directly or indirectly for livestock.

Given the above, it seems obvious that agricultural land used to grow crops for human consumption, especially the 'Best and Most Versatile', is best used for that purpose and should be strongly protected from development. Losing this valuable agricultural asset, even to produce renewable energy, may ultimately result in *higher* emissions and is therefore counter to the CCC's balanced pathway and indeed to Uttlesford's own Climate change strategy [Climate change strategy - Uttlesford District Council](#)[6].

Uttlesford should instead exhaust other locations first, for example building solar over the airport car parks. See Newcastle's MetroCentre Solar Project for an example of what can be achieved. <https://themetrocentre.co.uk/news/solar-project>. There is also potential to mitigate the impact on food production by the use of agrivoltaics, but this is not part of the plan.

A final note on Statera as a company: their various failings are well documented by other respondents and I shall not repeat them here. Suffice to say that the evidence indicates they cannot be relied upon to operate in the best interests of the local community or the environment.

Given the evidence, I believe that the proposed development goes against current planning guidance and is not ultimately in the best interests of the environment, and I object to it on that basis.

References:

1. [REDACTED]