

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

My name is Wendy Riddell
[REDACTED]

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

The reason for my objection is as follows:

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 there 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: <http://pelhamsolar.co.uk/> the developer says the following:
Question: What other locations did you consider? Answer: None!
- 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.

This is a large development of 177 acres, and is not being considered in conjunction with other renewable energy projects in the immediate vicinity

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

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.

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 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, including moving to a Statera economy.
- 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

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. Do Statera employ gardeners – doubtful!

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 Claggate 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 roads are 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 heritage 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.