

Ian Stumpf [REDACTED]

5 February 2023

The Planning Inspectorate,
Major Casework Team,
Room 3J Kite Wing,
Temple Quay House,
2 The Square, Bristol,
BS1 6PN

Dear Sir/ Madam,

Section 62A Planning Application: S62A/22/0006 Berden Hall Farm, Ginns Road, Berden [OBJECTION]

We have received notice from Uttlesford District Council (10 January 2023) that the Applicant of the above has submitted additional documents.

These additional documents, including the Environmental Statement (ref. NPI2716, dated November 2022 – which is titled as a “DRAFT” on its cover), does not in any way ameliorate the basic concerns we raised in our first letter of objection dated 5 August 2022. The principal issues are discussed in summary below in the context of the additional information submitted:

1. The fact that there are more suitable places for these projects. This is supported by the NPPF/ government planning guidance which makes it clear that the countryside is not the preferred location for solar developments. The applicant has not in our view addressed the alternative sites requirement of the legislation and has assessed the project on a very narrow basis (that presupposes the development must be built in this localised area of north Essex) and not in the sense of a wider context¹. It is undeniable that there are more suitable sites for such projects and until these are exhausted, the countryside should not be used.

Section 3 of the Environmental Statement lacks any meaningful analysis of alternative sites and is a whitewash. The applicant’s argument appears to rely on the fact that various White Papers and national/ international strategies require climate change to be addressed (which is not denied); however, no alternative sites have been assessed and the applicant has not complied with its obligations in this regard. Only a case for the proposed site has been put forward, premised on its proximity to an existing sub-station² (an argument which is misleading and is for the applicant’s convenience only).

The proposed site cannot be the only suitable space in the UK or the region. The applicant has not therefore complied with planning policy by not properly considering

¹ Environmental Summary: Non-Technical Summary (paragraphs 5.35, 3.36).

² Environmental Statement, NPI2716, Draft, November 2022 (paragraph 3.50).

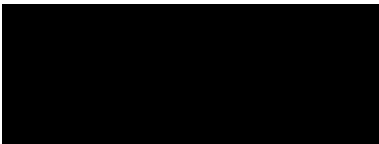
suitable alternatives or providing a compelling case as to why countryside is the only option.

2. The destruction of unspoilt English countryside in substantial quantity. This is surely undeniable and the applicant does not address in the additional documents submitted how this can be avoided in principle (because it cannot – should the development proceed).
3. The irony of potentially sacrificing arable land in exchange for a sustainable form of energy production which is counterintuitive to the objective of tackling climate change and promoting sustainable living. The applicant has not addressed the issue as to why the development is proposed on non-developed, agricultural land when planning guidance states this is not the preferred solution. The applicant has not answered the point as to why the loss of agricultural land is so necessary and has provided expedient justification by suggesting the land could be used for sheep (when it has previously been arable) and the fact that the development is only “temporary” for 40 years.³

It would be a travesty if these kind of developments are allowed to proceed in a haphazard way with no proper masterplanning and driven by private organisations simply seeking out willing landowners who see a way of making easy money from renting their land.

Finally, government guidance⁴ states: “The views of local communities likely to be affected should be listened to”. Suffice to say there is an overwhelming objection to this development in the local community for reasons that are obvious.

Yours faithfully



Ian Stumpf

For and on behalf of:

(Ian Stumpf

(Charlie Stumpf

(Edward Stumpf

(Beverley Stumpf

³ Environmental Summary: Non-Technical Summary (paragraphs 5.35, 3.36).

⁴ [Renewable and low carbon energy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/renewable-and-low-carbon-energy#solar-farms) <https://www.gov.uk/guidance/renewable-and-low-carbon-energy#solar-farms>