

Objection to Solar Farm on Land East of Pelham substation, Maggots End Manuden - Application number: S62A/2022/0011

To whom it may concern:

I am writing to object to the application to construct a solar farm comprising ground mounted solar photovoltaic (PV) arrays and battery storage together with associated development including inverter cabins, DNO substation, customer switch gear, access, fencing and CCTV cameras on land near Pelham Substation, Maggots End Road, Manuden. I still uphold the following objections to S62A/2022/0011

My name is Catherine Hutchings, and I live at [REDACTED]

The reasons for my objection 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... it would be the biggest solar farm in Uttlesford by some margin and one of the biggest in Essex.
- The land identified by Low Carbon as the site for Pelham Spring solar Farm extends to 196 acres. This important fact is not mentioned in the Planning Statement.
- The visual impact of such a huge solar farm would fundamentally change the character of the area

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

- In their Planning document Low Carbon refer to the Planning Guidance in relation to Renewables and low carbon energy. Paragraph 7 of this Guidance considers the criteria that should apply in relation to planning applications and notes that "*local topography is an important factor in assessing whether ... large scale solar farms could have a damaging effect on landscape and recognise that the impact can be as great in predominately flat landscapes as in hilly or mountainous areas*".
- As the heritage report notes "The topography of the site varies from approximately 105m above sea level and rises to approximately 120m above sea level in the northern and western extents of the site".
- There is a significant slope which rises up from Brick House Lane to Battles Wood (which is at the northern point of the site). The OS Map shows the contours of the eastern boundary of the site adjacent to Brick House End to be 108m above sea level. Battles Wood is therefore around 12m higher. As the panels are over 3m high, it follows that they

will be completely visible to walker, cyclist, rider or road user as they travel along Brick House End. It will be impossible to mitigate the significant visual impact of this industrial development by planting a hedge.

3. I am concerned about the impact of the development on the rich variety of wildlife on the site

- The site for the development is rich in ecology.
- Page 36 of the Ecological Impact Assessment concludes that it is possible that Greater crested newts are present on the site given that their presence has been detected in five ponds in close proximity to the site.
- A number of red listed bird species noted as being present on the site including skylarks, yellow hammers, yellow wagtails, linnets and song thrushes.
- A study carried out in 2016 estimated that **utility-scale solar farms around the US may kill nearly 140,000 birds annually**. One leading theory suggests birds mistake the glare from solar panels for the surface of a lake and swoop in for a landing, with deadly results.
- The Ecological Impact Assessment notes that hares are seen on the site but concludes that they are unlikely to be affected! How can this be true when their habitat is being ruined and the site is being surrounded by 2m high perimeter fence.
- The solar farm will completely change the character of Battles Wood. This is an ancient woodland and home to many wild animals including [REDACTED] and deer.
- Pump Spring is also an important woodland which is shown on the 1881 Ordnance Survey map. It will be completely surrounded by solar panels and other man made infrastructure.

4. Low Carbon have not demonstrated that the use of high quality agricultural land is necessary

- Eddie Hughes MP, 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.
- No evidence has been provided by Low Carbon to demonstrate that there has been consideration of other sites for a solar farm.

5. Low Carbon have not considered using roof tops

- 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 UTT/21/2664/SCO)**

6. **The solar farm is inappropriate development in the countryside**

- The development proposed by Low Carbon 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 ; 26 containerised inverters; 40 containerised battery storage units a DNO substation and Customer 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 low carbon 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

7. **The land will not remain in agricultural use**

- Paragraph 170 of the Planning Guidance on renewable and low carbon energy says where a proposal involves greenfield land it must proposal allows for continued agricultural use.
- Low Carbon have not provided any assurance on this point. They simply claim that "notwithstanding, the development would not result in the permanent loss of agricultural land" and that "Agricultural activities could coincide with the solar farm, such as sheep grazing, and following cessation of use, the land will be returned to full agricultural use", but I've never seen a single sheep on-site at the existing solar farms I have seen **anywhere**. Besides which, this is an arable area.
- I understand from a local small holder who has sheep that he would never consider allowing them to graze on a solar farm – how would he know if one of his flock was injured? He would not be able to see it underneath the solar panels
- In their consultation, Low Carbon stated that they would improve biodiversity on the site by keeping bees. There is absolutely no mention of bees in the Planning Statement. Besides which, Berden already has several bee keepers (one at Brick House End).

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

- The land to the East of Brick House End (in front of Battles Wood) slopes upwards towards the wood
- The land to the West of the development is a huge open field – there are no existing hedgerows
- The Planning Committee must visit the site to understand the full impact that this development will have
- The drawings of the panels submitted show that they will be 3.2 metres high
- Low Carbon’s claim that “the proposed development could be effectively integrated and assimilated into the surrounding landscape” is ridiculous
- 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, so do Low Carbon employ gardeners – I very much doubt this!

9. **Farmland should be used for farming**

- We need to ensure sustained food security.
- Low Carbon suggest that the majority of the land on the site is Grade 2 agricultural land. Over 81% of the site has been classified by Low Carbon as “best and most versatile” agricultural land.
- The Agricultural assessment is unreliable, because it does not reflect the actual site which is the subject of the planning application. For example, the area immediately to the West of Battles Hall has been included in the assessment but this is not part of the site.
- **This is productive farm land which should be used for farming and ensure our country’s food security.**
- 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.

10. **The local roads are not suitable for such large construction vehicles**

- 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.
- Low Carbon estimate that there will be a total of 922 vehicle movements during construction.
- This includes a total of around 749 deliveries by 15.4 metre articulated vehicles and of 59 deliveries by 10-metre-long rigid HGVs. The will be a substation measuring up to five metres long and three metres wide will be delivered to site individually by 15.4 metre artic vehicle.
- The road between Manuden and Clavering is a small country road. 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 primary school in Clavering – I am concerned about the safety of primary school children
- One of access routes will also pass directly in front of a secondary school – Joyce Franklin Academy – I am concerned about the safety of secondary school children.
- Lorries cannot possibly get under the low bridge in Newport.
- Permanent access to the site will be along a protected lane

11. **Low Carbon 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 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.
- Low Carbon's consultants conclude that the solar farm will give rise to no harm to the heritage significance of the Scheduled monument at The Crump, the Grade II Listed The Crump and former barn (now room) adjoining to north-west, the Grade II Listed Brick House, the Grade II Listed Rose Garth.
- It is surprising that the consultants conclude that the Brick House is best appreciated from its associated garden plot, particularly the front garden from where the main northern elevation can be experienced and understood. The consultants have not seen the building from the rear nor have they experienced the contribution made the adjoining land which abuts Pump Spring. The views from the Eastern window of the Brick House will be significantly impacted by the solar farm if it is constructed. There are no views from the house and the picture at Plate 29 does not give any indication as to the impact.
- The main views from Rosegarth are to the front of the building looking across the fields

which now form part of the site. Plate 31: purports to show “ the deliberate planting of trees on the opposite side of the road which will result in less clear views between the site and the asset during the summer months”. This not correct and the photo illustrates that most of the views are open. Despite the fact that the views from Rosegarth will be completely altered and the Consultants accept that there is “intervisibility between the land within the site and Rosegarth”, the consultant concludes that these are not key views and the land within the site is not considered to contribute to the heritage significance of the asset. This makes no sense at all.

- Elsewhere it is claimed that the ground floor views from Rose Garth would be interrupted by the roadside vegetation that forms the foreground to their eastward aspect. This is not correct – the current views are uninterrupted. The statement that “the magnitude of change for the residents of Rose Garth would be low at Year 1” and that the effects are likely to diminish as the site’s boundary vegetation matures further” are fanciful.
- It is accepted that Battles Hall, including the moated site, was under the ownership of Nicholas Calvert Esquire and the occupancy of Charles Brand who also owned and occupied a number of land parcels within the site. However, the consultants conclude that there will be less than substantial harm at the lower end of the spectrum to the heritage significance of the Grade II Listed Battles Hall, the Grade II Listed Dovecote and the Grade II Listed Cartlodge, with regards to setting.
- This seems to be extraordinary conclusion given the close connection between the buildings and the land.

12. There is no benefit to the local community

- There is no benefit of this development to the local community
- Local residents will not get cheaper solar energy
- There will be a loss of rural amenities such as footpaths with open views

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

- Low Carbon claim that the noise generated from the development will be minimal. However, they say that the inverters and accompanying batteries will be located at edge of the development zones.
- Table 11 of their Noise Assessment indicates that noise generated by the solar farm may exceed the noise target at by 1dB at the Brick House. This will impact multiple households on Brick House End particularly as the prevailing wind direction is from the South.
- There is NO background noise at present – this is quiet rural area.
- 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. Low Carbon make no mention of this equipment.

14. Low Carbon has ignored the views of local residents

- Low Carbon says that it has listened to all views expressed by local people during the pre-application consultation and has made appropriate changes to the proposed development to address and mitigate concerns raised where possible. This is not true.

Low Carbon received 133 comments on its proposal on its consultation website. Only 7 of those comments supported the development. Therefore 95% of the people responding were against the development. In addition Low Carbon received 69 emails objecting to its proposal.

- In the Consultation report which accompanies the Planning application Low Carbon admit that 5% of respondents were positive toward the proposals, 4% neutral and 92% negative. However, this does not reflect the comments sent by email.
- Low Carbon claims to have given “meaningful consideration” to the feedback received from the local community and has made a number of additions and changes to the design of the proposed development. There is no evidence of this.
- The 7 visual assessment submitted as part of the planning application were not shared as part of the consultation.
- Low Carbon claim that the evolution of the proposal is significant – it is not. It will still have an overwhelming impact on the countryside and on enjoyment of local residents.
- The overwhelming feedback was that the development should not go ahead. This has been ignored

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 Huddlestone 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 – why should Uttlesford?**

- 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!

- Low Carbon make frequent references to the fact that Uttlesford DC declared a climate emergency in 2019. But this is not a planning policy and is not relevant for the purposes of determining planning applications.

Yours faithfully

Dr Catherine Hutchings