

By email to: [section62a@planninginspectorate.gov.uk](mailto:section62a@planninginspectorate.gov.uk)  
The Planning Inspectorate,  
Major Casework Team,  
Room 3J Kite Wing,  
Temple Quay House,  
2 The Square,  
Bristol,  
BS1 6PN

17 February 2022

Dear Sir/Madam

**OBJECTION to Pelham Spring Solar Farm Application No. S62A/2022/0011:  
Land East of Pelham substation, Maggots End, Manuden**

I am writing to object to the application to construct a solar farm comprising ground mounted solar arrays together with battery storage, inverter cabins, a substation, fencing and CCTV cameras on land near Battles Farm on the grounds that this development is inappropriate in terms of size and scale (and therefore impact) and also on the grounds that the appearance of the development cannot be satisfactorily mitigated.

Paragraph 174 of the NPPF (Conserving and enhancing the Natural Environment) states that:

*Planning ... decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*

Uttlesford's Planning Policy S7 (The Countryside) also states that:

*.... In the countryside, which will be protected for its own sake, planning permission will only be given for development that needs to take place there, or is appropriate to a rural area. This will include infilling in accordance with paragraph 6.13 of the Housing Chapter of the Plan. There will be strict control on new building. Development will only be permitted if its appearance protects or enhances the particular character of the part of the countryside within which it is set or there are special reasons why the development in the form proposed needs to be there.*

Lastly, BRE's Planning guidance for the development of large scale ground mounted solar PV systems (which is endorsed by numerous of solar developers) advises that:

*Land selected should aim to avoid affecting the visual aspect of landscapes, maintain the natural beauty and should be predominantly flat, well screened by hedges, tree lines, etc and not cause undue impact to nearby domestic properties or roads.*

*The landscape / visual impact of a solar PV farm is likely to be one of the most significant impacts of such development. Developers may be attracted to southerly sloping sites, where solar gain is greatest. However such sites may be of high agricultural value and are likely to be more visible within the wider landscape.*

The land that has been selected by Low Carbon extends to 196 acres. The portion of the site below Battles Wood is sloping. I attach a photo of the site as **Appendix 1** to this letter. As the solar panels will stand around 3.2 metres high (according to Low Carbon) it will not be possible to mitigate their visual impact with hedges. In any event, hedges require both watering, weeding and pruning if they are to be established. The state of the hedging planted adjacent to the Battery Plant at Stocking Pelham almost 3 years ago suggests that the potential for hedges to disguise industrial developments of this sort is massively overstated (see **Appendix 2**). I very much doubt that Low Carbon plan to employ a team of gardeners to ensure that their hedges are maintained in tip top condition.

There is also the issue of sheer size of the development which is wholly inappropriate in this rural setting - particularly given its proximity to housing (including listed buildings). The development wraps around Brick House End and it will neither contribute to nor enhance the natural or the local environment.

When the original application made Low Carbon was submitted to Uttlesford District Council in 2021, the reasons given for refusal included the following:

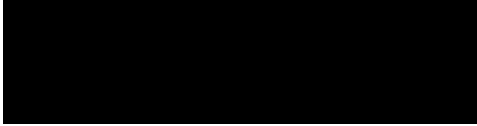
*“The proposal would introduce a sizeable new development to an area of open countryside and would result in an unnatural extension of built form in the locality. The proposals by reason of its sitting, size and scale would have a harmful impact upon the rural character and appearance of the area.*

*The proposals would significantly harm the intrinsic character and beauty of the countryside resulting in landscape and visual effects from a number of publicly accessible viewpoints and failing to perform the environmental role of sustainability, contrary to policy S7 of the Adopted Local Plan and the National Planning Policy Framework*

There have been no material changes to Low Carbon's application.

Planning permission should be refused.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

Jonathan Russell

A long black horizontal redaction bar covering the contact information.

cc Planning Department, Uttlesford District Council, Council Offices, London  
Road, Saffron Walden, CB11 4ER( 

A black rectangular redaction box covering the contact information.

Appendix 1 - a view of the Pelham Spring Site from Brick House End (showing Battles Wood)



Appendix 2 - picture of hedges around the Stocking Pelham Battery Plant (taken summer 2021)

