

9 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

7th March 2023

Inquiries and Major Casework Team
The Planning Inspectorate
3rd Floor
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

Via email to section62a@planninginspectorate.gov.uk

AND

Planning Department
Uttlesford District Council
Council Offices
London Road
Saffron Walden
Essex
CB11 4ER

Via email to [REDACTED]
[REDACTED]
[REDACTED]

Dear Planning Inspectorate and Uttlesford Planning Committee

**OBJECTION TO APPLICATION FOR CONSTRUCTION AND OPERATION OF A SOLAR FARM AT
LAND EAST OF PELHAM SUBSTATION, MAGGOTS END, MANUDEN
Application reference: S62A/2022/0011**

Following my previous objection to this application made when it was originally submitted to Uttlesford District Council in 2021, I am horrified to find that, following its refusal by Uttlesford at that time, there is now a further application to the Planning Inspectorate and that previous objections no longer count.

I understand that Uttlesford Planning Committee is now being consulted on this application as 'Statutory Consultees' and that it is meeting on 8th March to discuss its response to this application – I trust that, in line with their original refusal, Councillors will strongly recommend refusal of the application.

I am writing to again object to the application for a number of reasons:

- **The land is high quality agricultural land**, historically and currently in use for the production of arable crops, largely wheat and the majority of the site is classed as Best and Most Versatile; we cannot afford to lose agricultural capacity, particularly in the current global situation where we need to reduce our dependency on imports and where a recent study by Cambridge University suggests a shortfall of almost 5 million acres in only 7 years' time. Its use is also counter to the National Planning Policy Framework which makes it clear that large scale solar 'farms' should be constructed on 'brownfield,' previously developed and non-agricultural sites. There is a requirement that applications for construction on agricultural land demonstrate why its use is necessary and include compelling evidence to justify such a use. This should include which other sites have been considered, including options outside the local authority. Low Carbon's application does not demonstrate such a need to use agricultural land, it is entirely predicated on 'needing' to connect to the Pelham Substation (to keep their costs low and maximise profit) and it assumes there is a need for additional solar capacity whereas Uttlesford already has sufficient ground mounted solar to power a third more than its planned (2040) number of households. Uttlesford's Policy ENV5 is critical in this regard.

ENV15 is also relevant here. There is clearly going to be an adverse impact on the agricultural character of the landscape and on residential and recreational amenity for the many local residents and those who visit the area for leisure activities such as walking, horse-riding, cycling etc.

- **Effective industrialisation of the current agricultural land and surrounding rural communities** where the proposed solar 'farm' comprises:
 - solar panels, each mounted on a high table so they are 3m in height overall
 - 23 inverter units that are each the size of a shipping container
 - 36 containerised battery storage units
 - a substation compound
 - high perimeter fencing including CCTV units with infrared capability for use at night time

This will change the landscape significantly from its current natural open fields and public footpaths to one more akin to an industrial site.

- **Adverse impact on local wildlife** where we regularly see deer grazing and roaming through the fields and hedgerows, in their natural environment, and enjoy a variety of birds which are particularly threatened by solar panels, confusing them for water, along with other wildlife. In February 2022, Uttlesford District Council turned down this application from Low Carbon and its decision referenced protection of vulnerable wildlife in the area including great crested newts, bats and hazel dormice.

- **Adverse impact on enjoyment of the rural environment which is important for mental health and well-being** and where, along with many local residents and visitors to the area, I benefit from having the countryside on my doorstep. I chose to live here specifically because of the open spaces and the agricultural landscape with a variety of footpaths and routes to take directly from my house. The proposed site for the solar 'farm' will impact many of the regular routes taken, with current views across wide open fields becoming restricted and footpaths becoming narrow corridors between solar panels and other associated buildings – like walking through an industrial estate. Paragraph 155 of the National Planning Policy Framework makes it clear that the cumulative landscape and visual impacts of the proposed development must be considered – it is wholly negative – and it is essential that both Uttlesford and the Planning Inspectorate take a holistic view, bearing in mind the other current applications for solar 'farms' and battery plants impacting the same areas and communities.
- **Increased risk of both flooding and fire (from the sub-station and any new battery which is the subject of a separate planning application)** Large areas of solar panels will change the way that rainwater falls and soaks into the ground, air currents will change and large areas of the fields will be permanently shaded. Surface water drainage will be impacted and flooding risk increase. Should there be a battery fire – where there seem to be increasing numbers seen elsewhere – the rural location makes access for fire engines and emergency services difficult and there are issues with adequate water supply and pressure to fight a fire effectively.
- **Adverse impact on designated listed buildings, particularly St. Nicholas Church, Berden Hall and The Crump** as detailed in Essex County Council – Built Heritage's letter of 11th August 2022 (relating to an application from Statara re Berden Hall Solar 'Farm') which states that 'the site has remained historically open agrarian land which positively contributes to the rural character and setting of the heritage assets.' 'The proposed development is considered to result in a more industrial character contrary to the prevailing rural character of the site.' The letter suggests that the harm should be weighed against the public benefits of the proposal but I can see no public benefits in the proposal – it benefits the landowner and Low Carbon financially but Uttlesford already has sufficient ground mounted solar to power 132% of its households so does not need more. The listed buildings should continue to enjoy their established and intended rural character without suffering harm from this solar 'farm.'
- **Huge and adverse impact on local roads and residents during any construction** where proposed routes (and indeed, any route, given the location of the proposed development) are completely unsuitable as they include miles of narrow and winding country lanes – there are many places where two vehicles cannot pass at the same time and where heavy lorries would cause traffic chaos and delays, as well as damage the road surface which is not the best in any event with many potholes. The proposed routes through Newport or via Great Hormead will pass Great Hormead Primary School and Clavering Primary School, where parking at drop-off and pick-up times makes it difficult for even cars to pass safely and easily, but HGVs and construction traffic would make it particularly dangerous.

In summary, I am strongly opposed to the Pelham Springs Solar Farm proposal and trust that Uttlesford will recommend to the Planning Inspectorate that it is refused, and that the Planning Inspectorate will also refuse the application. Uttlesford's first consultation on its Local Plan under Theme 3: Climate Change confirmed that green infrastructure projects should be encouraged on sites that are unproductive and of low value with regards to landscape and views. The Pelham Springs site clearly does not meet those criteria. It also stated that solar plants should be restricted to brownfield sites of limited agricultural value whereas the proposed site is classified as Best and Most Versatile and is therefore of high value for arable use and should continue to be used for farming.

Thank you for considering my objection.

Kind regards

Andrea Morley