

[REDACTED]

The Planning Inspectorate
Major Casework Team
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4 March 2023

Sent by Email Only to : section62a@planninginspectorate.gov.uk

Dear Sirs,

**Objection to Planning Application S62A/2022/0011
Solar Farm on Land East of Pelham Substation, Maggots End, Manuden**

My name is Trevor Howard. I live at [REDACTED]

I am writing to object to the above Planning Application for construction of a proposed solar farm comprising ground mounted solar arrays, and including, but not limited to, 36 containerised battery storage units, 23 containerised inverters, a sub-station, perimeter fencing and CCTV cameras on land near Pelham Substation, at Maggots End, East End Road, Manuden CM23 1BJ.

The proposed solar farm is an inappropriate development in the countryside

There is no Statutory requirement for a solar farm to be located in the countryside. There is no Statutory requirement for a solar farm to be located adjacent, or near to, an existing sub-station. Significantly, there is no technical reason for a solar farm to be located adjacent, or near to, an existing sub-station. Similarly, there is no technical reason for a solar farm to be located in the countryside.

However, there is a considerable commercial and logistical benefit to the developer by locating the proposed solar farm in close proximity to a sub-station. The closer the proximity of the solar farm to the sub-station, the shorter the very expensive and complex cable run / feed-in connection to the National Grid via the existing sub-station and a reduced logistical issue and cost associated with obtaining access etc., across private land for the feed-in connection.

There are so many fundamentally negative aspects associated with the Application, it can only be reasonable to assume the Planning Application S62A/2022/0011 is commercially opportunistic and accordingly, should be considered as such by the Inspectorate / Local Authority.

In addition to the foregoing, I submit the following in support of my objection to this commercially opportunistic Application:

- 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.
- In addition, the site is very close to the numerous listed buildings and scheduled monuments. I do not accept that Low Carbon's proposed solar farm would in any way, 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
Low Carbon's claim that *"the proposed development could be effectively integrated and assimilated into the surrounding landscape"* is both disingenuous and absurd.
- 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. Low Carbon's Application does not appear to either cover or provide for this necessary maintenance.

The size of the development simply too big

- Uttlesford's Policy ENV15 states 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
- Low Carbon's proposal is **not** a "small scale" scheme.
- 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.
- If approved, this would be the biggest solar farm in Uttlesford by some margin and one of the biggest in Essex.
- The visual impact of such a huge solar farm would fundamentally change the character of the area.
- The scheme will not contribute to the energy needs of local residents. 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 focuses on renewable energy 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.

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

- In its Planning document, Low Carbon refers 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*".
- The majority of the site is sloping and it is not possible to "hide" the solar farm.
- 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 walkers, cyclists, riders or road users 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.

I do not want to walk through a solar farm

- Low Carbon defines visual amenity as the "*Overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area.*"

- There are eight local Public Rights of Ways within, and immediately adjacent to the site, comprising of one Bridleway and seven Footpaths.
- As a local resident I frequently walk along these footpaths.
- Because the fields slope upwards, the solar farm will be visible at all times of year.
- Access to open countryside is particularly important these days - it makes a significant contribution to my mental well-being.
- I do not accept that the impact can be satisfactorily mitigated by planting hedges - there is no existing hedgerow.
- The planting adjacent to the existing battery plant adjacent to the Substation at Stocking Pelham demonstrates that hedges do not provide adequate screening.

Enjoyment of the countryside will be ruined

- I regularly walk and exercise along the single track lane between Manuden and Furneux Pelham (East End Lane) and have done so for many years.
- I understand that this is listed as a Protected Lane (UTTLANE152). In its 2012 assessment of East End Lane, Uttlesford scores the lane at 15. Importantly, the score in relation to Aesthetic value is "2" which reflects the fact that the lane has a variety of aesthetic features or forms / alignment and / or a significant view
- The views along this lane will be significantly and negatively impacted by the construction of huge numbers of solar panels and the associated infrastructure.
- The lane is not heavily trafficked and cycling / walking and riding etc., along it is a peaceful and solitary experience in the middle of the countryside.

impact of the development on the rich variety of wildlife

- The proposed 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.
I see many birds of prey, including Red Kites, Buzzards and Goshawks swooping the area for food and nesting etc.. I also see Ravens, Owls and a multitude of smaller birds and Hares using this wonderful area of nature, which I fear will undoubtedly, be lost as a consequence of this ill-considered, commercially opportunistic proposal. 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.
- I frequently see Roe deer wandering across the site because they shelter in Battles Wood. These beautiful creatures will be lost.

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. There 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 construction vehicles will pass directly across the front entrance of the primary school in Clavering thereby increasing the danger to the safety of the primary school children and their parents at this particularly hazardous location.
- One access route will also pass directly in front of a secondary school - Joyce Franklin Academy. Similarly, increasing the danger to the safety of the secondary school children and their parents in the area of this at this hazardous location.
- Lorries cannot possibly get under the low bridge in Newport.

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 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.
- 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 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 by 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 *Rose Garth* 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 is 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.

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 the edge of the development zones.
- Table 11 of their Noise Assessment indicates that noise generated by the solar farm may exceed the noise target 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 necessary cooling equipment.

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 simply 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

I trust the Inspectorate / Local Authority will very carefully consider the foregoing together with all other submitted objections and reject the Planning Application.

Yours faithfully

T M Howard

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