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26th March 2021

Low Carbon Group Limited
Second Floor
13 Berkeley Street
London
W1J 8DU

Dear Sirs

**Public Consultation for Proposed Pelham Spring Solar Farm and Battery Storage
Location: Land Near Pelham Substation Maggots End Road Manuden/Berden**

This letter is jointly written by the above two Parish Council's in response to your public consultation letter regarding the above development proposal. We also refer to the meeting with Berden Parish Council on 1st March 2021 and your subsequent email of 23rd March 2021.

We have the following collective comments in this regard:

1. Low Carbon Public Consultation – The early closure of the public consultation exercise makes a mockery of both the process and the very ethos of community engagement as advocated by the Localism Act and NPPF. This goes against everything that has been said by Low Carbon to date. We note that you now state on the consultation website that you "have taken the decision to close the consultation early to carefully review and consider this information before we progress any further with the project." Can you please tell us why you have taken this decision and what you are now intending to do?

We will be writing to Nigel Brown, the UDC Development Manager (copied to the Chair of the Planning Committee) to highlight this and reinforce the need for an Environmental Impact Assessment and Environmental Statement and to ensure that no planning application is validated without one.

We will also highlight the failings in the Low Carbon feedback form as previously highlighted by Berden Parish Council.

Berden Parish Council held a meeting on Tuesday to determine their position, having carried out their own survey (see below) and found that the majority of residents are of the same view.

2. Berden Parish Survey – Given the nature of the proposal, Berden Parish Council have carried out their own survey in the Parish with a simple 'yes' 'no' form and inviting comments.

A substantial 97 responses have been received from households (not people) in the Parish (which were not duplicated as on coloured paper and with name/address provided except for 7 anonymous forms).

Of these 97 responses, a staggering 86 are against the proposal (87%).

Berden Parish Council have further received a number of comments and reasons for objection together with separate emails and letters expressing detailed views and opinions.

3. Manuden Parish Survey – Similarly, Manuden Parish Council have carried out a survey using a simple online form with responses ranging from “Strongly Opposed” to “Strongly in Favour” and an invitation to comment.

Again, a very high response was received with 119 responses and an overall 80% against, with 68% being strongly against.

Given the short notice and very limited time frame this gives Manuden Parish Council a mandate to object to the proposal.

4. Joint Parish Council Responses – Based on the two clear and unequivocal survey responses from the two most affected Parishes and comments made by respondents, we can outline our objection to the proposal as below.
5. Grounds for Objection – Whilst there is a need to see and assess the full documentation which will be submitted with the planning application (including an Environmental Statement), our initial view is that the reasons for objection include the following:
 - Visual impact on landscape, open space and industrialisation of the countryside;
 - Impact on heritage assets;
 - Lack of a sequential test to consider more appropriate and suitable alternative locations with less impact;
 - Overbearing and significant scale and size of the proposal (180 acres);
 - Loss and misuse of grade 2 agricultural land;
 - Impact on residential properties;
 - Inability to properly screen the panels and plant due to existing rising ground levels;
 - Impact on footpaths and public rights of way;
 - Absence of any cable route (as referred to in the feedback form);
 - Construction access and traffic (in particular through Manuden);
 - Impact on drainage and flood risk;
 - Ecological and biodiversity impact
6. Joint Position Statement - Having given due consideration to your Pelham Solar Farm proposal and having considered all the ramifications involved, including the national need for renewable energy, we, the three most affected Parish Councils, knowing that we have the support of all our fellow councillors and the vast majority of our electorate, will be rejecting this proposal.


We are all of the same opinion that this proposal will be damaging to our communities, our natural & farming environment and the beauty of the Stort Valley. We already have more than our fair share of grid station, battery unit, pylons and associated cables.

Action groups have been formed in Berden and our councils and communities will be doing their utmost to support them.


You should understand that we intend to speak with one voice. Any attempt to engage in individual negotiations with one Parish Council in order to develop a proposal which you consider to be more acceptable to that particular Parish will be rejected.

This is the wrong place for a solar farm.

Yours faithfully,



John Burton
Chair
Berden Parish Council



John Archer
Chair,
Manuden Parish Council