

**SECTION 62A PLANNING APPLICATION: S62A/2022/0011**

**OBJECTIONS TO PELHAM SPRINGS SOLAR FARM**

1. These objections are submitted by and on behalf of the Hill family (address provided below), who *together* have known the hamlet of Brick House End - and the listed Brick House Farm in particular - for a total of well over one hundred years. We are all regular visitors to Brick House End. We have arrived by car, by bicycle and on foot. We have walked the footpaths, observed the seasonal farming of the excellent agricultural land at Battles and frequently admired the scattered historic buildings and ancient sites which sit within this predominantly agricultural landscape - with its woods, copses and hedgerows. All that will change (certainly for the remainder of two of our lifetimes) if productive agriculture is replaced with an endless sea of plastic panels for 40 years and the hamlet of Brick House End is effectively surrounded, hemmed in, on three sides by a vast solar farm.
  
2. Our objections are focused on matters which flow directly from national guidance on large scale solar development in the Government's Planning Practice Guidance.
  
3. The most salient elements of National Policy which provide locational guidance for large scale solar proposals (drawn from the PPG) are considered to be as follows (largely cited *verbatim*):
  - i. The deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes. This latter factor is re-

emphasised by the later reference in the guidance to “appropriate land topography”, with the clear inference that topography can be either “appropriate” or “inappropriate” for large scale solar developments.

- ii. Particular factors a local planning authority will need to consider include:
  - a. encouraging the effective use of land by focussing large scale solar farms on previously developed and non-agricultural land, provided that it is not of high environmental value; and
  - b. where a proposal involves greenfield land, whether the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land.
- iii. the proposal’s visual impact, the effect on landscape of glint and glare...and on neighbouring uses.
- iv. the need for, and impact of, security measures such as lights and fencing.
- v. Depending on their scale, design and prominence, a large scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset.

4. There also remains the key issue of cumulative impact, given the extraordinary focus of solar applications in the countryside of this part of Essex & Hertfordshire. This arises both generally and directly as a consequence of the application being for EIA development.
5. Measured against the key elements of national planning policy set out above, this application fails on a wide range of grounds.

#### Topography

6. The extensive eastern part of the site is on undulating land, rising from Brick House End to Battles Wood, an area well traversed with footpaths and with clear views both from within and around heritage assets in the hamlet, such as Brick House Farm and Rose Garth. It does not respect the clear direction of national guidance to avoid undulating topography, which inevitably results in a much greater area of visual influence than is apparent from a flat, well contained and screened site. This part of the site, in particular, is fundamentally ill-suited to solar development, as the rising ranks of solar panels will appear like the scales of a vast armadillo.

#### Sequential approach and “site selection”

7. The proposal is not on previously developed or non-agricultural land.
8. The proposed use of agricultural land has not been shown to be necessary, nor has poorer quality land been used in preference to higher quality land.

9. At this point, it is necessary to consider the submitted document which calls itself the “Alternative Sites Assessment”. Government policy has been broadly expressed and its clear purpose (to avoid the sterilization of Best and Most Versatile agricultural land for 40 years) must not be subverted by a self-fulfilling application of the sequential approach. And is clear that the vast majority of the application site (over 80%) is Best and Most Versatile agricultural land, which national policy is seeking to protect.
10. It simply cannot be correct to approach this essential exercise by reference to a “grid connection offer” which was inevitably made to support the application being considered and the deal made by the applicant with the landowner. The critical operational fact about the “national grid” is that supply to it can be made from an extremely wide variety of locations remote from the principal area of power consumption (for example, the vast offshore wind farms in the North Sea, which are supplying power to the UK mainland grid).
11. National policy flows from an approach to farm & food security which requires the country to conserve its best agricultural land. This cannot be swept aside because the applicant has “done a deal” for a grid connection to support its own application and doesn’t want to look further afield. Virtually every farmer in lowland England with the potential for a grid connection will have received letters from solar developers seeking to sign them up. That is the way that the solar development industry has chosen to operate. It does not start from a point of screening out Best and Most Versatile agricultural land, seeing what remains and focusing on those options.

12. There is absolutely no sense that a sequential site search preceded this application.

The land deal came first and then attempt to justify it came second.

13. The validity of a sequential approach depends entirely upon the parameters for the search and the rigour with which it is pursued. The very limited effort which comprises the “Alternative Sites Assessment” focuses on a tiny area within a 4km/2.5mile radius of the grid connection and then looks in a very cursory way at other land solely within Uttlesford District, without even attempting to assess what proportion of the Grade 3 land might be Grade 3b and thus not BMV land. Quite apart from this criticism, there is no attempt to assess land in East Herts district which is just as close or other nearby (or more distant) districts, with Grade 3b, 4 or 5 agricultural land.

#### Landscape impacts

14. The LVIA, however lengthy, is not considered to capture the nature and scale of change which will be imposed upon the historic hamlet of Brick House End, focused on the listed Brick House, when it is hemmed in on three sides by solar development, visible and ever-present in all approaches by road, on foot, bicycle or horse.

#### Heritage impacts

15. These are brushed away by the applicant’s report, but are in fact far from insubstantial, as Historic England notes. The heritage assets affected all depend to a significant degree for their significance upon their agricultural setting. This will all be

materially diminished by the substitution of fields of growing crops with a vast solar-scape, fringed with security fencing and cameras.

Amenity impacts arising from surrounding residential properties with solar arrays

16. Even the applicant's own reports admit to "major adverse and significant visual effects" to several residential properties at Brick House End. This is in fact the likely impact for all the houses in the hamlet. It is simply not acceptable for such impacts to be inflicted on the innocent residential occupiers of the hamlet.

Cumulative impact assessment

17. It is considered that the EIA fails to assess or assess accurately the cumulative impacts of this very substantial development alongside the other very large solar developments in the immediate vicinity of the application site.

Summary & Conclusion

18. In summary, it is requested that the application be refused. We would like to attend a hearing if one is proposed.

**Tom & Kate Hill and family**

[REDACTED]

**20<sup>th</sup> March, 2023**