

From: [REDACTED]

Sent: 15 March 2023 20:45

To: Section 62A Applications <section62a@planninginspectorate.gov.uk>

Subject: Objection to Solar Farm on Land East of Pelham substation, Maggots End, Manuden - Application number: S62A/2022/0011

Dear Sir or Madam,

I am writing to object to the application to construct a solar farm comprising ground mounted solar arrays together with (among other things) battery storage, inverter cabins, a substation, fencing and CCTV cameras on land near Pelham Substation Maggots End Road Manuden CM23 1BJ.

My name is Ulrike Maccariello, I reside at [REDACTED].

The reasons for my objection are as follows:

The size of the development simply too big

- Uttlesford's Policy ENV15 says 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
- This is not a "small scale" scheme.
- The area covered by solar panels is even larger than the area which was contemplated at the time of the application to Uttlesford District Council for a Screening Opinion.
- 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 cumulative effect of the solar farm and the adjacent industrial battery storage facility is unacceptable

- Paragraph 155 of the National Planning Policy Framework makes it clear that the adverse impacts of solar farms must be addressed satisfactorily and that the cumulative landscape and visual impacts of the proposed development must be considered.
- The cumulative impact of the hugely visible and poorly screened battery storage facility and the proposed solar farm will completely industrialise this rural area.
- The size of the proposed solar farm is excessive. The location has not been chosen because of its suitability but because it will be cheap for the developer.

The Developers have not demonstrated that the use of high-quality agricultural land is necessary

- Eddie Hughes MP, a Minister at the Ministry of Housing, Communities and Local Government confirmed in June 2021 that there the statements made by Eric Pickles in 2015 are still applicable. Therefore, Uttlesford must consider whether the use of agricultural land has been shown to be necessary.
- Uttlesford's Policy ENV5 also says that development of the best and most versatile agricultural land will only be permitted where opportunities have been assessed for accommodating development on previously developed sites or within existing development limits. Where development of agricultural land is required, developers should seek to use areas of poorer quality except where other sustainability considerations suggest otherwise.

- As the land identified for development is high-quality agricultural land its use must be justified by the most compelling evidence.
- 19 October 2014, Liz Truss (then a DEFRA Minister) said the following:
 “English farmland is some of the best in the world and I want to see it dedicated to growing quality food and crops. I do not want to see its productive potential wasted and its appearance blighted by solar farms. Farming is what our farms are for, and it is what keeps our landscape beautiful. I am committed to food production in this country, and it makes my heart sink to see row upon row of solar panels where once there was a field of wheat or grassland for livestock to graze. That is why I am scrapping farming subsidies for solar fields. Solar panels are best placed on the 250,000 hectares of south facing commercial rooftops where they will not compromise the success of our agricultural industry”.

The Developers have not considered using roof tops.

- The Building Research Establishment announced in 2016 there were around half a million acres of rooftops facing in the right direction for solar panels. Why haven't these been considered?
- It is no longer credible to argue that solar panels on industrial roofs can't be used because they are too heavy
- Why not place solar panels on the rooftops of the huge terminal buildings owned by Stansted airport?
- Clearly Stansted airport don't think that there is a problem with this because they have just applied for planning permission to put solar panels on their own land (see S62A/22/0000004)

The solar farm is inappropriate development in the countryside

- The development proposed 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 containerised inverters and a 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.
- I do not understand how a massive solar farm which is an industrial development can possibly enhance the natural environment.
- The site is very close to the numerous listed buildings and scheduled monuments I do not accept that it can possibly 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

The land will not remain in agricultural use

- Paragraph 170 of the Planning Guidance on renewable says where a proposal involves greenfield land it must allow for continued agricultural use.
- The Developers have not provided any assurance on this point.

The visual impact of this huge development cannot be satisfactorily mitigated.

- The Planning Inspector must visit the site to understand the full impact that this development will have
- The proposed development cannot be effectively integrated and assimilated into the surrounding landscape.
- 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

Farmland should be used for farming

- The majority of the land on the site is Grade 2 or Grade 3a agricultural land which is “best and most versatile” agricultural land.
- This is productive farmland which should be used for farming.
- We currently import more than 40 per cent of our food, and recent threats by countries to ban exports of vaccinations have highlighted the threat that similar bans could be imposed on food if countries are themselves short of supplies in the future.
- It is predicted that we will need to produce 56 per cent more food by 2050 due to increasing populations. We have not increased food production by 56 per cent in the last 30 years, and if we continue to build on farmland, we have no hope of achieving it in the next 30 years either.
- New research from the CPRE has found almost 14,500 hectares of the country’s best agricultural land has been permanently lost to development in just 12 years. The research has found that there has been a huge rise in BMV agricultural land set aside for housing and industry between 2010 and 2022, from 60 hectares to more than 6,000 hectares per year.

There is no benefit to the local community

- There is no benefit of this development to the local community. Residents do not wish to be “bought off” by the offer of modest amounts of funding. The loss of the countryside is irreplaceable.
- Local residents will not get cheaper solar energy
- There will be a loss of rural amenities such as footpaths with open views

The Noise associated with the development has not been fully considered and is not acceptable

- The Developers claim that the noise generated from the development will be minimal. However, the inverters will be noisy and will add to the noise from the substation.
- 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.

Yours faithfully

Ulrike Maccariello

[Redacted signature]

[Redacted contact information]