

**From:** Wendy [REDACTED]

**Sent:** 10 March 2023 18:02

**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

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 Wendy Riddell and I live at [REDACTED]  
[REDACTED]

The reasons for my objection are as follows:

### **The visual impact of this huge development cannot be satisfactorily mitigated**

- 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.
- The solar farm will completely change the character of Battles Wood. This is an ancient woodland and home to many wild animals including badgers and deer.
- Pump Spring is also an important woodland which is shown on the 1881 Ordnance Survey map. It will be completely surrounded by solar panels and other man made infrastructure.
- 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.

### **We need good quality farmland for farming**

- This is productive farm land which should be used for farming. Over 81% of the site has been classified by Low Carbon as “best and most versatile” agricultural land. As the land identified for development is high-quality agricultural land its use must be justified by the most compelling evidence.
- The Agricultural assessment is unreliable, because it does not reflect the actual site which is the subject of the planning application. For example, the area immediately to the West of Battles Hall has been included in the assessment but this is not part of the site.
- Eddie Hughes MP, 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.

- No evidence has been provided by Low Carbon to demonstrate that there has been consideration of other sites for a solar farm.

#### **The 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 edge of the development zones.
- Table 11 of their Noise Assessment indicates that noise generated by the solar farm may exceed the noise target at 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 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 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

#### **There are listed building close by**

- 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 heritages 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 Crump, 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 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 Rosegarth 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 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.

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

- In their Planning document Low Carbon refer 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.
- 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 walker, cyclist, rider or road user 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 am concerned about the impact of the development on the rich variety of wildlife on the site**

- The 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.
- 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.