



The countryside charity

Essex

RCCE HOUSE

THRESHELFORDS BUSINESS PARK, FEERING, COLCHESTER, CO5 9SE

Planning and Building Control  
Uttlesford District Council  
Council Offices,  
London Road,  
SAFFRON WALDEN  
Essex  
CB11 4ER  
For the attention of William Allwood

Dear Sirs

**Solar Farm application, Land to the West of Thaxted (UTT/21/1833/FUL)**

CPRE Essex have serious worries in relation to this application and write to register our objection. Prompted by the number of increasingly large solar farm schemes coming forward in Essex, and Uttlesford in particular, we recently adopted a policy in relation to this form of development (copy attached to e-mail). The development proposed at Cutlers' Green is in conflict with this policy in a number of respects and we would strongly urge you to refuse permission. We have a significant number of members in your District and we understand that many of them have signed a petition urging your Council to adopt a policy that would ensure that no further harm is done to the Uttlesford countryside by the development of solar farm installations. There are now in excess of 700 signatures to the petition which reflects the views of local residents and it is clear that our concerns are widely shared and our objections well supported.

We will for convenience set out our specific concerns under headings below.

**POLICY CONTEXT**

This application will be judged against planning and other related policy and guidance. It is our belief that it fails to satisfy the principles set out in a number of relevant documents.

## National Policy

Following nationwide concern about the environmental impact of solar farms a ministerial statement (HCWS 488,2015) from DCLG was issued in 2015. This states in no uncertain terms: *Meeting our energy goals should not be used to justify the wrong development in the wrong location and this includes the use of high quality land. Protecting the global environment is not an excuse to trash the local environment*. It goes on to say *Any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence*

These sentiments are echoed in both the NPPF and the PPG where it is stated that development should be focused on previously developed land and non-agricultural land.’ Where the use of green field land is proposed this has to be ‘necessary’ and poorer quality land should be used in preference to higher quality land. The BRE planning guidance elaborates further saying ‘National Planning Policy would not normally support development on the best agricultural land’ and again emphasises the need to use ‘previously developed land, contaminated land or agricultural land of classification 3b, 4 or 5. In this instance the applicants have not only failed to provide the ‘most compelling evidence as to why this development needs to take place on high quality land; they have not provided any evidence to that effect at all.

It is worth pointing out that national planning policy also stresses the need to protect the landscape and refers to ‘sustaining and enhancing the significance of heritage assets’.

It will be obvious that this proposal not only fails the various national policy tests in terms of land quality but is also and unquestionably, detrimental to both landscape quality and the setting of important heritage assets.

## Local Plan policy

There are a number of Local Plan policies that are directly relevant to the determination of this application:

**Policy S7** deals specifically with development in the countryside. Despite some debate over the conformity of this policy with the NPPF it has been determined by inspectors in many recent appeals that the principle of protecting the countryside is entirely consistent with the aims of the NPPF. Policy S7 states that development in the countryside will only be permitted if it needs to be there or is appropriate to a rural area. It goes on to say that it will only be permitted if its appearance protects or enhances the particular character of the part of the countryside within which it is set. Not only does an industrial development on this scale fail to protect or enhance the character of Cutlers’ Green, but there is absolutely no need for it to be there. DECC has confirmed that there are millions of square feet of south facing roofs on industrial space in the UK. It is obvious that there is

ample scope for an equivalent amount of development to take place where it does not harm the rural environment nor use productive farmland.

The development also fails to meet the requirements of **Policy GEN 2** in that it is clearly not compatible with the scale, form, layout, appearance and materials of surrounding buildings. Indeed, it is entirely at odds with the surrounding listed buildings.

Whilst **Policy ENV15** does refer to solar it is only permissive of 'small scale' schemes and only if they do not adversely affect the character of sensitive landscapes. This could never be described as a small scale scheme and could not do anything other than harm the surroundings within which it is set.

### **National Energy Strategy**

In pursuing its carbon cutting ambitions the government has published many policy papers dealing with renewable energy. These concentrate very largely on off-shore wind rather than solar as a source of renewable energy. In ***Build Back Green (Oct 2020)*** it is proposed that off-shore wind capacity should be increased three-fold. In the ***10 Point Plan for a Green Industrial Revolution (Nov 2020)*** renewables are only considered in the context of off-shore wind.

### **THE INEFFICIENCY OF SOLAR FARMS**

The applicants state that the scheme is capable of supplying power to 13,000 homes. One wind turbine in the North Sea has the capacity to power 16,000 homes. When the surface area of the space occupied by each generator is compared it will be seen how wasteful of our land solar farms are. Similarly, in terms of efficiency rating (i.e. the amount of power exported to the grid, solar's rating is between 11 and 15% whereas for off-shore wind the figure is 50%+. On one day last year it has been reported that 78% of the UK's electricity came from off-shore wind.

### **LOSS OF FARMLAND**

The whole of the site over which the applicants have an option was classified as Grade 2. This has been confirmed by Uttlesford in their response to the EIA screening request. Grade 2 land is classified as 'Best and Most Versatile' and as such there would be a presumption against its use for solar farm purposes.

The amount of arable land in the UK is in decline. It currently stands at 6 million has. which is the lowest since World War 2. In fact, land is being taken out of cultivation at a rate of some 40,000 has. per annum. At the same time yields are declining as is land quality due to the effect of global warming. So, production potential is already

diminished and we cannot afford to lose further parcels of arable land to development that has no need to be there.

The applicants have submitted a report by their own consultants which seeks to re-classify the Cutlers' Green land. As will be seen however from other evidence submitted by objectors to this project, not only was their method flawed but it is remarkable how their results remove significant areas from the 3b classification thereby reducing the amount of 'Best and Most Versatile' land. Their conclusions are however rather meaningless without any details as to the recent cropping and yields history of the land. That would be the most appropriate measure of productivity and a proper indicator of the opportunity cost of the site.

## **IMPACT ON THE LANDSCAPE**

It is first worth referring to the work done by Chris Blandford Associates for the local authorities in north-west Essex in 2006. In that study this area is identified as a part of the 'Thaxted Farmland Plateau', where it is stated that the landscape pattern is 'sensitive to potential large-scale development' and has 'a relatively high sensitivity to change'. The guidance is to 'conserve the open views'. It is quite clear therefore that a development on this scale consisting of seemingly never-ending uninterrupted rows of glass panels would have a dramatic effect on an important local landscape. Local Plan policies militate against development in this area specifically in order to preserve the beauty of the countryside and the outstanding rural setting of historic settlements such as Thaxted.

There are a number of Public Rights of Way that traverse the site starting from Cutlers' Green itself, in the vicinity of Richmonds-in-the-Wood; Debden Green off Henham Road; and off Bolford Street adjacent to Water Hall. The visual impact on these routes would be dramatic. Views across open fields would be replaced by an industrial landscape of metal, glass and containers set within a vast compound of security fencing together with the added intrusion of security cameras. Any attempt to mitigate the impact with new planting would largely be futile as new vegetation would take time to mature and no benefits would be seen for some 15 years. The setting of tree belts and other features that define the landscape will be completely changed. Perhaps of greatest concern in terms of visual intrusion however is the effect on the approach to Thaxted. Bolford Street between Debden Green and The Borough provides some of the most remarkable views of Thaxted with the church and windmill juxtaposed to highlight the glory of one of East Anglia's most visually attractive villages set within its unaltered medieval landscape. The Grover Lewis report on heritage setting which provided supporting evidence for the Thaxted Neighbourhood Plan highlighted the importance of this 'gateway' into Thaxted as did the 2009 Historic Settlement Character Assessment commissioned by Uttlesford District Council. The fundamental point about this approach to the village is that the Conservation Area is so perfectly framed within its original historic landscape. That wide open view would be destroyed by the intrusion of security fencing and floodlighting along its southern periphery.

## **IMPACT ON HERITAGE SETTING**

As identified above one of the most significant issues in relation to the setting of Thaxted's heritage is in relation to the distant views of the settlement contained within its unaltered landscape. There are however specific issues associated with individual heritage assets which are inadequately dealt with in the applicants' heritage statement.

**RICHMONDS-IN-THE-WOOD** - dating from the 14th to the 16th century and listed Grade II, Richmonds was one of the sub-manors of Thaxted. It retains much of its medieval heritage and its agrarian character with adjacent early barns. Its agricultural setting which determines its character as a former working farmstead will be destroyed with its original land-holding covered by industrial development and the house itself surrounded by security fencing, floodlighting and all of the infrastructure required for such a project.

**LOVES FARM** - another farmhouse with medieval origins and one of the original farms on the Horham Hall estate. It contains many original timbers and staircase features. The impact on its rural setting has again been seriously down-played by Pegasus with wholly inadequate photography and no proper assessment of the impact on the appreciation of this asset.

**HORHAM HALL** - dating from the late 15th century this is generally regarded as one of the most important Tudor houses in Essex. The Great Hall with its fine Oriel Window is outstanding. No attempt has been made to even consider the impact on its setting and it has presumably been conveniently ignored on the basis of its distance from the solar farm (section 6 of the Pegasus report). It is however highly likely that the panels will feature strongly in distant views from the house situated on land that was part of its original estate.

**THAXTED PARISH CHURCH** - The church of St. John the Baptist is one of the finest parish churches in England. Pegasus see its significance as being derived from its 'architectural, artistic and historic interest and as an example of a medieval church with later additions'. Whilst that is undoubtedly damning it with faint praise the true glory of Thaxted church is its dominance in its surrounding rural landscape and its association with the neighbouring John Webb's windmill. Pegasus seem to see its setting as being confined to its immediate surroundings yet its 180 foot spire can be seen for miles around with some of the most important views being from Bolford Street. To destroy such outstanding views with an intervening industrial wasteland would be one of the worst acts of heritage vandalism of the modern era.

### **CUTLERS' GREEN**

As noted by Pegasus there are many listed buildings on and around Cutlers' Green. Whilst they are no doubt of merit in their own right, the importance of Cutlers' Green is in its collective whole, its historical associations and its completeness as a rural

settlement. Its character would be destroyed by a development of this nature. No discussion on this point appears in the Pegasus report.

As the Countryside Charity we are clearly concerned about the effect of developments such as this on the landscape and the rural environment but the setting of heritage assets is clearly a very significant part of that.

## **IMPACT ON WILDLIFE AND BIODIVERSITY**

There has been limited research into the long term impact on the natural world of land being used for solar energy purposes for up to 40 years. There are however a number of points that are obvious:

- A continuous (literally miles) of security fencing will act as a barrier to transitory animals. There is a very large deer herd that roams this particular landscape. With traditional routes closed to them they will be diverted onto roads with the inevitable increase in the number of accidents.
- Birds and bat deaths will increase as the glass panels are mistaken for water
- Ground nesting birds such as lapwing, plover and skylarks will be deprived of their natural habitat within cropped fields.
- There is considerable uncertainty over the condition of the soil after a 40 year period of solar plant use. Large areas will have been in permanent shadow and deprived of rainfall while other areas will simply become channels for rainwater run-off. Whether this condition differential could ever create a satisfactory growing environment again is highly doubtful. The applicants provide no proof that it could.

## **LASTING HARM**

The applicants are seeking a 40 year permission period. It is highly likely that the PV panels in use today will be obsolete long before the expiry of that period. It is also likely that in perhaps 20 years time a better alternative source of renewable energy will have been found which begs the question of what will happen to the site at around the half way stage of its life-span. It will be a brown-field former industrial site. The planning committee needs to consider what its long term future might be. It is an entirely unsustainable location for housing development. There is also very considerable uncertainty over the ability and viability of recycling solar panels. Experience in the United States suggests that many have already been sent to land-fill.

Developers and their investors are usually quite happy to enter into a bond arrangement with the landowner and local authority knowing that on a discounted cash-flow basis the cost in 40 years' time in present value terms, is very small. Indeed, the bond entered into in relation to the Terrier's Farm development, which doesn't even come into effect for 15 years, would appear to be completely worthless.

In summary, it only need be said that there is uncertainty and very serious concern about the long-term future of these sites.

### **CUMULATIVE IMPACT**

We have already highlighted the number of solar energy projects being promoted in the Uttlesford District. Around Thaxted alone there are already Terriers Farm and Spriggs Farm which combined amount to some 200 acres. With ColeEnd and Cutlers' Green there would be nearly a further 300 acres of productive arable land, concentrated around one village, taken out of food production with a dramatic change to a highly sensitive landscape. We believe there are better ways to generate electricity from renewable sources.

Yours faithfully,

Richard Haynes – CPRE, Essex