

I would like to address you today on Uttlesford's proposed planning policy for renewables.

It cannot have escaped your notice that Uttlesford has become the "go to" destination for solar farm developers. The location of these solar developments is driven not by thoughtful planning considerations but by the willingness of farmers to offer their land for development. Despite clear government guidance requiring that the use of BMV land must be justified by the most compelling evidence, none of the solar farms approved by Uttlesford to date have been the subject of a genuine site selection exercise.

I applaud the intent of Core Policy 23 which requires that renewable energy must be generated on-site for all new developments. However, I accept that this policy can not address the generation of renewable energy for existing buildings. It follows that Uttlesford can expect more applications to develop large scale solar farms.

Uttlesford has already approved 163 MW of ground mounted solar generation capacity. If the proposed developments at Cutlers Green and Berden Hall are approved this will rise to 253 MW. Based on consumption figures put forward by developers, 253 MW is sufficient to power 79,000 homes. In 2021, Uttlesford had around 39,000 houses and the draft Plan assumes that 14,300 new homes will be built by 2041. So even if no new homes have on site energy generation - contrary to Core Policy 23 - there would still be over 82 MW of spare capacity.

So my first question is why Core Policy 26 begins with the text "The Council supports proposals for renewable and low carbon energy generation". Surely, there is a case for saying that Uttlesford already has sufficient renewable energy capacity?

A new local plan offers a once in a generation opportunity to take control of development in Uttlesford. So, if Councillors believe that there is still a case for more solar farms, they could adopt a much better approach to planning.

Para 155 of the NPPF states that:

“To help increase the use and supply of renewable and low carbon energy.. plans should consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure”

Apparently, the Uttlesford 'Call for Sites' yielded enough land to accommodate well in excess of 70,000 new homes. If Councillors genuinely believe that more ground mounted solar is needed, I fail to understand why Uttlesford did not issue a call for sites for renewables. At least 3 of the sites already put forward are in close proximity to the high voltage network and we know that suitable grade 3b land exists in the county¹. Moreover, other councils (including Stroud) have demonstrated that the approach advocated in the NPPF is deliverable. Why is Uttlesford so reluctant to take control of the location of future solar farms?

However, if these pleas fall on deaf ears I would like highlight a number of deficiencies in the text of Core Policy 26 which does not comply with National Planning Policy in some key respects.

Firstly, the passing reference to best and most versatile land is wholly inadequate. In order to comply with NPPF footnote 58, solar farm applications on BMV land must be accompanied by evidence that the use of BMV land is necessary.

Secondly, Core Policy 26 must specifically incorporate the requirements of NPPF paras 201 and 202, and should set out explicitly that where the development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

¹ Both the Cole End Solar Farm (UTT/21/0688/FUL) and Felsted Solar Farm (UTT/22/0007/FUL) are located on Grade 3b land

Thirdly, this policy must prioritise the development of rooftop solar. A recent CPRE report² confirms that existing warehouse rooftops and car parks could contribute more than half of the national target of 70GW of solar energy by 2035.

Fourthly, the reference to roofs being “structurally adequate” is a get out of jail free card for developers of ground mounted solar farms. This text must be revised.

Fifthly, the text in para 9.46 must be reflected in the wording of the core policy. In particular, the preference for the use of previously developed land should appear in the policy wording.

More generally, the decision to remove existing policies ENV5 and S7 is fundamentally mistaken. With respect, other local authorities deal much better with development in the countryside and the importance of protecting BMV land. Uttlesford should adopt Policy S67 of the 2023 Central Lincolnshire Local Plan³ and Policy 7S of the 2020 Bedford Local Plan⁴.

If Councillors do not address these issues, they will have failed in their key aims of conserving and enhancing the natural and historic environment and maintaining and enhancing the quality of life of Uttlesford residents.

² based on research by UCL:

https://www.ucl.ac.uk/bartlett/energy/sites/bartlett_energy/files/ucl_ei_net_zero_land_use_for_cp_re_barrett_scamman_180523.pdf

³ <https://www.n-kesteven.gov.uk/sites/default/files/2023-04/Local%20Plan%20for%20adoption%20Approved%20by%20Committee.pdf>

⁴ <https://www.bedford.gov.uk/media/4011/download?inline>