From:
 Diane Wallace

 To:
 Longfield Solar Farm

 Cc:
 Diane Wallace

Subject: Fw: EN010118 - Longfield Solar Farm - EIA Scoping Notification and Consultation

Date: 05 December 2020 21:06:50

Attachments: Longfield Solar Farm Statutory consultation letter Dec 2020.pdf

Dear Ms King,

Trying to send e mail again as earlier one was returned undelivered.

Kind regards.

Cllr Diane Wallace

From: Diane Wallace

Sent: 05 December 2020 9:01 PM

To: LongfieldSolaFarm@planninginspectorate.gov.uk <LongfieldSolaFarm@planninginspectorate.gov.uk> **Cc:** Sarah Gaeta <parishclerk@hatfieldpeverelpc.com>

Subject: EN010118 - Longfield Solar Farm - EIA Scoping Notification and Consultation

Dear Ms King,

Further to your e mail of the 6th November 10:06:28 please find attached Hatfield Peverel Parish Council's letter in response to the Scoping Report consultation for the proposed Longfield Solar Energy Farm.

I'm emailing the attached letter in case this was not sent yesterday by the Parish Clerk on behalf of the Parish Council for which I apologise. I acknowledge the deadline was 4th December and is a statutory requirement that cannot be extended. However, it was the intention of the Parish Council for this to be submitted on the 4th December, and trust you will accept late submission if in deed this was not sent yesterday.

Kind regards,

Cllr Diane Wallace on behalf of Hatfield Peverel Parish Council



Clerk to the Council Sarah Gaeta

> Parish Council Office Community Association Village Hall Maldon Road Hatfield Peverel Essex CM3 2HP

> > Tel: (01245) 382865

E Mail: parishclerk@hatfieldpeverelpc.com

Your Ref: EN010118-LSF

Via e mail: LongfieldSolaFarm@planninginspectorate.gov.uk

Katherine King
Senior EIA Advisor
Major Casework Directorate
Temple Quay House
2 The Square
Bristol BS1 6PN

4th December, 2020

Dear Ms King,

Re: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) Regulations 10 and 11.

Application by Longfield Solar Energy Farm Limited (the Applicant) for an Order granting Development Consent for the Longfield Solar Farm (the Proposed Development).

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested.

In response to the invitation to comment on this application, Hatfield Peverel Parish Council make the following observations.

The scoping report is comprehensive in covering most of the adverse effects of the proposal. Concern is expressed whether proposed mitigation measures are likely to be adequate in some areas as follows:

The statement at 2.1.6 ignores a number of larger fields within the site and fails to state objective criteria on which the site description has been based.

The photographs from 2.2.13 to 2.2.36 indicate significant landscape impacts arising from the scheme. This is especially evident in 2.2.31 for the battery storage units.

The security fence described at 2.2.44 will limit access to the site for many forms of wildlife over most of the designated area. It will seriously interrupt long established wildlife corridors. It is relevant here that this land has been in the ownership of one family for

generations resulting in a rich ecosystem. The 5m high CCTV posts are bound to have a visual impact across the whole site.

Transport 2.4.5 will require careful objective assessment. Many of the minor roads in the area around the site are unsuitable for such traffic. The construction phase in this regard is of particular concern. These narrow rural roads become muddy especially in winter and a number of large vehicles combined with rural traffic could churn verges up even more.

The extent of the site and the security fence to be installed will be intrusive features on the landscape. It is therefore difficult to see how biodiversity and habitat loss mitigation 2.4.11 will be adequate to compensate for that currently in existence. Without sight of the proposed Management Plan it is not possible to make sensible comment at this moment in time.

It is important that detail unavailable at present is provided for the focus outlined in 3.1.2.

Statements at 3.1 and 3.2 are unclear on the nature and parameters of the alternative site assessments and appear contradictory. The implication that solar farm development at any cost is acceptable (3.1.3) does not constitute considered evaluation. Electricity is not a fixed commodity needing to be locally sourced, although preferable, and it can be fed into the grid from other areas.

The convenience of the site for the proposers being a very large area with one willing landowner is not enough to justify the scheme. As presented here, it is not possible to comment further on the site selection at this stage.

- 4.5.3 In the current circumstances virtual meetings and presentations 4.5.3 can be effective in engaging in consultation with relatively small groups. Given the scale and implications for this site however, a wider public face to face exhibition or discussion meeting process would be more suitable. Consideration should be afforded to a relatively short delay in the process to allow this to be achieved.
- 5.7.2 Impacts on 'rights of way' and should be included in this section.

The section on climate change impact (Chapter 6) should include the loss of carbon sink capability of the land as currently covered by crops and grassland.

- 7.5.2 This has potential for a very high cumulative significant harm effect given the number of heritage assets in close proximity to the site.
- 8.4.3 The timescale over which ecological surveys are undertaken should be over a reasonable period and cover all seasons. As in 2.4.11 above, the effect of the security fence on a site of this size should be taken into consideration.
- 9.4.16 This should include specific study of identified pollution at Great Leighs.
- 9.5.3 Changes in flood potential with possible resulting pollution risks must be rigorously and independently assessed. Adequate mitigation/avoidance measures should be put in place for all phases of construction, operation and decommissioning. The importance of this is again made necessity due to the scale of the proposal.

- 10.4.36 As in 8.4.3 above such fieldwork should be undertaken in different seasons. In the period stated, it is highly likely that trees and vegetation were still in leaf.
- 10.5.3 Consideration should also be given to any possible significant adverse landscape effects arising from refurbishment/replacement of units following relevant technological advances which evolve during the lifespan of the project. Receptors/Those affected are not limited to local residents but include walkers and cyclists who make use of the area.
- 10.6.28 While acknowledged that 'glint and glare' can be significant, it seems to be downplayed elsewhere in the report (section 14). The assessment will need to be robust and independent for a proposal of this size. Detailed information is unavailable to comment further at this moment in time.
- 11.5.5, 11.5.8 While the report accepts that there will be operational noise, no specific mitigation measures are included for evaluation. Only an assumption is given on the performance of the plant. Further detail on the proposed plant is required to fully evaluate and comment.
- 12.6.11 The ES statements section 12 will be central to the planning decision. The size of the scheme at 400ha is far in excess of the 20ha + level identified as 'potentially significant'. When considering loss of BMV this requires justification accordingly.
- Section 13 As above, the local road network is inadequate for the type of HGV activity that will be required. This is particularly relevant in the construction phase.
- 14.3.1 & 14.3.2 The proposed area includes areas of grade 1, 2 and 3 all in the category of BMV land. Such areas will become more important in the context of climate change. BMV land is also pertinent to changes in domestic food production that may arise following the British departure from the EU.

Is the correct government department, (Ministry of Agriculture Fisheries and Food) referred to in 14.3.2?

The introduction of sheep to the area is seen more as an effective means to keep vegetation under control through grazing than an opportunity for new land use arising from the scheme. It is noted that the area has been in previous use for grazing cattle.

- Table 14.1 While the table acknowledges a potential risk of fire, reliance is placed on cooling systems in place within the housings to minimise the risk. No further development of mitigation in the event a fire occurring or the possibility of polluting emissions resulting from a fire are explored. Neither does consideration appear to have been given to what may be required to return the site to agricultural use following decommissioning in dealing with any contamination or pollution that might result from a fire or explosion incident.
- 14.2 Potential changes in surrounding air quality particularly in relation to the A12 following the present trend to increased use of low emission vehicles should be taken into account. This should be used as a comparator for the effects of the site over its lifetime.

Hatfield Peverel Parish Council thank you for this opportunity to make comment on Longfield Solar Farm.

The Parish Council wish to be notified, and given an opportunity to comment on any future consultation regarding this site.

Yours sincerely,



Sarah Gaeta Clerk to the Council