



BY EMAIL ONLY to: [REDACTED]

Pinsent Masons LLP
30 Crown Place
London
EC2A 4ES

5 November 2025

Dear Mr Tresadern,

THE LONGFIELD SOLAR FARM ORDER 2023 – S.I. 734 (“THE ORDER”) AND THE LONGFIELD SOLAR FARM (CORRECTION) ORDER 2023 – S.I. 1241 – PROPOSED NON-MATERIAL CHANGE APPLICATION

REGULATION 7(3) OF THE INFRASTRUCTURE PLANNING (CHANGES TO, AND REVOCATION OF, DEVELOPMENT CONSENT ORDERS) REGULATIONS 2011 - WRITTEN CONSENT FROM THE SECRETARY OF STATE FOR NOT CONSULTING A PERSON OR AUTHORITY

1. Thank you for your email and letter of 15 October 2025 on behalf of Longfield Solar Energy Farm Limited (“the Applicant”). The letter and email of 15 October 2025 provided a description of the proposed non-material changes to the Longfield Solar Farm Order 2023, the reasons for the proposed changes, the proposed reduced consultee list, and a list of the parties consulted on the original application in respect to the Longfield Solar Farm Order 2023 and as corrected by the Longfield Solar Farm (Correction) Order 2023. The letter requested the Secretary of State’s consent under Regulation 7(3) of the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 (as amended) (“the 2011 Regulations”) to a reduced list of consultees.
2. The letter provides the following description of the changes sought:
 - a. *amendment of Work No. 4A in Schedule 1 to authorise installation of a second 400kV cable circuit between the onsite substation and the existing substation extension;*
 - b. *amendment of Article 6 to include modification of the Hedgerows Regulations 1997;*
 - c. *amendment of Requirement 9 in Schedule 2 to require submission of a single site-wide Biodiversity Net Gain Strategy rather than multiple phase-specific strategies; and*
 - d. *amendment of Article 6(4) to clarify that limited overlaps with adjacent minerals planning permissions at Bulls Lodge Quarry are permitted.*

3. The Applicant proposes to consult 15 parties: Anglian Water Services Limited, Boreham Parish Council, Braintree District Council, British Telecommunications Plc, Chelmsford City Council, Environment Agency, Essex and Suffolk Water Limited, Essex County Council, Lord Rayleigh's Farms Limited, National Grid Electricity Transmission Plc, Natural England, Network Rail Infrastructure Limited, Pioneer Aggregates (UK) Limited, Hanson Quarry Products Europe Limited, Vodafone Limited, and UK Power Networks Limited. These parties have been identified because they are host authorities, statutory bodies, or asset owners whose operations or interests may be directly affected by one or more of the proposed non-material changes.
4. The Secretary of State considers that Historic England and the Joint Nature Conservation Committee should be consulted because the Applicant has not provided specific reasons why these consultees should not be consulted. The Secretary of State considers that these consultees may have representations to make in relation to the proposed change.
5. The Secretary of State is satisfied that it is not necessary for other consultees from the Order to be included in the reduced consultee list, as they are not directly affected, either because the proposed amendments will not affect their interests or because their interests relate to a different part of the scheme.
6. Accordingly, the Secretary of State gives written consent for the consultation to proceed in accordance with the details set out above, under regulation 7(3) of the 2011 Regulations.
7. In taking this decision, the Secretary of State acknowledges that notice of the Application will be provided by the Applicant, in line with the requirements in Regulation 6 of the 2011 Regulations.
8. The Secretary of State's written consent in this matter should not be taken as indicating approval for any other aspects of the proposed changes to the Order, which fall to {her/him} for consideration and determination, or whether the proposed changes will ultimately be regarded as material or not.

Yours sincerely,

Kerry Crowhurst-Kozlova

Head of Planning

On behalf of the Secretary of State for Energy Security and Net Zero

BY E-MAIL

Secretary of State for Energy Security and Net Zero
Energy and Infrastructure Planning
1 Victoria Street
London
SW1H 0ET

15 October 2025

Dear Secretary of State

**THE LONGFIELD SOLAR FARM ORDER 2023
PROPOSED NON-MATERIAL CHANGE APPLICATION – REQUEST FOR REDUCTION IN
CONSULTEES UNDER REGULATION 7(3) OF THE INFRASTRUCTURE PLANNING
(CHANGES TO, AND REVOCATION OF, DEVELOPMENT CONSENT ORDERS)
REGULATIONS 2011**

1. INTRODUCTION

- 1.1 We act for Longfield Solar Energy Farm Limited ("**Longfield**").
- 1.2 On 26 June 2023, the Secretary of State made the Longfield Solar Farm Order 2023 (S.I. 2023 No. 734) (the "**Order**") as corrected by the Longfield Solar Farm (Correction) Order 2023 (S.I. 2023 No. 1241) in respect of a new solar photovoltaic array generating station, co-located with battery storage, together with grid connection infrastructure (the "**Scheme**").

2. NON-MATERIAL CHANGES TO THE ORDER

- 2.1 Longfield seeks to make four non-material changes to the Order.

Change 1 – amending Work No. 4A of Schedule 1 of the Order to facilitate the installation of a dual circuit

- 2.2 Work No. 4A of Schedule 1 of the Order authorises, at paragraph (i), works including the installation of one 400 kilovolt cable circuit connecting Work No. 3 (the new onsite substation) to Work No. 5 (the extension to the existing substation).
- 2.3 For resilience purposes, Longfield is seeking to install a second 400 kilovolt cable circuit as part of these works. Longfield is therefore proposing to amend the description of Work No. 4A of Schedule 1 of the Order to authorise this dualling.

Change 2 – amending Article 6 of the Order to modify the Hedgerows Regulations 1997

- 2.4 Article 6 of the Order identifies extant legislation that is authorised to be modified or disapplied by virtue of the Order being made.

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- 2.5 However, the list of legislation in Article 6 of the Order does not include the modification of the Hedgerows Regulations 1997 in relation to the carrying out of development for the Scheme. This results in a requirement for Longfield to submit a Hedgerow Removal Notice under the Hedgerows Regulations 1997 every time that any additional hedgerow needs to be removed outside of those already identified in Schedule 12 of the Order. This is an onerous and complex process that restricts the flexibility of the detailed design of the Scheme and poses a risk to the timing of phases of the Scheme due to determination timescales.
- 2.6 Longfield is therefore proposing to amend Article 6 of the Order to include the modification of the Hedgerows Regulations 1997. This approach has been consented in recent solar DCOs, including the Oaklands Farm Solar Park Order 2025.

Change 3 – amending Requirement 9 of Schedule 2 of the Order to require one submission of the BNG Strategy

- 2.7 Requirement 9 of Schedule 2 of the Order requires Longfield to submit (for approval by the relevant planning authority) a landscape and ecological management plan (“**LEMP**”) for each phase of the Scheme. As currently written in the Order, each LEMP requires the submission of a Biodiversity Net Gain (“**BNG**”) Strategy to detail how the Scheme is achieving the minimum 87% BNG during the operation of the Scheme.
- 2.8 However, targeted LEMPs have been submitted for various works (including vegetation removal as part of permitted preliminary works and road widening works as part of Phase 1 of the Scheme) without containing BNG Strategies, as information regarding BNG was not available at the time of the submission of these LEMPs (as the landscape design for the Scheme had not yet been developed, nor did it form part of the works to which those LEMPs related). Therefore, Requirement 9 of Schedule 2 of the Order has only partially been discharged in relation to those LEMPs, which represents an inefficient process.
- 2.9 Longfield is therefore proposing to amend Requirement 9 of Schedule 2 of the Order to alter the approach such that only one site-wide BNG Strategy is required to be submitted as part of the site-wide LEMP for the Scheme’s main site construction works. This approach has been discussed and agreed with Essex County Council’s ecologist.

Change 4 – amending Article 6(4) of the Order to address interactions with other planning applications

- 2.10 There are four small areas of overlap between the Order and two adjacent planning permissions relating to the extraction of minerals at Bulls Lodge Quarry (i.e. in proximity to the existing substation).
- 2.11 Longfield has sought legal advice on these overlaps, in which it has been concluded that the overlaps are de minimis and neither the Order nor the other planning permissions are prejudiced from ongoing implementation.
- 2.12 However, for the sake of clarity and good order, Longfield is proposing to amend Article 6(4) of the Order to expressly provide for these overlaps to occur. Longfield notes that Article 6(4), as currently written in the Order, already addresses one of the areas of overlap, which lies directly to the north of the existing substation. The proposed change is to ensure that all of the overlaps are covered by Article 6(4), making the Order explicit in this regard whilst continuing to not prejudice the ongoing implementation of the Order and the other planning permissions.

Conclusions

- 2.13 None of the proposed changes to the Order will give rise to any new or materially different environmental effects to those originally assessed as part of the application for the Order; therefore, Longfield considers that the proposed changes are non-material in nature.

- 2.14 Longfield has held discussions with Essex County Council and Chelmsford City Council regarding the proposed non-material changes, both of whom are generally supportive of the proposals.

3. **CONSULTATION AND SUBMISSION OF THE NON-MATERIAL CHANGE APPLICATION**

- 3.1 Applications for non-material changes to development consent orders are governed by the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011. Under regulation 7(3), the applicant can seek written consent to reduce the number of parties that need to be consulted on a non-material change application.

- 3.2 We consider that, taking a proportionate approach, only the following organisations should be consulted on this application:

- 3.2.1 Anglian Water Services Limited, as the holder of assets within the land to which Change 1 relates;
- 3.2.2 Boreham Parish Council, as the host Parish Council for the land to which Change 1 relates;
- 3.2.3 Braintree District Council, as a host authority for land relating to Changes 1-4;
- 3.2.4 British Telecommunications Plc, as the holder of assets within the land to which Change 1 relates;
- 3.2.5 Chelmsford City Council, as a host authority for land relating to Changes 1-4;
- 3.2.6 Environment Agency, in case of interests relating to Changes 1-4;
- 3.2.7 Essex and Suffolk Water Limited, as the holder of assets within the land to which Changes 1 relate;
- 3.2.8 Essex County Council, as a host authority for land relating to Changes 1-4;
- 3.2.9 Lord Rayleigh's Farms Limited, as the holder of assets within the land to which Change 1 relates;
- 3.2.10 National Grid Electricity Transmission Plc, as the owner and operator of the existing substation to which Change 1 relates;
- 3.2.11 Natural England, in case of interests relating to Changes 1-4;
- 3.2.12 Network Rail Infrastructure Limited, as the holder of assets within the land to which Change 1 relates;
- 3.2.13 Pioneer Aggregates (UK) Limited and Hanson Quarry Products Europe Limited, as the relevant entities of the operator of the overlapping planning permissions to which Change 4 relates;
- 3.2.14 Vodafone Limited, as the holder of assets within the land to which Change 1 relates; and
- 3.2.15 UK Power Networks Limited, as the holder of assets within the land to which Change 1 relates,

together, the "**Consultees**".

- 3.3 The Consultees' operations are relevant to some or all of the proposed non-material changes, as set out above, whereas all other previous consultees during the application for the Order are unaffected by the proposals.
- 3.4 We would be grateful for the Secretary of State's confirmation that this approach to consultation is acceptable. Longfield intends to submit the non-material change application to the Order shortly.
- 3.5 If you would like to discuss this letter, please contact Alex Tresadern at [REDACTED]

Yours sincerely

Pinsent Masons LLP

(This letter has been sent electronically and so is unsigned)