

BY E-MAIL

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

23 January 2026

Dear Secretary of State

**THE LONGFIELD SOLAR FARM ORDER 2023  
PROPOSED NON-MATERIAL CHANGE APPLICATION  
RESPONSE TO NORTHUMBRIAN WATER LIMITED (TRADING AS "ESSEX AND SUFFOLK  
WATER") CONSULTATION RESPONSE**

**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**").
- 1.3 On 13 November 2025, pursuant to section 153 and paragraph 2 of Schedule 6 to the Planning Act 2008 and in accordance with the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011, Longfield submitted an application to the Secretary of State to make changes to the Order that are not material (the "**NMC Application**").
- 1.4 In a letter dated 22 December 2025, Northumbrian Water Limited (trading as "Essex and Suffolk Water") provided the sole objection to the NMC Application (the "**Objection**").

**2. THE OBJECTION**

- 2.1 In summary, the Objection arises on the basis that Essex and Suffolk Water are concerned that there will be a lack of protective provisions and/or asset protection agreements for its benefit following the NMC Application. Longfield has been in contact with Essex and Suffolk Water to discuss the Objection and confirm that this is factually incorrect. In the meantime, Longfield sets out its position below for the benefit of the Secretary of State.

**3. LONGFIELD'S POSITION**

- 3.1 The Order contains protective provisions for the benefit of Essex and Suffolk Water at Part 9 of Schedule 15 of the Order (the "**Protective Provisions**"). The Protective Provisions will continue to apply to the authorised development and for the benefit of Essex and Suffolk Water in the event that the proposed changes under the NMC Application are approved. Accordingly, no additional protective provisions are required as a result of the NMC Application.
- 3.2 The Protective Provisions suitably manage any potential impacts on Essex and Suffolk Water's assets and operational requirements to ensure that Essex and Suffolk Water does not suffer serious detriment to the carrying on of its undertaking.

- 3.3 Paragraph 100 of Part 9 of Schedule 15 requires Longfield, before commencing construction of a “specified work” (meaning so much of the authorised development as is in, on, under, over or within the ‘standard protection strips’, as defined in paragraph 99 of Part 9 of Schedule 15), to submit to Essex and Suffolk Water plans of the specified work and such further particulars available to it as Essex and Suffolk Water may reasonably require.
- 3.4 The works involved must only be constructed in accordance with the plans and details as approved in writing by Essex and Suffolk Water under paragraph 100. In addition, under paragraph 100, the approval of Essex and Suffolk Water may be given subject to such reasonable requirements as Essex and Suffolk Water may make for the protection of its apparatus taking into account the terms of the Order.
- 3.5 Further, Essex and Suffolk Water is entitled to watch and inspect the construction of the works pursuant to paragraph 102 of Part 9 of Schedule 15.
- 3.6 In short, Essex and Suffolk Water is adequately protected within the existing Order by virtue of the Protective Provisions.

If you would like to discuss this letter, please contact [REDACTED] [REDACTED] [REDACTED]  
[REDACTED]

Yours sincerely

**Pinsent Masons LLP**

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