



Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Hedgehog Grove Solar Farm

Case Reference: EN0110021

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) to
Regulation 10 of The Infrastructure Planning (Environmental Impact
Assessment) Regulations 2017

02 June 2025

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1. INTRODUCTION

- 1.0.1 On 22 April 2025, the Planning Inspectorate (the Inspectorate) received an application for a scoping opinion from Hedgehog Grove Solar Farm Ltd (the applicant) under regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Hedgehog Grove Solar Farm (the proposed development). The applicant notified the Secretary of State (SoS) under regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and by virtue of regulation 6(2)(a), the proposed development is 'EIA development'.
- 1.0.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a Scoping Report, available from:
- <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110021>
- 1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the proposed development as currently described by the applicant. This Opinion should be read in conjunction with the applicant's Scoping Report.
- 1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has/ has not agreed to scope out certain aspects/ matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects/ matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/ matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in appendix 1 in accordance with EIA regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.0.6 The Inspectorate has published a series of advice pages, including '[Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#)'. AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.
- 1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

['Nationally Significant Infrastructure Projects: Advice pages'](#)

- 1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (eg on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Section 3)

ID	Ref	Description	Inspectorate's comments
21.1	Paragraph 1.1.8	Site boundary	The Scoping Report states that the site boundary is likely to be refined as the proposed development progresses. The ES should describe any alterations to the final boundary for the Development Consent Order (DCO), including an explanation of the reasons for the changes. The applicant should ensure that the ES reflects the total area of the proposed development and the maximum extent of likely significant effects.
21.2	Paragraph 1.1.8; figure 1.3	Additional land for cable connections	The Scoping Report states that figure 1.3 illustrates the maximum area of land required for the proposed development at this point of the design. However, figure 1.3 shows that there are parcels of 'developable solar area' within the order limits that are not connected to the main site boundary or connection corridor options. For example, the small parcels of land located in the north west of the site are separate from the main site boundary. The ES should clearly define the extent of the proposed development and identify any likely significant effects of the entire proposed development, including any cable connections between parcels of land within the DCO boundary.
21.3	Section 6.8	Design flexibility	The Inspectorate notes the applicant's intention to apply a 'Rochdale Envelope' approach to maintain flexibility within the design of the proposed development. The Inspectorate expects that at the point an application is made, the description of the proposed development will be sufficiently detailed to include the design, size, capacity, technology, and locations of the different elements of the proposed development or where details are not yet known, will set out the assumptions applied to the assessment in relation to these aspects. This should include the footprint and heights of the structures (relevant to existing ground levels), as well as land-use requirements for all elements and phases of the development. The description should be supported (as necessary) by figures, cross-sections, and drawings which should be clearly and appropriately referenced. Where

ID	Ref	Description	Inspectorate's comments
			flexibility is sought, the ES should clearly set out and justify the maximum design parameters that would apply for each option assessed and how these have been used to inform an adequate assessment in the ES.
214	Paragraph 3.4.1	Watercourse, rail and road crossings	<p>Natural and manmade features such as ditches, watercourses, infrastructure (including roads and rail), and sensitive habitats have the potential to be crossed during construction of the proposed development. Paragraph 3.4.1 of the Scoping Report states that all cable corridor options presented are required to cross National Rail's Braintree Branch Line.</p> <p>The ES should identify which features will be crossed and at what locations, with reference to accompanying figure(s). The ES should describe the types of crossings that are required, their scale and dimensions and the nature of any associated construction works (for example the use of horizontal directional drilling (HDD)). Where flexibility is deemed necessary this should be fully justified, and the ES should base assessments on the worst-case scenario and justify why this scenario would lead to the greatest environmental impact. Sufficient detail should be provided to inform a robust assessment of likely significant effects on relevant aspects/ matters, including ecological receptors. Efforts should be made to agree the approach to crossings with the relevant consultation bodies.</p>
215	Paragraphs 3.4.4 and 3.4.5	Cable corridor option 1	Section 3.4 provides a description of the cable corridor options assessed in the Scoping Report. Cable option 1 proposes to locate cable trenches in parallel to the Willows Green Solar Park (granted planning permission in 2022). Whilst the Inspectorate notes that the preferred cable corridor option is not yet known, the ES should clearly describe the relationship between the proposed development and any connected projects. This should include the extent to which the proposed development is dependent on their delivery and the development timelines of the other projects, with an explanation of how these will be coordinated.
216	Paragraph 3.5.19	Cable trenches	The width and depth of cable trenches required for the cabling between the on-site substation and UKPN Braintree 132 kilovolts (kV) Substation as well as the proposed excavation methods are not described in the Scoping Report. The ES should include a complete description of the proposed development including the maximum depth and width

ID	Ref	Description	Inspectorate's comments
			of all cable trenching, proposed excavation methods and final easements for all cabling required and use this to inform a worst-case scenario in the assessments, where relevant.
21.7	Paragraph 3.5.24	Construction lighting	The approach to operational lighting is described in paragraph 3.5.24 of the Scoping Report. The ES should describe the lighting requirements for all elements and phases of the proposed development. It should be explained what measures are proposed to minimise light spill on human and ecological receptors.
21.8	Paragraph 3.5.30	Construction compounds	The Scoping Report states that the proposed development would require temporary construction compound(s); however, the exact location is yet to be determined. To ensure a robust assessment of likely significant effects, the ES should provide details regarding the number, location and dimensions of construction compounds.
21.9	Paragraph 3.6.2	Construction phasing	The Scoping Report states that construction is anticipated to last approximately 24 months. The ES should include details of how the construction would be phased, including the likely commencement date, duration and location of the required construction activities. Where uncertainty remains, the assessment should be based on a worst-case scenario.
21.10	Paragraph 3.6.4	Construction activities	An overview of indicative construction activities is provided in paragraph 3.6.4 of the Scoping Report. This information should be set out in the ES including key construction milestones, associated plant and machinery and the proposed construction hours.
21.11	Paragraphs 3.6.13 to 3.6.17	Operational and maintenance activities	The ES should describe the potential scope and duration of maintenance works that would be required during the operation of the proposed development, including predicted vehicle movements and staffing numbers. The proposals for ongoing management and maintenance of the land around and under the solar photovoltaic (PV) modules should be confirmed in the ES, including any vegetation management and animal grazing. Any potential adverse impacts of maintenance activities should also be assessed in the ES where significant effects are likely to occur. Proposals for maintaining vegetation around easements and the Public Rights of Way (PRoW) within the application site should also be described.

ID	Ref	Description	Inspectorate's comments
21.12	Paragraphs 3.6.18 to 3.6.20	Decommissioning	The ES should include a description of the process and methods of decommissioning, land use requirements and estimated timescales. A description of any assumptions made in the assessment, eg about the approach to retention or removal of the on-site substation or cabling, should be provided. The Inspectorate strongly recommends that an outline decommissioning environmental management plan (DEMP) is submitted with the DCO application.
21.13	N/A	Agricultural land	The ES should contain a clear tabulation of the areas of land in each Best Most Versatile (BMV) classification to be temporarily or permanently lost as a result of the proposed development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided. Consideration should be given to the use of BMV land in the applicant's discussion of alternatives.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 6)

ID	Ref	Description	Inspectorate's comments
221	Paragraph 6.5.1	Professional judgement	The ES should clearly identify where professional judgement has been relied upon to determine the level of significance of effects. Any use of professional judgement to assess significance should be fully justified within the ES.
222	Section 17.8	Transboundary	<p>The Inspectorate on behalf of the SoS has considered the location, nature and characteristics of the proposed development and concludes that it is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the proposed development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts.</p> <p>The Inspectorate considers that the likelihood of transboundary effects resulting from the proposed development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision.</p> <p>Note: The SoS' duty under regulation 32 of the 2017 EIA Regulations continues throughout the application process.</p> <p>The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the annex to its Advice Page 'Nationally Significant Infrastructure Projects: Advice on Transboundary</p>

ID	Ref	Description	Inspectorate's comments
			Impacts and Process', links for which can be found in paragraph 1.0.7 above.
223	Appendix C	Commitments register	The Inspectorate welcomes the inclusion of the Commitments Register in appendix C of the Scoping Report. The Commitments Register should be updated to demonstrate changes to any commitments or assumptions set out in the Scoping Report to those presented in the ES. The Inspectorate recommends that the Commitments Register is submitted with the application, provided as a separate appendix to the ES.
224	N/A	Monitoring	The ES should identify and describe any proposed monitoring of adverse effects and how the results of such monitoring would be utilised to inform any necessary remedial actions.
225	N/A	Scoping table	The Inspectorate recommends the use of a table in the ES to set out key changes in parameters/ options of the proposed development presented in the Scoping Report to those presented in the ES. It is also recommended that a table demonstrating how the matters raised in the Scoping Opinion have been addressed in the ES and/ or associated documents provided.
226	N/A	Environment Agency (EA) data	The EA has published new flood and coastal erosion risk data in 2025 following the release of its "National assessment of flood and coastal erosion risk in England 2024". Further updates are also expected to follow. The applicant should ensure that assessments take account of updated data sets as these become available through Defra's Data Services Platform. The applicant should liaise with the EA to determine the implications for project design and agree the scope of assessments, and evidence of agreement should be provided within the application.
227	N/A	Presentation of information	The Inspectorate notes that there are a number of presentation errors within the Scoping Report, this includes incorrect cross-referring to

ID	Ref	Description	Inspectorate's comments
			figures. For example, paragraph 8.3.10 of the Scoping Report refers to figure 8.1 but should refer to figure 8.2. The applicant should make efforts to ensure that there are no presentation errors within the ES.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Air Quality

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Table 7.3; paragraph 7.3.11	Operation – dust and particulates	The Inspectorate agrees that based on the nature of the proposed development, operation would not generate significant emissions of dust and particulates to the air and is content to scope this matter out of further assessment.
3.1.2	Table 7.3; paragraph 7.3.11	Operational traffic	The applicant proposes to scope out this matter on the basis that vehicle movements would be minimal during operation of the proposed development and would mainly relate to ad-hoc maintenance works. The Inspectorate agrees that vehicle movements during operation are unlikely to give rise to significant effects and subject to confirmation in the ES that the proposed vehicle numbers will not exceed the relevant Institute of Air Quality Management (IAQM) thresholds, is content to scope this matter out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.1.3	Paragraph 7.3.3; figure 7.1	Study area	The Scoping Report states that the study area for the proposed development will be based on activities within 250m of the site boundary, including solar PV areas and cable corridor options. The ES should include an explanation of the study areas used to identify potential significant air quality effects on human and ecological receptors with reference to relevant guidance. This should be supported by appropriate figures. The assessment methodology and selection of study areas should also be discussed and agreed with relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
3.14	Paragraph 7.3.7	Receptor location	The ES should be accompanied by an appropriate plan illustrating the location of sensitive air quality receptors within the vicinity of the proposed development to aid understanding of the extent of effects.
3.15	Paragraphs 7.4.6, 7.4.7 and 7.7.1	Construction traffic screening	The Inspectorate notes that a screening level qualitative assessment will be undertaken, with reference to IAQM guidance, to confirm whether a detailed construction phase traffic emissions modelling assessment is required. Should it be considered that the detailed modelling assessment is not required, the ES must provide up to date information on the anticipated construction programme and the predicted number of heavy goods vehicle (HGV) movements to demonstrate that the relevant IAQM thresholds are not exceeded by the proposed development on its own or cumulatively with other proposals.
3.16	N/A	Guidance	The applicant's attention is drawn to the Defra advice 'PM2.5 Targets: Interim Planning Guidance'. The ES should explain how key sources of air pollution within the proposed development have been identified and how action has been taken to minimise emissions of PM2.5 or its precursors.

3.2 Biodiversity and Nature Conservation

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321	Table 8.6	International statutory designated sites	The applicant proposes to scope out this matter on the basis that there are no international designated sites within 10km (or sites designated for bats within 30km) of the proposed development. The Inspectorate agrees that the proposed development is unlikely to result in significant effects on international designated nature conservation sites and is content for this matter to be scoped out of further assessment.
322	Table 8.6; paragraph 8.3.8	National statutory designated sites	The Scoping Report proposes to scope out this matter stating that there are no national designated sites located within 2km of the site boundary and it is unlikely that the proposed development would lead to direct and indirect impacts on the designated sites. On this basis, the Inspectorate agrees that construction, operation and decommissioning of the proposed development is unlikely to result in significant effects on the national designated sites and is content for this matter to be scoped out of further assessment.
323	Table 8.6	Local nature reserves (LNRs)	<p>The Scoping Report proposes to scope out this matter stating that there would be no direct effects from the proposed development on LNRs and mitigation measures will be implemented to avoid indirect effects during construction and decommissioning.</p> <p>The Inspectorate notes that there are four LNRs within 2km of the proposed development, including Flitch Way LNR which is located directly adjacent to the site boundary. In the absence of information about potential impact pathways which would extend beyond the site boundary (eg deposition of pollutants, emissions to water, noise, etc), the ES should provide an assessment of likely significant effects on relevant LNRs or provide evidence demonstrating clear agreement with relevant consultation bodies and the absence of likely significant effects.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
324	Table 8.6	Non-statutory designated sites	<p>The applicant proposes to scope out an assessment of non-statutory designated sites on the basis that there would be no direct effects from the proposed development on non-statutory designated sites (eg local wildlife sites (LWSs)) and mitigation measures will be implemented to avoid indirect effects during construction and decommissioning.</p> <p>The Inspectorate notes that there are six LWSs within 2km of the proposed development, including Flitch Way LWS which is located directly adjacent to the site boundary. In the absence of information about potential impact pathways which would extend beyond the site boundary, the ES should provide an assessment of likely significant effects on relevant non-statutory designated sites or provide evidence demonstrating clear agreement with consultation bodies and the absence of likely significant effects.</p>
325	Table 8.6	Wintering birds – operation	<p>The Inspectorate agrees that the level of human activity due to take place on the proposed development site during operation is low; however, impacts to wintering birds could arise from the substantive land use change and the siting of solar PV panels. The ES should provide an assessment of the likely significant effects on wintering birds during operation or provide evidence demonstrating clear agreement with relevant consultation bodies and the absence of likely significant effects.</p> <p>For the avoidance of doubt, the ES should also provide an assessment of the effects on wintering birds during construction and decommissioning taking into account the potential for the proposed development to disturb foraging wintering birds and reduce suitable foraging habitat.</p>
326	Table 8.6	Invasive non-native species (INNS)	<p>The Scoping Report states that the risk of INNS being present on site is low and measures to avoid the introduction and spread of INNS would be set out in the outline Construction Environmental Management Plan (CEMP) and an invasive species management plan. However, the Inspectorate notes that INNS have been identified in previous surveys of the site and does not agree to scope this matter out of further assessment.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The ES should identify the locations of INNS records, assess any likely significant effects and detail and secure mitigation/ biosecurity measures during all phases of the proposed development to avoid/ control the spread and introduction of INNS. In respect of operation, the applicant should ensure necessary control and eradication measures are included within an outline operation environmental management plan (OEMP).

ID	Ref	Description	Inspectorate's comments
327	Paragraph 8.3.6	Study area	The Scoping Report does not set out the study area(s) that have been used to inform the biodiversity and nature conservation assessment. The ES should clearly set out the relevant study area(s) used in the assessment and ensure that study area(s) reflect the proposed development's zone of influence (ZOI) rather than being based on a fixed distance. The ES should consider the potential for effects to occur beyond fixed distances, particularly where sites are designated for mobile species such as birds and bats, or where there is hydrological connectivity. Efforts should be made to agree the study area(s) with relevant consultation bodies.
328	Table 8.4	Previous surveys and older datasets	Table 8.4 describes the protected species surveys that have been undertaken to date. Should the biodiversity and nature conservation assessment seek to rely on older datasets, the ES should explain whether this approach has been agreed with relevant consultation bodies and why these surveys remain representative of the current situation on site.
329	Section 8.4	Planned surveys	Further surveys to be undertaken to inform the assessment are described in section 8.4 of the Scoping Report. The applicant should agree the number, extent and approach to ecological surveys with relevant consultation bodies. Details of relevant ecological surveys should be provided within the ES.

ID	Ref	Description	Inspectorate's comments
32.10	Section 8.4	Cable corridor surveys	<p>The Scoping Report states that breeding and wintering bird surveys are not required within the cable corridor route due to the “<i>temporary and localised nature</i>” of the potential effects. However, in the absence of detailed information regarding construction activities and the proposed construction lighting strategy, the Inspectorate considers that there is potential for effects on breeding and wintering birds within the land required for the cable corridor options during construction.</p> <p>The ES should ensure that ecological assessments are supported by robust baseline data. Detailed breeding and wintering bird surveys should be conducted for the proposed development site, including the cable corridor options, or the ES should provide evidence of agreement with relevant consultation bodies that such surveys are not required</p>
32.11	N/A	Fish	<p>The ES should assess the potential impacts of the proposed development on fish, including impacts associated with watercourse crossings and electromagnetic fields (EMFs) where high voltage cables pass underneath watercourses. The assessment should be informed by relevant desk study and field surveys. Any relevant measures required to mitigate likely significant effects on fish should be secured and agreed with relevant consultation bodies. The applicant's attention is drawn to the consultation response from the EA on this matter (appendix 2 of this Opinion).</p>
32.12	N/A	Aquatic flora and fauna	<p>The Scoping Report does not consider the potential impacts of the proposed development on aquatic invertebrates or macrophytes. The Inspectorate considers that the ES should provide an assessment of the impacts on these receptors, where significant effects are likely to occur. Any relevant measures required to mitigate likely significant effects on aquatic flora and fauna should be secured and agreed with relevant consultation bodies. The applicant's attention is directed to the consultation response from the EA for further information (appendix 2 of this opinion).</p>
32.13	N/A	Watercourse buffer zones	<p>Paragraph 8.6.5 of the Scoping Report states that the minimum buffer for watercourses (including ditches) is 20m. However, paragraph 16.5.10 states that a 15m buffer is proposed for main rivers and ordinary watercourses and a 10m buffer is proposed for ditches. The ES should clarify the watercourse buffer distance proposed and provide</p>

ID	Ref	Description	Inspectorate's comments
			justification for the distance selected, with reference to potential impacts on ecology. The applicant's attention is directed to the consultation response from the EA in appendix 2 of this Opinion.
32.14	N/A	Confidential Annexes	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.

3.3 Climate Change and Greenhouse Gas Assessment

(Scoping Report Section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
331	Table 9.5	Sea level rise	The Scoping Report states that the proposed development is not located in an area that is susceptible to sea level rise. The Inspectorate agrees that significant effects are not likely to occur and further assessment of sea level rise in the climate change resilience review can be scoped out.
332	Table 9.5	Coastal flooding	The Inspectorate is content that based on the location of the proposed development, impacts from coastal flooding are not likely to result in significant effects and agrees that further assessment of coastal flooding in the climate change resilience review can be scoped out.

ID	Ref	Description	Inspectorate's comments
333	N/A	N/A	N/A

3.4 Cultural Heritage and Archaeology

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
34.1	Table 10.2; paragraph 10.5.5	Direct impacts to heritage assets beyond the site boundary	The applicant proposes to scope out this matter on the basis that there are no activities outside of the site boundary that could lead to direct physical impacts (eg removal or structural damage) on heritage assets. The Inspectorate agrees that the proposed development is unlikely to lead to significant direct effects on heritage assets beyond the site boundary and is content for this matter to be scoped out of further assessment.
34.2	Table 10.2	Indirect physical impacts to heritage assets beyond the site boundary	<p>The Scoping Report proposes to scope out this matter on the basis that significant indirect physical effects to heritage assets are unlikely to occur beyond the site boundary. The Inspectorate considers that noise, vibration, dust, and traffic impacts associated with construction and decommissioning of the proposed development could result in physical indirect impacts to heritage assets beyond the site boundary. There is also a lack of information at this stage regarding the likely duration and location of construction activities and access routes in relation to heritage assets.</p> <p>The Inspectorate therefore does not consider sufficient information has been presented to provide confidence that significant effects would not occur. The ES should include an assessment of indirect physical impacts on the heritage assets beyond the site boundary during construction and decommissioning or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. Any relevant mitigation measures should be set out in the outline CEMP and DEMP and secured in the draft DCO.</p>
34.3	Table 10.2; paragraph 10.5.14	Setting impacts to non-designated heritage assets	The Scoping Report states that the proposed development is unlikely to result in significant effects on the setting on non-designated heritage assets and proposes to scope this matter out of further assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate notes that the scoping report does not contain information about location of non-designated heritage assets within the context of the zone of theoretical visibility (ZTV). The ES should assess potential effects on the setting of non-designated heritage assets within the ZTV or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects.
344	Table 10.2	Temporary setting impacts to designated and non-designated heritage assets (cable corridor route) – operation	The Scoping Report states that setting impacts to heritage assets from the cable corridor route are unlikely to extend beyond the construction phase and proposes to scope this matter out of further assessment. Having considered the nature of the proposed development, the Inspectorate agrees that operation of the cable corridor route is unlikely to lead to temporary setting impacts on heritage assets and is content for this matter to be scoped out of further assessment.
345	Table 10.2	Temporary setting impacts to designated and non-designated heritage assets (cable corridor route) – decommissioning	The applicant proposes to scope out this matter on the basis that that temporary setting impacts to heritage assets from the cable corridor route are unlikely to extend beyond the construction phase. However, in the event that underground cabling is removed, the Inspectorate considers that the potential effects on setting during decommissioning are likely to be similar to those experienced during construction. On this basis, the ES should include an assessment of temporary setting impacts on the heritage assets during decommissioning of the cable corridor or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects.

ID	Ref	Description	Inspectorate's comments
346	Paragraph 10.3.3	Archaeological fieldwork	The applicant should ensure that the information used to inform the assessment is robust and allows for suitable identification of below ground assets likely to be impacted by the proposed development. The applicant should make efforts to agree the need for intrusive investigations, such as trial trenching, with relevant consultation bodies. The scope of intrusive investigations should be proportionate and informed by desk-based assessment, and where appropriate geophysical survey and / or other field-based non-intrusive

ID	Ref	Description	Inspectorate's comments
			methods, as agreed with the relevant stakeholders. Intrusive investigation should be completed prior to submission of the DCO application and reported in the ES, unless otherwise agreed with the relevant consultation bodies.
34.7	Paragraph 10.3.4	Study area	The Scoping Report states that a 3km study area will be used to assess the potential setting impacts to designated and non-designated assets. It should be clear how the approach taken ensures that any heritage assets or conservation areas with long distance views towards or out from the proposed development have been identified and considered. The study area should be agreed with the relevant consultation bodies and informed by the visual analysis in the form of understanding the ZTV. The final study areas and locations of the heritage assets should be depicted on supporting plan(s).

3.5 Ground Conditions and Land Quality

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
35.1	Table 11.4; paragraph 11.3.14	Impacts to geological Sites of Special Scientific Interest (SSSIs) or Local Geological Sites (LoGS)	The Scoping Report states that there are no SSSIs or LoGS within the proposed 500m study area and proposes to scope out this matter from further assessment. On this basis, the Inspectorate agrees that significant effects are unlikely to occur and is content to scope this matter out of further assessment.
35.2	Paragraph 11.5.4	Decommissioning assessment	<p>Paragraph 11.5.4 of the Scoping Report states that the effects from decommissioning on ground conditions will be no worse than those that occur during construction and proposes to scope out an assessment of decommissioning phase activities.</p> <p>The Inspectorate considers that activities during decommissioning have potential to introduce new impact pathways on ground conditions and soils, such as the remobilisation of contaminants. As such, the ES should include an assessment of the likely significant effects of decommissioning on ground conditions or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects.</p>
35.3	Table 11.4	Temporary changes to soil function – construction	<p>The Scoping Report proposes to scope out an assessment of the temporary changes to soil function (eg compaction, changes to drainage/ infiltration of water to ground) during construction on the basis that the topsoil and subsoil in temporary working areas subject to vehicle and heavy plant movement, will be stripped and stored in line with Defra's guidance.</p> <p>The Inspectorate considers that there is potential for construction of the proposed development to result in damage to soils and does not agree to scope this matter out of further assessment. The ES should provide an assessment of the likely significant effects resulting from temporary changes to soil function with reference to relevant construction</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			activities and location of temporary soil stockpiles or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. Any relevant mitigation measures should be recorded as part of the outline CEMP and Soil Management Plan (SMP) and agreed with relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
354	Paragraph 1.3.3	Baseline data sources	The Scoping Report refers to various data sources which have been utilised to characterise the baseline conditions at the site. Copies of reports used to establish the baseline conditions at the proposed development site should be submitted as part of the ES, which could be in the form of technical appendices. Efforts should also be made to agree the scope and method of any potential site walkovers and ground investigation surveys with relevant consultation bodies.
355	Paragraph 11.5.6	Soil management	The Scoping Report states that an SMP will be produced, detailing measures to promote sustainable soil management and minimise impacts on soil health. For clarity, an outline SMP should be provided with the application along with the proposed methods by which it will be secured in the DCO.
356	N/A	Horizontal directional drilling (HDD)	The Scoping Report states that HDD may be required to install underground cabling, particularly in relation to crossing National Rail's Braintree Branch Line. The ES should confirm where HDD will be employed and provide an assessment of any impacts on ground conditions associated with its use. If the use of HDD has potential to impact groundwater or take place in land affected by contamination, appropriate mitigation, such as measures to be included in a drilling fluid breakout plan, should be described in the ES and appropriately secured.
357	N/A	Soils – hydrology	The Scoping Report does not consider the potential impacts on soil quality due to changes in the hydrological regime. The ES should consider the impact of hydrology and

ID	Ref	Description	Inspectorate's comments
			hydrogeology changes on soil quality within the site and any potential implications for the wider area.

3.6 Landscape and Visual

(Scoping Report Section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
36.1	Table 12.7; paragraph 12.3.37	National landscape designations	The Inspectorate is content to scope this matter out on the basis that there are no national landscape designations located within 5km of the proposed development. The ES should confirm the distance between the site boundary and nearest national landscape designation.
36.2	Table 12.7; paragraph 12.3.40; figure 12.1	Local landscape designations	The Scoping Report proposes to scope out this matter on the basis that there are no local landscape designations within the site boundary. However, paragraph 12.3.40 states that the Saling Grove and Saling Hall Registered Park and Garden is located approximately 3km from the site boundary and the ZTV provided in appendix A, figure 12.1 illustrates the potential for the proposed development to be visible beyond 3km. As such, the proposed development has potential to impact local landscape designations beyond the site boundary. The ES should identify, locate and assess impacts to local landscape designations or provide evidence that there is no intervisibility between the proposed development and local landscape designations within the study area, this should include reference to the ZTV and agreement with the relevant consultation bodies.
36.3	Table 12.7	National Character Areas (NCAs)	The applicant proposes to scope out an assessment of NCAs stating that the proposed development is unlikely to result in significant effects on landscape at a national level. The Inspectorate considers NCAs to be sensitive receptors within their own right and that the ES should identify, locate and assess both direct and indirect impacts to NCAs or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
364	Table 12.7	Landscape characters areas beyond 5km study area	The Inspectorate agrees that an assessment of effects on landscape character areas beyond the study area can be scoped out of further assessment; however, the ZTV should be reviewed according to the final proposed development parameters and presented in the ES to demonstrate that there is no potential for significant effects to occur.
365	Table 12.7	Visual impacts to users of PRow within the site boundary – construction and decommissioning	<p>The Scoping Report states that PRow which cross the site will be temporarily closed or diverted during construction and decommissioning and proposes to scope this matter out of further assessment.</p> <p>The Inspectorate considers that there is potential for visual impacts to users of temporarily diverted PRow during construction and decommissioning of the proposed development. As such, the ES should assess the visual impacts to users of temporarily diverted PRow or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. Cross references regarding the closure and diversion of PRow should be made to the socio-economics and land use chapter, where relevant.</p>
366	Table 12.7	Visual impacts to public receptors beyond 5km study area	The Inspectorate agrees that an assessment of visual effects on receptors beyond the study area can be scoped out of further assessment; however, the ZTV should be reviewed according to the final proposed development parameters and presented in the ES to demonstrate that there is no potential for significant effects to occur.
367	Table 12.7	Visual impacts to workers on the land or at private recreational locations	The Scoping Report proposes to scope out this matter on the basis that outdoor workers and other receptors involved in an outdoor activity (eg sports) are unlikely to be focussed upon views and any adverse effects on visual amenity are unlikely to be significant. The ZTV illustrates that proposed development would be visible to a wide range of receptors within the study area. The ES should assess potential effects on views and visual amenity within the ZTV where significant effects are likely to occur.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate considers that the ES should assess the visual impacts on these receptors or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects.
36.8	Table 12.7	Lighting impacts	<p>The Scoping Report proposes to scope out an assessment of lighting effects stating that the proposed development would not be routinely lit during operation and lighting required during construction and decommissioning would be designed to minimise visual intrusion and managed in accordance with best practice guidance.</p> <p>The Inspectorate considers that the ES should explain the construction and operational lighting strategy and how the lighting design has been developed to minimise light spill and the effects of intermittent lighting on human and ecological receptors. The ES should also provide an assessment of lighting effects during construction, operation and decommissioning, including a night-time assessment, or the information required to demonstrate the absence of likely significant effects. Cross references should be made to other relevant aspect assessments and sensitive receptors (such as biodiversity and nature conservation and cultural heritage and archaeology).</p>
36.9	Table 12.7; paragraph 12.3.36; figure 12.1	Residential Visual Amenity Assessment (RVAA) for properties beyond 250 m from the proposed development	<p>The Scoping Report states that this matter has been scoped out on the basis that views of the proposed development beyond 250m are unlikely to materially impact residential amenity. However, the ZTV provided in figure 12.1 illustrates that the proposed development would be visible to residential properties beyond 250m of the site boundary. The ES should assess potential effects on views and visual amenity within the ZTV where significant effects are likely to occur.</p> <p>The Inspectorate considers that the ES should provide an RVAA for properties beyond 250 m of the proposed development or evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects.</p>
36.10	Table 12.7	RVAA for properties within 250 m of the proposed development	The applicant proposes to scope out this matter stating that construction and decommissioning would be for a short duration and unlikely to materially affect residential

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		– construction and decommissioning	<p>amenity. However, the ZTV shows that the proposed development would be visible to residential properties within 250m of the site boundary.</p> <p>The Inspectorate considers that construction and decommissioning activities would be visible to residential receptors and the ES should assess potential effects on views and visual amenity within the ZTV where significant effects are likely to occur. The ES should provide an RVAA for properties within 250 m of the proposed development during construction and decommissioning or evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects</p>
36.11	Table 12.7	Cumulative effects where developments are outside the 5km study area and/ or have no intervisibility with the proposed development	<p>The applicant proposes to scope out an assessment of this matter on the basis that significant cumulative landscape and visual effects are not expected for developments located beyond 5km of the site boundary or do not have intervisibility with the proposed development. Insufficient information has been provided on the cumulative schemes in proximity to the proposed development. The Inspectorate does not agree that this matter can be scoped out of further assessment. Any receptors at risk of significant cumulative effects beyond the 5km study area should be identified and assessed using an appropriate ZTV.</p> <p>The cumulative effects assessment methodology (including other projects included in the assessment) should be agreed with the relevant consultation bodies and any exclusions should be clearly justified and explained with reference to the Planning Inspectorate's advice note regarding cumulative effects assessment.</p>

ID	Ref	Description	Inspectorate's comments
36.12	Paragraph 12.3.3	ZTV and study area	<p>The ES should clearly justify the ZTV and study area used and should ensure that a worst-case scenario is assessed. Where there are elements of the proposed development which exceed 3.5m, including the onsite substation, the applicant should consider using multiple ZTVs to assess the potential visibility for all components of the proposed development. The applicant should also make efforts to agree the study area for the</p>

ID	Ref	Description	Inspectorate's comments
			landscape and visual assessment with relevant consultation bodies and provide evidence of this within the ES.
36.13	Paragraph 12.3.57	Viewpoints	The Inspectorate advises that the ES should include confirmation of the consultation undertaken, together with evidence of agreement about the final viewpoint selection. Where any disagreement remains, an explanation as to how the final selection was made in accordance with the relevant guidance should be provided. Viewpoint locations should be identified on a plan within the ES. Baseline viewpoint photography for summer and winter should be provided.
36.14	Paragraph 12.3.61	Visualisations	The applicant should fully justify the location and number of visualisations, ensuring these are fully representative of the maximum visual envelope of the proposed development. The applicant should seek agreement from relevant consultees regarding the appropriateness of selected photomontages and evidence of this agreement should be provided within the application. The photomontages should show all components of the proposed development, including security fencing, CCTV poles and onsite substations etc.
36.15	N/A	Mitigation planting	The ES should clearly present any assumptions made with regards to the height that the proposed mitigation planting would have reached by the assessment years, with reference to relevant guidance to ensure that these are based on accepted growth rates for the plant species concerned, for the purposes of generating photomontages and reaching the assessment conclusions.

3.7 Noise and Vibration

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	Table 13.7	Road traffic noise – operation	The Inspectorate is content that minimal road traffic movements would occur during operation and that significant effects are unlikely. On this basis, this matter can be scoped out of further assessment. However, the ES should confirm access routes and the operational vehicle types and numbers (with reference to thresholds within relevant guidance) to justify this position.
3.7.2	Table 13.7; paragraph 13.2.9	Noise from underground cables – operation	The Scoping Report proposes to scope out this matter on the basis that the underground cables will be buried and are unlikely to lead to relevant airborne noise emissions. The Inspectorate agrees that noise emissions from underground cables are unlikely to result in significant effects and is content for this matter to be scoped out of further assessment.
3.7.3	Table 13.7; paragraph 3.5.6	Noise and vibration from solar PV modules – operation	The Scoping Report states that the noise and vibration emitted by the solar PV modules would be negligible and proposes to scope this matter out. The Inspectorate agrees that significant effects are not likely and this matter can be scoped out of the ES. However, the detailed description of the proposed development within the ES should demonstrate that the solar PV modules selected (including the use of tracker panel mechanisms) is of a type that would be unlikely to result in significant noise and vibration effects on sensitive receptors.
3.7.4	Table 13.7	Noise from maintenance works	<p>The applicant proposes to scope out this matter on the basis that the potential noise levels arising from the maintenance of the proposed development is equivalent to any agricultural works present within the site.</p> <p>The Inspectorate considers that there is potential for maintenance works to result in increased levels of noise, eg from the replacement of solar PV modules, and does not agree to scope this matter out of further assessment. The ES should provide an</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			assessment of the likely significant effects on sensitive noise receptors resulting from maintenance of the proposed development or provide evidence demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects. Any relevant mitigation measures should be recorded as part of the outline OEMP and agreed with relevant consultation bodies.
3.75	Table 13.7	Vibration from onsite substation – operation	The Scoping Report proposes to scope out this matter stating that the onsite substation is not considered to constitute a source of vibration. The Inspectorate agrees that vibration from the onsite substation is likely to be low and unlikely to result in significant effects on sensitive receptors. The Inspectorate is therefore content for this matter to be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
3.76	Paragraph 13.3.3	Study area	The ES should explain how the study area and sensitive receptors have been selected with reference to the extent of likely impacts and how these have been predicted. The ES should provide a plan showing the location of all sensitive receptors identified for assessment. Efforts should be made to agree the study area and approach to the assessment with relevant consultation bodies.
3.77	Paragraph 13.3.5; figure 13.5	Baseline monitoring	The Scoping Report states that noise surveys of the site are currently being conducted and the indicative location of the noise monitoring surveys are illustrated on figure 13.5. The ES should explain how the number and location of baseline noise monitoring surveys were chosen and how they are deemed to be representative of nearby receptors, taking into account any receptors located along the selected cable corridor options. The monitoring locations should be agreed with relevant consultation bodies.
3.78	Paragraph 13.5.2	Vibration from construction traffic	The Inspectorate notes that vibration from the construction phase is scoped into the ES. However, vibration from construction traffic has not been included in the list of activities therein that would potentially generate vibration. The condition of the roads have not

ID	Ref	Description	Inspectorate's comments
			been assessed, nor have the anticipated number and type of vehicles been provided to justify why vibration from construction traffic should be scoped out. The ES should provide evidence to confirm that ground-borne vibration generated from HGV movements (including along access routes) during construction and decommissioning would not result in significant effects on sensitive receptors or include an assessment of the likely significant effects, unless otherwise agreed with relevant consultation bodies.
3.7.9	Figure 13.5	Figures	Figure 13.5 identifies the indicative baseline monitoring locations, these have been labelled one to nine. However, noise monitoring location number six has been omitted from figure 13.5. For the avoidance of doubt, the ES should provide figure(s) that clearly display the location of all noise monitoring surveys in relation to any noise sensitive receptors.
3.7.10	N/A	Receptors – cross referencing	The Inspectorate considers that noise and vibration may also have potential to lead to adverse effects on landscape and visual receptors and cultural heritage assets. Potential adverse effects on landscape and cultural heritage should be cross referenced in the relevant aspect chapters in the ES. The ES should also consider whether any ecological receptors require consideration in respect of noise and vibration related impacts. The applicant should seek agreement from the relevant consultation bodies on any ecological receptors and cross refer to relevant chapters within the ES.

3.8 Socio-economics and Land Use

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
381	Table 14.13	Wider socio-economic effects – operation	<p>The applicant proposes to scope out this matter on the basis that wider socio-economic effects (such as structural economic change or disruption to established local industries) are not expected to arise during the operational phase. Moreover, table 14.13 states that any long-term effects arising during construction and continuing into operation will be assessed as construction effects.</p> <p>The Inspectorate is content with this approach and agrees to scope this matter out of further assessment. However, the ES should clearly identify any likely land use impacts that would continue beyond the construction phase. The applicant should also ensure that assessing such impacts during the construction phase does not underplay the potential duration in the assessment of significance of effects.</p>
382	Table 14.13	Socio-cultural effects – operation	<p>The Inspectorate agrees that operation of the proposed development is unlikely to result in significant changes to the local demographics or demand for services and is content for this matter to be scoped out of further assessment. However, the ES should confirm the number and type of jobs created during operation.</p>
383	Table 14.13	Land use effects – operation	<p>The Scoping Report seeks to scope out this matter on the basis that land use effects are not expected to arise during operation and any long-term effects occurring during construction and continuing into operation, for example temporary or permanent loss of BMV agricultural land, will be assessed as construction effects.</p> <p>The Inspectorate is content with this approach and agrees to scope this matter out of further assessment. However, the ES should clearly identify any likely land use impacts that would continue beyond the construction phase. The applicant should also ensure that assessing such impacts during the construction phase does not underplay the potential duration in the assessment of significance of effects.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
384	Table 14.13; paragraph 14.5.2	Direct effects for users of PRow – operation	<p>The Scoping Report explains that potential direct effects on users of PRow would be assessed during construction and would not be considered further in the operational assessment. However, the Scoping Report states that indirect effects for users of PRow during operation will be assessed in the ES.</p> <p>The Inspectorate is content with this approach and agrees to scope this matter out of further assessment. However, the ES should clearly identify any direct impacts (ie diversions or closures) that would last beyond the construction phase. The applicant should also ensure that assessing such impacts during the construction phase does not underplay the potential duration in the assessment of significance of effects.</p>

ID	Ref	Description	Inspectorate's comments
385	Paragraph 14.5.3	Decommissioning	Paragraph 14.5.3 of the Scoping Report states that the potential effects of decommissioning would be comparable to those identified during construction and proposes that the scope is the same as for construction. Whilst the Inspectorate is content with this approach, the ES should clearly describe the methodology used for each phase of the development. Efforts should be made to agree the assessment approach with relevant consultation bodies.
386	Paragraph 14.5.7	PRow – mitigation	The ES should identify any PRow that are proposed to be temporarily or permanently diverted or closed. Any proposed mitigation measures should be clearly described in the ES with explicit cross-reference to relevant information within the outline PRow Management Plan. The proposed mitigation must be secured in the draft DCO.
387	N/A	PRow - surveys	The proposed development will affect a number of PRow but no surveys are proposed to understand the baseline use. It is therefore unclear how the baseline will be established for these PRow. The Inspectorate considers that surveys should be undertaken to provide baseline data in relation to the use of the PRow affected by the proposed development or the ES should provide evidence of agreement with relevant consultation bodies that such

ID	Ref	Description	Inspectorate's comments
			surveys are not required. The location of relevant PRow should be depicted on a supporting plan(s).

3.9 Traffic and Transport

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
391	Table 15.7; paragraph 15.5.5;	<p>Operational traffic assessment of the following:</p> <ul style="list-style-type: none"> • severance • driver delay • pedestrian delay • non-motorised user amenity • fear and intimidation (and degree of hazard) • road safety • hazardous loads/ large loads 	<p>The applicant proposes to scope out these matters on the basis that the number of vehicle trips generated during operation of the proposed development are expected to be minimal. Paragraph 15.5.5 of the Scoping Report estimates that during operation of the proposed development there would be between one and two maintenance visits each month.</p> <p>The Inspectorate agrees that operational traffic movements will be low and therefore unlikely to give rise to any likely significant effects. On this basis, the Inspectorate is content to scope this matter out of further assessment. The ES description of the proposed development should confirm the vehicle types and numbers (with reference to thresholds within relevant guidance) required during operation.</p>

ID	Ref	Description	Inspectorate's comments
392	Paragraph 15.3.5	Indicative study area	The ES should explain how the study area for the traffic and transport assessment has been defined, with reference to the relevant industry guidance, sensitive receptors and extent of likely impacts. The ES should document any consultation undertaken with

ID	Ref	Description	Inspectorate's comments
			relevant highways authorities with regards to the final study area and key roads included in the assessment. A plan illustrating the extent of the study area should be included in the ES. Efforts should be made to agree the extent of the study area with consultation bodies, including the relevant highways authorities.
393	Paragraph 15.3.26; figure 15.4	Access points and vehicle routes	Figure 15.4 illustrates the proposed construction routes and access points to the solar PV areas. The expected route(s) of construction traffic to access all areas of the proposed site, including the cable corridor and construction compound(s), and the anticipated numbers of vehicle movements (including vehicle type, peak hour and daily movements) should be included in the ES. The location of vehicle routes and access points should be depicted on a supporting plan(s).
394	Paragraphs 15.4.19 and 15.4.20	Abnormal indivisible loads (AILs)	The Scoping Report states that there will be a limited number of AILs required to transport items, such as the substation transformers, to the proposed development. The impacts on safety from the delivery of AILs should be assessed within the ES where significant effects are likely to arise. Appropriate measures to ensure safe transportation of hazardous loads (if any) should be included within the AIL report and secured in the draft DCO.
395	N/A	Highways works	It is not clear whether any highway improvement works are required as part of the proposed development to facilitate construction access. The ES should include a description of any required works and provide an assessment of significant effects where these are likely to occur.

3.10 Water Resources and Flood Risk

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Table 16.8	Impacts on wastewater supplies – all phases	<p>The applicant proposes to scope out this matter on the basis that wastewater will be sourced and disposed of using temporary measures and there will be no additional demand placed on the supply and receiving capacity of wastewater networks. However, section 16.7 of the Scoping Report states that the method of wastewater discharge and management is not yet confirmed.</p> <p>The Inspectorate does not consider that sufficient detail has been provided regarding how wastewater will be dealt with during construction and operation and is therefore not currently in agreement that this can be scoped out of further assessment. The ES should provide an assessment of this matter where there is potential for a likely significant effects to occur or demonstrate the absence of a likely significant effects and agreement with the relevant consultation bodies. The ES should also provide details relating to the water supply and demand requirements of the proposed development and clearly set out how wastewater will be dealt with.</p>
3.10.2	Table 16.8; paragraph 16.3.23	Impacts on designated sites – all phases	<p>The Scoping Report proposes to scope this matter out on the basis that there are no designated sites within the 1km study area. The Inspectorate agrees that the proposed development is unlikely to result in adverse hydrological impacts on any designated sites and is content for this matter to be scoped out of further assessment.</p>

ID	Ref	Description	Inspectorate's comments
3.10.3	Paragraph 16.3.16	Flood defences	<p>The Scoping Report states that areas of the proposed development site which border the River Ter are located within flood zone 2 and 3. Moreover, paragraph 16.3.16 explains that the River Ter benefits from flood defences running along the entirety of the watercourse. The ES should locate, identify and describe the flood defences as well as</p>

ID	Ref	Description	Inspectorate's comments
			any other assets which may have implications on flooding/ flood risk, their condition and who is responsible for their maintenance. Impacts to/ from these flood defences and assets should be assessed in the Flood Risk Assessment (FRA) and their influence on the impacts to/ from flooding should be described. This should take into account the most up to date climate change projections to inform a worst-case scenario, particularly in relation to breach events.
3.104	N/A	Construction compounds	The applicant should ensure that an assessment of the potential impacts from construction compounds on water environment receptors is included in the ES. The ES should also explain how the location of construction compounds, including access, has been considered to reduce potential effects on the water environment and how any mitigation is secured through the DCO.
3.105	N/A	Mitigation measures	Design and mitigation measures for flood risk should be agreed with the EA, lead local flood authority (LLFA) and relevant Internal Drainage Board (IDB). Cross-reference should be made to relevant information contained within the FRA, as appropriate.
3.106	N/A	Water demands	The ES should set out whether there will be a requirement for concrete batching facilities during construction of the proposed development and how water demands associated with these facilities would be managed and secured. The applicant is directed to the response from Anglian Water (appendix 2 of this Opinion) on this matter.

3.11 Other Environmental Topics

(Scoping Report Section 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Table 17.6	Decommissioning waste	<p>The Inspectorate notes the applicant's intention to provide a proportionate assessment of waste within the other environmental topics chapter of the ES. However, the Scoping Report proposes to scope out an assessment of decommissioning waste.</p> <p>The ES should contain a description of the potential waste streams from all phases of the proposed development, including estimated volumes and an assessment of the likely significant effects. In addition, the ES should describe any measures implemented to minimise waste and state whether the waste hierarchy will be utilised. The CEMP, DEMP and site waste management plan (SWMP) should include as much detail as possible in relation to on-site waste management, recycling opportunities, and off-site disposal. The ES should also explain if extensive replacement of solar PV panels or other infrastructure is likely to be required during the lifetime of the proposed development and set out any assumptions regarding the maximum expected rate of replacement.</p>
3.11.2	Section 17.3	Glint and glare	<p>The Scoping Report proposes to scope out a glint and glare ES aspect chapter; however, a standalone glint and glare assessment is proposed to be submitted as a technical appendix to ES. The Inspectorate is content with this approach, however the standalone glint and glare assessment should assess the worse-case scenario and provide a description of any relevant mitigation measures and safety considerations. In the event that glint and glare effects are identified, it should be used to inform the relevant chapters in the ES, in particular for the landscape and visual aspect chapter.</p>
3.11.3	Section 17.4	Heat and radiation	<p>The Scoping Report proposes to scope out an assessment of impacts from heat and radiation during construction, operation and decommissioning as no notable sources of heat and radiation are anticipated due to the scale and nature of the proposed development. The Inspectorate agrees that this matter can be scoped out from further consideration provided that the ES clearly signposts to any identified sources of heat and</p>

			radiation and how this has been considered with respect to site selection, site layout and mitigation design.
3.11.4	Section 17.5	Utilities and telecommunications	The Inspectorate is content to scope these aspects out provided that the ES sets out the findings of the utility search and relevant consultation and how this information has been taken into account in the design of the proposed development to mitigate potential impacts.
3.11.5	Section 17.6	Major accidents and disasters	A standalone chapter for major accidents and disasters is not proposed on the basis that potential accidents and disasters will be assessed in other chapters of the ES where relevant. The Inspectorate has considered the characteristics of the proposed development and is content with this approach. The applicant's attention is drawn to the Health and Safety Executive's comments (appendix 2 of this Opinion) relating to potential hazards and receptors to be addressed within the ES. Any measures to ensure risks to human and environmental receptors are minimised should be set out and secured in the draft DCO.
3.11.6	Section 17.7	Human health	The Scoping Report states that the potential effects on human health will be considered within the aspect chapters of the ES. The Inspectorate is content with this approach and agrees that a standalone assessment on human health is not required. The ES should clearly signpost where impacts relating to human health have been considered in the relevant ES chapters.
3.11.7	Section 17.9	Electromagnetic fields (EMF)	On the basis that the voltage of underground cables does not exceed 132 kV, the Inspectorate agrees that EMF can be scoped out of further assessment. However, should the design of the proposed development be altered to include underground cables with a voltage greater than 132kV, an EMF assessment should be provided in an appendix to the ES. The assessment should include the location, routing, and voltages of any cables over 132kV and a risk assessment to any human and ecological sensitive receptors within an established Zol.
3.11.8	Table 17.7	Population	The Scoping Report states that an assessment of effects on population will be considered within the socio-economics and land use chapter of the ES. The Inspectorate is content with this approach and agrees that a standalone assessment on population is not required.

			The ES should clearly signpost where impacts relating to population have been considered in the relevant ES chapters.
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ID	Ref	Description	Inspectorate's comments
3.11.9	Section 17.8	Transboundary	The applicant's attention is directed to the Inspectorate's comments in ID 2.2.2 above.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Secretary of State for Defence	Ministry of Defence
The relevant parish councils	Felsted Parish Council
	Stebbing Parish Council
	Little Dunmow Parish Council
	Flitch Green Parish Council
	Boreham Parish Council
	Great Waltham Parish Council
	Great and Little Leighs Parish Council
	Little Waltham Parish Council
	Terling and Fairstead Parish Council
	White Notley and Faulkbourne Parish Council
	Cressing Parish Council
	Rayne Parish Council
	Shalford Parish Council
	Wethersfield Parish Council
	Gosfield Parish Council
	Witham Town Council
	Bradwell with Pattiswick Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Stisted Parish Council
	Black Notley Parish Council
	The Salings Parish Council
	Panfield Parish Council
	Silver End Parish Council
	Great Notley Parish Council
The Environment Agency	Environment Agency
Natural England	Natural England
The Forestry Commission	Forestry Commission
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The Canal and River Trust	Canal and River Trust
The relevant Highways Authority(s)	Essex County Council
	National Highways
The Civil Aviation Authority	Civil Aviation Authority
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England
The relevant police authority	Police, Fire and Crime Commissioner for Essex
The relevant ambulance service	East of England Ambulance Service

SCHEDULE 1 DESCRIPTION	ORGANISATION
The relevant fire and rescue authority	Essex County Fire and Rescue Service

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

‘Statutory undertaker’ is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS Hertfordshire and West Essex Integrated Care Board
	NHS Mid and South Essex Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	East of England Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Canal Or Inland Navigation Authorities	Canal and River Trust
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	Environment Agency
The relevant water and sewage undertaker	Anglian Water
	Essex and Suffolk Water

STATUTORY UNDERTAKER	ORGANISATION
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
	National Gas
The relevant electricity generator with CPO Powers	Lightsource BP Renewable Energy Investments Limited

STATUTORY UNDERTAKER	ORGANISATION
The relevant electricity distributor with CPO Powers	Advanced Electricity Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	UK Power Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operation Limited

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
Epping Forest District Council
Brentwood Borough Council
Colchester Borough Council
Basildon Borough Council
East Hertfordshire Council
Babergh District Council
South Cambridgeshire District Council
Rochford District Council
North Hertfordshire District Council
West Suffolk Council
Maldon District Council
Uttlesford District Council
Chelmsford City Council
Braintree District Council
Essex County Council
Southend-on-Sea Borough Council
Thurrock Council
London Borough of Havering
Enfield Council
Waltham Forest Council
London Borough of Redbridge
Medway Council

LOCAL AUTHORITY	
Cambridgeshire County Council	
Suffolk County Council	
Hertfordshire County Council	

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Anglian Water
Black Notley Parish Council
Bradwell with Pattiswick Parish Council
Braintree District Council (including responses from Rayne Parish Council, Black Notley Parish Council, Historic England and Essex County Council Highways Authority)
Brentwood Borough Council
Cambridgeshire County Council
Chelmsford City Council
Enfield Council
Environment Agency
Epping Forest District Council
Essex County Council
Forestry Commission
Health and Safety Executive
Historic England
Medway Council
NHS Mid and South Essex Integrated Care Board
Ministry of Defence
National Gas
National Highways
NATS En-Route Safeguarding
Natural England
NHS Hertfordshire and West Essex Integrated Care Board

North Hertfordshire District Council
Rochford District Council
Suffolk County Council
The Salings Parish Council
United Kingdom Health Security Agency
Uttlesford District Council
Waltham Forest Council
West Suffolk Council

Jack Patten
EIA Advisor
The Planning Inspectorate
By email: HedgehogGroveSolar@planninginspectorate.gov.uk

Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
Cambridgeshire. PE29 6XU

www.anglianwater.co.uk
strategicgrowth@anglianwater.co.uk

Our ref: Hedgehog Grove Solar/Scoping

20 May 2025

Dear Jack,

HEDGEHOG GROVE SOLAR FARM EIA SCOPING NOTIFICATION AND CONSULTATION – ANGLIAN WATER RESPONSE

Thank you for the opportunity to comment on the scoping report for the above project. Anglian Water is the statutory water and sewerage undertaker for the proposed project area, and this response is in our statutory capacity regarding water resources, water supply network, water recycling centres (WRCs), water recycling assets and the sewer network, as well as the related role of surface water drainage.

Anglian Water works to support the construction and operation of nationally significant infrastructure projects that are conducted in accordance with the Water Industry Act 1991. We would expect the next stages of the project to include reference to any existing infrastructure managed and owned by Anglian Water, and any provision of replacement infrastructure or requirements for new infrastructure.

Anglian Water works with developers, including those constructing projects under the 2008 Planning Act, to ensure requests for alteration of sewers, wastewater and water supply infrastructure are planned to be undertaken with the minimum of disruption to the project and customers. We would encourage on-going engagement to ensure that AWS and the developer have reached agreement on the approach to assets and connections in order that these matters in advance of the submission of the draft DCO for examination.

3. THE PROPOSED DEVELOPMENT

The project area [Figure 1.3 DCO Limits] is located within Uttlesford District Council, Chelmsford City Council, and Braintree District Council areas. Anglian Water is the statutory sewerage undertaker for the entire project area, but only the statutory water supply undertaker for part of Braintree District Council area that comprise some of the cable corridor option routes.

None of the proposed site boundary for the three areas identified as HG1, HG2 and HG3 [para 3.2.3] appears to interface with our existing underground assets. This is mainly within the area where we are the statutory sewerage undertaker and Essex & Suffolk Water are the statutory water undertaker. [Figure 1.1 Site Location].

However, the cable corridor options [subsection 3.4] between the onsite substation to the UKPN Braintree Substation [Figure 1.2], include areas where we are both the statutory water and sewerage undertaker, extending from east of Bartholomew Green and south of Great Notley and Braintree. The extent of the cable corridor options includes interfaces with our water mains and sewer pipes - most numerous interfaces are identified around the A131/Blackley Lane/London Road pinch point crossing (where all cable corridor options merge), and south of Braintree to Black Notley, which include strategic water mains. In addition, there are pumping stations within/adjacent to the route options.

Figure 1.5 - the cable corridor options are varied and have different levels of interfaces with our underground/above ground assets. We would advise that the route with least number of interfaces and potential diversions (or additional protection measures) is identified, to reduce the risk of interruption to the operation of our networks and water supply, and consequent risks to the environment and local residents. Cable Option 1 to co-locate the cable route with Willows Green Solar Park demonstrates the ability to minimise disruption and effectively helps to manage utility interfaces with our underground assets; including avoiding having to potentially divert the same asset twice, and the capital and operational carbon emissions associated with this activity.

Cable option routes that utilise public highways (e.g. Options 2 and 4) will have more interfaces with our water mains and sewer assets as these tend to follow highways/highway verges, particularly in settlements. This could lead to significant risks to the operation of our networks, and a greater need for diversions and protection of our assets.

The Applicant should be aware that cable corridor option routes that run parallel to part of the Braintree Bypass should ensure that the trenches and laydown areas do not impact our strategic water main that also runs parallel to the southern boundary of the bypass.

Site access and tracks:

Indicative site access locations are outlined in para 3.5.26 and identified in Figure 1.4 - the far east site access from School Road would interface with a water main, that may be located in the verge or at the field edge, and we would advise the location either seeks to avoid the interface or undertakes necessary construction measures to protect our asset and these mitigation measures are set out in the outline Construction Environment Management Plan (oCEMP) supporting the Environmental Statement (ES).

Surface Water Drainage:

It is noted that para. 3.5.28 states that an outline Surface Water Drainage Strategy will be prepared and submitted with the DCO application - this is welcomed by Anglian Water. The onsite substation option is close to Bannister Green, which has a combined sewer network (surface and foul

drainage). Surface water flood risk arising from the construction and operation of the site should be mitigated through the drainage hierarchy with the recommendation to utilise SuDS to reduce and attenuate any increased run-off risk to the neighbouring settlement that could impact the hydraulic capacity of our combined network. No surface water flows will be accepted into our foul drainage or combined network.

Anglian Water supports the design of drainage systems to address the supply of water for fire suppression systems to mitigate the need for additional water resources. Any necessary modifications to the land drainage systems should be designed to mitigate any potential unintended impacts on creating other water pathways that might impact on our sewer networks.

Temporary Construction Compounds:

We would advise that temporary construction compounds are carefully located so as to minimise any impacts on our assets, particularly within the cable corridor. The removal of topsoil, creation of bellmouths and laydown areas for storing materials can increase risk to damaging our underground assets and the operation of our networks, including interruptions to supply.

Any temporary water or wastewater connections required to serve the compounds should be requested through our Inflow platform at an early stage, when designs are fixed, to ensure these can be planned for effectively. In terms of any non-domestic water resources, please see our comments under Chapter 16.

3.6 Development Programme

It is noted that the construction phase is expected to last 24 months from Q3 in 2027. Anglian Water emphasises that early engagement with utility providers is a fundamental element of planning the specific construction details in the DCO application, particularly with regard to any diversions.

Anglian Water has a considerable programme of investments in AMP8 (2025-2030) and will be managing the interfaces with our assets and diversions for a significant number of NSIPs within our region during the same period. Where interfaces/diversions cannot be avoided, we would recommend that NSIP Promoters that have a large number of Anglian Water assets (or assets of a strategic nature) interfacing with the Project, engage with us on the specific detail of these interfaces at an early stage, as this will help inform the extent of the order limits, should any diversions be required, and help to reduce delays later in the process when the project reaches delivery stage.

3.6.4 lists the typical construction activities including marking infrastructure component locations. It is unclear as whether or not this activity is to identify existing underground and overground utility interfaces. In either situation, Anglian Water would endorse this activity to ensure the protection of our assets and the safety of the construction team. We would advise on trial holes to ascertain the location of our assets where this will directly interface with construction activities, unless already identified through other surveys such as ground investigations.

Anglian Water supports the preparation of an outline Construction Environmental Management Plan as an appendix to the PEIR and ES, and the identification of the processes that will be outlined therein, including utilities diversions and emergency response and contingency plans. This will help ensure robust measures are in place to manage the construction processes and should be consistent with the Protective Provisions for Anglian Water for inclusion in the DCO. As previously indicated, more detailed advice, technical assurance can be provided by Anglian Water at an early stage which will assist with measures for inclusion in the oCEMP to help de-risk the delivery of the project at a later stage.

6. ENVIRONMENTAL IMPACT ASSESSMENT METHODOLOGY

Construction:

6.6.8 - whilst this list does not provide the full range of effects during construction, Anglian Water would seek to include 'interfaces with utility infrastructure' in the PEIR and ES.

9. CLIMATE CHANGE AND GREENHOUSE GAS ASSESSMENT

Anglian Water notes that all phases of the development have been scoped in to the EIA in relation to GHG assessment, which means that the carbon emissions regarding any required diversions of utilities should be factored into the operational and capital carbon elements of the design and associated cable corridor route.

11. GROUND CONDITIONS AND LAND QUALITY

Anglian Water agrees that the potential effect is 'scoped in' on ground conditions through the construction phase (Table 11.3) such as encountering contamination during construction works activities, and the potential effects on groundwater. This would address matters such as utilities strikes given the number of interfaces that potentially need to be managed once the cable corridor option has been confirmed.

13. NOISE AND VIBRATION

Table 13.6 Elements of the Noise and Vibration assessment Proposed to be Scoped In to the EIA: this includes vibration arising from construction works. The rationale suggests that this may be intrusive to sensitive receptors, but mechanical vibration can also impact on underground pipes (sewers and water mains) and we would seek to ensure that measures to appropriately mitigate these effects are included in the oCEMP.

15. WATER RESOURCES AND FLOOD RISK:

Water Resources:

The Anglian Water region is identified as 'seriously water stressed' in the Environment Agency's 2021 classification of water stressed areas. One specific point for the Environmental Statement (ES) therefore and in view of the potential impacts on water resources, is that the applicant is advised to consider the published Water Resources East [Regional Plan](#) which sets out the collective water companies position in the east of England. The Water Resource Management Plan (WRMP) for Anglian Water is available on our [website](#) and we would advise these documents are referenced in the data sources in 16.3.2. The AWS [Non-Domestic Water Requests policy paper](#) means that the

project's ES will need to consider water resources and water efficiency and that a Water Resources Assessment (WRA) will be required to be produced by the applicant and agreed with Anglian Water if non-domestic water demand is likely to exceed 20m³/day. The WRA will need to address water and wastewater for the project's temporary construction compounds and activities as well for permanent operational sites including the onsite substation.

Anglian Water recommends that the WRA is an integral part of the Water Resources chapter of the ES (see 5.3 of the applicant's Scoping Report). There does not appear to be sufficient information on the project's water supply requirements during construction and operation to suggest that water resources should be scoped out. The flows needed to fill water storage tanks for example (if the Applicant decides not to use rainwater harvesting on site to meet this non potable demand) will need to be assessed by us to advise whether a supply is feasible when assessed in terms of the potential to jeopardise domestic supply or at a significant financial or environmental cost. The Water Resources Assessment (WRA) should set out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses.

Water Supplies:

The completion of the WRA will enable the project to demonstrate that it is maximising water efficiency and protection of finite water resources which are needed to support the region's growth - consistent with the Applicant's assertion that further details on public water supplies will be obtained to inform the ES from utility providers. The Applicant should confirm that there will be no temporary concrete batching facilities with consequent water demands and so not require an on-site non-domestic supply. Water requirements for firefighting measures and construction traffic (dust suppression/ wheel washing areas) should also be explained. Further advice on water capacity and options can be obtained by submitting a pre-development enquiry to the Pre-Development Team at: planningliaison@anglianwater.co.uk

Table 16.7 Elements of the Water Resources and Flood Risk Assessment Proposed to be Scoped In to the EIA: Anglian Water notes that water supplies have been scoped in for the EIA and welcomes this approach.

Flood Risk:

Anglian Water supports [16.4.12] the preparation of a site-specific FRA and the mitigation measures required to prevent, reduce or offset the residual effects of the project.

Surface Water Drainage Strategy:

Anglian Water would seek to ensure that any potential embedded design measures in the outline Surface Water Drainage Strategy (OSWDS) such as Sustainable Drainage Systems (SuDS) will effectively manage rainfall run-off and achieve sufficient attenuation to avoid increases in surface water flood risk, whilst offering the potential for integrated water management measures (e.g. Rainwater harvesting and reuse). Similar factors should be applied to manage surface water run-off at temporary site compounds. Anglian Water is responsible for management of the risks of flooding from surface water which are directed to surface water sewers or combined water sewer systems. Our preference would be for surface water run-off from above ground permanent buildings and impermeable surfacing to be managed by SuDS with reuse opportunities considered first (e.g. for

fire suppression during operation and dust suppression during construction), followed by any outfall to a watercourse, in accordance with the drainage disposal hierarchy. We welcome the approach to engage with the LLFA to agree on the design and layout for the SWDS. Anglian Water would welcome attendance at a future workshop if there is an intention to discharge surface water to a public surface water sewer.

Subject to confirmation that all surface water will be managed through SuDS, Anglian Water would seek to ensure that the draft DCO will have no powers to connect to the public sewer network for the discharge of water during construction or for operations. This would then negate the need for the draft DCO Order to provide for any connection and so require consequent Requirements to ensure any connections did not compromise the wastewater services of existing customers.

Wastewater discharge:

It is noted in Table 16.8 that wastewater supplies have been scoped out as it is anticipated that wastewater disposal will be managed through temporary measures with no need to connect to existing sewerage network. We would suggest that this is confirmed at an early stage, or that a pre-application is made to request a connection through our [Inflow](#) platform, so that connections can be appropriately planned for.

17. OTHER ENVIRONMENTAL TOPICS

17.5 Telecommunications and Utilities

It is noted that a utility search will be conducted to identify any existing infrastructure constraints [17.5.2]. Maps of AWS's underground assets are available to view at the following link:

<http://www.digdat.co.uk/>

We advise Applicants for nationally significant infrastructure projects, particularly those likely to have a number of interfaces with our underground assets, to contact Anglian Water to discuss provision of further assessments for clash detection, identification of potential diversions, and asset protection measures. This will help to ensure that the proposed order limits are suitable to accommodate such works and help de-risk the delivery programme for the Project if such matters are identified at an early stage.

It is agreed that the oCEMP should encompass any additional mitigation measures required to safeguard below-ground utilities from interference and that Protective Provisions would be expected to be agreed with statutory undertakers [16.5.3].

Anglian Water requires that the following standoff distances are applied for working each side of the medial line of our pipes. The text is drawn from our template Protective Provisions which will need to be agreed with Anglian Water prior to the DCO submission.

- (a) 4 metres where the diameter of the pipe is less than 250 millimetres.
- (b) 5 metres where the diameter of the pipe is between 250 and 400 millimetres, and
- (c) a distance to be agreed on a case-by-case basis and before the submission of the Plan under sub-paragraph (1) is submitted where the diameter of the pipe exceeds 400 millimetres.

These distances are a starting point for design, assessment, diversion or mitigation measures including crossing provisions.

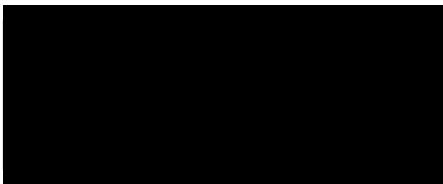
Next steps

Anglian Water would welcome the progression of discussions with the Applicant, in line with the requirements of the 2008 Planning Act and guidance. Experience has shown that early engagement and then agreement is required between NSIP applicants and statutory undertakers during design and assessment and well before submission of the draft DCO for examination. Consultation at the statutory PEIR stage would in our view be too late to inform design and may result in objections and delays to the project, including potentially requests to change the project's Order Limits to ensure Anglian Water services to existing customers and to support growth are not prejudiced. As part of the wider progression of the project alongside the ES, Anglian Water recommends discussion on the following issues:

1. Impact of development on Anglian Water's water and water recycling assets.
2. The design of the project to minimise interaction with Anglian Water assets/ critical infrastructure and specifically to avoid the need for mitigation works and diversions which have associated carbon costs.
3. Requirement for potable and raw water supplies (if any) and the inclusion of the WRA in the PEIR.
4. Requirement for water recycling connections (if any).
5. Confirmation of the project's cumulative impacts (if any) with Anglian Water projects.
6. The Draft Development Consent Order (DCO), including draft Protective Provisions and requirements specifically to ensure Anglian Water's services are maintained during construction.

Advice on the form and content of suitable Protective Provisions in the draft Development Consent Order should be sought. Please do not hesitate to contact strategicgrowth@anglianwater.co.uk on these aspects or should you require clarification on the above response or during the pre-application to decision stages of the project.

Yours sincerely,



Tessa Saunders
Spatial and Strategic Planning Manager



Patten, Jack

From: info@blacknotley-pc.gov.uk
Sent: 16 May 2025 11:57
To: Hedgehog Grove Solar
Subject: RE: EN0110021 - Hedgehog Grove Solar Farm - EIA Scoping Consultation and Notification

You don't often get email from info@blacknotley-pc.gov.uk. [Learn why this is important](#)

Good morning Jack

Black Notley Parish Council Object to this Application as it is on Grade 2 and 3a Good Agricultural Land. Also there is insufficient information to make further comment.

Black Notley Parish Council are not averse to the development of Solar Sites/Panels, however the Parish Council is in agreement that Solar Sites/Panels should be on Industrial Sites, Factory Roofs, All Newbuilds, - as endorsed by the LGA – Local Gov. Assoc. – Brown Field Sites, and Very Poor Agricultural Land only, not on Good Quality Agricultural Land Grade 2 and 3a or on Green Buffers which should be reserved for food production for an increasing population.

This application will have a Major Impact on the Parish of Black Notley.

The Statement Chapter 3 – Cabling. 4 Options are offered. 3 using existing major/minor roads/unclassified lanes.

None of these Options give specific details as to how they are implemented. Would there be complete road closures or a traffic light system?

The similar cable laying project by UK Power Networks in 2024 brought months of inconvenience to residents of Black Notley, this was exacerbated by on-road parking on the Diversion route, and became severe at the closure of Witham Road with no adequate Diversion available. There was also the added problem of vibration, noise and dirt for homeowners (Bakers Lane) directly on, and only feet from the cable route excavation.

Therefore (a) The Option to use the most direct route via A120 would be quicker (b) The Option to share the route with Clearway would be a sensible option. (c) An Option to follow the A120 along the proposed New Housing Development at Hayeswood Gt Notley should be explored.

Therefore Black Notley Parish Council request to be kept informed of all future developments regarding this matter.

Regards

Helen Waterfield
Clerk to Black Notley Parish Council

Telephone - 01376 550309. Email - info@blacknotley-pc.gov.uk
The Clerk works part-time hours if your enquiry is urgent please telephone.

From: Hedgehog Grove Solar <HedgehogGroveSolar@planninginspectorate.gov.uk>
Sent: 23 April 2025 08:58
Subject: EN0110021 - Hedgehog Grove Solar Farm - EIA Scoping Consultation and Notification

Dear Sir/Madam

Please see attached correspondence on the proposed Hedgehog Grove Solar Farm.

The applicant for the proposed development intends to make an application for Development Consent under the Planning Act 2008. The applicant has sought a scoping opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **21 May 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Jack Patten



Jack Patten [REDACTED]
EIA Advisor
The Planning Inspectorate

 [@PINSGov](https://twitter.com/PINSGov)  [The Planning Inspectorate](https://www.linkedin.com/company/the-planning-inspectorate/)  planninginspectorate.gov.uk

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Patten, Jack

From: Bradwell with Pattiswick Parish Council <clerktohppc@outlook.com>
Sent: 20 May 2025 17:58
To: Hedgehog Grove Solar
Subject: Re: EN0110021 - Hedgehog Grove Solar Farm - EIA Scoping Consultation and Notification

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: EST

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Good afternoon,

Bradwell with Pattiswick have no comments for this application.

Kind regards,

Theresa Trotzer Wilson

Parish Clerk & Responsible Financial Officer (RFO)

Bradwell with Pattiswick Parish Council

Phone: [REDACTED] | Website: [REDACTED]

Bradwell Village Hall, Church Road, Bradwell, Braintree, Essex, CM77 8EP

Please note that I work part-time and with flexible hours. I will respond to your message as soon as possible.

From: Hedgehog Grove Solar <HedgehogGroveSolar@planninginspectorate.gov.uk>
Sent: 23 April 2025 08:57
Subject: EN0110021 - Hedgehog Grove Solar Farm - EIA Scoping Consultation and Notification

Dear Sir/Madam

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The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **21 May 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Jack Patten



The Planning
Inspectorate

Jack Patten ([REDACTED])
EIA Advisor
The Planning Inspectorate



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DPC:76616c646f72



Our ref: 25/00965/SCO
Your Ref: EN0110021
Direct Dial: 01376 312765
Ask for: Timothy Havers
Date: 21.05.2025



Development Management
Causeway House Braintree
Essex CM7 9HB

F.A.O. Mr Jack Patten
Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Mr Patten

APPLICATION NO: 25/00965/SCO

YOUR REF: EN0110021

DESCRIPTION: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) Regulations 10 and 11, Scoping Consultation regarding an application by Hedgehog Grove Solar Farm Ltd (the applicant) for an Order granting Development Consent for the Hedgehog Grove Solar Farm (the proposed development)

LOCATION: Hedgehog Grove Solar Farm, South of the A120, between Bannister Green and Bartholomew Green, Fentons Road, Rayne, Essex

I write in response to the consultation received by Braintree District Council on 23rd April 2025 in relation to the Environmental Impact Assessment Scoping Report consultation issued by the Planning Inspectorate concerning the above development proposal.

Scoping Report

Regulatory Requirements and Assessment Methodologies

Braintree District Council consider that the Scoping Report (SR) has met the regulatory requirements set out in Part 4, Section 15(2) of the EIA Regulations which state that a scoping request must include *“a plan sufficient to identify the land; a brief description of the nature and purpose of the development and of its possible effects on the environment; and such other information or representations as the person making the request may wish to provide or make”*.

The SR provides proportionate detail on the methodologies to be employed for each topic.

One of the benefits of scoping is the opportunity it presents to agree the detailed assessment methods prior to submission of the application. The more information provided, the more useful the response will be.

The Applicant should ensure the details of the proposed methods underpinning each EIA topic are agreed prior to submission of the ES with the relevant consultees, which would include for example, agreeing baseline survey locations and study areas, agreeing viewpoint locations etc. This should form part of the on-going consultation into the EIA.

Scoping – Environmental Topics Scoped into and Scoped out of the EIA

The SR sets out the topics/elements of topics identified as being scoped into and scoped out of the EIA. The Council agrees that all the topics/elements of topics identified as being ‘scoped in’ should be ‘scoped in’.

With regard to the elements of topics identified as being ‘scoped out’ the Council does not agree with the following, particularly given that there has been very limited engagement with the Council from the Applicant at this stage:

Elements of Topics Identified as being ‘Scoped Out’ which the Council consider should in fact be ‘Scoped In’

Biodiversity and Nature Conservation:

- Statutory designated sites within 2km.
- Non-statutory designated sites within 2km.
- Wintering birds.
- Invasive Non-Native Species.

Cultural Heritage and Archaeology

- Assessment of the direct physical impacts to heritage assets outside the Site.
- Indirect physical impacts to heritage assets outside the Site and its immediate vicinity.
- Setting Impacts to non-designated heritage assets.
- Temporary Settings Impacts to designated and non-designated heritage assets as a result of the operation and decommissioning of the Cable Corridor Options.

Ground Conditions and Land Quality

- Temporary changes to soil function (e.g. compaction, changes to drainage/infiltration of water to ground) during construction.

Landscape and Visual

- Landscape subject to non-statutory/ local landscape designation.
- National Character Area (NCA).
- Local Landscape Character Areas outside of the Study Area.
- Visual receptors using PRoW within the Site Boundary.
- Visual receptors using Public Rights of Way or other public outdoor locations within the Study Area where the ZTV demonstrates no visibility.
- Visual receptors at public locations outside of the Study Area.
- Visual receptors: workers on the land or private outdoor recreational locations.
- Cumulative Effects of similar developments without intervisibility or outside of the Study Area.
- Night-time effects and or lighting effects.
- Residential Visual Amenity Assessment (RVAA) for properties within 100 m of the Proposed Development.
- Residential Visual Amenity Assessment for properties beyond 250m from the Proposed Development.

Noise and Vibration

- Noise arising from the operation of the solar PV modules.
- Noise arising from the maintenance of the Proposed Development.
- Land use effects.

Socio-Economics and Land Use

- Wider socio-economic effects.
- Socio-cultural effects.
- Direct effects for users of PRow.

Waste

- Handling and disposal of decommissioning phase wastes.
- Requirement for a separate Waste chapter of the ES.

Glint and Glare

- Assessment of Glint and Glare effects during the construction phase.
- Assessment of the Glint and Glare impact on aviation receptors (airfields, Air Traffic Control Towers, and incoming aircraft) located beyond 10 km from the Site.
- Assessment of the Glint and Glare impact on ground receptors (road users, residential dwellings and PRowS) located beyond 1 km from the Site.
- Requirement for a separate Glint and Glare chapter of the ES.

Telecommunications and Utilities

- Assessment of Telecommunications and Utilities for the operational phase and decommissioning phases.

Major Accidents and Disasters

- Requirement for a separate Major Accidents and Disasters chapter of the ES.

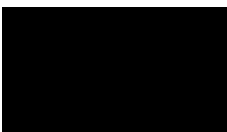
Comments from consultation undertaken by BDC as part of the Scoping Report consultation response

Appended to this letter are consultation responses from the following received by the Council in relation to consultation carried out by the Council to help inform this Scoping Report consultation response:

Appendix A – Rayne Parish Council
Appendix B – Black Notley Parish Council
Appendix C – Historic England
Appendix D – North-East Essex Badgers Group
Appendix E – Essex County Council Highways
Appendix F – BDC Archaeology (via ECC Place Services)
Appendix G – BDC Ecology (via Place Services)
Appendix H – BDC Historic Buildings (via Place Services)

This consultation response is made with regard to the SR in the context provided by the Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11 and does not prejudice Braintree District Council's consideration of the other planning matters relating to the development of this site.

Yours sincerely



Timothy Havers MRTPI
Lead Principal Planner
for Head of Planning

DC/615/1
BLANKL



RAYNE PARISH COUNCIL

Clerk to the Council: Mrs Hazel Godfrey
Community Information Point,
Gore Road,
Rayne
CM77 6TX
Tel: (01376) 552489

rpc@rayneessex.gov.uk

www.rayne-essex.gov.uk

Rayne Parish Council – Submission on the Proposed Hedgehog Solar Farm (98MW)

Date: 14/05/2025

Rayne Parish Council wishes to formally submit its comments on the scoping document on the proposed Hedgehog Solar Farm development, a 98MW installation between the villages of Rayne and Felsted. Whilst the Council supports the UK's transition to renewable energy and acknowledges the vital role solar power plays in achieving national sustainability targets, we have serious concerns about the suitability of this particular proposal in terms of scale, location, and cumulative impact on our community and environment.

1. Landscape and Visual Impact

The proposed development occupies a large swathe of countryside that is much valued by local residents and visitors alike. In our view, this scale of industrial development constitutes a significant and semi-permanent intrusion on the rural landscape — a green space that contributes to the distinct character and quality of life in Rayne. If permitted, this scheme would fundamentally alter the nature of the area and be seen as a large blot on treasured land between Rayne and Felsted.

2. Impact on the Flitch Way

A particular concern is the impact on the Flitch Way, a former railway line now designated as a linear country park and non-designated heritage asset. The Flitch Way is described by many as the "jewel in the crown" of Braintree District and provides important access to the countryside for walkers, runners, cyclists, and horse riders. Any development that affects the views and tranquillity of this route must be approached with extreme caution. Should the proposal proceed, serious mitigation measures must be required, including native landscaping, screening, and carefully planned buffer zones to preserve the visual amenity and character of the Flitch Way in line with the principles of the National Planning Policy Framework (NPPF).

3. Wildlife and Biodiversity

The proposed site and surrounding area support a range of local wildlife, including deer that are frequently observed roaming the land. There is real concern that large-scale disruption could displace deer and other species from their habitat, forcing them into nearby farmland, roads, or residential areas. This not only endangers the animals but may cause safety issues for residents. The

development area also includes habitats that are important for birds, small mammals, and insects. We urge that full ecological surveys are conducted, and that a long-term biodiversity management plan be a required condition for any approval.

4. Impact on Public Rights of Way (PROWs)

Numerous Public Rights of Way cross the proposed development site. These well-used paths offer residents and visitors the opportunity to enjoy open countryside and uninterrupted views across farmland and woodland. The proposed solar farm would severely degrade the rural setting of these routes, replacing natural vistas with rows of panels and fencing. This represents a loss not just of amenity but of a cultural and recreational asset used by the community on a daily basis. The loss of rural character around PROWs is a major concern that must be addressed in any planning assessment.

5. Cumulative Impact with Other Developments

The Hedgehog Solar Farm proposal must not be viewed in isolation. Permission has already been granted for a separate solar farm between Rayne and Willows Green, and there is a growing concern over the cumulative impact of multiple developments within a small geographical area. The combination of these projects risks overwhelming the rural character of the parish, creating an impression of industrialisation in what is currently peaceful and undeveloped countryside. The Council calls for a strategic, coordinated approach to renewable energy siting that considers the broader landscape context and ensures that no single area bears a disproportionate burden.

6. Construction Traffic and Access

Access during the construction phase is another significant concern for Rayne Parish Council. The local road network consists of narrow, rural county lanes that are not designed to accommodate sustained use by heavy construction vehicles. Increased traffic from large vehicles could pose safety risks to residents, damage road surfaces, and cause severe disruption to daily life in and around the village. Should the development proceed, it is essential that traffic management plans are robust, enforceable, and sensitive to local conditions. In addition, any cabling required to connect the site to the grid should, wherever possible, be coordinated with existing or approved solar developments in the area. Joint infrastructure planning would help reduce unnecessary trenching, roadworks, and environmental disturbance, and should be a clear expectation set by the Development Consent Order.

7. Loss of Agricultural Land and Food Security

Rayne Parish Council is also deeply concerned about the permanent loss of productive agricultural land. The proposed development site includes areas classified as Grade 3a — identified as Best and Most Versatile (BMV) land under national planning policy. These soils are among the most productive in the country and are vital for maintaining domestic food production. At a time when food security is an increasing concern, it is inappropriate to allow large-scale industrial development on land that could otherwise contribute to sustainable farming and local food systems. The National Planning Policy Framework (NPPF) is clear that significant development on BMV land should be avoided unless there is a clear justification. We believe this application fails to demonstrate such a justification, especially when alternative less sensitive sites may exist elsewhere.

8. Public Engagement and Transparency

Rayne Parish Council believes that genuine public consultation is essential in ensuring that developments of this scale are appropriate, sustainable, and supported by those affected. We welcome open and transparent dialogue between developers, local authorities, and the community. Meaningful consultation not only helps to identify and address local concerns early, but also leads to better outcomes for everyone — residents, developers, and the environment alike. We urge that any decisions regarding this proposal take full account of local views and that further opportunities for constructive public engagement are provided throughout the process.

9. Heritage and Residential Amenity

The proposed solar farm is surrounded by a number of listed buildings, many of which contribute to the historic and rural character of the area. Any development in such proximity must be carefully assessed for its impact on heritage assets and their settings, in accordance with both national and local planning policies. We strongly urge that heritage impact assessments be rigorously applied. Furthermore, should the proposal proceed, Rayne Parish Council requests that all noise-generating infrastructure, such as inverters and transformers, be located as far as possible from residential properties to minimise disturbance. Effective noise mitigation and sensitive siting are essential to protect the amenity of those living nearby.

10. Summary and Recommendations

In conclusion, while Rayne Parish Council supports the principles of renewable energy and sustainability, we believe this proposal is inappropriate in scale and setting, with potential to cause long-term harm to our community, environment, and landscape. The development poses a threat to local wildlife, public enjoyment of the countryside, historic and recreational assets like the Flitch Way, and the safety of our rural road network. We urge decision makers to:

- Refuse this application in its current form
- Require a cumulative impact assessment across all local solar developments
- Mandate comprehensive mitigation measures if approval is granted
- Protect the Flitch Way and PROWs through strong landscape and visual safeguarding
- Insist on collaborative infrastructure planning to reduce construction impacts
- Safeguard BMV agricultural land in line with national policy and food security priorities
- Protection and mitigation for listed properties that surround the proposal

Consultee Comments for Planning Application 25/00965/SCO

Application Summary

Application Number: 25/00965/SCO

Address: Hedgehog Grove Solar Farm South Of The A120 Between Bannister Green And Bartholomew Green Fentons Road Rayne Essex

Proposal: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) Regulations 10 and 11, Scoping Consultation regarding an application by Hedgehog Grove Solar Farm Ltd (the applicant) for an Order granting Development Consent for the Hedgehog Grove Solar Farm (the proposed development)

Case Officer: Timothy Havers

Consultee Details

Name: Black Notley PC

Address: [REDACTED]

Email: Not Available

On Behalf Of: Black Notley Parish Council

Comments

Black Notley Parish Council Object to this Application as it is on Grade 2 and 3a Good Agricultural Land. Also there is insufficient information to make further comment.

Black Notley Parish Council are not averse to the development of Solar Sites/Panels, however the Parish Council is in agreement that Solar Sites/Panels should be on Industrial Sites, Factory Roofs, All Newbuilds, - as endorsed by the LGA Local Gov. Assoc. Brown Field Sites, and Very Poor Agricultural Land only, not on Good Quality Agricultural Land Grade 2 and 3a or on Green Buffers which should be reserved for food production for an increasing population.

This application will have a Major Impact on the Parish of Black Notley.

The Statement Chapter 3 Cabling. 4 Options are offered. 3 using existing major/minor roads/unclassified lanes.

None of these Options give specific details as to how they are implemented. Would there be complete road closures or a traffic light system?

The similar cable laying project by UK Power Networks in 2024 brought months of inconvenience to residents of Black Notley, this was exacerbated by on-road parking on the Diversion route, and became severe at the closure of Witham Road with no adequate Diversion available. There was also the added problem of vibration, noise and dirt for homeowners (Bakers Lane) directly on, and only feet from the cable route excavation.

Therefore (a) The Option to use the most direct route via A120 would be quicker (b) The Option to share the route with Clearway would be a sensible option. (c) An Option to follow the A120 along the proposed New Housing Development at Hayeswood Gt Notley should be explored.

Therefore Black Notley Parish Council request to be kept informed of all future developments regarding this matter.



Historic England

Mr Timothy Havers
Braintree District Council
Development Management
Causeway House, Bocking End
Braintree
Essex
CM7 9HB

Direct Dial: [REDACTED]

Our ref: PL00798726

9 May 2025

Dear Mr Havers

25/00965/SCO - Hedgehog Grove Solar Farm, South of the A120 between Bannister Green and Bartholomew Green, Fentons Road, Rayne, Esse - Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) Regulations 10 and 11, Scoping Consultation regarding an application by Hedgehog Grove Solar Farm Ltd (the applicant) for an Order granting Development Consent for the Hedgehog Grove Solar Farm (the proposed development)

Thank you for your consultation dated 29th April 2025 over the above EIA scoping opinion application.

The land within the proposal boundary includes pre-eighteenth century enclosure fields that form part of an agrarian landscape serving a dispersed group of historic farmsteads lying on either side of the Ter Valley. The long history of human exploitation of this landscape is indicated by the unscheduled Roman villa found in 1987 when the A12 was constructed, just to the north of the proposal site, and the cropmarks between Bannister Green and Watch House Farm.

Long term impacts on designated assets would be limited to settings effects and we recommend that reasons to scope cultural heritage into an EIA include this impact.

Impacts on undesignated buried remains can also be expected and should be informed and managed following archaeological assessment agreed with the LPAs' archaeological planning advisers, including as part of their EIA scoping exercise.

In view of the minerals and solar farm consents either under consideration or granted in the landscape around Braintree, we recommend that EIA assessments consider the effects of cumulative harm to both the historic landscape and to affected listed assets.

Assessments should be carried out following Historic England guidance, including GPA 3 on The Settings of Heritage Assets, by a recognised and appropriately experienced historic environment practice.

Yours sincerely,



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



Historic England

Adam Single
Inspector of Ancient Monuments
[REDACTED]@HistoricEngland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Comments for Planning Application 25/00965/SCO

Application Summary

Application Number: 25/00965/SCO

Address: Hedgehog Grove Solar Farm South Of The A120 Between Bannister Green And Bartholomew Green Fentons Road Rayne Essex

Proposal: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) Regulations 10 and 11, Scoping Consultation regarding an application by Hedgehog Grove Solar Farm Ltd (the applicant) for an Order granting Development Consent for the Hedgehog Grove Solar Farm (the proposed development)

Case Officer: Timothy Havers

Customer Details

Name: Mrs Renee Hockley-Byam

Address: [REDACTED]

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

Comment: As Chairman of NORTH EAST ESSEX Badger Group I would like to flag up the fact that there are badger setts within the proposed site. We are willing to share information on locations that we have identified and monitored over some years. [REDACTED]

Consultee Comments for Planning Application 25/00965/SCO

Application Summary

Application Number: 25/00965/SCO

Address: Hedgehog Grove Solar Farm South Of The A120 Between Bannister Green And Bartholomew Green Fentons Road Rayne Essex

Proposal: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) Regulations 10 and 11, Scoping Consultation regarding an application by Hedgehog Grove Solar Farm Ltd (the applicant) for an Order granting Development Consent for the Hedgehog Grove Solar Farm (the proposed development)

Case Officer: Timothy Havers

Consultee Details

Name: Mr Martin Mason ECC Highways

Address: County Hall, Chelmsford CM1 1QH

Email: Not Available

On Behalf Of: ECC Highways

Comments

Dear Tim,

Thank you for your consultation dated 29th April 2025.

Having reviewed the relevant submitted information, I confirm the planning application should be accompanied by a Transport Statement, the scope of which should be agreed with the Highway Authority as soon as possible.

Thanks again & best wishes.

Martin



FAO: Planning Department,
Braintree District Council

Our ref:04167
Application ref: 25/00965/SCO
Date:20 May 2025

ARCHAEOLOGICAL ADVICE

RE: Hedgehog Grove Solar Farm South Of The A120 Between Bannister Green And Bartholomew Green Fentons Road Rayne

The application is for Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) Regulations 10 and 11, Scoping Consultation regarding an application by Hedgehog Grove Solar Farm Ltd (the applicant) for an Order granting Development Consent for the Hedgehog Grove Solar Farm (the proposed development).

The proposed development is located within an area of high potential for multi-period archaeological remains. Adjacent to the northern boundary of the proposed solar farm is the Flitch Way (HER 19629) which preserves the line of the former Bishops Stortford to Braintree Railway line, which closed in 1972. The line is formed on a substantial banked earthwork which preserves a number of industrial heritage features along its route. North of the Flitch Way the Roman road, known as Stane Street (HER 1226), is considered to be preserved in the modern route of the Dunmow Road. The remains of a high status Roman settlement (HER 9014) were uncovered along the route during the excavations for the A120 bypass, the status of the finds suggesting the presence of a nearby villa building. Also in the vicinity, ongoing excavations at Rayne Quarry which is immediately north of the proposed development area, are revealing evidence for further extensive Roman activity, in addition to prehistoric activity.

The submitted documentation identifies that the forthcoming application will include Cultural Heritage and Archaeology (Chapter 10) as one of the main chapters within the Environmental Impact Assessment (EIA) and includes the relevant methodology, policy and legislation for the assessment of the historic environment.

The solar PV arrays and associated infrastructure are largely located within Uttlesford District. A small area of solar panels within the section identified as HG1, is located within the Braintree District. It can be accessed via the A120 and is located approximately 500 m east of Little Common and Bartholomew Green. The Cable Corridor Options have been identified for the location of



underground cable routes to connect the Proposed Development to the UKPN Braintree 132 kV Substation. Geophysical Surveys were completed on HG1 in 2023, the results of these surveys are discussed in Chapter 10.

Four Cable Corridor Options are identified in this Scoping Report, largely located within the Braintree District. These corridors will be refined as the Proposed Development's design progresses and only two will be carried forward into the PEIR and ES. The cable corridors have potential to impact archaeological deposits in areas where greenfield land is required, there is unlikely to be any impact on archaeological remains where the cable corridors follow public highways.

Archaeological remains located within the Site boundary are susceptible to direct impacts as a result of the proposed development. This would potentially be limited to areas of solar panels and potential below ground cables along the arrays in addition to ground disturbance associated with construction largely from inverters, compounds and cable corridors. Site access tracks, onsite substation and routing of underground cabling are not yet finalised in the design. The level of disturbance will be governed by the nature of construction. It is possible to use techniques such as cables connected to panels rather than being put below ground, which allows the reduction of impact. This should be considered at an early stage in the design thus defining the potential level of impact to the heritage resource.

Chapter 10 recognises that there is potential for direct physical impacts upon non-designated heritage assets within the site boundary including the cable corridor and any buried archaeological features identified within the Site by geophysical survey. Section 10.3.2 identifies the potential of aerial photography but limits this to the Historic England Mapping explorer.

The level of harm to non-designated remains is likely to be significant in some areas. For the forthcoming EIA to be compliant with the requirements of Local Policy LPP 59 and paragraph 207 of the National Planning Policy Framework (2024) an archaeological evaluation will be required to be carried out prior to submission of the application. The results of this should be submitted with the application in order to determine the level of harm.

In addition to the information proposed to be submitted within the scoping document the applicants are advised to discuss aerial photography with Place Services who have maintained, via Historic England funding, a yearly programme of aerial flying to identify cropmarks across the county. These assessments should then be used to inform a programme of targeted trial trenching to ground truth the results.

The submitted scoping document states that the proposed mitigation of known archaeology identified through the non-intrusive surveys will be avoidance, where possible. A detailed understanding of the proposed construction method will help inform the understanding of the potential impact.

In summary the proposed development is a Nationally Significant Infrastructure Project (NSIP). To meet the requirements of the EIA regulations an Environmental Statement will need to be submitted. The ES will include Cultural Heritage and Archaeology (Chapter 10). The ES should be supported by a Desk Based Assessment, geophysical survey across the whole of the proposed site, aerial photographic rectification, LIDAR and a programme of targeted trial trenching to ground truth the nonintrusive techniques. We would recommend that an aerial rectification assessment is undertaken to accurately locate the cropmark evidence. This will need to be completed and the results provided in advance of any targeted trial trenching. Much of the grid connection options are located within the Braintree District, no further information has been provided at this stage on which option will be chosen.

Please do not hesitate to contact us if you have any queries in relation to this advice.

Teresa O'Connor MSc MCIfA
Historic Environment Consultant
Place Services
Email: HistoricEnvironment@essex.gov.uk



Note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter



Date: 21 May 2025

Our ref: 04211

Timothy Havers
Braintree District Council
Development Services
Causeway House
Bocking End
Braintree
Essex
CM7 9HB

By email only: Planning Department, planning@braintree.gov.uk

Thank you for requesting advice on this scoping opinion from Place Services' ecological advice service. This service provides advice to planning officers to inform Braintree District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application:	25/00965/SCO
Location:	Hedgehog Grove Solar Farm South Of The A120 Between Bannister Green And Bartholomew Green Fentons Road Rayne Essex
Proposal:	Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) Regulations 10 and 11, Scoping Consultation regarding an application by Hedgehog Grove Solar Farm Ltd (the applicant) for an Order granting Development Consent for the Hedgehog Grove Solar Farm (the proposed development)

Thank you for consulting Place Services on the above scoping opinion application.

Summary

We have reviewed the Hedgehog Grove Solar Farm EIA Scoping Report (ERM Ltd April 2024). As a result, we have the following comments with regard to the report and the proposed ecological considerations to be included within the scope of the Environmental Impact Assessment.

Legislation, Policy and Guidance:

We are generally satisfied that the EIA Scoping Report references appropriate legislation, planning policies and guidance. However, we note that the most up to date Hazel Dormouse guidance is not being referenced. Therefore, this should be updated to the following:

- Bullion, S., Wolton, R. and White, I. (2024). *Hazel Dormouse Conservation Handbook*. 4th ed. Mammal Society.
- Wells, D., Chanin, P., Gubert, L. (2024). *Hazel Dormouse Mitigation Handbook*. 4th ed. Mammal Society.

Data Sources:

We are pleased to see that the desktop assessment has been prepared in consultation with the Essex Field Club and that these records have informed the survey requirements. We are satisfied that appropriate habitat assessment and Protected and Priority species have been carried out to date. Records from new or updated surveys undertaken should be shared with the local record centre.

Baseline conditions:

We agree that no international / European Sites are within 10 km of the Site Boundary. The application does fall within the 22km Zone of Influence of the Blackwater Estuary Special Protection Area & Ramsar. However, as the proposal contains no residential development, the proposals will not trigger any further mitigation requirements in line with the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy.

With regard to nationally designated sites, we note that the scoping threshold has been limited to 2km. It is highlighted that the River Ter Sites of Special Scientific Interest (SSSI) is located c.4km from the cable route. However, the Site Boundary is not located within the SSSI Impact Risk Zone of this nationally designated site, no impacts are expected by the proposals. As the development is not within the SSSI Impact Risk Zone of any other nationally designated site, we are satisfied that the 2km scoping threshold is appropriate.

We also note that a number of Local Nature Reserves (LNR) and Local Wildlife Sites (LoWS) have been identified, which includes the Flitch Way LNR & LoWS adjacent to the site.

As a result, we agree that designated sites have been considered appropriately within the EIA Scoping Report and that further considerations will be required for nearby Local Nature Reserves and Local Wildlife Sites.

With regard to irreplaceable habitat, we support the locations of Ancient Woodland set out in Figure 8.1 of the EIA Scoping Report. There are Ancient Woodlands near to the cable route in closer proximity to nearest Ancient Woodland stated, but ultimately, we agree that impacts are unlikely upon Ancient Woodland. However, it is recommended that Ancient and Veteran trees should be included within the scope of the assessments.

With regard to the habitat assessment, we support that the Extended UK Hab surveys were completed for HG1 and HG3. We note that this assessment will be updated in 2025 and will include HG2. We are satisfied with the initial findings and would expect detailed assessment to be included as part of the EIA, which would also inform biodiversity net gain calculations.

With regard to protected and Priority species, we are generally satisfied that appropriate surveys have been completed and welcome the initial results of this assessment.

We support the planned survey programme proposed for habitats and species, which includes further updated surveys and more detailed survey effort for HG2. It is highlighted that the habitat and species assessment will need to refer to Priority habitats and species in order for the LPA to demonstrate compliance with its biodiversity duty under s40 of the NERC Act (as amended) and the strengthened duty to conserve and enhance biodiversity.

Potential Impacts:

We have reviewed the proposed scope of the EIA, as referenced within Tables 8.5 (referenced as 8.4 by mistake) and 8.6 of the EIA Scoping Report and generally agree with the scope proposed.

However, we disagree that statutory designated sites and non-statutory designated sites within 2km should be scoped out from the construction phase, due to the proximity of the Flitch Way LNR & LoWS being adjacent to the site.

We also acknowledge that proposed project does not impact on internationally and European designated sites. Therefore, we agree that a brief statement can be included within the DCO application with regard to a Habitats Regulations Assessment - Screening Report, even though internationally and European designated sites are scoped out.

Methodology:

We are satisfied that nationally agreed guidelines have been followed for the ecology surveys and all survey work has been undertaken in the appropriate season by appropriately qualified ecological consultants. Survey and assessment for protected species should meet the requirements of Natural England Standing Advice.

In accordance with Regulation 14 of the EIA Regulations, the ES should provide a statement about the relevant expertise or qualifications of the competent experts involved in its preparation.

Any report on badgers should be submitted as a separate confidential appendix clearly marked as containing sensitive information.

Opportunities:

To comply with NPPF, there is an opportunity to enhance the corridor, to deliver net gain for biodiversity. The EIA should thoroughly explore all reasonable options to enhance the development for protected and Priority species and meet the requirements of mandatory biodiversity net gain.

It is highlighted that a Viability Assessment of Biodiversity Net Gain in Essex (August 2024) has been produced by Essex, which sets out the delivery costs of 20% net gain are achievable, with Solar Farms NSIPs particularly having opportunities to go well above the 10% mandatory biodiversity net gain requirement. As a result, the Council would expect that a minimum 20% biodiversity net gain should be delivered for this proposal.

Conclusion:

We generally agree with the scope of Biodiversity chapter of the EIA, subject to non-statutory designated sites within 2km should be scoped out from the construction phase.

Please do not hesitate to contact us if you have any queries in relation to this advice.

Yours sincerely,

Hamish Jackson ACIEEM BSc (Hons)

Place Services at Essex County Council

Email: PlaceServicesEcology@essex.gov.uk



Place Services provide ecological advice on behalf of Braintree District Council.

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.



FAO: Planning Department,
Braintree District Council

Our ref: 04198
Application ref: 25/00965/SCO
Date: 21st May 2025

HISTORIC BUILDINGS AND CONSERVATION ADVICE

RE: Hedgehog Grove Solar Farm, South of The A120 Between Bannister Green and Bartholomew Green, Fentons Road, Rayne Essex

This letter provides a response in relation to a Scoping Consultation regarding an application by Hedgehog Grove Solar Farm Ltd (the applicant) for an Order granting Development Consent for the Hedgehog Grove Solar Farm (the proposed development). This is in accordance with the Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) Regulations 10 and 11.

Section 10 of the submitted Scoping Report relates to Cultural Heritage and Archaeology. Within this, it is stated that the forthcoming application will include assessment of the impact on the historic environment as part of an EIA. The relevant methodology, policy and legislation for the assessment of the historic environment are outlined within the Scoping Report. The data sources and study areas outlined by the applicant are considered appropriate for their assessment; a study area of 1km will be used for an assessment of the Site's archaeological potential with a 3km study area used to assess the potential setting impact on any designated heritage assets.

The solar PV arrays and associated infrastructure are largely located within Uttlesford District. A small area of solar panels within the section identified as HG1, is located within the Braintree District. It can be accessed via the A120 and is located approximately 500 m east of Little Common and Bartholomew Green. The solar panels located within the Braintree district are within the immediate setting of a group of three listed buildings at Fentons Farm with numerous other designated heritage assets located within 3km study area. Other aspects of the proposal involve cable corridors, access tracks, inverters and compounds. These are not finalised and may too have an effect on the setting of these listed buildings; the effect on buried heritage assets is discussed in the letter provided by the local authority's Historic Environment Consultant, Teresa O'Connor. Four cable corridor options are identified within the scoping report and the number of assets within the study area for each outlined in paragraphs 10.3.15- 10.3.17 of the Scoping Report.

Tables 10.1 and 10.2 of the scoping report show the elements of the Cultural Heritage and Archaeology Assessment to be scoped in and out of the subsequent EIA report. I agree with the rationale provided for the elements scoped in (Table 10.1). However, the aspects scoped out (Table 10.2) raise concern. Whilst it is unlikely that there will be physical impacts to any listed buildings or other designated and non-designated built heritage assets, as none are within the red line boundary



of the Site, there is nonetheless always the potential for accidental or indirect physical impacts to the assets. The routes may not be suitable for large vehicles, for example, and increases in vibration and traffic pose a real physical risk to these sensitive buildings which, due to their age and construction can be very vulnerable to local environmental changes. Similarly, alterations to drainage and water run off on the Site, or other associated infrastructure should be considered as a potentially harmful change.

Furthermore, the scoping out of settings impacts to non-designated heritage assets is not considered appropriate. Whilst Braintree do not have a formalised local list across the district, there are non-designated built heritage assets within proximity of the Site. Most notable is The Flitch Way, a disused railway now country park, which extends across Uttlesford and Braintree districts, and is positioned just north of the Site. The introduction of urbanising or view altering features within the setting of The Flitch Way have the potential to harm the ability to appreciate and understand the heritage value of this asset and therefore non-designated assets should be scoped into the setting assessment. It is expected that the applicant will use the opportunity to identify other non-designated assets as part of their subsequent research and walkover surveys in lieu of Braintree having a formal Local List.

These recommendations are requested in line with section 207 of the NPPF to allow for the local authority to fulfil their duty as outlined in section 208.

Please do not hesitate to contact us if you have any queries in relation to this advice.

Laura Johnson BA (Hons) MSc
Senior Built Heritage Consultant

Place Services

Email: BuiltHeritage@essex.gov.uk



Note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter



Jack Patten
The Planning Inspectorate

Sent by email hedgehoggrovesolar@planninginspectorate.gov.uk

Date: 16 May 2025
Our reference: 25/00521/OBS
Your reference: EN0110021

TOWN AND COUNTRY PLANNING ACT 1990

Dear Sir / Madam

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

Application by Hedgehog Grove Solar Farm Ltd (the applicant) for an Order granting Development Consent for the Hedgehog Grove Solar Farm (the proposed development)

Thank you for the notification providing Brentwood Borough Council an opportunity to comment on the above submission.

In replying to this type of consultation the Borough Council confines its formal considerations to strategic matters which could affect planning interests in this borough. This proposal does not raise strategic issues and on that basis, I make no formal comments.

Yours faithfully

Julia Sargeant

Team Leader – Development Management for Brentwood Borough Council
planning@brentwood.gov.uk

Patten, Jack

From: NSIPs <nsips@cambridgeshire.gov.uk>
Sent: 23 April 2025 13:16
To: Hedgehog Grove Solar
Cc: NSIPs
Subject: FW: EN0110021 - Hedgehog Grove Solar Farm - EIA Scoping Consultation and Notification
Attachments: HGSF - Statutory Consultation Letter.pdf

You don't often get email from nsips@cambridgeshire.gov.uk. [Learn why this is important](#)

Good afternoon

Thank you for your email regarding Hedgehog Grove Solar Farm.

As Cambridgeshire County Council is a neighbouring authority, we would be interested to be kept informed of the progress of this DCO. Please could you include the nsips@cambridgeshire.gov.uk email and remove the planningdc@cambridgeshire.gov.uk email from your distribution list.

At the present time, we do not have any comments to make.

Kind regards

Barbara Plumb
Consents Coordinator
Place and Sustainability
Pronouns: [REDACTED] [why have I put this here?](#)
[Cambridgeshire County Council](#) | [Facebook](#) | [X](#)

Phone: [REDACTED]
PO Box 761, ALC2660, Huntingdon, Cambs PE29 9QR



From: Hedgehog Grove Solar <HedgehogGroveSolar@planninginspectorate.gov.uk>
Sent: 23 April 2025 09:19
Subject: EN0110021 - Hedgehog Grove Solar Farm - EIA Scoping Consultation and Notification

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FAO Head of Planning

Dear Sir/Madam

Please see attached correspondence on the proposed Hedgehog Grove Solar Farm.

The applicant for the proposed development intends to make an application for Development Consent under the Planning Act 2008. The applicant has sought a scoping opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **21 May 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Jack Patten



Jack Patten ([REDACTED])
EIA Advisor
The Planning Inspectorate

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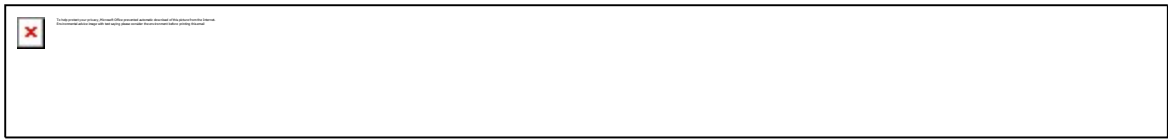
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The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Planning and Development Management
P.O. Box 7544, Civic Centre,
Duke Street, Chelmsford,
Essex, CM1 1XP

Your ref: EN0110021
My ref: 25/00669/OBS4
Please ask for: Allocated
Telephone: 01245 606441
Date: 19 May 2025

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: Scoping consultation for an application by Total Energies (the Applicant) for an Order Development Consent for the Hedgehog Grove Solar Farm (the Proposed Development)

APPLICATION NO: 25/00669/OBS4

DATE RECEIVED: 23rd April 2025

We refer to the above application, and are writing to advise you that Chelmsford City Council have the following comments on this proposal.

2.4. Local Policy

The proposed cable routes would fall within the administrative area of Chelmsford City Council (CCC) who, at the time of writing, is defined as a Host Authority in accordance with Section 43 of the Planning Act.

There is no reference to the Chelmsford Local Plan within the Scoping Report.

The Chelmsford Local Plan 2013-2036 was adopted in May 2020. Chelmsford City Council is in the process of reviewing its adopted Local Plan. Consultation on the Chelmsford Local Plan: Pre-Submission (Regulation 19) Document closed on Tuesday 18th March 2025. The next stage is to submit the Local Plan to the Secretary of State.

Regard would need to be had to the Policies of both the Adopted and review Local Plan within the relevant chapters of the Preliminary Environmental Information report (PEIR) /Environmental Statement (ES).

Currently there is no reference to the Local Plan within the following chapters of the Scoping Report:

7. Air Quality
8. Biodiversity and Nature Conservation
9. Climate Change and Greenhouse Gas Assessment
10. Cultural Heritage and archaeology
11. Ground conditions and land quality
12. Landscape and Visual
13. Noise and Vibration

- 14. Socio Economics and Land Use
- 15. Traffic and Transport
- 16. Water Resources

There are other documents forming part of the Chelmsford Local Plan including Supplementary Planning Documents that would need to be considered within the PEIR/ES.

5.2. Consultation Approach: Statutory Consultation

Reference should be made to Chelmsford City Council within the Statutory Consultation.

6.9. Cumulative Effects (also Chapter 18 of the Scoping Report)

Nationally Significant Infrastructure Projects (NSIPS)

Two Development Consent Orders (DCO's) for NSIPS have been granted within the wider locality. These are Longfield Solar Farm and the A12 Widening Project. In addition, the Norwich to Tilbury pylon proposal is at pre-submission stage and an application for a DCO is expected to be submitted in Summer 2025 by National Grid.

Regard should be had to the cumulative effects of these proposals, particularly the effects of construction as the proposals are looking to use the neighbouring road networks; with construction proposed within a similar five year period. This could have a temporary significant adverse effect upon the local highway network.

Local proposals

Regard should be had to the cumulative effects on construction arising from Strategic Growth sites 7A, 7B and 7C in Great Leighs, as well as the development sites promoted within the current Strategic Housing and Employment Land Availability Assessment (SHELAA).

Further, the Chelmsford Garden Community is under construction to the north of Chelmsford. Other developments within the locality include the Proposed Chelmsford North East Bypass and the Proposed Northern Radial Distributor Road and improvements to Essex Regiment Way. Works are also proposed at the Boreham Interchange.

Cumulatively, the construction associated with these works has potential to create temporary localised pressure on the highway network and regard should be had to the cumulative impacts of these proposals.

7. Air Quality

The effect of the construction implications of the proposal; including the use of the local highways network, should be assessed with regard to air quality to ensure that residential amenity is safeguarded and mitigated at all times.

8. Biodiversity and Nature Conservation

Trees

The effect of the proposed cabling routes should be assessed with regard to the arboricultural impact with appropriate mitigation applied.

The proposed cabling would run through a linear feature of preserved trees protected by extant order TPO/2001/083 and close to TPO/2001/100.

The works would be close to Ancient & Semi-Natural Woodlands Bushy/Breams Woods (298) and Fair Wood (425). Natural England and Forestry Commission advice on distance from development on ancient woodlands states that 15 m buffer zones would need to be provided and adhered to during the construction of the development.

Ecology

The effect of the proposed cabling along Moulsham Hall Lane and Blackley Lane should be assessed. There are trees and hedgerow adjacent to both roads, in particular Blackley Lane which is lined either side by vegetation that extends for approximately 650m in length. There is potential for protected species to reside within trees and hedgerows and the effects upon protected species would need to be assessed, with appropriate mitigation provided.

10. Cultural Heritage and archaeology

The solar farm itself is sufficiently distant and screened from Chelmsford City Council's administrative area such that there would be no impact on the setting of any designated or non-designated heritage assets.

The cabling route options would pass through the northern part of CCC's area and the county archaeologist should be consulted to assess any archaeological impacts. There are unlikely to be any built heritage impacts; the assumption being that there are no intermediate structures, compounds or substations and the cable route through Chelmsford is entirely below ground.

Option one would pass through Youngs End, following the line of part of Blackley Lane. The closest listed buildings within Chelmsford would be sited approximately 1.2km away on Moulsham Hall Lane. There would be no impact on their setting.

Option two would follow the line of Moulsham Hall Lane and Blackley Lane. The route would pass adjacent to Gate House Farm (NHLE 1305569). Subject to normal good working practice to avoid excessive vibration, make the road good and avoid damage to the verges and vegetation, there would be no impact on setting, other than minor short term construction impacts.

Option three would cross the fields between Willows Green and Youngs End and would use part of Blackley Lane. At its closest point, the route would be sited approximately 350m from Gate House Farm (NHLE 1305569). Subject to normal good working practice to minimise the impact on trees and hedges there would be no impact on setting.

Option four is as per option two for the Chelmsford section of the route.

13. Landscape and Visual

The area listed as a Landscape Character Area (B16 Felsted Farmland Plateau Landscape Character Area) and the landscape character should be protected.

13. Noise and Vibration

The effect of the construction implications of the proposal; including the use of the local highways network, should be assessed with regard to noise and vibration to ensure that residential amenity is safeguarded and mitigated at all times.

14. Socio Economics and Land Use

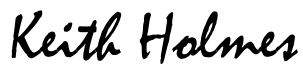
The Socio Economic Study Area / Wider Study Area should be expanded to include proportionate reference to the Chelmsford City Council administrative area.

15. Traffic and Transport

Regard should be had to the cumulative impact of the construction of the development on the local highway network having regard to planned development identified within the cumulative effects comments at 6.9 above.

For a copy of the officers report please view our website www.chelmsford.gov.uk/planningonline and search for application 25/00669/OBS4.

Yours faithfully

A handwritten signature in black ink that reads "Keith Holmes". The script is cursive and fluid.

KEITH HOLMES

Planning Development Services Manager

Patten, Jack

From: Gideon Whittingham <[REDACTED]@enfield.gov.uk>
Sent: 29 April 2025 14:53
To: Hedgehog Grove Solar
Subject: EN0110021 - Hedgehog Grove Solar Farm - EIA Scoping Consultation and Notification
Attachments: HGSF - Statutory Consultation Letter.pdf

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Dear Sir/Madam,

We acknowledge receipt of your consultation letter regarding the scoping opinion for the Environmental Statement (ES) for the Hedgehog Grove Solar Farm project.

As the Local Planning Authority for Enfield, we have reviewed the information provided and confirm that we have no comments to make on the scope and level of detail of the information to be provided in the ES.

Please do not hesitate to contact us if you require any further information.

Kind regards,

Gideon Whittingham
Planning Decisions Manager
Planning and Growth
Environment & Communities

T: [REDACTED]
E: [REDACTED]@enfield.gov.uk
W: www.enfield.gov.uk

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From: Hedgehog Grove Solar <HedgehogGroveSolar@planninginspectorate.gov.uk>
Sent: Wednesday, April 23, 2025 9:19 AM
Subject: EN0110021 - Hedgehog Grove Solar Farm - EIA Scoping Consultation and Notification

FAO Head of Planning

Dear Sir/Madam

Please see attached correspondence on the proposed Hedgehog Grove Solar Farm.

The applicant for the proposed development intends to make an application for Development Consent under the Planning Act 2008. The applicant has sought a scoping opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **21 May 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Jack Patten



Jack Patten ([REDACTED])
EIA Advisor
The Planning Inspectorate



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Jack Patten - EIA Advisor
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our ref: XA/2025/100343/01

Your ref: EN0110021

Date: 20th May 2025

hedgehoggrovesolar@planninginspectorate.gov.uk

Dear Jack,

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) –
Regulations 10 and 11**

**Application by Hedgehog Grove Solar Farm Ltd (the Applicant) for an Order
granting Development Consent for the Hedgehog Grove Solar Farm (the
proposed development).**

Thank you for consulting the Environment Agency (EA) on the Environmental Impact Assessment (EIA) Scoping Opinion for the above Nationally Significant Infrastructure Project (NSIP).

We have reviewed the submitted documents insofar as they relate to our remit. A full list of documents reviewed is presented in Appendix 1.

We recommend that the following topics are scoped into the EIA where they are currently proposed to be scoped out:

- Fish and aquatic ecology – impacts should be assessed to mitigate harm and loss or damage to habitat as well as deterioration of Water Framework Directive (WFD) status.

Detailed comments relating to these issues are presented in Appendix 2.

We also recommend that significant attention is given to the following EIA non-scope related issues:

- Legislation pertaining to fish, water quality and waste
- Watercourse crossing methods
- WFD designated waterbodies
- Water supply
- Flood modelling

A full list of general comments for consideration is provided in Appendix 3.

Informatives and advice to the Applicant is in Appendix 4.

Please note this response does not represent our final view in relation to any future Development Consent Order (DCO), or any environmental permit applications made to us. Our final views will be based on all relevant information including applications and guidance available at the time of submission.

If you require any further details, please contact us on the email address below.

Yours sincerely,

Miss Siobhan Martin
Planning Advisor – National Infrastructure Team
Email: Nlteam@environment-agency.gov.uk

List of Appendices

Appendix 1 – List of Documents Reviewed

Appendix 2 – Detailed comments related to the scope of the EIA

Appendix 3 – General comments for consideration

Appendix 4 – Informatives and Advice to the Applicant

Appendix 1 – List of Documents Reviewed

Hedgehog Grove Solar Farm EIA Scoping Report, Prepared by ERM for TotalEnergies, Dated: April 2025, Version 3, Reference: 0754465.

Hedgehog Grove Solar Farm EIA Scoping Report – Appendix A Figures, Prepared by ERM for TotalEnergies.

Hedgehog Grove Solar Farm EIA Scoping Report – Appendix B Existing Baseline Assessments, Prepared by ERM for TotalEnergies, Dated: 14th April 2025, Version 1, Reference: 0754465.

Hedgehog Grove Solar Farm EIA Scoping Report – Appendix C Commitments Register, Prepared by ERM for TotalEnergies, Dated: 14th April 2025, Version 1, Reference: 0754465.

Appendix 2 – Detailed comments related to the scope of the EIA

Fisheries

Document Reference(s): EIA Scoping Report, Chapter 8, Sections 8.3, 8.4 and 8.6	
Issue	Fish have been omitted from the scope of the EIA despite the presence of suitable habitat within, and adjacent to, the draft Order limits.
Impact	If impacts on are not assessed, then the proposal could lead to harm to this receptor and loss or damage to habitat. It could also lead to a deterioration in WFD status of waterbodies.
Solution	Fish should be scoped into the EIA.
Additional narrative/ explanation	
<p>Baseline data should be obtained through a desk study (including EA fish population data) and field surveys. Impact-pathways should be identified and assessed in the EIA, which should include (but not limited to):</p> <ul style="list-style-type: none">• Impacts on fish from electromagnetic fields (EMFs) where high voltage cables pass underwater watercourses (as per NPS EN-3, paragraph 3.8.131)• Impacts from noise and vibration associated with construction• Impacts from pollution and increased sedimentation• Impacts from open cut crossing of watercourses and potential loss or damage to habitat• Impacts from light pollution on watercourses and aquatic ecology <p>We would favour cable route option 1 as it crosses the fewest main watercourses. However, it does cross the River Brain, which contains a notable population of coarse fish, European eel (<i>Anguilla anguilla</i>) and bullhead (<i>Cottus gobio</i>). The River Ter is within the draft Order limits. The Ter contains a notable population of coarse fish, European eel, brook lamprey (<i>Lampetra planeri</i>), brown/sea trout (<i>Salmo trutta</i>) and bullhead. Please note, this comment is regarding fisheries preferences only. We welcome further consultation with us, and a multi-disciplinary approach, on route option selection.</p>	

Biodiversity

Document Reference(s): EIA Scoping Report, Chapter 8, Sections 8.4, 8.6 and 8.7	
Issue	Aquatic receptors are not explicitly mentioned in the proposed scope of assessment.

	<p>Aquatic flora/ fauna (e.g. macrophytes, macroinvertebrates) surveys, which could be required depending upon scheme impacts, do not appear to be planned.</p> <p>Potential significant effects and mitigation does not identify any potential effects upon aquatic ecological receptors during construction (e.g. habitat loss, disturbance/ degradation/ run off) or operation (e.g. from run off associated with maintenance/ cleaning of panels). Sufficient design, construction/ operation methodology and baseline information is not provided to be able to support this assessment at this stage.</p>
Impact	Impacts to aquatic ecology could be overlooked in the assessment and appropriate mitigation not implemented.
Solution	Aquatic ecology should be scoped into the EIA. Review the need for assessment of aquatic ecological features as further scheme design and construction information becomes available, as informed by results of further habitat survey. We welcome consultation regarding this.

Appendix 3 – General comments for consideration

Fisheries

Document Reference(s): EIA Scoping Report, Chapter 8, Section 8.2	
Issue	Omission to include specific fish legislation.
Impact	Impacts on fish during construction, operation and decommissioning have not been fully considered.
Solution	The Salmon and Freshwater Fisheries Act 1975 and The Eels (England and Wales) Regulations 2009 should be listed as relevant in the biodiversity chapter of the ES and submitted as part of the DCO.
Additional narrative/ explanation	
Parts of The Salmon and Freshwater Fisheries Act 1975 relevant to this type of development and that should be considered, are (but not exhaustive) Part 1, Sections 2 and 4.	
Parts of The Eels (England and Wales) Regulations 2009 relevant to this type of development and that should be considered, are (but not exhaustive) Part 4.	

Biodiversity

Document Reference(s): EIA Scoping Report, Chapters 8 and 16, Sections 8.6.5 and 16.5.10	
Issue	Inconsistent buffer distances are quoted for watercourses.
Impact	Inappropriate watercourse buffers could cause unacceptable impacts to aquatic ecology and geomorphology.
Solution	Clarification of proposed watercourse buffer distances. Buffers should be an appropriate distance from top of bank to mitigate potential impacts on ecology and geomorphology and promote environmental benefits such as improved water quality. Ensure consistency is followed through in the EIA.
Additional narrative/ explanation	
Chapter 8 states minimum 20m buffer from watercourses including ditches.	
Chapter 16 states 15m buffer from (bank top) main river and ordinary watercourses and 10m buffer from ditches.	

Document Reference(s): EIA Scoping Report, Chapter 16, Section 16.3.6	
Issue	The River Brain is not identified/ considered in the appraisal of baseline conditions even though it is to be traversed by the cable route options.
Impact	Potential unacceptable impacts to the River Brain.
Solution	Ensure due consideration is given to impacts and requirements for survey, assessment (including WFD assessment) and mitigation as appropriate.

Document Reference(s): EIA Scoping Report, Chapter 16, Section 16.5	
Issue	Watercourse crossings are proposed.
Impact	Potential key issue/ impact pathway for water ecology.
Solution	Provide further details regarding proposed methods for crossing watercourses alongside baseline ecological conditions to inform assessment. Further survey and mitigation may be required. Please see informative regarding watercourse crossings in Appendix 3.

Document Reference(s): EIA Scoping Report, Chapter 16	
Issue	The River Ter runs adjacent to the site but is not considered in terms of ecological enhancement.
Impact	This is a missed opportunity to contribute to WFD objectives and local habitat connectivity.
Solution	Include riparian habitat enhancements within the buffer zone, such as native marginal planting, tree cover for cooling (refer to Keeping Rivers Cool map layer), and bank structure improvements. Include these as part of the BNG or LEMP strategy.

Document Reference(s): EIA Scoping Report, Chapter 11 and 16, Sections 11.5.4, 16.5.12, 16.5.15	
Issue	While a Decommissioning Environmental Management Plan (DEMP) is proposed, there is no commitment to ecological resurvey or post-use habitat consideration.
Impact	Opportunities to retain valuable habitats or ensure sensitive removal could be lost.
Solution	Protected species resurvey and ecological reassessment should be undertaken at the decommissioning stage. Identify opportunities to retain beneficial habitat or enhance restoration outcomes.

Geomorphology

Document Reference(s): EIA Scoping Report, Chapter 16, Section 16.5 and Table 16.7	
Issue	Watercourse crossings are proposed.
Impact	Potential to restrict flow, interfere with sediment transport pathways and cause harm to channel morphology.
Solution	Provide further details regarding proposed methods for crossing watercourses. Please see informative regarding watercourse crossings in Appendix 3.

Document Reference(s): EIA Scoping Report, Chapter 16, Sections 16.3.6 to 16.3.12	
Issue	Omission to identify all WFD waterbodies.
Impact	Misidentification of WFD waterbodies, could lead to unintentional, but detrimental impacts to WFD waterbodies within the study area.
Solution	Ensure all WFD waterbodies have been identified and included in the assessment. The River Brain is a WFD waterbody, as is the Stebbing Brook and its headwater catchment, which the northwestern part of the array sites sits within.
Additional narrative/ explanation All watercourses and waterbodies are covered by WFD, not just those with WFD designations. Small watercourses, with catchments smaller than 10km ² , take their WFD classifications from the WFD designated waterbody they connect with/ flow into.	

Groundwater and Contaminated Land

Document Reference(s): EIA Scoping Report, Chapter 11, Section 11.3.19	
Issue	The underlying Essex Gravels Groundwater Body is stated as having 'Poor' ecological status.
Impact	Ecological status is not a measure of WFD groundwater body condition.
Solution	Review status of WFD groundwater body on the site. This could be within the proposed WFD report.
Additional narrative/ explanation The status of the WFD groundwater body is poor overall. It has Poor chemical and Good quantitative status. The Poor status due to General Chemical Test. It is rated Good for chemical and quantitative Groundwater Dependent Terrestrial Ecosystems (GWDTEs) tests.	

Document Reference(s): EIA Scoping Report, Chapter 11, Section 11.4.2	
Issue	A walkover/ reconnaissance should be undertaken as part of the desk study.
Impact	Visual evidence of historical land use and potential contamination could be missed if a physical site visit is not undertaken.
Solution	Include a site walkover of the area as part of proposed baseline geoenvironmental assessments.
Additional narrative/ explanation The Applicant states that a targeted walkover of the area <i>may</i> be undertaken as part of further baseline assessment. We consider this fundamental as part of the desk study in line with EA LCRM guidance and BS10175 .	

Document Reference(s): EIA Scoping Report, Chapter 11, Section 11.5.4	
Issue	A separate assessment for decommissioning phase activities is not proposed to be undertaken for this topic.
Impact	The method of construction might not allow the most effective and environmentally sensitive decommissioning if it is not considered at the design stage.
Solution	Consider impacts and method of decommissioning at the design stage.

Surface Water Quality

Document Reference(s): EIA Scoping Report, Chapter 16, Section 16.2	
Issue	Not all key topic-specific legislation has been correctly identified in the report.
Impact	Potential non-compliance with legal obligations.
Solution	Ensure that all relevant legislation has been identified.
<p>Additional narrative/ explanation</p> <p>Section 16.2.8 – Parts of the Water Resources Act 1991 relating to pollution and permitting of discharges was repealed and transferred across to the Environmental Permitting (England and Wales) Regulations when they were introduced in 2010.</p> <p>Section 16.2.15 – Requirements relating to Environmental Permitting (England and Wales) Regulations 2016 (as amended) are more wide ranging than that has been listed and also include water pollution offences and water discharge permitting requirements which came across for the Water Resources Act 1991.</p> <p>The Control of Pollution (Oil Storage) (England) Regulations 2001 should be added as this is likely to be relevant to the construction and operational phases.</p>	

Water Resources

Document Reference(s): EIA Scoping Report, Chapter 16	
Issue	Consumptive uses of water identified by the report include potable/ domestic supply to welfare stations, dust suppression, wheel washing, and drilling fluids associated with Horizontal Directional Drilling (HDD). However, potential water supply need has not been adequately evaluated.
Impact	Mains connections may be impractical in remote areas. Water supply from Anglian Water may be limited to potable/ domestic uses*. Tankering water will add to HGV numbers on local roads. Groundwater is closed to new abstraction and surface water (via trading or a new licence) will be restricted by local flow conditions.

Solution	Produce a water supply strategy (or Water Resources Assessment defined by Anglian Water) which options appraises sources of supply available to meet consumptive uses of water (such as those identified above). This should accompany the Environmental Statement (ES) or be included as part of the Water Resources chapter. This should be undertaken based on engagement with the water companies and review of the abstraction licensing strategy for the area.
Additional narrative/ explanation <p>*Anglian Water Services Ltd (AWS) and Affinity Water Ltd, who supply the region of this development, are subject to licence reductions (caps) on groundwater licences to manage the risk of deterioration of the associated water bodies, according to the principles set out in the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (WFD Regulations).</p> <p>AWS has adopted a “Non-Domestic Water Requests Policy” for which it asks of applicants who require non-domestic water supply to complete Water Resource Assessment to understand water demands, water efficiency measures and to effectively forecast water supply requirements. Communications around this moratorium are expected presently with AWS’s most recent approach outlined in their dWRMP Statement of Response (p.250, 4d V2 Final WRMP24 Statement of Response (anglianwater.co.uk)) which sets out that the company may not be able to supply all new non-domestic demands until new strategic supplies are developed.</p>	

Document Reference(s): EIA Scoping Report, Chapter 9, Table 9.4 Water related, water stress and drought	
Issue	We disagree that the Site lies on land defined as having low risk of water stress. The ways in which the project will affect water resources have not been identified by the report and may not relate directly to the Site.
Impact	<p>The project boundary is located within Affinity Water’s Stort supply zone and Anglian water’s South Essex supply zone. Both water companies are acting on water stress in the wider region through licence reductions and the development of new strategic resource options. Until these come online, the area is considered to be of serious water stress*.</p> <p>For surface water abstraction, prolonged dry weather and drought may also affect water availability to meet demands such as dust suppression which is at its highest need during summer months. Any licences issued from surface water will be effectively restricted to winter access only.</p>

Solution	<p>Suitable mitigation for the indirect pressures of increased use of public water supply include ensuring minimum consumption and maximum efficiency when considering water demands.</p> <p>If water supply is needed from surface water licences, temporary storage may be required to buffer periods of unavailability.</p>
Additional narrative/ explanation <p>*The location of this development is in an area of serious water stress (as identified in our report Water stressed areas – 2021 classification (https://www.gov.uk/government/publications/water-stressed-areas-2021-classification)).</p>	

Document Reference(s): EIA Scoping Report, Chapter 16, Section 16.4.2	
Issue	Certain private and small water supplies do not require a licence to abstract water; therefore, we are not necessarily aware of their existence.
Impact	New developments should not detrimentally affect both licensed and unlicensed abstractions.
Solution	<p>Any disruption to surrounding abstraction licences during and after construction must be avoided or mitigated.</p> <p>The locations of private domestic sources may be held by the local authority on the register required by Regulation 14 Private Water Supplies Regulations 2016.</p>

Flood Risk

Document Reference(s): EIA Scoping Report, Chapter 16, Section 16.3.16	
Issue	Flood defence assets are within the study area.
Impact	Potential impacts caused to flood defences assets by the development.
Solution	The Flood Risk Assessment (FRA), or a separate assessment, should include full details of all flood defences and associated assets within the study area. This should include their current condition, crest levels, and standard of protection. This will allow assessment of potential impacts to defences and any mitigation required, taking the development and climate change into account, to ensure that flood risk is not increased over the development's lifetime.

Document Reference(s): EIA Scoping Report, Chapter 16, Section 16.4.15	
Issue	The proposed lifetime of the development is yet to be confirmed.
Impact	The proposed development lifetime will determine the applicable climate change epoch and relevant increases to fluvial flow to be assessed.
Solution	<p>The design life of the proposed development and the corresponding climate change allowances should be confirmed.</p> <p>Non-residential development is assumed to have a minimum 75-year design life. Therefore, this would require consideration of the 2080's climate change epoch, and this should be the starting point of the assessment within the FRA.</p>

Document Reference(s): EIA Scoping Report, Chapter 16, Section 16.4.16	
Issue	Flood Zone 3b is classified as the 1 in 30-year flood extent, not 1 in 20-year as is in the report.
Impact	Current reference to the 1 in 20-year event will underestimate the extent of Flood Zone 3b.
Solution	The FRA should present the 1 in 30-year (3.3% AEP) flood event outline to show the extent of Flood Zone 3b. This can be used to inform the sequential approach to site design and to ensure infrastructure is not located within Flood Zone 3b.

Flood Modelling

Document Reference(s): EIA Scoping Report, Sections 16.4.16, 16.4.18 and 16.4.19	
Issue	We do not hold any detailed hydraulic modelling for the River Ter which runs through the main site boundary. The Flood Map for Planning in this area is based on recent JFLOW 2d modelling. The updated Flood Map for Planning was published in March 2025.
Impact	Flood risk to and from the site could be underestimated if a sole reliance is placed on the existing published Flood Map for Planning and Risk of Flooding from Surface Water datasets.
Solution	Depending on the configuration of the site there may be a requirement for detailed hydraulic modelling of the River Ter to confirm the design flood level. If infrastructure is placed within the design flood extent there may also be a requirement to undertake proposed “with development” hydraulic modelling so that the impacts to third parties can be quantified. We welcome consultation to determine whether this is needed. This will largely depend on the finalised site configuration and proximity to watercourses such as the River Ter. When hydraulic modelling is

	undertaken the following guidance should be consulted: Using modelling for flood risk assessments - GOV.UK
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Additional narrative/ explanation

Please note, we do hold detailed hydraulic modelling for the River Brain which is available on request.

Document Reference(s): EIA Scoping Report, Section 16.4.18	
Issue	It is noted that for watercourses which are not designated as main river it is proposed to use the 0.1% (1 in 1000) annual exceedance probability (AEP) JFLOW flood extents as a proxy for the design flood extent and level. However, no evidence is presented in the scoping report to demonstrate that this would be a reasonable proxy for the design flood. In some cases, the climate change growth factor can be larger than the 1% (1 in 100) to 0.1% (1 in 1000) growth factor.
Impact	The assessment of flood risk could be inaccurate or underestimated.
Solution	Clear justification should be provided as to why the 0.1% (1 in 1000) annual exceedance probability (AEP) output shown in Flood Zone 2 within the Flood Map for Planning is a suitable proxy for the design flood event. In some cases, the growth factor for climate change can be larger than the growth factor for the 0.1% (1 in 1000) AEP scenario. As a minimum, evidence should take the form of comparing fluvial flows for the 1% (1 in 100) and 0.1% (1 in 1000) AEP scenarios and comparing this to the respective climate change growth factors for the higher central and upper allowances. It is also important to note that the strategic scale 2d modelling which is used to generate the Flood Map for Planning in this area may not have adequate representation of structures or channel capacity. It is important to consider these limitations when assessing flood risk.

Waste

Document Reference(s): EIA, Scoping Report, Chapter 17, Section 17.2	
Issue	Omission to include Environmental Permitting (England and Wales) Regulations 2016 in the list of topic-specific legislation in this chapter.
Impact	Potential to miss aspects of definition of waste, environmental permits and waste exemptions, which are relevant to this development and covered in this legislation.
Solution	Include Environmental Permitting (England and Wales) Regulations 2016 in the list of topic-specific legislation in this chapter.

Appendix 4 – Informatives and Advice to the Applicant

Biodiversity Net Gain

We welcome the commitment to delivering over 10% BNG as stated in section 8.6.10. We recommend that the Applicant outlines proposals for how this would be achieved. We encourage measures to enhance the water environment, including enhancements within proposed buffer areas to watercourses, which could confer water quality benefits including nutrient and sediment attenuation and cooling (where tree planting is considered). The planned habitat surveys should be used to identify opportunities for enhancement measures.

Watercourse Crossings

The following are general guiding principles to consider when designing watercourse crossings to avoid negatively affecting geomorphology and natural processes:

- Avoid unnecessary interference with natural processes. For instance, encourage use of trenchless techniques such as HDD to minimise the likelihood of cables entering the water environment.
- Ensure watercourse crossing design is informed by assessment of fluvial processes and geomorphology. For example, depth of HDD crossing should consider the likelihood of vertical channel change.
- Avoid designs which present legacy risks to natural processes and geomorphology beyond the project lifespan. For example, infrastructure such as access tunnels which are left in-situ after decommissioning could be exposed by future river movement, becoming an impediment to natural processes.
- Consider opportunities to deliver WFD mitigation measures as part of the design.
- Avoid preventing delivery of mitigation measures, e.g. avoid bringing cables to surface level in floodplains earmarked for future river restoration.

Notes:

- i. WFD applies to all surface waterbodies, not just those designated for monitoring purposes.
- ii. Small watercourses and WFD - watercourses with a catchment less than 10km² connected to a downstream WFD waterbody take the classification of that waterbody.
- iii. BNG guidelines indicate that structures built within 10 m of the bank top of a watercourse qualify as encroachment, which may affect the uplift score calculated using the BNG Watercourse metric.

[BNG guidance is mentioned here because our [EA] usual easement for structures, operations, launch pits is to be at least 8m away from the watercourse bank or

landward base of fluvial defence structure/embankment (16m if defence structure is for tidal purposes). As stated in the note above, BNG watercourse metric considers anything within 10m of bank top to be encroaching on the watercourse.]

- Any potential construction, operational, and decommissioning phase impacts that the proposed scheme may have on the river must be subject to a WFD Assessment to the satisfaction of the EA.
- Any infrastructural developments on river/floodplain environments should be designed and delivered to have a minimal impact on natural river dynamics (e.g. erosion, deposition, meander migration etc.) and should not place any significant limitations on future river restoration projects.
- Geomorphologically dynamic behaviour is deemed likely to intensify in the next decades in line with Flood Estimation Handbook ([Flood Estimation Handbook \(FEH\) | UK Centre for Ecology & Hydrology \(ceh.ac.uk\)](#)). Therefore, any infrastructure developments should also take some account of the likelihood for increased lateral and vertical river dynamics anticipated to result from continued hydro-climatic intensification (e.g. 'a flood-rich epoch') over the remainder of the 21st century (i.e., future proofed designs that are not just based on present-day baseline geomorphological configuration/behaviour).
- If watercourse crossings are required to enable access to project work areas, then open span bridges are the preferred option. Box/ piped culvert crossings, even those appropriately designed, are a structure of last resort. If existing culverted crossings require upgrading for access purposes, consider replacing with open span structures, or 3-sided/arched culverts that do not interfere with the channel bed. This is in line with our policy regarding culverts. We will normally only grant a permit for a culvert if there is no reasonably practical alternative, and if the detrimental effects would be sufficiently minor that a more costly alternative would not be justified or there are reasons of overriding public/economic interest. We would expect to see geomorphologically robust designs that will cause minimal impacts on natural fluvial processes operating in the river/ floodplain environment over the course of the 21st century. We would also expect the effects of proposed crossings on hydrology, biodiversity (including fisheries) and geomorphology to be considered.

Further guidance regarding river crossings can be found in the following document: SEPA, 2010. Engineering in the water environment: good practice guide River crossings Second edition. SEPA

Watercourse Sensitivity

- Care should be taken by Applicant when determining watercourse sensitivity, especially the use of Q95 scores. Rivers with a higher Q95 flow are not more sensitive than rivers with a lower Q95. In the case of water quality, the reverse

of this is true, with less dilution meaning a higher sensitivity to change. Some watercourses with low Q95 may also be winterbournes, and therefore cannot accommodate change easily, as they would be dry for most of the year.

- WFD designation is a method of monitoring and classifying the ecological health of the water environment and not an indication of greater or lesser sensitivity to change. Therefore, watercourses with a WFD designation are no more sensitive than those which have not been designated.
- Sensitivity to change cannot be determined from a desk study alone. When determining the sensitivity of a watercourse, the applicant should ensure that professional judgement and the results of any surveys are also incorporated into the assessment.

Enhancement – Great Crested Newt

While Great Crested Newt presence is confirmed and mitigation is acknowledged, no specific habitat enhancements are proposed. Without enhancement, the Scheme misses the opportunity to contribute meaningfully to landscape-scale conservation. The Applicant should consider including hibernacula, log piles, and new or enhanced ponds where appropriate as well as maintaining connectivity to breeding ponds via field margins and hedgerows. We recommend that the Applicant consults with Natural England regarding Great Crested Newt enhancement.

Commitments Register

Commitment HFR2 could also relate to Ground Conditions and Land Quality.

Dewatering, Abstraction and Discharges

If dewatering is needed, it will require an abstraction licence if it does not meet the criteria for exemption in [*The Water Abstraction and Impounding \(Exemptions\) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works*](#). It may also require a discharge permit if it falls outside of our [*regulatory position statement for de-watering discharges*](#).

If the Applicant does not meet the exemption and requires a full abstraction licence, they should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found here: [Abstraction licensing strategies \(CAMS process\) - GOV.UK \(www.gov.uk\)](#) and [Apply for a water abstraction or impounding licence - GOV.UK \(www.gov.uk\)](#)

If the dewatering activity can be demonstrated to be discharged to the same source of supply without intervening use (i.e. non-consumptive), this will increase the likelihood of a licence being granted.

Please note that the typical timescale to process a licence application is 9-12 months. The Applicant may wish to consider whether a scheme-wide dewatering

application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.

Temporary dewatering of wholly or mainly rainwater that has accumulated in an excavation may be exempt from an Environmental Permit for a Water Discharge Activity. More information can be found on our website: Temporary dewatering from excavations to surface water: RPS 261 - GOV.UK (www.gov.uk). Note that this does not permit discharge of groundwater from a passive or active dewatering activity or permit the abstraction of groundwater.

The Applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found here: Discharges to surface water and groundwater: environmental permits - GOV.UK (www.gov.uk).

The use of drilling muds for directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.

Piled Foundations

CL:AIRE has published new guidance on piling risk and groundwater in April 2025, please ensure this new guidance is followed: [Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention](#).

Storage of Fuel, Oil and Chemicals

We note that the configuration of the emergency diesel generator will be guided by environmental and technical considerations. The Applicant should ensure any above ground oil storage associated with the installation complies with The Control of Pollution (Oil Storage) (England) Regulations 2001 (where relevant) and suitable emergency spill response procedures are put in place. See guidance: <https://www.gov.uk/guidance/storing-oil-at-a-home-or-business>

An emergency spill response procedure should be put in place for the operational phase of the development. Guidance on preparing this procedure can be found here: <https://www.gov.uk/guidance/prevent-groundwater-pollution-from-solvents#prepare-for-emergencies-create-a-pollution-incident-response-plan>

Foul Water Disposal

If foul water is proposed, such as from temporary construction compounds, the Applicant will need to assess requirements and options for disposal and ensure that any permits (where required) are obtained in a timely manner. Guidance on applying for a water discharge activity environmental permit can be found at: <https://www.gov.uk/guidance/discharges-to-surface-water-and-groundwater-environmental-permits>

Wheel Washing

Wheel washing areas should be designed to prevent pollution of any nearby watercourses. The Applicant should consider a self-contained wheel washing system to avoid discharges to the environment.

Flood Risk Assessment

It is noted that an FRA will be prepared as a technical appendix to the EIA (Section 16.4.12). As the FRA has not yet been submitted for our review, it is not possible to provide detailed comments, however we offer the following recommendations:

Sequential Test

In accordance with National Planning Policy Framework and the sequential test (paragraph 168), development should apply a sequential, risk-based approach to the location of development, taking into account all sources of flood risk and the current and future impact of climate change, to avoid (where possible) flood risk to people and property. The project should take a sequential approach where it can, if there are any opportunities for development to be located outside of Flood Zones 2 and 3 and into Flood Zone 1, this should be prioritised.

Flood Zones

The FRA will need to consider the future flood extent of the design flood plus climate change which should be informed by the design life of the development. We would also recommend development be setback from watercourses and the design flood extent. This allows for future remediation, replacement, raising of flood assets in the context of a changing climate and increasing flood risk.

Climate Change

If the development is classed as essential infrastructure, then from a fluvial flood risk perspective the higher central climate change allowance should be used (70th percentile). A sensitivity test for the credible maximum scenario, which in this case would be the upper climate change allowance for fluvial flows (95th percentile), should also be completed. Essential infrastructure should remain operational during the design flood scenario.

Watercourse Crossings

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert

- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river)

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549.

The Applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Generation of Waste

Section 9 (Climate Change) includes waste treatment, recovery, or disposal of large plant, panels, and associated components. Waste management options are likely to be resource intensive. Given that the typical lifespan of a panel is 25 to 30 years, all panels are likely to be replaced during the facility's lifetime. Consequently, significant quantities of waste will be generated during the lifetime and at the decommissioning stage, necessitating treatment, recovery, or disposal.

Manufacturing Waste

Solar panels, inverters, and other components produce waste during their manufacturing process. This includes materials like silicon, glass, metals, and chemicals. Although this waste is not directly generated on-site, its lifecycle impact should be considered as part of the environmental assessment of the project.

Waste Minimisation

Design and management techniques should be considered to minimise waste produced in extreme weather events, such as storms.

Regulatory Compliance

All waste management must comply with UK environmental regulations, which dictate how non-hazardous, hazardous and electronic waste should be assessed, classified, handled, transported, and disposed of or recycled.

Construction Waste

During the construction phase, there will be waste from packaging materials, offcuts of materials used for mounting structures, excess concrete, and soil from earthworks. These need to be managed in compliance with waste regulations to minimise environmental impact and a Waste Permits or alternative regulatory control may be required. See: [Waste: environmental permits - GOV.UK](#).

Movement of Waste Off Site – Duty of Care

The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable to any off-site movements of wastes.

The code of practice applies to you if you produce, carry, keep, dispose of, treat, import or have control of waste in England or Wales.

The law requires anyone dealing with waste to keep it safe and make sure it's dealt with responsibly and only given to businesses authorised to take it. The code of practice can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/506917/waste-duty-care-code-practice-2016.pdf

If you need to register as a carrier of waste, please follow the instructions here:

<https://www.gov.uk/register-as-a-waste-carrier-broker-or-dealer-wales>

Waste On Site – Contaminated Land

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether excavated material arising from site during remediation or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to:

- [CL:AIRE Definition of Waste: Code of Practice](#)
- [EA Regulatory Position Statement 215](#): Treating small volumes of contaminated soil and groundwater

Waste to be taken Off Site – Contaminated Land

Contaminated soil that is, or must be, disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework

for the Preparation and Application of a Sampling Plan'. The permitting status of any proposed treatment or disposal activity should be clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to our website at www.gov.uk/government/organisations/environment-agency for more information.

Movement of Waste Off Site – Duty of Care & Carriers, Brokers and Dealers Regulations Characterisation and Classification of Waste

In order to meet the Applicant's objectives for the waste hierarchy and obligations under the duty of care, it is important that waste is properly classified. Some waste (e.g. wood and wood based products) may be either a hazardous or non-hazardous waste dependent upon whether or not they have had preservative treatments.

Proper classification of the waste both ensures compliance and enables the correct onward handling and treatment to be applied. In the case of treated wood, it may require high temperature incineration in a directive compliant facility. More information on this can be found here: <https://www.gov.uk/how-to-classify-different-types-of-waste>

Use of Waste On Site – Authorisation or Permit Required

If materials that are potentially waste are to be used on-site, the Applicant will need to ensure they can comply with the exclusion from the Waste Framework Directive (WFD) (article 2(1) (c)) for the use of, 'uncontaminated soil and other naturally occurring material excavated in the course of construction activities, etc...' in order for the material not to be considered as waste. Meeting these criteria will mean waste permitting requirements do not apply.

Where the Applicant cannot meet the criteria, they will be required to obtain the appropriate waste permit or exemption from the Environment Agency.

A deposit of waste to land will either be a disposal or a recovery activity. The legal test for recovery is set out in Article 3(15) of WFD as:

- any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.
- We have produced guidance on the recovery test which can be viewed at <https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-recovery-plans-and-deposit-for-recovery->

[permits#how-to-apply-for-an-environmental-permit-to-permanently-deposit-waste-on-land-as-a-recovery-activity.](#)

You can find more information on the Waste Framework Directive here:

<https://www.gov.uk/government/publications/environmental-permitting-guidance-the-waste-framework-directive>

More information on the definition of waste can be found here:

<https://www.gov.uk/government/publications/legal-definition-of-waste-guidance>

More information on the use of waste in exempt activities can be found here:

<https://www.gov.uk/government/collections/waste-exemptions-using-waste>

Non-waste activities are not regulated by us (i.e. activities carried out under the CL:AIRE Code of Practice), however you will need to decide if materials meet End of Waste or By-products criteria (as defined by the Waste Framework Directive). The 'Is it waste' tool, allows you to make an assessment and can be found here:

<https://www.gov.uk/government/publications/isitwaste-tool-for-advice-on-the-by-products-and-end-of-waste-tests>

The direct link to CL:AIRE can be found here: <https://www.claire.co.uk/projects-and-initiatives/dow-cop>

The Waste Hierarchy and Resource Management in relation to Construction Wastes

The developer must apply the waste hierarchy as a priority order of prevention, re-use, recycling before considering other recovery or disposal options. Government guidance on the waste hierarchy in England can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69403/pb13530-waste-hierarchy-guidance.pdf

Site Waste Management Plans (SWMP) are no longer a legal requirement, however, in terms of meeting the objectives of the waste hierarchy and your duty of care, they are a useful tool and considered to be best practice.

Management and Reporting Systems

Where a development involves any significant construction or related activities, we would recommend using a management and reporting system to minimise and track the fate of construction wastes, such as that set out in PAS402: 2013, or an appropriate equivalent assurance methodology. This should ensure that any waste contractors employed are suitably responsible in ensuring waste only goes to legitimate destinations.

Environmental Permits

If Environment Agency permit/authorisation is required, we recommend engaging with our National Permitting Service as early as possible. Please also see the following pre-application advice: <https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>

General Errors and Omissions

Misidentification of Proposed Site Areas

Section 3.3.19 appears to discuss HG3 rather than HG1. Misidentification of areas and locations could lead to unintentional, but detrimental impacts to anything within those misidentified areas. Please redraft this paragraph to reflect the correct location and details associated with it, including WFD waterbodies.

Use of Acronyms

Please ensure acronyms do not cause confusion within the report. 'WFD' is used to refer to Water Framework Directive and Waste Framework Directive in the report. The glossary also only features WFD as representing Water Framework Directive. Acronyms should be clearly differentiated, and all should be included in the glossary/ list of abbreviations and acronyms.

Appendix B Baseline Ecology Reports

Habitat surveys and other accompanying figures are difficult to read due to poor resolution reproduction so there is a limited ability to interpret. Please ensure figures are provided of sufficient resolution to review going forward.

Planning Services

Civic Offices
High Street
Epping
CM16 4BZ

Our Ref: EPF/1023/25

Your Ref: EN0110021

Case Officer: Muhammad Rahman

By Email Only

Dear Jack Patten,

Town and Country Planning Act 1990

Site Address Hedgehog Grove Solar Farm - Located between Felsted and Bartholomew Green, Braintree

Proposal: Proposed development for a (98MW) Solar Farm

This letter is a formal response to your consultation request.

The site lies within the boundary of Uttlesford District Council, although as a National Strategic Infrastructure Project (NSIP) the decision lies with the Secretary of State for Energy Security and Net Zero rather than the Local Planning Authority.

Given the significant distance beyond Epping Forest District Council's boundary, the Council does not consider there to be any significant environmental impacts that would affect the District, although flag the potential impact on the Epping Forest Special Area of Conservation (EFSAC) that may arise during the construction phase of the development. Background information re the EFSAC is below.

A large part of the Epping Forest contains a Special Area of Conservation (EFSAC) which has been identified primarily for its value in respect of beech trees and wet and dry heaths and for its population of stag beetle. As an internationally important site it is afforded the highest level of protection due to its habitats and species that are vulnerable or rare within an international context. The Council has identified two main issues (known as 'Pathways of Impact') that are currently adversely affecting the health of the Epping Forest.

The first is recreational pressure. Surveys have demonstrated that most visitors live within 6.2km (Zone of Influence) of the Epping Forest. As new residential development within 6.2km is likely to result in more people visiting the Epping Forest on a regular basis this will add to that recreational pressure.

The second issue is atmospheric pollution which is caused primarily by vehicles travelling on roads in close proximity to the Forest emitting pollutants (Nitrogen Dioxide and Ammonia). Development proposals (regardless of their type, size, and location within the District) which would result in even an increase in just one additional vehicle has the potential to contribute to increases in atmospheric pollution within the Epping Forest.

As the proposal is for non-residential development the development would not result in a likely significant effect on the integrity of the EFSAC as a result of recreational pressures. However, the development has the potential to result in a net increase in traffic using roads through the EFSAC, particularly during the construction phase. A construction management plan should accompany the application ensuring that any Construction traffic will be routed to ensure that HGV and other traffic does not use roads going through or within the 200m buffer zone of the EFSAC.

Yours sincerely,

Muhammad Rahman
Senior Planning Officer

Jack Patten
EIA Advisor
on behalf of the Secretary of State
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Ref: EN0110021
Date: 21 May 2025

Dear Mr Patten,

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

Application by Hedgehog Grove Solar Farm Ltd (the applicant) for an Order granting Development Consent for the Hedgehog Grove Solar Farm (the proposed development)

Thank you for your letter as dated 23 April 2025 and consulting Essex County Council (ECC) on Hedgehog Grove Solar Farm Limited (the applicant) request for a Scoping Opinion on this proposal. The Council is happy to be given the opportunity to respond. The Hedgehog Grove Solar Farm Environmental Impact Assessment (EIA) Scoping Report April 2025 is hereafter referred to as the 'Scoping Report'.

You have asked that our comments are sent to you by the 21 May 2025, and you are asked to note that this response meets this response deadline.

The overview of the proposal is set out within the Scoping Report and comprises the installation and operation of solar photovoltaic (PV) generating modules and associated development across a site in the administrative boundaries of Uttlesford District Council (UDC) and Braintree District Council (BDC). It is understood that the proposal also includes underground cabling to enable future grid connection into the existing UK Power Networks (UKPN) Braintree 132 kilovolt (kV) Substation. At this stage of the design process, there are currently four cable corridor options which have been identified, which will be narrowed down to a maximum to two alternatives for the Environmental Statement (ES). The site extends to 255 hectares and assumes the development, if consented, would generate 98MW of energy.

The site is rural in nature and forms gently undulating land to the south of the Flitch Way and north of Bannisters Green and is currently under agricultural production. The site and its environment is rural in nature, and relies on the rural road network to access it. The Flitch Way, which would mark the northern boundary of the site, follows a former railway line that passes through 15 miles of rural Essex. The Flitch Way offers perfect easy terrain for a variety of outdoor activities in the heart of rural Essex and also forms part of National Cycle Network 16. The flat, relatively straight and well-surfaced route is accessible to all for jogging, cycling, dog-walking or horse riding in a safe and traffic-free environment.

The identification of multiple cable corridors is currently creating an element of uncertainty regarding the potential impact of the development. Each of the proposed cable corridors shown within the Scoping Report will require more detailed consideration alongside the main proposal in terms of their scale, design, access for maintenance, landscape and visual impact given its rural location, impact on the biodiversity, flood risk and drainage, and amenity impacts such as noise. It is noted that the applicant intends to use the 'Rochdale Envelope' approach within the as proposed, red-lined site, with maximum parameters as the design of the development is still evolving.

The Secretary of State must decide any application in accordance with the Overarching National Policy Statement for Energy (EN-1) (NPS EN-1), the National Policy Statement for Renewable Energy (EN-3)¹¹ (NPS EN-3) and the National Policy Statement for Electricity Networks Infrastructure (NPS EN-5) and due consideration has been referenced to these policies through the Scoping Report.

Furthermore, throughout the Scoping Report, reference is made to Essex County Council policies and guidance which is welcomed. However, there are instances which have been identified within this response where further or updated policies or guidance should be considered. ECC continues to seek out and promote best practice opportunities, developing guidance and policies, such as the published Our Nationally Significant Infrastructure (NSIP) Policy (December 2022). ECC would draw attention to the need for the applicant to engage, at cost neutral to the Council, to ensure compliance with published policies but also gain an appreciation of ongoing workstreams which may be able enhance the DCO application and the scheme itself.

ECC understands that part of the proposed development was previously divided into two separate projects, located respectively on the areas referred to as HG1 and HG3 as identified in the Scoping Report. These two previous proposals were initially developed as two planning applications. As such, as section 1.3 'Existing Baseline Reporting' of the Scoping Report sets out, there were a number of reports produced as part of the assessment work in 2022. It would be useful to understand which of the studies are to be updated to inform the baseline.

The Planning Inspectorate's Technical Advice for Scoping Solar Development sets out that early engagement with the relevant consultation bodies in advance of a scoping request can help to enable agreement on the scope of the EIA. ECC has had only limited engagement on this proposal, with initial meetings taking place with the applicant between January – March 2025. The County Council agrees the statement in the Scoping Report (paragraph 5.1.2 and 5.2.2) that 'early and continuous engagement is vital' to inform the development and shape the mitigation of the potential effects. However, the limited engagement to date is of concern given the proposed programme with an application intended to be submitted by the end of 2025. It is noted that the Scoping Report reflects on the initial conversations with the County Council as Local Highway Authority, however there are a significant number of key topics which have not been subject to prior engagement. Given the current limited level of engagement, it is therefore more challenging at this stage to understand what the true impacts of the scheme may be and the matters which may have to be implemented to ensure the scheme can be delivered effectively and adverse impacts appropriately mitigated.

However, ECC can confirm that it is anticipating future engagement with the applicant prior to submission, with discussions on-going as to a future stakeholder engagement plan, and on the establishment of a Planning Performance Agreement by which engagement will be at cost neutral, in accordance with our published NSIP policy. The County Council has also received a Statement of Community Consultation and will provide commentary to the applicant in due course.

Overall, the County Council welcomes sight of the Scoping Report and the opportunity to provide commentary. However, this Scoping Report has been published following only limited engagement to date with the applicant. Therefore, as this response sets out, ECC is seeking for the majority of topics to be scoped in for Environmental Assessment at this stage where data or evidence is not available or presented to justify why a specific matter can be scoped out. Solar farms have the potential to have significant and lasting impacts on the surrounding communities and environment, not least on highways and transportation, the Public Rights of Way network, heritage and archaeology, landscape, water, ecology and socioeconomics and these matters must be fully addressed through the EIA process alongside engagement with relevant authorities including the County Council.

Commentary is raised on the following topics from the submitted EIA Scoping Report dated April 2025. The numbers reflect the chapter numbers within the Scoping Report.

- 7. Air quality
- 8. Biodiversity and nature conservation
- 9. Climate change and greenhouse gas assessment
- 10. Cultural heritage and archaeology
- 11. Ground conditions and land quality
- 12. Landscape and visual
- 13. Noise and vibration

- 14. Socioeconomics and land use
- 15. Traffic and transport
- 16. Water resources and flood risk
- 17. Other environmental topics

Within these topics, ECC has provided commentary on what matters it considers should be scoped in and out of assessment within the EIA. However, ECC's statutory roles are noted, and where matters are more relevant for Braintree District Council and Uttlesford District Council, we defer to them for comment on this Scoping submission.

Going forward ECC wish to work in parallel with the impacted District Authorities in the consideration of this NSIP proposal.

7. Air quality

It is noted that this issue is largely matter for the district authorities – Uttlesford District Council and Braintree District Council, however, brief commentary has been provided for information.

Proposed scope of the EIA

The table below summaries Table 7.2 Elements of the air quality assessment proposed to be scoped into the EIA and Table 7.3 Elements of the air quality assessment proposed to be scoped out of the EIA from the Scoping Report. ECC then provides commentary on the matters proposed to be scoped in and out for assessment within the EIA.

Potential effect / topic	Proposed Assessment within EIA	ECC commentary
Construction		
Construction dust	Scoped in	It is agreed that this matter should be scoped in for assessment within the EIA as it has been identified by the applicant that proposed construction works are associated with dust raising activities which can have an effect on human and ecological receptors.
Construction Traffic	Scoped in (for screening assessment)	It is agreed that this matter should be scoped in for assessment within the EIA due to the lack of clarity on construction traffic data and the potential impact that this may have on the local rural highway network and air quality.

Decommissioning Phase		
Decommissioning Dust	Scoped in	It is agreed that this matter should be scoped in for assessment within the EIA as the activities are likely to involve similar types and movements of vehicles and equipment as experienced during decommissioning.
Operation Phase		
Operation of the Proposed Development	Scoped out	Rationale noted. There is expected to be minimal activity during the operational phase, however, details of any expected activities involved in the maintenance would be welcomed for clarity to understand what impacts may arise.
Operational Traffic	Scoped out	Rationale noted, although relevant data and explanation on the level of traffic likely during the operation of the proposed development would be welcomed (see Chapter 15 commentary below).

8. Biodiversity and nature conservation

In respect of biodiversity and nature conservation within the Uttlesford area, at this stage the County Council will be leading on this matter. Braintree District Council are leading on this matter within the Braintree area.

Appendix B of the Scoping Report provides details of surveys which were carried out in 2022. Section 8.4 of the Scoping Report states that there are further surveys are being undertaken in 2025. It is welcomed therefore that there are a broad range of matters scoped in at this stage, and that assessment will be formed against up to date data.

Flitch Way, a designated Local Wildlife Site (LWS) and Local Wildlife Reserve (LNR) is located directly adjacent to the site, and in Table 8.3 of the Scoping Report, it is recognised that this provides a vital wildlife corridor for Living Landscape Areas, nature reserves and open spaces whilst supporting a variety of notable species. The Flitch Way also provides a surfaced and accessible linear walkway linking Dunmow in the west to Braintree in the east, and is a much used and valued space. The buffer between Flitch Way and the proposed development does not appear to generally present an obstruction for wildlife. Therefore, there must be detailed consideration of the impact of the proposed development on Flitch Way as a LWS / LNR. Engagement must take place with relevant authorities and impacted stakeholders to understand any impacts and maximise on the potential ecological and biodiversity benefits

which could be achieved with effective ecological enhancement measures implemented through the proposed development.

Proposed scope of the EIA

The table below summaries Table 8.5 Elements of the biodiversity and nature conservation assessment proposed to be scoped in to the EIA and Table 8.6 Elements of the biodiversity and nature conservation assessment proposed to be scoped out of the EIA from the Scoping Report. The table then provides commentary on the matters proposed to be scoped in and out for assessment within the EIA.

Potential effect / topic	Proposed Assessment within EIA	ECC commentary
Construction and Decommissioning		
Loss of, and disturbance to habitat	Scoped in	It is welcomed that these potential effects / topics are scoped in for assessment within the EIA but would urge the need for updated surveys where necessary to give the best understanding of the current baseline.
Amphibians including GCN	Scoped in	
Badgers	Scoped in	
Bats (roosting)	Scoped in	
Bats (foraging and commuting)	Scoped in	
Breeding birds	Scoped in	
Hazel dormice	Scoped in	
Reptiles	Scoped in	
Invertebrates	Scoped in	
Other mammals (such as hedgehog and brown hare)	Scoped in	
Otter	Scoped in	
Water vole	Scoped in	
Operation		
Amphibians including GCN	Scoped in	It is welcomed that these potential effects / topics are scoped in for assessment within the EIA but would urge the need for updated surveys where necessary to give the best understanding of the current baseline.
Badgers	Scoped in	
Bats (roosting)	Scoped in	
Bats (foraging and commuting)	Scoped in	
Breeding birds	Scoped in	
Hazel dormice	Scoped in	
Reptiles	Scoped in	

Invertebrates	Scoped in	
Other mammals (such as hedgehog and brown hare)	Scoped in	
Otter	Scoped in	
Water vole	Scoped in	
Construction and Decommissioning		
International / European designated sites within 10 km	Scoped out	Noted, rationale is clear on this matter as there are no international / European designated sites within 10 km.
Statutory designated sites within 2 km	Scoped out	It is noted that the proposed development avoids statutory designated sites and there are no LWS within the site boundary. However, Flitch Way, as both a LWS and LNR is directly adjacent to the proposed development with obvious connectivity to the site of the proposed development. Measures must be in place to ensure there are no direct or indirect impacts on Flitch Way throughout the lifecycle of the development. Possible impacts could include but not limited to, loss or disturbance to habitats and loss of land linked to functionality of statutory and non-statutory designated sites. Potential impacts and effects must be comprehensively assessed within the EIA, not just within the Construction Environment Management Plan (CEMP) and Decommissioning Environment Management Plan (DEMP) as currently proposed. As such, statutory and non-statutory designated sites within 2km, including Flitch Way must therefore be scoped into assessment within the EIA to ensure impacts are minimised and necessary mitigation is in place with ecological enhancement opportunities explored and
Non-statutory designated sites within 2 km	Scoped out	

		secured. ECC consider that, on balance, it simply is incorrect to suggest that a development of this scale and scope would not have an impact on both a LWS and LNR which will stand immediately adjacent to this 255 hectare site. To properly assess this impact this must be scoped in to the EIA.
SACs within 30 km where bats are qualifying features	Scoped out	Rationale noted.
Operation		
International / European designated sites within 10 km	Scoped out	Rationale noted.
Statutory designated sites within 2 km	Scoped out	<p>It is noted that the proposed development avoids statutory designated sites and there are no LWS within the site boundary. However, Flitch Way, as LWS and LNR is directly adjacent to the proposed development with obvious connectivity to the site of the proposed development.</p> <p>Measures must be in place to ensure there are no direct or indirect impacts on Flitch Way throughout the lifecycle of the development. Possible impacts could include but not limited to, loss or disturbance to habitats and loss of land linked to functionality of statutory and non-statutory designated sites. Potential impacts and effects must be comprehensively assessed within the EIA, not just within the Construction Environment Management Plan (CEMP) and Decommissioning Environment Management Plan (DEMP) as currently proposed.</p> <p>As such, statutory and non-statutory designated sites within 2km, including Flitch</p>
Non-statutory designated sites within 2 km	Scoped out	

		Way must therefore be scoped into assessment within the EIA to ensure impacts are minimised and necessary mitigation is in place with ecological enhancement opportunities explored and secured. Hence it is ECC's strongly held view that such a topic cannot be scoped out at this time.
SACs within 30 km where bats are qualifying features	Scoped out	Rationale noted.
Wintering Birds	Scoped out	According to Table 8.1 of the Scoping Report, surveys for HG1 and HG3 were carried out in 2024, but there appears to be a lack of survey data for HG2 to inform the Scoping Report. Although it is appreciated that the environment of HG2 is likely to be similar to that of HG1 and HG3, a question is raised whether wintering birds should be scoped out without this data being available.
Invasive non-native species	Scoped out	Although the risk of invasive non-native species (INNS) is currently considered to be low based on current investigation, it is noted that measures within the CEMP will aim to avoid the introduction and or spread of INNS. The CEMP should be developed in respect of biodiversity and nature conservation in conjunction with relevant authorities.

9. Climate change and greenhouse gas assessment

It is welcome by ECC that climate change and greenhouse gas assessment will be considered as a standalone chapter within the ES. It is recognised that two assessments of climate change will be presented - Climate Change Resilience Review (CCRR) and In Combination Climate Impact (ICCI). Both of these assessments will be used to inform how the proposed development can be adapted to increase its resilience to climate change. The information and initiatives within this chapter are significant and engagement would be welcomed on this topic. Engagement relating to the proposed mitigation measures which will be incorporated into

channels such as the Construction Environment Management Plan, in consideration of paragraph 9.5.10, would also be welcomed.

Mitigation against the climate change and greenhouse gas impacts of the proposed development will also be brought through a range of issues that will need to be considered in the EIA. This includes but is not limited to transportation (electric vehicles and charging points, use of public transport, car sharing, sustainable low carbon traffic modes etc) the built environment, green infrastructure (planting, Sustainable Urban Drainage, greenhouse gas emissions, air quality etc).

In respect of paragraph 9.2.14 of the Scoping Report, ECC would also welcome consideration of County Council policies including the Essex Design Guide (accessed via [Home | Essex Design Guide](#)) which includes a series of sections around climate change and the Essex Climate Action Plan in respect of climate change matters.

The table below summaries Table 9.3 Elements of the greenhouse gas assessment proposed to be scoped in to and out of the EIA, Table 9.4 Climate hazards proposed to be scoped in to the CCRR, and Table 9.5 Climate hazards proposed to be scoped out of the CCRR from the Scoping Report, and provides commentary on the matters proposed to be scoped in and out for assessment within the EIA.

Potential effect / topic	Proposed Assessment within EIA	ECC commentary
Construction Phase		
Site preparation	Scoped in	These matters should be scoped into the proposed assessment within the EIA as they have been identified by the applicant as a source of emissions for the proposed development. There must be a detailed understanding of the resulting impacts and effects, and how these can be minimised accordingly.
Civils works	Scoped in	
Construction of panels and associated infrastructure	Scoped in	
Operation phase		
Operation including maintenance and repair	Scoped in	These matters should be scoped into the proposed assessment within the EIA as they have been identified by the applicant as a source of emissions for the proposed development. There must be a detailed understanding of the resulting impacts and effects, and how these can be minimised accordingly.

Decommissioning phase		
Decommissioning including removal of equipment and restoration	Scoped in	These matters should be scoped into the proposed assessment within the EIA as they have been identified by the applicant as a source of emissions for the proposed development. There must be a detailed understanding of the resulting impacts and effects, and how these can be minimised accordingly.

Potential effect / topic	Proposed Assessment within EIA	ECC commentary
Temperature related		
Extreme heat	Scoped in	These matters should be scoped in to the proposed assessment within the EIA as the rationale notes the likelihood of increasing temperatures and prolonged warm spells are anticipated to occur within the site and an overall annual warming in the UK. Therefore, resulting effects such as risk of wildfires, stress on material and structures, effects on surrounding environmental receptors and site personnel must be considered.
Wildfires	Scoped in	
Water related		
Extreme rainfall	Scoped in	This matter must be scoped in for assessment within the EIA to ensure appropriate consideration as to how the proposed development should be designed to be resilient to impacts resulting from changes to precipitation.
Pluvial rainfall	Scoped in	This matter must be scoped in for assessment within the EIA to ensure consideration of how increases in extreme rainfall resulting in increased pluvial flooding could impact assets.
Fluvial rainfall	Scoped in	As the site contains areas which have a high risk of flooding from rivers, which climate change may continue to exacerbate, this

		matter must be scoped in for assessment within the EIA.
Water stress and drought	Scoped in	As the site is projected to become a medium-high water stress area by 2050 under the SSP126 (optimistic) climate change projection, this matter must be scoped in for assessment within the EIA.
Wind related		
Extreme winds	Scoped in	This matter should be scoped in for assessment within the EIA. The proposed development could be vulnerable to changing wind patterns, and as UK Climate Projects show, there may be an increased in mean wind speed and an increase in the number of windstorms over the UK. The effect on the proposed development must be understood.
Water related		
Sea level rise	Scoped out	Noted, rationale accepted as the location is not close to the coast, nor is the site shown as being an area which may be susceptible to sea level rise.
Coastal flooding	Scoped out	

10. Cultural heritage and archaeology

In respect of cultural heritage, this matter is being led by both district authorities as one of their statutory duties.

In respect of archaeology within Uttlesford, the matter is currently being led by ECC at this stage, Appendix 1 provides a detailed response on this.

Braintree District Council is leading on archaeology for the area of the proposed development within Braintree.

Engagement must take place with relevant authorities and stakeholders as soon as possible in respect of cultural heritage and archaeology. Informed methodologies for investigation must be agreed and implemented to allow for a detailed assessment of the impact of the development. This evidence must then be used to inform the design development, including the cable corridor options.

It is important to recognise the potential impacts which a solar proposal may have on archaeology, which can have a material impact on the design and development of a solar proposal. Engagement must take place with relevant authorities at the earliest stages to ensure that necessary investigation can be agreed, and the findings reviewed collaboratively to inform the design development process. ECC is currently preparing guidance regarding the level of archaeological investigation (desk based and site investigation works) which it expects to be carried out for a solar development. A discussion would be welcomed on this matter to understand how the proposed development may be able to accord with this emerging guidance.

It is further recommended that an integrated approach is taken to assessing impacts of the scheme. It is important that this approach is applied to the inter-relationships of built heritage and archaeology with other important EIA topics such as landscape and visual and noise and land matters.

Proposed scope of the EIA

The table below summaries Table 10.1 Elements of the cultural heritage and archaeology assessment proposed to be scoped in to the EIA and Table 10.2 Elements of the cultural heritage and archaeology assessment proposed to be scoped out of the EIA from the Scoping Report. The table then provides commentary on the matters proposed to be scoped in and out for assessment within the EIA.

Environmental Receptor, Assessment or Effect	Proposed Assessment within EIA	ECC commentary
Direct Physical Impacts to Heritage Assets within the Site (excluding the Cable Corridor Options)	Scoped in	It is vital that any physical impacts are understood and avoided / mitigated as required and therefore this matter must be scoped in for assessment within the EIA.
Direct Physical Impacts to Heritage Assets within the Cable Corridor Options	Scoped in	When considering the cable corridor options, it is vital that any direct physical impacts are understood and avoided / mitigated as required and therefore this matter must be scoped in for assessment within the EIA.
Indirect Physical Impacts to Heritage Assets within and immediately adjacent to the Site	Scoped in	It is vital that any indirect physical impacts are understood and avoided / mitigated as required and therefore this matter must be scoped in for assessment within the EIA.

Setting Impacts to designated assets (and any non-designated heritage assets of equivalent significance) within the 3 km Study Area	Scoped in	It is important that setting impacts are be scoped in for assessment within the EIA as it is expected that the project will have landscape impacts that could affect the setting of heritage assets. Clarity is sought on how the applicant will differentiate between 'non designated heritage assets' and 'non-designated heritage assets of equivalent significance'.
The cumulative effect of the Proposed Development in conjunction with other developments within 3 km	Scoped in	It is vital that the cumulative effect of this development is considered in conjunction with other developments to understand the broader context of the area. There are a significant number of energy and other developments within Essex and the wider area, therefore ECC strongly supports the consideration of cumulative effects across all topics within the EIA to ensure that impacts can be managed and mitigated as necessary.
Assessment of the direct physical impacts to heritage assets outside the Site	Scoped out	Figures 10.1-10.4 show that there are a significant number of designated assets within the 3km study area. Many of these are located close to the site boundary and should be assessed in terms of potential direct and indirect physical impacts within the EIA and therefore should be scoped in to ensure that any resulting effects can be avoided or mitigated as may be required.
Indirect physical impacts to heritage assets outside the Site and its immediate vicinity	Scoped out	
Setting impacts to non-designated heritage assets	Scoped out	Clarity is sought on how the applicant will differentiate between 'non designated heritage assets' and 'non-designated heritage assets of equivalent significance' without prior discussion and agreement from relevant authorities. It is therefore recommended that all non-designated assets are considered as the proposed development has the potential for significant setting impacts on all heritage assets given its scale. Setting impacts to non-designated heritage assets should

		therefore be scoped in for assessment within the EIA.
Temporary settings impacts to designated and non-designated heritage assets as a result of the operation and decommissioning of the underground cable (if decommissioned)	Scoped out	Temporary settings impacts are not expected to extend beyond construction; however, efforts should be in place to make sure, even where temporary, settings impacts are minimised where possible.

11. Ground conditions and land quality

Essex County Council is the Minerals and Waste Planning Authority for the area. Overall, the recognition of Broadfield Farm, located to the north of the adjacent A120 as a proposed and reserved site for future mineral (sand and gravel) extraction within the Scoping Report is welcomed. Although the proposed development is temporary in nature, it does have a 40-year life span so this matter should be addressed through the EIA. Engagement with the County Council as the relevant authority would be welcomed to ensure this matter is appropriately addressed within the ES.

Proposed scope of the EIA

The table below summaries Table 11.3 Elements of the Land Quality and Ground Conditions Assessment Proposed to be Scoped in to the EIA and Table 11.4 Elements of the Ground Conditions and Land Quality Assessment Proposed to be Scoped Out of the EIA from the Scoping Report. The table then provides commentary on the matters proposed to be scoped in and out for assessment within the EIA.

Potential effect / topic	Proposed Assessment within EIA	ECC commentary
Construction		
Loss of BMV agricultural soil resource	Scoped in	Although the loss is temporary in the location of construction areas, this matter should be scoped into the assessment within the EIA as much of the site is classified as Best and Most Valuable land in respect of its Agricultural Land

		Classification. Consideration of NPS EN-3 should be clear within the ES.
Potential impacts on designated mineral resources	Scoped in	As Minerals and Waste Planning Authority, this matter being scoped in for assessment within the EIA is welcomed. It is vital that the proposed development does not impact Broadfield Farm. Further engagement would be welcomed.
Encountering contamination during construction works during activities involving ground disturbance	Scoped in	Given the extent of proposed construction works and likely potential resulting impact, this matter should be scoped in for assessment within the EIA.
Potential effects on groundwater as a result of excavations and dewatering	Scoped in	This matter should be scoped in for assessment with the EIA given the rationale being presented by the applicant regarding foundation construction and ground disturbance.
Use of plant and equipment and storage and use of materials and substances with polluting potential.	Scoped in	This matter should be scoped in for assessment with the EIA given the substances expected to be used during construction which could have an impact on the ground or controlled waters as a result of accidental leaks.
Temporary changes to soil function (e.g. compaction, changes to drainage/ infiltration of water to ground) during construction.	Scoped out	Work should be carried out in line with Defra's 2009 Construction Code of Practice for the Sustainable Use of Soils on Construction Sites PB13298143.
Operational Phase		
Loss of BMV agricultural soil resource	Scoped in	This matter should be scoped into the assessment within the EIA as the majority of the site is classified as Best and Most Valuable land in respect of its Agricultural Land Classification. Consideration of NPS EN-3 should be clear within the ES.
Encountering contamination during	Scoped in	Given the extent of proposed construction works and likely potential resulting impact,

occasional operational phase maintenance activities involving ground disturbance		this matter should be scoped in for assessment within the EIA.
Use of plant and equipment and storage and use of materials and substances with polluting potential	Scoped in	This matter should be scoped in for assessment with the EIA given the substances expected to be used during construction which could have an impact on the ground or controlled waters as a result of accidental leaks.
Permanent changes to or loss of soil function in the locations of permanent development (e.g. compaction, changes to drainage/infiltration of water to ground).	Scoped in	This matter is currently scoped in, although the rationale currently states that this 'aspect is not considered to require further assessment'. Question is raised whether or not this is proposed to be scoped in. At this stage, it is recommended that this matter is scoped in for assessment within the EIA as changes to drainage may have wider impacts which need to be understood and assessed.
Construction, Operation and Decommissioning		
Impacts to geological SSSIs or LoGS.	Scoped out	Noted as the rationale details as there have been no SSSIs or LoGS identified in the study area.

12. Landscape and visual

It is noted that this issue is largely matter for the district authorities – Uttlesford District Council and Braintree District Council, however, brief commentary has been provided for information and the County Council would wish to remain engaged in discussions on this topic with the applicant given the prominence of this matter.

The proposed development will have a significant impact on the landscape through the obvious change of use for the area. Although the development is described as “temporary” it will never the less be a generational change for the local area. Therefore, a clear understanding of the extent of the impacts and possible effects of the proposed development must be established, and design and mitigation must seek to minimise the impacts and resulting effects on receptors. Based on prior experience, this is likely to be a key issue for this project, therefore engagement must take place with relevant authorities and stakeholders to ensure this matter is addressed comprehensively, and necessary mitigation understood and secured.

Flitch Way, as previously stated, is directly adjacent to the site and is an important PRoW in the area attracting leisure and amenity users, as well being an important asset to the area recognising the historic railway which ran adjacent to the site. There is a notable landscape and visual impact arising from the proposed development, changing the outlook from this PRoW from its current agricultural use, to one which is more akin to a quasi-industrial look. Furthermore, there are a number of further PRoW within and close to the proposed development site which will be significantly impacted visually by the development. Currently footpaths cross this open rural landscape and provide long views of the same. Erecting a solar array, with footpaths between the arrays, will be materially different. The visual impact arising from the development on PRoW must be understood, and necessary design and mitigation measures, including screening, must be in place during construction, operation and decommissioning stages of the proposed development.

To help inform the landscape baseline, a detailed landscape audit to be provided. This should include details of existing landscape features present across the development sites. Furthermore, the landscape and visual receptors should be submitted and approved by the relevant local authorities prior to the assessment being undertaken. Supporting Zone of Theoretical Visibility mapping should also be provided to ensure long distance views outside the assessment study area need to be considered. All visual representation with any submitted Landscape and Visual Impact Assessment (LVIA) should be in accordance with the latest guidance and policy to ensure the assessment of visual impact is accurate and in turn an appropriate judgement of the assessed impacts can be made.

In respect of paragraph 12.2.21 of the Scoping Report providing detail of the guidance documents that the LVIA will draw on, the reference to Essex County Council (2005) Design Guide should be updated as the latest design guide was published in 2018 and can be accessed via [Home | Essex Design Guide](#). This importantly includes 'Solar Farm Guiding Principles'. This address matters such as the 'Protection and enhancement of the Public Rights of Way Network' and 'Landscape and Visual Impact'. The applicant must demonstrate due consideration of the latest Essex Design Guide.

Proposed scope of the EIA

The table below summaries Table 12.6 Elements of the LVIA proposed to be scoped into the EIA and Table 12.7 Elements of the LVIA proposed to be scoped out of the EIA from the Scoping Report and provides commentary on the matters proposed to be scoped in and out for assessment within the EIA.

Receptor group	Proposed Assessment within EIA	ECC commentary
Landscape fabric including trees (and	Scoped in throughout construction,	The proposed development will result in direct and indirect landscape effects as a

Tree Preservation Order (TPO) or veteran trees), woodland (and ancient woodland) and hedgerows, landform and land use and features/ characteristics of value on the Site (considered in its local context).	operation and decommissioning	result of additional features from the proposed development which must be assessed within the EIA. The impact must be understood, and necessary mitigation agreed and secured throughout the construction, operation and decommissioning stages of the project.
Local Landscape Character Areas within the Study Area	Scoped in throughout construction, operation and decommissioning	It is recognised that the proposed development may potentially result in effects on the landscape character areas within the study area. The impact must be understood, and necessary mitigation agreed and secured throughout the construction, operation and decommissioning stages of the project.
Visual receptors using PRoW within the Site Boundary	Scoped in during operation	<p>The proposed development will impact visual receptors using the PRoW network due to the significance of change to the landscape arising from the development. This impact and effect must be understood and assessed within the EIA to ensure necessary mitigation and screening is designed into the development.</p> <p>The applicant must liaise with the local highway authority regarding any temporary closures or diversions.</p>
Visual receptors at public locations or users of Public Rights of Way within the Study Area where the ZTV demonstrates theoretical visibility	Scoped in throughout construction, operation and decommissioning	<p>The impact and effect of the proposed development for visual receptors at public locations or users of PRoW must be understood and assessed within the EIA to ensure necessary mitigation and screening is designed into the development.</p> <p>Viewpoints proposed should ensure a broad range of consideration of the potential</p>

		impacts of the PRow network arising from the development. Draft representative viewpoints as proposed must be agreed with the relevant authorities.
Visual receptors: residents within the Study Area	Scoped in throughout construction, operation and decommissioning	The proposed development is likely to have an impact on residents within the study due to the significance of change to the landscape arising from the development. This impact and effect must be understood and assessed within the EIA to ensure necessary mitigation and screening is designed into the development. ECC acknowledges that only a few visual receptors stand close to the site. However, the Flitch Way itself is well patronised and provides long views across the site.
Cumulative effects of similar developments with intervisibility within the Study Area	Scoped in throughout construction, operation and decommissioning	Cumulative effects of similar developments could result in a significant change to the landscape of an area; therefore, this matter must be assessed within the EIA. The applicant must engage with the necessary stakeholders to ensure cumulative effects are effectively understood and considered within EIA.
Residential Visual Amenity Assessment (RVAA) for properties within 250 m of the Proposed Development	Scoped in during operation	The proposed development is likely to have an impact on properties within 250m of the proposed development due to the expected change to the landscape, including during operation. The significance and effect of the impacts must be defined and understood through an assessment within the EIA to ensure screening and mitigation is planned according.
Landscape subject to statutory landscape designation	Scoped out throughout construction, operation and decommissioning	It is accepted that there are no National Parks or National Landscapes in or impacted within the study area.
Landscape subject to non-statutory/ local landscape designation	Scoped out throughout construction,	It is accepted that there are no local landscape designations within the site.

	operation and decommissioning	
National Character Area (NCA)	Scoped out throughout construction, operation and decommissioning	It is accepted that the proposed development is unlikely to adversely affect the character of the landscape at national level, however, as noted above, cumulative impacts on the area must be considered and addressed.
Local Landscape Character Areas outside of the Study Area	Scoped out throughout construction, operation and decommissioning	It is considered the proposed development would not result in direct effects on the elements/features which define the character area outside of the study area, and the proposed development would be unlikely to result in significant adverse indirect effects upon their character as a result of visibility. There is likely to be a significant change to the local landscape character within the study area arising from the proposed development which should be considered accordingly through assessment within the EIA.
Visual receptors using PRow within the Site Boundary	Scoped out for construction and decommissioning	<p>The construction and decommissioning of the proposed development will cause disruption to the area, which will affect local communities, and visitors alike. Impacts will arise from the closures, disrupting local connections, and the enjoyment and leisure of the PRow network which must be scope in and assessed within the EIA throughout the lifecycle of the development. This includes disruption to the PRow network in respect of visual matters, which must be assessed and understood, and any necessary mitigation measures must be secured accordingly.</p> <p>The applicant must liaise with the local highway authority regarding any temporary closures or diversions.</p>

Visual receptors using Public Rights of Way or other public outdoor locations within the Study Area where the ZTV demonstrates no visibility	Scoped out throughout construction, operation and decommissioning	Where no visibility can be determined and this is agreed with relevant authorities, then this is able to be scoped out.
Visual receptors at public locations outside of the Study Area	Scoped out throughout construction, operation and decommissioning	The proposed development is unlikely to be readily perceptible or is unlikely to result in significant adverse visual effects at public locations outside of the study area given consideration of the distance, intervening screening and context of existing views.
Visual receptors: workers on the land or private outdoor recreational locations	Scoped out throughout construction, operation and decommissioning	It is recognised that those involved in a certain outdoor activity e.g. sports are unlikely to be focused upon views and any adverse effects upon their views and visual amenity. However, this should not exclude users of the Flitch Way using the route for leisure or amenity for assessment within the EIA as wide open views of the proposed site are afforded from the Flitch Way.
Cumulative effects of similar developments without intervisibility or outside of the Study Area	Scoped out throughout construction, operation and decommissioning	Where developments are outside the Study Area and / or have no visibility to the proposed development and would be unlikely to result in significant cumulative effects, these can be scoped out.
Nighttime effects and or lighting effects	Scoped out throughout construction, operation and decommissioning	In the absence of more detailed proposals regarding night time effects and / or lighting effects or the mitigation of night-time lighting effects, it is suggested that these should be assessed on a reasonable worst-case basis within the EIA and should therefore be scoped in. There is no information on nighttime lighting. It is inevitable that the site will require some level of luminance to deter unauthorised access or allow maintenance at times when daylight hours are shorter. Experience suggests that, especially in low lit rural

		areas the impact of nighttime lighting on amenity and the environment can be significant.
Residential Visual Amenity Assessment (RVAA) for properties within 250 m of the Proposed Development.	Scoped out for construction and decommissioning	At 24 months construction period, this has the potential to impact residential properties for a reasonable length of time. Therefore, assessment within the EIA of Residential Visual Amenity Assessment (RVAA) for properties within 250 m of the proposed development is recommended to ensure that visual, as well as other impacts arising from construction are considered accordingly. This matter should therefore be scoped in for assessment within the EIA.
Residential Visual Amenity Assessment for properties beyond 250 m from the Proposed Development	Scoped out throughout construction, operation and decommissioning.	It is recognised that properties beyond 250m would be unlikely to result in visual change that would materially affect residential amenity.

13. Noise and vibration

ECC notes that this issue is largely matter for the district authorities – Uttlesford District Council and Braintree District Council. Engagement must take place with the relevant local Environmental Health departments. Interrelationships of noise and vibration and other matters such as built heritage and traffic and transport requires consideration.

Proposed scope of the EIA

The table below summaries Table 13.6 Elements of the noise and vibration assessment proposed to be scoped into the EIA and Table 13.7 Elements of the noise and vibration assessment proposed to be scoped out of the EIA from the Scoping Report and provides commentary on the matters proposed to be scoped in and out for assessment within the EIA.

Environmental Receptor, Assessment or Effect	Proposed Assessment within EIA	ECC commentary
Construction Phase		
Noise arising from construction traffic	Scoped in	Traffic data during construction, operation and decommissioning has not been made

		available to the local highway authority. It is therefore not clear the level of noise which may arise from traffic from the proposed development and therefore, how significant the noise effect may be for local receptors. This matter must therefore be scoped in for assessment within the EIA.
Noise arising from construction works	Scoped in	Noise impacts are expected during construction which must be assessed within the EIA. Relevant authorities must be engaged to understand impact and potential mitigation measures which may need to be secured.
Vibration arising from construction works	Scoped in	The absence of details around the project design creates uncertainty regarding impacts and effects arising from vibration, this must therefore be scoped in for assessment within the EIA.
Operational Phase		
Noise arising from the operation of substations	Scoped in	It is recognised that items of plant will generate sound of which the level and potential impact on receptors must be assessed to understand necessary mitigation measures.
Noise arising from operational traffic	Scoped out	Without data relating to operational traffic, it is not clear the level of noise which may arise from the proposed development and the impact on receptors. This matter should therefore be included for assessment within the EIA.
Noise arising from underground cables	Scoped out	Noted that noise impact associated with underground cables during operation is negligible.
Noise arising from the operation of solar PV modules	Scoped out	Noted that noise impact associated with solar PV modules is negligible.
Noise arising from the maintenance of the proposed development	Scoped out	Maintenance of the proposed development will be detailed within the Construction Environment Management Plan (CEMP). However, this detail is not currently available for assessment and therefore the

		level of impact and effect from noise arising from the maintenance of the proposed development is not clear. This matter should therefore be scoped in for assessment within the EIA at this stage.
Vibration arising from the operation of the solar PV modules	Scoped out	It is understood that these are not considered sources of vibration and can therefore be scoped out at this stage.
Vibration arising from the operation of the Onsite Substation	Scoped out	
Decommissioning phase		
Noise arising from decommissioning traffic	Scoped in	Traffic data during construction, operation and decommissioning has not been made available to the local highway authority. It is therefore not clear the level of noise which may arise from traffic from the proposed development and therefore, how significant the noise effect may be for local receptors. This matter must therefore be scoped in for assessment within the EIA.

14. Socioeconomics and land use

The inclusion on a specific chapter considering socioeconomics is welcomed. By scoping in socioeconomics into the ES, it is hoped that impacts arising from the proposed development can be understood, and the potential benefits it can offer developed in conjunction with relevant authorities.

In accordance with Essex County Council Our Nationally Significant Infrastructure (NSIP) Policy NSIPs should be capable of providing long term legacy benefits beyond construction to the local economy, environment and health and wellbeing of communities across Essex.

Section 14.2 provides details of topic specific legislation, policy and guidance. However, it is noted that there is no consideration of County Council policies within this section which can be provided to the applicant on request. Essex County Council has a number of policies and guidance which must be considered in respect of socioeconomics and land use. Engagement with relevant services across the County Council is encouraged in respect of this topic.

Positive consideration of the County Council NSIP policy would be welcomed to consider how the proposed development can maximise social value and contribution to the levelling up of

the local economy. Collaborative working between relevant authorities and the applicant will ensure that socioeconomic benefits, creating a legacy for this development, are planned and delivered accordingly.

Proposed scope of the EIA

The table below summaries Table 14.12 Elements of the Socio-Economics and Land Use Assessment Proposed to be Scoped into the EIA and Table 14.13 Elements of the Socio-Economics and Land Use Assessment Proposed to be Scoped Out of the EIA from the Scoping Report. The table then provides commentary on the matters proposed to be scoped in and out for assessment within the EIA.

Potential effect / topic	Proposal for Assessment within EIA	ECC commentary
Construction Phase		
Employment and supply chain effects	Scoped in	It is agreed that this matter should be scoped in for assessment within the EIA, noting that the proposed development has the potential to create jobs. However, details of the level and type of jobs and resulting employment and supply chain effects is not clear at this stage. Therefore, this matter should be scoped in to allow for greater assessment of this matter. ECC remains committed to ensure that a DCO can be implemented using the available local workforce and supply chain.
GVA effects	Scoped in	It is agreed that this matter should be scoped in for assessment within the EIA as it is unclear at present the level of gross added value (GVA) this proposal will generate and the level of effect this may have.
Wider socio-economic effects	Scoped in	It is agreed that this matter should be scoped in for assessment within the EIA. The proposed development could have broad and significant impacts and effects in the local area which must be understood and necessary mitigation and compensation offered accordingly.

Socio-cultural effects	Scoped in	It is agreed that this matter should be scoped in for assessment within the EIA. It is currently unclear the level of construction workforce which could be generated from the proposed development and therefore the impact of this matter.
Land use effects	Scoped in	It is agreed that this matter should be scoped in for assessment within the EIA to address both the short term and long-term effects arising from the development given the change of use proposed for the site.
Direct effects for users of PRow	Scoped in	It is strongly agreed that this matter should be scoped in for assessment within the EIA. There could be direct and indirect impacts and effects on amenity for PRow users arising from noise and visual impacts during construction and operation of the proposed scheme. The clear importance of PRow as an amenity for local communities to improve their mental and physical health and wellbeing should be recognised, protected and enhanced. The Local Highway Authority must also be engaged in the development of the Outline PRow Management Plan to manage the impacts of the proposed development.
Indirect effects for users of PRow	Scoped in	
Operation Phase		
Employment and supply chain effects	Scoped in	It is agreed that this matter should be scoped in for assessment within the EIA, noting that the proposed development has the potential to create jobs. However, details of the level and type of jobs and resulting employment and supply chain effects is not clear at this stage. Therefore, this matter should be scoped in to allow for greater assessment of this matter.
GVA effects	Scoped in	It is agreed that this matter should be scoped in for assessment within the EIA as it is unclear at present the level of gross added value (GVA) this proposal will

		generate and the level of effect this may have.
Indirect effects for users of PRow	Scoped in	It is agreed that this matter should be scoped in for assessment within the EIA. There may be effects associated with the impacts on amenity for all PRow which may be distinct from the effects arising during construction which must be understood and managed. The proposed Outline PRow Management Plan must be developed with feedback and engagement from the local highway authority.
Wider socio-economic effects	Scoped out	The proposed development could have broad and significant impacts and effects in the local area even after construction has been completed, which must be understood and necessary mitigation and compensation offered accordingly.
Socio-cultural effects	Scoped out	It is understood that there is expected to only be a minimal workforce associated with the operation of the proposed development, therefore socio-cultural effects are not expected to be significant. However, data associated with the expected level of workforce would be useful to understand any likely impacts before a conclusion is reached that this matter should be scoped out of the assessment within the EIA.
Land users effects	Scoped out	It accepted that effects during construction are expected to continue into operation, such as temporary or permanent loss of BMV agricultural land. Therefore, this matter must continually be considered through the EIA.
Direct effects for users of PRow	Scoped out	The rationale notes that any long-term effects arising during construction that would be expected to continue into operation, such as effects associated with closure or diversion of PRow, will be assessed as construction effects. The

		<p>County Council considers that direct and indirect impacts for users of PRow must be addressed within the EA throughout the lifecycle of the development from construction, operation and decommissioning and this matter should be scoped in for assessment within the EIA.</p> <p>As noted above is vital that the applicant engages with the local highway authority in respect of any PRow Management Plan.</p>
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15. Traffic and transport

ECC is the Local Highway Authority for the proposed area of the development, and therefore welcomes the early engagement on the project. However, as this Scoping Report sets out, there are challenges relating to highway and transportation matters which require resolution to ensure that the site can be constructed and maintained safely. Therefore, ECC would request further engagement takes place, ahead of the statutory consultation on the traffic data and proposals which are not detailed within this response.

IEMA Guidance: Environmental Assessment of Traffic and Movement (July 2023) sets out the use of DfT TAG Unit A4-1 for assessing the hindrance of pedestrian movements and DMRB LA112 which contains sensitivity values for walkers, cyclists and horse riders based on traffic flow thresholds. Both will be important in considering impacts on these end users – particularly in relation to PRow.

Users of particular PRows should be defined as sensitive receptors where there is potential impact from the construction routes used on the external highway network (for example where a PRow crosses a construction route or users may be walking in the road to access a particular PRow), as well as within the internals of the site (for example where haul roads cross or interact with the PRow network.) The PRow receptors should be included in the classification Table 15.3 to define the level of sensitivity. The Essex County Council NSIP policy highlights a clear preference for Public Rights of Way and amenity to be dealt with in their own chapter of the EIA, in order that the impact of the scheme on the rights of way network and its receptors can be properly understood, including the iterations between different parts of the scheme, both temporally and spatially. Pedestrian/non-motorised user counts should be included on roads and PRows within the Study Area.

Further consideration of the impact of the proposed development on PRow is provided in Chapter 12 Landscape and Visual and Chapter 14 Socioeconomics and land use.

Proposed scope of the EIA

It is noted in the Scoping Report that swept path analysis will be undertaken for abnormal loads to determine if land take or road widening is required along the access routes. This should also be extended to include standard HGVs if the abnormal loads do not use the same routes as construction traffic.

Construction traffic predictions and abnormal load assessments should be confirmed for the whole of the construction period and not just focus on the worst-case peak construction period. This is so that traffic conditions are understood for the entirety of the construction period. The assessment should consider duration as well as increases in traffic flows when reviewing impact.

The demand for parking should be defined in the CEMP and Worker Travel Plan along with details of any parking areas shown on site illustrating there is sufficient capacity available to prevent offsite parking on the nearby rural lanes.

The table below summaries Table 15.6 Elements of the traffic and transport assessment proposed to be scoped into the EIA and Table 15.7 Elements of the traffic and transport assessment proposed to be scoped out of the EIA from the Scoping Report. The table then provides commentary on the matters proposed to be scoped in and out for assessment within the EIA.

Potential effect / topic	Proposed Assessment within EIA	ECC commentary
Construction		
Severance	Scoped in	<p>It is agreed that this topic should be scoped in for assessment within the EIA. ECC requires sight and engagement relating to data and details of vehicle trip generation and proposed construction access matters. Engagement must take place ahead of the preparation of the Preliminary Environmental Impact Report (PEIR) to understand the impact of the scheme on the local highway network and the potential mitigation which may be required.</p> <p>In respect of severance, ECC is keen to engage in respect of the PRoW network and would request that this is included in the</p>

		<p>proposed assessment within the EIA given the potential for significant impacts which the scheme may have on the PRoW network. As mentioned above, ECC's preference is for a standalone chapter for the PRoW network in the EIA.</p> <p>Consideration to be given to Department for Transport TAG Unit A4-1 for assessing the hindrance of pedestrian movements and Design Manual for Roads and Bridges LA112 which contains sensitivity values for walkers, cyclists and horse riders based on traffic flow thresholds.</p> <p>Walking, cycling and horse-riding activity to be surveyed where PRoW routes cross over or connect onto construction routes off site, as well as within the site itself.</p>
Driver delay	Scoped in	<p>It is agreed that this topic should be scoped in for assessment within the EIA.</p> <p>As above, further detail relating to construction traffic and potential impact is required and engagement requested ahead of the preparation of the PEIR. It is important that the impact of driver delay is considered for local junctions as well as road links. Further discussion is required with ECC to determine any traffic modelling requirements for junctions along the construction routes.</p>
Pedestrian delay	Scoped in	<p>It is agreed that this topic should be scoped in for assessment within the EIA.</p> <p>As above, further detail relating to construction traffic and potential impact is required and engagement requested ahead of the preparation of the PEIR. It is important that pedestrian delay (incorporating all non-motorised users) is considered and addressed within the assessment for the EIA to ensure that the</p>

		<p>impacts arising from the development is understood and mitigated against.</p> <p>The IEMA Guidance highlights that delays will depend on the general level of pedestrian activity, visibility and general physical conditions of the development site. It also suggests that a range of local factors and conditions can influence pedestrian delay (including rural setting). There are no thresholds and so the impact is considered on the basis of professional judgement to determine whether pedestrian delay constitutes a significant effect. On this basis, a review based on site observations is expected for key crossing points over the construction routes and survey data to collect non-motorised activity.</p>
Non-motorised user amenity	Scoped in	<p>It is agreed that this topic should be scoped in for assessment within the EIA.</p> <p>As above, further detail relating to construction traffic and potential impact on non-motorised user amenity is required and engagement requested ahead of the preparation of the PEIR. It is important that non-motorised user amenity is considered and addressed within the assessment for the EIA to ensure that the impacts arising from the development is understood and mitigated against.</p> <p>It is not agreed that non-motorised user amenity is combined with the Fear and Intimidation topic. Both topics should be reviewed separately.</p> <p>IEMA Guidance suggests a threshold as a starting point and that assessment should pay full regard to specific local conditions. On this basis, ECC would expect a review of the threshold alongside site observations to provide a balanced professional judgement.</p>

Fear and intimidation (and degree of hazard)	Scoped in	It is agreed that this topic should be scoped in for assessment within the EIA. As above, further detail relating to construction traffic and potential impact on non-motorised users is required and engagement requested ahead of the PEIR. It is important that fear and intimidation is considered and addressed within the assessment for the EIA to ensure that the impacts arising from the development is understood and mitigated against.
Road safety	Scoped in	<p>It is agreed that this topic should be scoped in for assessment within the EIA. It is noted that PIAs have been requested for all traffic routes which will be used to assess the impacts of construction vehicle trip numbers and resulting risk of accident. Without this data, this matter must be considered and addressed within the assessment for the EIA.</p> <p>It is expected that Road Safety Audits (Stage 1) will be undertaken for site access points and any changes to the local road network.</p>
Hazardous loads / large loads	Scoped in	It is agreed that this topic should be scoped in for assessment within the EIA. The Local Highway Authority notes that there will be AILs to transport items to the development. However, detail and data surrounding this matter is not currently understood. Therefore, without this data, this matter must be considered and addressed within the assessment for the EIA.
Decommissioning Phase		
Severance	Scoped in	It is agreed that all these topics should be scoped in for assessment within the EIA. A similar level of impact is expected to arise from decommissioning as with construction of the proposed development. Therefore,
Driver delay	Scoped in	
Pedestrian delay	Scoped in	
Non-motorised user amenity	Scoped in	

Fear and intimidation (and degree of hazard)	Scoped in	ECC supports that all these matters should be considered within the assessment for the EIA to understand the data, and potential impacts which may occur in respect of traffic and transport arising from the decommissioning of the development. ECC will therefore not repeat commentary raised above.
Road safety	Scoped in	
Hazardous loads / large loads	Scoped in	
Operational Phase		
Severance	Scoped out	As Local Highway Authority, ECC accepts that although it is anticipated that there may only be 'ad hoc infrequent and light maintenance trips', it would still be useful to engage in a discussion with the applicant and ensure data is available to support this assumption before agreeing with whether this phase is scoped out.
Driver delay	Scoped out	
Pedestrian delay	Scoped out	
Non-motorised user amenity	Scoped out	
Fear and intimidation (and degree of hazard)	Scoped out	
Road safety	Scoped out	
Hazardous loads / large loads	Scoped out	

16. Water resources and flood risk

ECC is the Lead Local Flood Authority (LLFA) for the area of the proposed development and therefore seeks engagement with the applicant on relevant matters to ensure any issues are addressed at this early stage in the design development. Recognition of Essex County Council Preliminary Flood Risk Assessment (2017); Essex County Council Local Flood Risk Management Strategy (2018) and The Sustainable Drainage Systems (SuDS) Design Guide for Essex is welcomed. The LLFA seeks engagement to ensure appropriate assessment of the matter is completed, and necessary measures are incorporated into the detailed design accordingly.

Proposed scope of the EIA

The table below summaries Table 16.7 Elements of the water resources and flood risk assessment proposed to be scoped into the EIA and Table 16.8 Elements of the water resources and flood risk assessment proposed to be scoped out of the EIA from the Scoping Report. The table then provides commentary on the matters proposed to be scoped in and out for assessment within the EIA.

Potential effect / topic	Proposed Assessment within EIA	ECC commentary
Construction, operation and decommissioning phases		
Reduction in surface water quality and/or quantity	Scoped in	The inclusion of this is welcomed by ECC as it is vital that surface water is managed accordingly. Engagement with the applicant is sought to ensure this matter is appropriately considered during the design and EIA processes.
Changes to (including potential reductions in) groundwater interflow patterns, groundwater quantity, and groundwater quality from temporary works, infrastructure, and cable route excavations	Scoped in	This matter must be scoped into the assessment within the EIA to ensure the proper management of water throughout the lifecycle of the proposed development.
Watercourse crossing/ trenching for the cable route leading to alterations to surface watercourse flows and characteristics	Scoped in	This matter must be scoped into the assessment within the EIA to ensure the proper management of water throughout the lifecycle of the proposed development.
Reduced quality or quantity of supply for water supplies and abstractions	Scoped in	It is agreed that this matter should be scoped into the assessment within the EIA, especially as it requires further investigation to understand the effects and impacts of the proposed development.
Increase in runoff and flood risk	Scoped in	This matter must be scoped into the assessment within the EIA to ensure the proper management of water throughout the lifecycle of the proposed development.
Cumulative effects due to other developments	Scoped in	This matter should be scoped into assessment within the EIA to ensure the proper management of water especially in consideration of cumulative effects arising from other developments in the area.

Impacts on wastewater supplies	Scoped out	Noted as wastewater is expected to be disposed of using temporary measures without the need to connect to existing wastewater networks.
Impacts on Designated sites	Scoped out	Noted as there are no designated sites in the study area.

Other environmental topics

17.2 Waste

ECC is the Minerals and Waste Local Planning Authority for Uttlesford and Braintree. ECC welcomes the consideration of the Essex and Southend-on-Sea Waste Local Plan 2017.

Paragraph 17.2.22 considers the guidance within the Institute of Environmental Management and Assessment Guide to Material and Waste in EIA that sets out that assessment based on landfill void capacity is the recommended methodology for statutory EIAs, this appears to be the approach proposed through the Scoping Report.

Assessment should seek to quantify the volumes of waste re-used on site and leaving the site, as well as demonstrating how the amount of waste forecasted to leave the site has been proactively minimised throughout the lifecycle of the development by incorporating sustainable working practices. The intention for the contractor to develop and implement a construction phase Site Waste Management Plan (SWMP) is noted, this will then be developed in detail and submitted via the outline CEMP (paragraph 17.2.38).

The table below summaries Table 17.5 Elements Waste Assessment Proposed to be Scoped into the EIA and Table 17.6 Elements Waste Assessment Proposed to be Scoped Out of the EIA from the Scoping Report and provides commentary on the matters proposed to be scoped in and out for assessment within the EIA.

Environmental Receptor, Assessment or Effect	Proposed Assessment within EIA	ECC commentary
Handling and disposal of excess soils generated during construction	Scoped in	ECC as Minerals and Waste Planning Authority notes consideration of burden on regional landfill capacity arising from this development and that this matter is scoped in for assessment within the EIA
Handling and disposal of construction	Scoped in	

wastes generated during construction		
Handling and disposal of operational phase wastes	Scoped in	
Handling and disposal of decommissioning phase wastes	Scoped out	It is recognised that decommissioning is not expected for 40 years and will consider the legal requirements at the time and will be undertaken in accordance with a decommissioning plan. It is also noted the assessment of waste during the entirety of the decommissioning phase is not proposed to be entirely scoped out in accordance with paragraph 17.2.42.

17.3 Glint and Glare

ECC recommends consideration is given to the design, alignment and movement of the solar panels, as this will have potential implications on the impact of the proposed development through 'glint and glare' on the existing communities. Detail on the design of the proposed development has not been made available for comment to ECC at this stage. The Scoping Report sets out that results and recommendations of any glint and glare calculations will be incorporated into the proposed development design and presented as a technical appendix to the ES; this is expected to be a standalone glint and glare assessment that considers ground based and airport receptors. Cross referencing is required to other technical assessments where any potential and/or significant effects are identified. Where any potential significant glint and glare effects are identified (for example, on PRow or roads), these must be considered within the relevant individual chapters of the ES, such as Landscape or Traffic and Transport. This approach is in accordance with NPS EN3 Sections 2.10.102-106.

It is noted that this will focus on the operation phase of the development as this is when the solar PV modules are present and therefore represents the worst-case scenario.

17.4 Heat and radiation

The Scoping Report sets out that it is expected that there will not be any sources of heat or radiation during the construction, operation or decommissioning stages of the proposed development. Therefore, no significant effects are anticipated, and this matter is proposed to be excluded from the scope of the EIA. Should sources of heat or radiation be identified, this must be assessed accordingly.

17.5 Telecommunications and Utilities

The Scoping Report identifies that the proposed development has the potential to affect existing utility infrastructure, and this be assessed only during the construction phase as the worst-case scenario. Consultation with relevant utility companies must take place to understand constraints and potential effects of the proposed development and inform the proposed layout of the proposed development. The Outline CEMP will encompass any additional mitigation measures required to safeguard below-ground utilities from interference during construction. It is accepted that this matter does not require a separate chapter in the EIA.

17.6 Major accidents and disasters

Table 17.7 within the Scoping Report presents a list of possible major accidents and disasters that will require consideration as the proposed development design progresses. The potential effects resulting from major accidents or disasters will be reported in the relevant topic chapter and assessments. Where design mitigation is unable to remove the potential interaction between a major accident or disaster and a particular technical topic, the potential effects resulting from major accidents or disasters will be reported in the relevant topic chapter and assessments. It is noted that a separate chapter is not proposed in the ES.

Battery Energy Storage Systems (BESS) are not to be utilised as part of the proposed development. Should this change, assessment will be required of the potential risks and assessed across other chapters within the ES.

17.7 Human health

The Scoping Report notes that consideration of affects to human health will be covered through findings of other ES topic assessments including air quality, noise and vibration, landscape and visual and traffic and transport. Therefore, it is not proposed that a separate chapter will be prepared. ECC questions given that health is a key cross cutting issue, this may be a missed opportunity to draw together all health-related aspects in a clear and concise manner. Necessary consideration be given to health matters within the other ES topic assessments to ensure that this matter is appropriately assessed.

17.8 Transboundary effects

Paragraph 17.8.1 of the Scoping Report sets out that given the characteristics and location of the proposed development, it is not expected that it would result in any significant environmental impacts on the environment of another European Economic Area State. Therefore, it is noted that a transboundary screening matrix is proposed to be excluded for the scope of the EIA.

Electromagnetic fields

It is noted that in accordance with the provisions set out within the Planning Inspectorate's Technical Advice for Scoping Solar Development, a separate chapter for EMFs is scoped out of the PEIR and ES and an EMF assessment is not deemed necessary.

18. Cumulative effects assessment

The proposed assessment of the potential cumulative effects of the proposed development should be carried out in accordance with the Planning Inspectorate Guidance 'Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment'.

The ES must clearly articulate the cumulative effects of all individual elements of the project as many receptors will be impacted by the development. This assessment will also need to consider the cumulative and in-combination sequential visual effects with other projects. Engagement with relevant authorities is required to ensure comprehensive assessment.

Overall, ECC welcomes the opportunity to provide commentary in respect of this Scoping Report and will welcome further engagement with the applicant and the Planning Inspectorate as this project progresses.

If you require any further information or clarification on any matter, please do not hesitate to contact us.

Yours sincerely

Mark Woodger

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Date: 20/05/25

For Attention of Francesca Potter

Specialist Archaeological Advice

Hedgehog Grove Solar Farm South of The A120 Between Bannister Green And Bartholomew Green Fentons Road Rayne

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) Regulations 10 and 11, Scoping Consultation regarding an application by Hedgehog Grove Solar Farm Ltd (the applicant) for an Order granting Development Consent for the Hedgehog Grove Solar Farm (the proposed development)

The proposed development is located within an area of high potential for multi-period archaeological remains and includes non-designated heritage assets within the proposed development area.

The submitted documentation identifies that the forthcoming application will include Cultural Heritage and Archaeology (Chapter 10) as one of the main chapters within the Environmental Impact Assessment (EIA) and includes the relevant methodology, policy and legislation for the assessment of the historic environment.

The solar PV arrays are largely located within Uttlesford District. The Cable Corridor Options have been identified for the location of underground cable routes to connect the Proposed Development to the UKPN Braintree 132 kV Substation. Four Cable Corridor Options are identified in this Scoping Report largely based within Braintree District. It is understood that these routes will be refined with only one being taken forward.

HG1 is located within the administrative areas of Uttlesford District and Braintree District. Geophysical Surveys were completed on HG1 in 2023, the results of these surveys are discussed in Chapter 10. HG2 and 3 are located wholly within Uttlesford District with a further geophysical survey completed in HG3.

Archaeological remains located within the Site boundary are susceptible to direct impacts as a result of the proposed development, this would potentially be limited to areas of ground disturbance



associated with construction largely from access roads, inverters, compounds and cable corridors. The level of disturbance will be governed by the nature of construction. It is possible to use techniques such as cables connected to panels rather than being put below ground, which allows the reduction of impact. This should be considered at an early stage in the design thus defining the potential level of impact to the heritage resource.

Chapter 10 recognises that there is the potential for direct physical impacts upon non-designated heritage assets within the site boundary including the cable corridor and any buried archaeological features identified within the Site by geophysical survey. Section 10.3.2 identifies the potential of aerial photography but limits assessment to the Historic England Mapping explorer.

The level of harm to non-designated remains is likely to be significant in some areas. For the forthcoming EIA to be compliant with paragraph 207 of the National Planning Policy Framework (2024) an archaeological evaluation will be required to be carried out prior to submission of the application. The results of this should be submitted with the application in order to determine the level of harm.

In addition to the desk-based assessment and geophysical survey information proposed to be submitted within the scoping document, the applicants are advised to discuss aerial photography with Place Services who have maintained, via historic England funding a yearly programme of aerial flying to identify cropmarks across the county. These assessments should then be used to inform a programme of targeted trial trenching to ground truth the results.

The submitted scoping document states that the proposed mitigation of known archaeology identified through the non-intrusive surveys will be avoidance, where possible. A detailed understanding of the proposed construction method will help inform the understanding of the potential impact.

In summary the proposed development is a Nationally Significant Infrastructure Project (NSIP). To meet the requirements of the EIA regulations an Environmental Statement containing a chapter on cultural heritage and archaeology will need to be submitted. The ES should be supported by a Desk Based Assessment, geophysical survey across the whole of the proposed site, aerial photographic rectification, LIDAR and a programme of targeted trial trenching to ground truth the non-intrusive techniques. At present some areas within Uttlesford District have not been subject to geophysical survey and it is recommended that this method is extended to all of the array areas. We would recommend that an aerial rectification assessment is undertaken to accurately locate the cropmark evidence. This will need to be completed, and the results provided in advance of any targeted trial trenching.

This office is happy to carry out discussions with the applicant or their appointed consultant concerning the production of the EIA and any associated archaeological evaluations.

Yours sincerely

Richard Havis
Senior Historic Environment Advisor

Telephone: [REDACTED]
Email: [REDACTED]@essex.gov.uk

NOTE: *This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter*

From: Squire, Sandra [REDACTED]@forestrycommission.gov.uk>
Sent: 16 May 2025 12:58
To: Hedgehog Grove Solar
Subject: Hedgehog Grove Solar Farm EIA Scoping Consultation - EN0110021

You don't often get email from [REDACTED]@forestrycommission.gov.uk. [Learn why this is important](#)

Thank you for consulting the Forestry Commission on this proposal.

As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland.

There are no Ancient Woodlands within the proposed site. However we note that there are a few small fragmented areas of mixed deciduous woodland within and adjacent to both the solar PV area and the cable corridor area.

Priority Habitat:

Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England).

They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".

Section 5.11.27 of EN-1 of the Overarching National Policy Statement for Energy states:

"Existing trees and woodlands should be retained wherever possible.....The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long term management and maintenance of newly planted trees should be secured"

Fragmentation is one of the greatest threats to mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through loss of connectivity, damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic or dust, particularly during the construction phase of a development. This is a particular concern where the woodland would become isolated in its landscape and surrounded by development on several sides or is completely surrounded by it.

For any woodland within the development boundary, land required for temporary use or land where rights are required for the diversion of utilities, the Root Protection Zone must be taken into consideration. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy.

Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals) and fencing off these areas to prevent unintended incursions into the root protection zone as well as dust prevention measures to reduce any potential impact of dust pollution.

Grant Funded Woodland:

It should be noted that there are two areas within the cable corridor area that show on our map system that they were established or managed with the support of public money in the form of the Farm Woodland Premium Scheme (FWPS). These will need to be assessed to check the status of the grant.

These grants appear to still be in 'obligation'. The obligation period can last for up to thirty years from the date the first instalment of grant was paid. The landowner is expected to meet all of the Terms and Conditions of the agreement contract. Failure to do so is likely to require the Forestry Commission to seek to recover all of the relevant grant that has been paid to avoid public money being wasted.

Net Deforestation and Tree Planting:

It is expected that there will be thorough assessment of all trees within the project boundary to identify any ancient or veteran trees in line with good arboricultural practice (BS 5837), also to assess any net loss of trees and the development of mitigation measures to minimise any risk of net deforestation because of the scheme.

Hedgerows, individual trees and woodlands within a development site should also be considered in terms of their overall connectivity between woodlands affected by the development.

Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees between existing woodland blocks, to link them and ensure maximum gains to increase habitat connectivity, making woodlands more resilient and to benefit biodiversity across the whole site, not solely in specific isolated areas to be used as screening. Ideally we would like to see woodland creation to be carried out in 5ha blocks or that connecting planting with existing woodlands, should create blocks of at least 5ha.

With the Government aspiration to increase tree and canopy cover to 16.5% of land area in England by 2050, The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss. However, there are a number of issues that need to be considered when proposing significant planting schemes:

The species and provenance of new trees and woodland needs to be considered to ensure a resilient treescape which can cope with the full implications of a changing climate. The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases.

Plans should also be in place to ensure the long term management and maintenance of new and existing woodland, perhaps by creation of a UK Forestry Standard compliant management plan, with access also needing to be considered for future management.

We hope these comments have been useful to you. If you require any further information, or would like to discuss woodland creation or management, please don't hesitate to contact me.

Best wishes

Sandra

Sandra Squire

**Local Partnership Advisor
East & East Midlands**

Tel: [REDACTED]
[REDACTED] [@forestrycommission.gov.uk](mailto:[REDACTED]@forestrycommission.gov.uk)



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This email has been scanned for viruses and malware.

Environmental Services
Operations Group 3
Temple Quay House
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Bristol, BS1 6PN
hedgehoggrovesolar@planninginspectorate.gov.uk

CEMHD - Land Use Planning,
NSIP Consultations,
Building 1.2, Redgrave Court
Merton Road, Bootle,
Merseyside L20 7HS.
NSIP.applications@hse.gov.uk

Date: 30/04/2025

Dear Sir/Madam,

**PROPOSED HEDGEHOG GROVE SOLAR FARM PROJECT
PROPOSAL BY HEDGEHOG GROVE SOLAR FARM LTD.
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2017 (AS AMENDED) REGULATIONS 10 AND 11**

Thank you for your e-mail of dated 23/04/2025 regarding the information to be provided in an environmental statement relating to the above project.

HSE's land use planning advice:

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records, the proposed DCO application boundary for this Nationally Significant Infrastructure Project is within the consultation zones of a major accident hazard pipeline ['MAHP']. This is based on the Hedgehog Grove Solar Park 'Developable Areas' (red lines) in Figure 1.2 in the EIA Scoping Report April 2025 ['Scoping Report'] Appendix A [downloaded from: EN0110021-000004-HGSF - EIA Scoping Report -- Appendix A.pdf].

The major accident hazard pipeline is operated by National Grid Gas and is:

- 5 Feeder Braintree / Roxwell; HSE ref. 7599, Transco ref. 1852 (passes through site).

The Applicant should contact the above operator to verify the above and to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident. There are three particular reasons for this:

- i. The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.
- ii. The standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.
- iii. To establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

HSE's Land Use Planning advice is dependent on the location of areas where people may be present [[HSE: Land use planning - HSE's land use planning methodology](#)]. Based on the information in the Scoping Report it is not clear if any parts of the development would meet any of HSE's development types. This may be because there are no relevant development types in which case it is unlikely that HSE would advise against the development. Please note that the advice is based on HSE's existing policy for providing land-use planning advice and the information which has been provided. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.

Would Hazardous Substances Consent be needed?

Hazard classification is relevant to the potential for accidents. Hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of [The Planning \(Hazardous Substances\) Regulations 2015](#) as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an "addition rule" in Part 4 of Schedule 1 for below-threshold substances.

Based on the [Scoping Report](#), it is not clear whether the applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. This may be because there are no in-scope hazardous substances. If hazardous substances planning consent is required, please consult the relevant Hazardous Substance Authority (usually the Local Planning Authority) on the application.

Consideration of Risk Assessments:

[Regulation 5\(4\)](#) of the [Infrastructure Planning \(Environmental Impact Assessment\) Regulations 2017](#) requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role in NSIPs is summarised in Advice Note 11 "working with public bodies in the infrastructure planning process" Annex G on the Planning Inspectorate's website: [Nationally Significant Infrastructure Projects - Advice Note Eleven, Annex G: The Health and Safety Executive - GOV.UK \(www.gov.uk\)](#). This document includes consideration of risk assessments under the heading "Risk assessments".

In the [Scoping Report](#) it was not clear if there was consideration of risk assessments arising from the development's vulnerability to major accidents (e.g. from the above identified sites and/or pipelines). We would advise this is considered further in line with Advice Note 11 Annex G taking account of the following: *"it may be beneficial for applicants to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation as design of the Proposed Development progresses."*

Explosives Sites:

Explosives Inspectorates response is no comment to make as there is no HSE Licensed explosive sites in the vicinity of the proposed development.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk. We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely

CEMHD NSIP Consultation Team



Historic England

Mr Jack Patten
The Planning Inspectorate
Temple Quay House, 2 The Square
Temple Quay
Bristol
BS1 6PN

Direct Dial: 07867 902 092

Our ref: PL00798682

21 May 2025

Dear Mr Patten

EN0110021: Hedgehog Grove Solar Farm, Great Notley, Braintree, Essex - A solar farm generating station with a targeted export capacity of 98 MW, consisting of ground-mounted solar photovoltaic (PV) panels and mounting structures, biodiversity enhancement, highway works for vehicular access, ancillary works (such as boundary treatments, security equipment and surface water management), and associated grid connection infrastructure including underground cabling to connect the development to the Braintree 132kV substation

Recommend Scoping IN

Thank you for contacting us on 23rd April 2025 seeking Historic England's EIA Scoping advice on the above case.

The land within the proposal boundary includes pre-eighteenth century enclosure fields that form part of an agrarian landscape serving a dispersed group of historic farmsteads lying on either side of the Ter Valley. The long history of human exploitation of this landscape is indicated by the unscheduled Roman villa found in 1987 when the A12 was constructed, just to the north of the proposal site, and the cropmarks between Bannister Green and Watch House Farm.

Long term impacts on designated assets would be limited to settings effects and we recommend that an EIA includes settings assessments and view virtualisations in a Cultural Heritage impacts assessment.

Impacts on undesignated buried remains should be informed and managed following archaeological assessment agreed with the determining authority's archaeological planning advisers.

In view of the minerals and solar farm consents either under consideration or granted in the landscape around Braintree, we recommend that settings assessments consider the effects of cumulative harm to both the historic landscape and to affected listed assets.

Assessments should be carried out following Historic England guidance, including



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



Historic England

GPA 3 on The Settings of Heritage Assets, by a recognised and appropriately experienced historic environment practice.

We would welcome the opportunity to advise further at application consultation stage.

Yours sincerely,

Adam Single
Inspector of Ancient Monuments
[REDACTED]@HistoricEngland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

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Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Decision Notice

MC/25/0854



Hedgehog Grove Solar Farm
19th Floor
10 Upper Bank Street
Canary Wharf
London
E14 5BF

Applicant Name:

Planning Service
Culture And Community
Regeneration, Culture & Environment
Transformation
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR
01634 331700
01634 331195
Planning.representations@medway.gov.uk

Town and Country Planning Act 1990

Location: Hedgehog Grove Solar Farm, On Land To The South Of The A120 Between Bannister Green And Bartholomew Green, In The County Of Essex, , ,

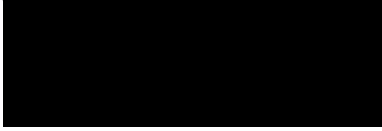
Proposal: Town and Country Planning Act (Environmental Impact Assessment) (England and Wales) Regulations 2017 (as amended) - request for a scoping opinion for Hedgehog Grove Solar Farm for a Nationally Significant Infrastructure Project (NSIP) , as defined in the Planning Act 2008 (as amended)

I refer to your letter of consultation regarding the above and would inform you that the Council **RAISES NO OBJECTION** to it.

- 1 Due to the proposals significant distance from Medway, Medway Local Planning Authority have no comments to make.

Your attention is drawn to the following informative(s) :-

- 1 This response is based on the consultation document received 23 April 2025



David Harris
Head of Planning
Date of Notice 21 May 2025

TOWN & COUNTRY PLANNING (APPEALS) (WRITTEN REPRESENTATIONS) (ENGLAND) (AMENDMENT) (REGULATIONS 2013)

TOWN AND COUNTRY PLANNING ACT 1990

Appeals to the Secretary of State

- If you are aggrieved by the decision of your Local Planning Authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.
- If you want to appeal against your Local Planning Authority's decision then you must do so within **12 weeks** from the date of this notice for appeals being decided under the **Commercial Appeals Service** and **6 months** from the date of this notice for all other **minor and major applications**.
 - However, if an enforcement notice has been served for the same or very similar development within the previous 2 years, the time limit is:
 - **28 days** from the date of the LPA decision if the enforcement notice was served before the decision was made yet not longer than 2 years before the application was made.
 - **28 days** from the date the enforcement notice was served if served on or after the date the decision was made (unless this extends the appeal period beyond 6 months).
 - Appeals must be made using a form which you can obtain from the Planning Inspectorate by contacting Customer Support Team on 0303 444 50 00 or to submit electronically via the Planning Portal at

https://www.planningportal.co.uk/info/200207/appeals/110/making_an_appeal

Commercial Appeals Service

- This type of appeal proceeds by way of written representations, known as the "Commercial Appeals Service". Third parties will not have the opportunity to make further representations to the Planning Inspectorate on these.

All other Minor and Major Applications

- The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.
- The Secretary of State need not consider an appeal if it seems to him that the Local Planning Authority could not have granted planning permission for the

proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

- In practice, the Secretary of State does not refuse to consider appeals solely because the Local Planning Authority based on their decision on a direction given by him.

Purchase Notes

- If either the Local Planning Authority or the Secretary of State refuses permission to development land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.
- In these circumstances, the owner may serve a purchase notice on the Council (District Council, London Borough Council or Common Council of the City of London) in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.

Our ref: NSIP/scoping
Your ref:

EMAIL ONLY

hedgehoggrovesolar@planninginspectorate.gov.uk

Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol BS1 6PN

Phoenix Court
Christopher Martin Road
Fryerns
Basildon
Essex SS14 3EZ

Catherine Bicknell
Email: [REDACTED] [@nhs.net](mailto:[REDACTED]@nhs.net)

19 May 2025

Dear Sir / Madam

NSIP EIA scoping consultation: Hedgehog Grove Solar Farm Ltd (the applicant) for an Order granting Development Consent for the Hedgehog Grove Solar Farm

Thank you for consulting the Mid and South Essex Integrated Care Board (MSE ICB) on the applicant's proposed scope of the environmental statement (ES) relating to the above-mentioned proposed development.

The ICB has duties prescribed by the Health and Care Act 2022 and other regulations and statutes. These include exercising its functions to:

- improve healthcare and health outcomes.
- tackle inequalities in population health and access to healthcare.
- promote innovation in the provision of health services.

The four key aims for ICS' are:

- Improving outcomes in population health and healthcare
- Tackling inequalities in outcomes, experience and access
- Enhancing productivity and value for money
- Supporting broader social and economic development

In addition, ICB's are obliged to consider the effects of their decisions on:

- The health and wellbeing of the people of England (including inequalities in that health and wellbeing)

Mid and South Essex Integrated Care Board
PO Box 6483, Basildon, SS14 0UG

www.midandsouthessex.ics.uk | [REDACTED]
Chair: Professor Michael Thorne CBE | CEO: Tom Abell

- The quality of services provided or arranged by both themselves and other relevant bodies (including inequalities in benefits from those services)
- The sustainable and efficient use of resources by both themselves and other relevant bodies.

The 'human health' section of the proposed Scoping Report, says that any significant effects on human health will not be assessed within a standalone chapter of the ES, but will be considered in chapters 7 Air Quality, 12 Landscape and Visual, 13 Noise and Vibration, and 15 Traffic and Transport.

This approach carries a risk that the different elements of human health impacts remain separate and unlinked without regard to their combined effects. To mitigate this risk, cross-referencing and consideration of linked impacts should be clearly set out, including a summary of human health impacts in the 'Other Environmental Issues' chapter.

Yours faithfully



Catherine Bicknell

Senior Planning Policy Manager



Defence Infrastructure Organisation

Christopher Waldron
Ministry of Defence
Safeguarding Department
DIO Head Office
St George's House
DMS Whittington
Lichfield
Staffordshire WS14 9PY

PINS reference:
EN0110021
Our reference:
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Jack Patten
EIA Advisor
Planning Inspectorate
Environmental Services
Operations Group
3 Temple Quay House
2 The Square
Bristol
BS1 6PN

21st May 2025

Dear Jack

MOD Safeguarding–East 2 WAM Network

Proposal: Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested. Hedgehog Grove solar farm generating station with a targeted export capacity of 98 MW, consisting of ground-mounted solar photovoltaic (PV) panels and mounting structures, biodiversity enhancement, highway works for vehicular access, ancillary works (such as boundary treatments, security equipment and surface water management), and associated grid connection infrastructure including underground cabling to connect the development to the Braintree 132kV substation.

Location: On land to the south of the A120 between Bannister Green and Bartholomew Green

The Planning Inspectorate consulted Defence Infrastructure Organisation (DIO) as a consultation body to inform a scoping opinion on the above proposed development, which was received by this office on the 23/04/2025.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the UK Military Low Flying System

The applicant has sought a Scoping opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The development would occupy the statutory safeguarding zone surrounding a technical asset called the East 2 WAM (Wide Area Multilateration) Network, an asset which provides data to facilitate air traffic management.

Technical safeguarding zone

The technical safeguarding zone defines areas to regulate the height of development, materials used in construction and introduction of sources of electro-magnetic fields around radars, radio transmitter/ receiver sites and other types of technical installations supporting operational defence or national security requirements

The proposed Hedgehog Grove solar farm occupies a technical safeguarding zone in which the MOD must be consulted on any development or change of land use.

Summary

On the basis of the information currently available, the MOD has concerns that the development proposed may impact on the operation and capability of defence sites and assets. It is acknowledged that any subsequent application would be supported by additional information which would allow MOD to better understand the development, how it would be progressed, and how it would be managed.

The MOD should be consulted on any future application stage to allow a detailed safeguarding assessment to be completed. As a result of those assessments, the MOD may object to proposals or may seek to apply conditions designed to mitigate potential impacts on the operation or capability of defence sites and assets.

The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed within the developer's document, submitted in support of scoping opinion EN0110021, as referred to in the consultation letters dated 23rd April 2025, received from the Planning Inspectorate.

Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely



Mr Chris Waldron
DIO Assistant Safeguarding Manager

Submitted via email to: hedgehoggrovesolar@planninginspectorate.gov.uk

Date: 14th May 2025

Dear Sir/Madam,

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

Application by Hedgehog Grove Solar Farm Ltd (the Applicant) for an Order granting Development Consent for the Hedgehog Grove Solar Farm (the Proposed Development)

I refer to your email dated 23/04/2025 regarding the above proposed DCO. This is a response on behalf of National Gas Transmission PLC (NGT). Having reviewed the scoping consultation documents, NGT wishes to make the following comments regarding gas infrastructure which may be affected by proposals.

NGT has 1 feeder main located within or in proximity to the Order limits. Details of this infrastructure is as follows:

- Feeder Main – FM05 – Braintree to Horndon
- Cathodic Protection Groundbeds/TR
- Ancillary apparatus

Please note that NGT has existing easements for these pipelines which provides rights for ongoing access and prevents the erection of permanent / temporary buildings/structures, change to existing ground levels or storage of materials etc within the easement strip.

You should also be aware of NGT's guidance for working in proximity to its assets, further guidance and links are available as follows.

CATHODIC PROTECTION SYSTEM

To ensure a high level of safety and reliability in operation, National Gas Transmission's assets are protected by a cathodic protection system. It is essential that buried steel pipework associated with the transmission and distribution of natural gas is designed, installed, commissioned and maintained to withstand the potentially harmful effects of corrosion and that the corrosion control systems employed are monitored to ensure continued effectiveness. Installations in the vicinity of National Gas Transmission's assets which may potentially interfere with the cathodic protection system must be assessed and approved by National Gas Transmission, and appropriate control measures must be put in place where required.

Installations which have the potential to interfere with National Gas Transmission's Cathodic protection system include (but are not limited to):

1. High voltage cable crossings and parallelism
2. High voltage ac pylon parallelism
3. Battery Energy Storage Systems
4. Third party pipelines with cathodic protection systems
5. PV Solar arrays

Further information on D.C interference can be found in UKOPA/GPG/031 Edition C Microsoft Word - UKOPA GPG 031 DC Interference Ed 1.docx

Microsoft Word - UKOPA GPG 031 DC Interference Ed 1.docx (hold ctrl and click to access) Further information on A.C. interference can be found in UKOPA/GPG/027 UKOPA Good Practice Guide UKOPA Good Practice Guide (hold ctrl and click to access)

The safe limits for transfer voltage and impressed current that a high-pressure gas pipeline can be exposed to are outlined in T/PL/ECP/1, T/PL/ECP/2 and BS EN 50122-1. These are the safe limits for non-electrically trained personnel.

SOLAR FARMS

Please be aware of the specific guidance for developing solar farms near to gas transmission pipelines:

<https://www.nationalgas.com/document/82936/download>

UKOPA Good Practice Guide - Requirements for the Siting and Installation of Solar Photovoltaic (PV) Installations in the Vicinity of Buried Pipelines - UKOPA/GP/014 Edition 1

Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGT's apparatus, NGT will require appropriate protection and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. A Deed of Consent will also be required for any works proposed within the easement strip.

Key Considerations:

- NGT has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc.
- Please be aware that written permission is required before any works commence within the NGT easement strip. Furthermore a Deed of Consent will be required prior to commencement of works within NGT's easement strip subject to approval by NGT's plant protection team.
- Any large installations which may result in a large population increase in the vicinity of a high pressure gas pipeline must comply with the HSE's Land Use Planning methodology, and the HSE response should be submitted to National Gas Transmission for review.

- The below guidance is not exhaustive and all works in the vicinity of NGT's asset shall be subject to review and approval from NGT's plant protection team in advance of commencement of works on site.

General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and NGT's Dial Before You Dig Specification for Safe Working in the Vicinity of NGT Assets. There will be additional requirements dictated by NGT's plant protection team.
- NGT will also need to ensure that its pipelines remain accessible during and after completion of the works.
- Our pipelines are normally buried to a depth cover of 1.1 metres, however actual depth and position must be confirmed on site by trial hole investigation under the supervision of a NGT representative. Ground cover above our pipelines should not be reduced or increased.
- If any excavations are planned within 3 metres of NGT High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a NGT representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.
- Below are some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets therefore consultation with NGT's Plant Protection team is essential:
 - Demolition
 - Blasting
 - Piling and boring
 - Deep mining
 - Surface mineral extraction
 - Landfilling
 - Trenchless Techniques (e.g. HDD, pipe splitting, tunnelling etc.)
 - Wind turbine installation - minimum separation distance of 1.5x the mast/hub height is required, and any auxiliary installations such as cable or track crossings will require a deed of consent.
 - Solar farm installation
 - Tree planting schemes

Traffic Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations.
- Permanent road crossings will require a surface load calculation, and will require a deed of consent.
- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.
- The type of raft shall be agreed with NGT prior to installation.
- No protective measures including the installation of concrete slab protection shall be installed over or near to the NGT pipeline without the prior permission of NGT
- NGT will need to agree the material, the dimensions and method of installation of the proposed protective measure.
- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to NGT.
- An NGT representative shall monitor any works within close proximity to the pipeline to comply with NGT specification T/SP/SSW22

New Asset Crossings:

- New assets (cables/pipelines etc) may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- The separation distance for a cable >33kV is 1000mm and pre and post energisation surveys may be required at National Gas Transmission's discretion. A risk assessment/method statement will need to be provided to, and accepted by National Gas Transmission prior to the deed of consent being agreed. Where a new asset is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.
- A new service should not be laid parallel within an easement strip
- Clearance must be at least 600mm above or below the pipeline
- An NGT representative shall approve and supervise any cable crossing of a pipeline.
- A Deed of Consent is required for any cable crossing the easement

Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGT apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO. NGT requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection.

Adequate access to NGT pipelines must be maintained at all times during construction and post construction to ensure the safe operation of our network.

Yours Faithfully

Asset Protection Team

Further Safety Guidance

To download a copy of the HSE Guidance HS(G)47, please use the following link:

<https://www.hse.gov.uk/pubns/books/hsg47.htm>

Working Near National Gas Assets

<https://www.nationalgas.com/land-and-assets/working-near-our-assets>

Specification for Safe Working in the Vicinity of National Gas High Pressure Pipelines and Associated Installations

<https://www.nationalgas.com/document/82951/download>

Tree Planting Guidance

<https://www.nationalgas.com/document/82976/download>

Excavating Safely

<https://www.nationalgas.com/document/82971/download>

Dial Before You Dig Guidance

<https://www.nationalgas.com/document/128751/download>

Essential Guidance:

<https://www.nationalgas.com/gas-transmission/document/82931/download>

Solar Farm Guidance

<https://www.nationalgas.com/document/82936/download>



NH ref: NH/25/10892

Your Ref

Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House 2
The Square Bristol,
BS1 6PN

Operations (East)
National Highways
Woodlands
Manton Lane
Bedford MK41 7LW

19 May 2025

Email:

hedgehoggrovesolar@planninginspectorate.gov.uk

Dear Sir/Madam,

Request for Scoping Opinion

Proposal: Application by Hedgehog Grove Solar Farm Ltd (the applicant) for an Order granting Development Consent for the Hedgehog Grove Solar Farm (the proposed development)

Location: Hedgehog Grove Solar Farm

Request for Transport Scoping response for a proposed solar farm development

We have been contacted regarding the EIA Scoping Report dated 23 March 25 in support of proposals to build a 98 MG solar farm.

On behalf of the Secretary of State for Transport, National Highways is responsible for managing and operating a safe and efficient Strategic Road Network (SRN), i.e. the Trunk Road and Motorway Network in England, as laid down in Department for Transport (DfT) Circular 02/2013 (Planning and The Strategic Road Network).

National Highways is appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). Highways England is responsible for ensuring the SRN serves its purpose as

a part of a national system for through traffic in accordance with Section 10 of the Highways Act 1980, and to satisfy the reasonable requirements of road safety.

We would wish to know if it is intended to cross the A120 with cables or could be potentially adversely affected by construction traffic. It is unlikely that once the proposed is complete that there will be any impact upon the SRN, subject to us being satisfied there is no glint and glare issues, we do not object to the principle of the proposed solar farm

We appreciate the scheme is at an early stage of design and construction is some way off. We will need to agree how and where cables cross or affect our network if that is intended. Construction traffic impact upon the network will need to be assessed and if necessary, mitigated, at this stage it is difficult to comment other than in broad principals.

We have undertaken a high-level review of the assessment methodology within the EIA Scoping Report, in respect of Transport there appears to be little detail. We would need to see a transport assessment. This response is intended to provide sufficient details of our requirements to enable the applicant to prepare relevant documents in support of the Planning DCO Application for the site, although discussion with us is strongly recommended as this has been found to help application run smoothly.

National Highways has a vested interest in managing the Strategic Road Network (SRN) in the vicinity of the Site the A120 runs close to the site. When considering the impact of the proposals on the SRN, our interest focuses on the assessment of the potential impact of traffic as a result of the development on the main line of the A120 and nearby junctions with the local road network. It is anticipated that the greatest impact is likely to be during the construction and dismantling of the solar farm

This response includes further recommendations we envisage to see and the promoter to consider as part of further work.

Transport Chapter (Transport Assessment)

We welcome Chapter 15 Transport is to be prepared, and we are in agreement regarding the modes of travel to be considered, and assume that a Transport Assessment will be prepared which will inform the chapter. It is also strongly recommended that we are consulted regarding establishing the extent and next stages of assessment.

With regard to potential impacts on key junctions and highway links, we wish to highlight that depending on the effect of the proposals, the study area within the SRN will not necessarily solely comprise the adjacent junctions. Through further engagement, we wish to establish the extent of effects on the SRN adjacent to the site and also any SRN links and junctions further from the site.

Approach and Methodology

We agree that the use of the IEMA 2023 guidance is the appropriate basis for assessing highways impacts. We also recommend that reference should also be made to guidance and standards in the DMRB in terms of highways assessments. We recommend that reference is made to the DfT Circular 01/2022, which provides guidance regarding how the impact of the proposed development on the SRN should be assessed together with 'The strategic road network and the delivery of sustainable development (National Highways and the strategic road network)'.

The use of survey data from December 2024 to February 2025 should be acceptable, pending a review and agreement on specific survey locations. While the methodology for establishing a future year scenario, we would wish for account to be made for seasonality in order to demonstrate the peak period for demand needs to be agreed.

It is also recommended that engagement takes place in order to reach agreement with local highway authorities regarding traffic growth and committed development.

Trip Distribution / Traffic Flow Diagrams / Junction Assessment

We would wish to see a methodology and outputs for distribution for construction traffic flows to be demonstrated on the local and strategic highway network for all scenarios. This will provide us with an indication on the junction assessments that would be expected to be carried out. These assessments will be important in terms of establishing the extent of the requirement for traffic assessment and mitigation measures.

Road Safety

We recommend that the applicant's consultant obtains the PIA data from the local highway authorities based on the study area which should be agreed beforehand and include the relevant junctions linking to the SRN. The data should be inclusive of the full STATS-19 dataset including locations, timings and causation, and it is important to note that the period from March 2020 until August 2021 (inclusive) will not be accepted due to the COVID-19 pandemic and therefore a longer period should be included.

A Walking Cycling and Horse-riding report (or exemption report) will be required.

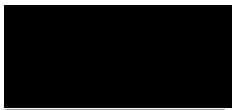
Travel Plan

We would like to see a Travel Plan (for construction period) as part of the planning application process. Significant focus should be placed on the Travel Plan which will be a key mitigation measure in terms of potential effects on the SRN,

A glint and glare report will be required to evidence that glint or glare will not be a safety issue for users of the A120.

I hope that the above is clear and will allow you to proceed, if you need anything further, please do not hesitate to contact me.

Yours sincerely



Mark Norman
Spatial Planner
National Highways
Operations (East)

Patten, Jack

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 25 April 2025 09:41
To: Hedgehog Grove Solar
Subject: RE: EN0110021 - Hedgehog Grove Solar Farm - EIA Scoping Consultation and Notification [SG39304]

Categories: EST

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Our Ref: SG39304

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Internal

From: Hedgehog Grove Solar <HedgehogGroveSolar@planninginspectorate.gov.uk>
Sent: 23 April 2025 08:58
Subject: EN0110021 - Hedgehog Grove Solar Farm - EIA Scoping Consultation and Notification

Dear Sir/Madam

Please see attached correspondence on the proposed Hedgehog Grove Solar Farm.

The applicant for the proposed development intends to make an application for Development Consent under the Planning Act 2008. The applicant has sought a scoping opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **21 May 2025**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Jack Patten



Jack Patten [REDACTED]
EIA Advisor
The Planning Inspectorate

 [@PINSgov](https://twitter.com/PINSgov)  [The Planning Inspectorate](https://www.linkedin.com/company/the-planning-inspectorate/)  planninginspectorate.gov.uk

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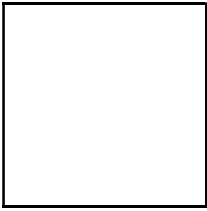
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Date: 21 May 2025
Our ref: 510523 Hedgehog Grove Solar Farm EIA Scoping
Your ref: EN0110021



Environmental Services Operations Group 3,
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By email only: hedgehoggrovesolar@planninginspectorate.gov.uk

Consultations
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Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Mr Patten,

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: Application by Hedgehog Grove Solar Farm Ltd (the applicant) for an Order granting Development Consent for the Hedgehog Grove Solar Farm (the proposed development)

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 23 April 2025, received on 23 April 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

For any further advice on this consultation please contact the case officer Jamie Melvin and copy to consultations@naturalengland.org.uk.

Yours sincerely,

Jamie Melvin
Sustainable Development Senior Officer – West Anglia

Annex A – Natural England’s Advice on EIA Scoping

1. General principles

Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an ES to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided¹.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

2. Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects
- b. approved but uncompleted projects
- c. ongoing activities
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and

plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

¹ National Infrastructure Planning [Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements](#) (see Insert 2 – information to be provided with a scoping request)

3. Environmental data

National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local Wildlife Trust, local geo-conservation group or other recording society.

4. Biodiversity and geodiversity

The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) and an [EclA checklist](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

5. Designated nature conservation sites

The Hedgehog Grove Solar Farm NSIP is unlikely to adversely impact any European or internationally designated nature conservation sites or nationally designated sites and has not triggered an Impact Risk Zone.

6. Protected species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#).

Applicants should check to see if a mitigation licence is required using Natural England guidance on licensing [Natural England wildlife licences](#). Applicants can also make use of Natural England's charged service [Pre Submission Screening Service](#) for a review of a draft wildlife licence application. Natural England then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. See [Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning](#) for details of the LONI process.

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and

protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

Where strategic approaches such as DLL for GCN are used, a Letter of No Impediment (LONI) will not be required. Instead, the developer will need to provide evidence to the Examining Authority (ExA) on how and where this approach has been used in relation to the proposal, which must include a counter-signed Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England, or a similar approval from an alternative DLL provider.

7. Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The ES should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

8. Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 186 of the National Planning Policy Framework (NPPF) sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

Natural England maintains the [Ancient Woodland Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

9. Biodiversity net gain

The Environment Act 2021 includes NSIPs in the requirement for BNG, with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. It is the intention that BNG should apply to all terrestrial NSIPs accepted for examination from November 2025. This includes the intertidal zone but excludes the subtidal zone (an approach to marine net gain is being developed but this will not form part of mandatory BNG). Projects that span both offshore and onshore will be subject to BNG requirements for the onshore components only. Some organisations have made public BNG commitments, and some projects are already delivering BNG on a voluntary basis.

10. Landscape

Landscape and visual impacts

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA) in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 (3rd edition) produced by LI and IEMA. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment

of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

The National Infrastructure Commission has also produced [Design Principles for National Infrastructure - NIC](#) endorsed by Government in the National Infrastructure Strategy.

Heritage landscapes

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

11. Connecting people with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 104 and there will be reference in the relevant National Policy Statement. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

12. Soils and agricultural land quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

The following issues should be considered and, where appropriate, included as part of the ES:

- The degree to which soils would be disturbed or damaged as part of the development.
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any BMV agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

13. Air quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg)^[1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO_x and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts of air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

Natural England has produced guidance for public bodies to help assess the impacts of road traffic emissions to air quality capable of affecting European Sites. [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001](#)

^[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development
<https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions
<https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

14. Climate change

The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 174), which should be demonstrated through the ES.

The Forum
Marlowes
Hemel Hempstead
Hertfordshire
HP1 1DN
21st May 2025

 [@nhs.net](mailto: @nhs.net)
<https://hertsandwestessex.icb.nhs.uk>

By email:
hedgehoggrovesolar@planninginspectorate.gov.uk

Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

Dear Sir/Madam,

Re: NSIP EIA Scoping Consultation: Hedgehog Grove Solar Farm Ltd (the applicant) for an Order granting Development Consent for the Hedgehog Grove Solar Farm

Location: Land between Felsted and Bartholomew Green, Essex

Thank you for consulting the Hertfordshire and West Essex Integrated Care Board (HWE ICB) on the applicant's proposed scope of the ES relating to the above-mentioned proposed development. Please accept this letter as a joint response from the NHS HWE ICB and the East of England Ambulance Service.

The Hertfordshire and West Essex Integrated Care Board (HWE ICB) became a statutory body on 1 July 2022 and is the health commissioner responsible for delivering joined up health and social health care to a population of c1.5m. in Hertfordshire and west Essex.

The HWE ICB works in partnership with health providers, local authorities, and other organisations to:

- improve the general health and wellbeing of Hertfordshire and west Essex residents and improve health care services in the area.

Dr Jane Halpin, Chief Executive

Rt. Hon. Paul Burstow, Chair

- tackle the inequalities which affect people's physical and mental health, such as their ability to get the health services they need, and the quality of those services help tackle health and wider inequalities.
- get the most out of local health and care services and make sure that they are good value for money.
- help the NHS support social and economic development in Hertfordshire and west Essex.

The HWE ICB has reviewed the 'human health' section of the proposed Scoping Report. It is noted that any significant effects on human health will not be assessed within a standalone chapter of the ES, with human health impacts instead spread over Chapters 7, 12, 13 and 15. This approach appears sensible subject to appropriate cross-referencing and explanation, and a summary of the human health impacts within the 'Other Environmental Issues' chapter.

With regards to the intention to 'scope out' a standalone chapter on major accidents or disasters, the HWE ICB and the East of England Ambulance Service would wish to see all shortlisted accidents or disasters to be fully considered within the ES, rather than considered throughout the design process.

Yours faithfully,



Rachael Donovan
Town Planning Policy Manager
NHS Hertfordshire & West Essex ICB

cc. Zoe May- East of England Ambulance Service

Dr Jane Halpin, Chief Executive

Rt. Hon. Paul Burstow, Chair



www.north-herts.gov.uk

Jack Patten
The Planning Inspectorate

Our Ref : 25/01091/ADJ

Contact : Paul Chaston

Direct Line : [REDACTED]

Email : [REDACTED]@north-herts.gov.uk

Date : 7th May 2025

Dear Sir / Madam,

**Adjoining Authorities Consultation: EIA Scoping Notification and Consultation,
Hedgehog Grove Solar Farm**

Please quote the following reference: 25/01091/ADJ on all correspondence

I write with reference to the above project which you have consulted us on.

I have no comments to make or issues to raise in respect of the EIA scoping opinion.

Yours faithfully

[REDACTED]

Shaun Greaves
Development and Conservation Manager

The Council's Privacy Notice is available on our website: <https://www.north-herts.gov.uk/home/council-data-and-performance/data-protection/information-management-gdpr>

Patten, Jack

From: Katie Rodgers [REDACTED]@Rochford.gov.uk>
Sent: 08 May 2025 17:06
To: Hedgehog Grove Solar
Subject: Consultation response - EN0110021

You don't often get email from [REDACTED]@rochford.gov.uk. [Learn why this is important](#)

Dear Sir/Madam,

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

Application by Hedgehog Grove Solar Farm Ltd (the applicant) for an Order granting Development Consent for the Hedgehog Grove Solar Farm (the proposed development)

I am writing in response to the consultation letter dated 23 April 2023 and can advise that Rochford District Council has no comment to make in respect of this consultation.

Kind regards,

**TWO COUNCILS
ONE TEAM**



Katie Rodgers, BSc (Hons), MA
Team Leader, Development Management
Rochford District Council

E: [REDACTED]@rochford.gov.uk
www.rochford.gov.uk

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Hedgehog Grove Solar Farm

EIA Scoping Comments

Suffolk County Council

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Glossary of Acronyms

<i>DCO</i>	<i>Development Consent Order</i>
<i>MW</i>	<i>Megawatt</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>RSCF</i>	<i>Regional Skills Coordination Function</i>

“The Council” / “SCC” refers to Suffolk County Council. “UDC” refers to Uttlesford District Council. “BDC” refers to Braintree District Council.

1 Introduction

- 1.1. These comments of Suffolk County Council (SCC) are in response to the EIA Scoping consultation held between the 23rd April and 21st May 2024 by the Planning Inspectorate in respect of the Hedgehog Solar Farm Scoping Report.
- 1.2. Hedgehog Grove Solar Farm would comprise the construction, operation, maintenance, and decommissioning of a 98 MW solar farm and associated infrastructure. The site will be on land located between Felsted and Bartholomew Green within the administrative boundaries of Uttlesford District Council (UDC) and Braintree District Council (BDC). As SCC shares a boundary with BDC, SCC is therefore a neighbouring authority and a statutory consultee of the proposed development. The Site (not including the area for the Cable Corridor Options) is located approximately 3.5 kilometres southwest of Braintree, Essex respectively on approximately 255 hectares of predominantly arable farmland. The proposed development will also include underground cabling to enable future grid connection into the existing UK Power Network's Braintree 132 kilovolt substation.
- 1.3. The Proposed Development would allow for the generation of more than 50 Megawatts (MW) of electricity and therefore qualifies as a Nationally Significant Infrastructure Project (NSIP). Solar NSIPs require a Development Consent Order (DCO) under Sections 14(1)(a) and 15(2) of the Planning Act 2008 to grant the required permissions for the proposed development to be constructed and operated.
- 1.4. As mentioned, SCC is a Neighbouring Authority to the proposed development. Due to the distance between SCC's administrative boundaries and the boundaries proposed development, SCC's comments on the scoping report are restricted to matters relating to:
 - a. cumulative effects;
 - b. highways and skills; and,
 - c. economic development.

2 SCC Energy and Climate Adaptive Infrastructure Policy

- 2.1. SCC adopted its Energy and Climate Adaptive Infrastructure Policy in May 2023, setting out its overall stance on projects required to deliver the UK's Net Zero ambitions. The policy is relevant for the SCC's position on the Hedgehog Farm Solar Farm proposals, and states:
 - 2.1.a. "Suffolk County Council has declared a Climate Emergency and is therefore predisposed to supporting projects that are necessary to deliver Net-Zero carbon and climate adaptation for the UK. However,

projects will not be supported unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately recognised, assessed, appropriately mitigated, and, if necessary, compensated for.”¹

- 2.2. SCC will follow this approach in this response, and throughout the subsequent DCO process.
- 2.3. SCC continues to be willing to work with the project promoter to address the issues, improve of the proposals and required mitigations, and awaits further engagement in the coming months.
- 2.4. SCC has also published a Supplementary Guidance Document² for its Energy and Climate Adaptive Infrastructure Policy which gives specific guidance for developers of solar farms, following SCC’s experience with such NSIPs, which the Applicant is encouraged to consult. The document contains guidance on the roles of the developer and authorities, how they should interact and how SCC expects solar-specific issues to be handled by the Applicant.

3 General Comments

- 3.1. SCC appreciates that the Applicant is a commercial entity and so has swiftly published this scoping report. However, SCC would have preferred to have been consulted during the drafting process of this report to ensure that its key concerns could have been addressed at an earlier stage by means of changes being made to the Applicant’s approach to the report.

4 Cumulative effects

- 4.1. The scoping report fails to propose any meaningful approach to cumulative effects such as employment, skills, accommodation or supply chain effects from concurrent NSIPs in the region. This is a significant omission and does not align with national policy expectations (NPS EN-1 5.13.4) or Suffolk County Council’s published supplementary guidance. SCC requests that these elements be scoped in and assessed appropriately within the Environmental Statement.

5 Highways

- 5.1. An AIL (“Abnormal Indivisible Load”) report will be required to be shared with Suffolk County Council, as the Local Highway Authority, if the Applicant intends

¹ See SCC Energy and Climate Adaptive Infrastructure Policy: <https://www.suffolk.gov.uk/asset-library/energy-and-climate-adaptive-infrastructure-policy.pdf>

² Energy and Climate Adaptive Infrastructure Policy Large scale solar schemes Supplementary Guidance Document: <https://www.suffolk.gov.uk/asset-library/scc-policy-large-scale-solar-booklet.pdf>

to use the Suffolk local road network, including where the network is used to access the ports in Suffolk.

6 Skills and Economic Development

6.1. Suffolk County Council is concerned that the assessment methodology proposed is overly descriptive and insufficiently analytical. While we welcome the inclusion of baseline data, the approach must go beyond static socio-economic profiling. As outlined in SCC's *Supplementary Guidance Document: Skills, Workforce and Supply Chain* (attached as Appendix A), the methodology must:

- Clearly define workforce phases (e.g., civils, mechanical & electrical, commissioning)
- Model workforce numbers and skill requirements for each phase
- Differentiate between home-based and non-home-based labour (with separate geographies)
- Use scenario modelling (low, medium, high) to estimate employment and supply chain uptake probabilities
- Quantify impacts on local services (e.g., housing, health, education) arising from worst-case labour scenarios
- Analyse direct, indirect and induced GVA impacts with a robust methodology

6.2. The proposed approach in the Scoping Report does not currently meet these expectations, particularly with regard to the absence of scenario-based employment forecasting, temporal labour modelling, and explicit engagement with Suffolk's Regional Skills Coordination Function.

6.3. Suffolk County Council expects the applicant to engage proactively with its Regional Skills Co-ordination Function (RSCF), as outlined in our Energy and Climate Adaptive Infrastructure Policy. SCC expects that the Applicant will work collaboratively with the RSCF to:

- 6.3.a. Agree the methodology for skills and supply chain impact assessment;
- 6.3.b. Identify how local labour market opportunities can be maximised for the region; and,
- 6.3.c. Understand and mitigate potential negative consequences both project specific (e.g., labour displacement, wage inflation).

6.4. Failure to engage meaningfully with SCC on these matters would represent a missed opportunity to optimise social value and mitigate adverse regional impacts.

6.5. To address SCC's initial key concerns noted in this Scoping Report, the Council recommends the following actions are taken:

- 6.5.a. Scope in and robustly assess cumulative labour and skills impacts in combination with other NSIPs;
- 6.5.b. Revise the methodology in line with SCC's supplementary guidance, incorporating scenario-based workforce and supply chain modelling; and,
- 6.5.c. Engage and agree the assessment parameters with SCC's Regional Skills Co-ordination Function.



Hedgehog Grove Solar Farm

EIA Scoping Comments

**Appendix A: Energy and Climate Adaptive
Infrastructure Policy Supplementary Guidance
- Skills and Workforce**

Suffolk County Council

Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy

Supplementary Guidance Document

The assessment of skills, workforce, and supply chain requirements, the mitigation of adverse impacts, and the maximisation of opportunities.

This is a supplementary guidance document, to support the Energy and Climate Adaptive Infrastructure Policy¹, which was adopted by Suffolk County Council's Cabinet, on the 16th of May 2023.

Scope and purpose of this Supplementary Guidance Document

Suffolk has natural and geographic advantages that make it attractive to project promoters for locating low-carbon technologies, and the consequent supporting infrastructure. This, therefore, creates significant challenges and opportunities for the economy, environment, and communities of Suffolk.

Major infrastructure projects, both alone and in combination with other projects, require a significant transitory construction workforce to ensure effective delivery. Projects may also require an operational workforce consisting of both permanent staff, and contractors, on a periodic or rolling basis, that engages and involves local and regional supply chains.

Project promoters should be seeking to deliver inclusive growth through working with partners, such as Suffolk County Council², to identify and deliver additional social value. National toolkits, frameworks, and individual case studies, such as those available through the HMG Social Value model³, could assist with this process and the measurement of outcomes. A skills programme for example, could be achieving a reduction in long distance commuting, and supporting other local businesses, as well as reducing health inequalities.

The purpose of this document is to set out how the County Council expects project promoters to:

- Identify the anticipated geography from which the workforce will be drawn, and the extent to which any non-home-based workforce is likely to require additional temporary accommodation, particularly during construction.
- Effectively identify skills and labour force needs for the construction, operation and decommissioning of their project, and in doing so, maximise the opportunities for local companies and employment.

¹ <https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects-including-nsips/energy-infrastructure-policy>

² <https://www.suffolk.gov.uk/business/tenders-and-supplying-us/social-value>

³ <https://www.gov.uk/government/publications/social-value-act-information-and-resources/social-value-act-information-and-resources>

- Identify workforce numbers by skill, and the duration for which each workforce type will be required, throughout the construction of the project.
- Analyse and identify the linkages and dependencies between these workforce requirements and the implications for, transport modelling, accommodation and housing, and provision of local services, including, but not limited to, health and public protection.
- Identify and analyse the extent to which the project's labour and skills demands, both alone and in combination with other projects, may capture staff from the existing workforce, leading to adverse outcomes, for the delivery of services, or for the local economy more widely.
- Recognise that there may be specific local sensitivities, in respect of the natural environment and communities, that may be adversely impacted by the workforce needs of the project, which will also need to be identified and mitigated.
- Identify the spatial and temporal relationships between their project, and other projects, working collaboratively with other project promoters to both minimise and mitigate adverse impacts, and maximise positive impacts.

In addition to identifying and mitigating any potential harms in respect of workforce and skills, the County Council also expects, in accordance with the Energy and Climate Adaptive Infrastructure Policy, that, outside consideration of the planning balance, project promoters will support the delivery and use of local and regional supply chains by:

- Recognising the project's regional role as part of Suffolk's energy cluster, increasing and accelerating inward investment of Tier one and Tier two contractors, who are likely to be working on multiple projects locally.
- Delivering opportunities for the growth of non-engineering or non-construction related businesses associated with supporting the delivery of the project, including, but not limited to, catering, transport, and facilities management.
- Identifying and developing opportunities for research, development, and innovation, across the energy and construction sectors in Suffolk, and the region.
- Supporting the delivery of long term, sustainable opportunities, in the energy sector, and related sectors, across Suffolk and the region.
- Recognising that it is essential to differentiate between the construction and civils opportunities of the project, and the mechanical and electrical engineering opportunities, during the construction cycle.

- Recognising that the mechanical and electrical engineering opportunities of the construction cycle, are likely to support and enhance the long term, permanent staffing and regional legacy benefits of the project.

Project promoters should deliver, and enhance existing and emerging, skills and educational initiatives by:

- Establishing an agreed governance framework for the project's skills and educational enhancement with Suffolk County Council, through Suffolk County Council's Regional Skills Coordination Function.
- Ensuring alignment with skills and educational initiatives in Suffolk, the Suffolk Social Value Skills Ask and, where appropriate, the wider region.
- Coordinating and assisting contractors to develop initiatives to ensure the sufficient supply of skills and capabilities are available, at the right time, to enable both project delivery, and the growth of the energy sector in Suffolk.
- Promoting and securing inclusive growth, by working to ensure provision of opportunities relevant to the regional need.
- Ensuring that skills and educational initiatives are fully inclusive, recognising, and responding to, the diverse needs of Suffolk's communities; taking action to create access and remove barriers to opportunities for those groups that require it.

The assessment of socio-economic impacts

To date the assessment of socio-economic impacts within the EIA are usually dominated by the characterisation of the local baseline conditions, whilst the meaningful assessment of effects has been limited, or entirely absent.

The Council considers that this focus, on reproducing baseline information in the EIA, is not effective, or sufficient, to understand the impacts of, or opportunities arising from, a project. Likewise, it does not allow the effective understanding of cumulative impacts or opportunities.

The outputs of socio-economic modelling are the foundation for the assessment of effects regarding transport, temporary accommodation, housing, and the provision of local public services and public protection.

The principal purpose of this guidance is to ensure that project promoters deliver a robust and effective assessment of effects, both positive and negative, arising from their project. The Council considers that these effects should be agreed, and understood, before project effects and mitigations, on transport, accommodation and housing, and the provision of local services, are modelled.

The proposed approach to the assessment of socio-economic impact, and the labour force and skills needs, for the project alone, and in combination with other projects, is set out in the Appendix.

Appendix

The following elements are to be provided or assessed in detail:

- The existing socio-economic environment and baseline
- The relevant strategy and policy
- A comprehensive supply chain assessment, including the details of what relevant businesses exist locally; and what their capacity to supply, or ability to expand is, to meet the project's requirements
- Education and training infrastructure and their capacity to supply, or ability to expand through investment, to provide learning or training required to support the supply of relevant skills, competencies, and capabilities.

The purpose of assessing these elements is to arrive at agreed and evidenced, percentages of local employment (direct, indirect, and induced) and supply chain effects in low, medium, and high engagement scenarios, allowing the applicant, with confidence, to provide:

- direct employment numbers (and associated GVA)
- indirect employment numbers (local/regional supply chain) (and associated GVA)
- A robust temporal model of the needs of the project in terms of labour force numbers and skills, during its construction, operation and decommissioning.

The applicant will also provide evidence that the methodology used to calculate induced employment, (and associated GVA) correlates with the above.

Regarding data sources, the applicant should work with Suffolk County Council's Regional Skills Coordination Function, and the skills and economic functions of Local Authorities, to support identification of relevant and up to date sources of local and regional data.

THESE FINDINGS INFORM TRANSPORT MODELLING, ACCOMMODATION AND HOUSING, AND PROVISION OF LOCAL SERVICES, INCLUDING BUT NOT LIMITED TO, HEALTH AND PUBLIC PROTECTION.

Therefore, the project promoter and the County Council will need to agree the detailed assessment methodology prior to this work being undertaken. Subsequently, the County Council and project promoter will need to agree that the outputs are acceptable and robust, such that they can inform both the socio-economic modelling and the potential impacts, on transport modelling, accommodation, housing and local services.

The most important information for the County Council to understand, from any and all project promoters, is how many people, and what skills, are required for what period of time, for both the workforce and supply chain.

Most consenting applications spend time and effort scoping what the region looks like, the employment level, skills and attainment levels, unemployment etc. The County Council is aware of the existing conditions, and although these do need to be correctly set out in an EIA, the work should concentrate on the correct identification of the following elements to inform the subsequent analysis:

1. The workforce

Identify the anticipated geography from which the workforce will be drawn. Due to the distinct difference between workforce and supply chain, the applicant is expected to define a separate economic study area for these two distinct elements.

Workforce Inputs:

- Define the distinct workforce phases of the project (e.g. Civils, Mechanical & Electrical, Commissioning etc) at the most granular level that data and knowledge support.
- Identify the skills required within these phases and the duration of the phase.

Once these elements are defined, the applicant can begin to define an economic study area for the workforce considering the following:

- The propensity for travel is different for skilled and unskilled workers and will also differ depending upon the duration of role.
- The availability of public transport and the local road network
- Preferred method of travel to work.
- Correlation to Traffic and Transport methodology.

Workforce Outputs:

- A defined geography from which unskilled/semi-skilled labour can be expected to be drawn from for each distinct work phase
- A defined geography from which skilled labour could be expected to be drawn from for each distinct work phase.

2. The Supply Chain

Supply Chain Inputs:

As supply chain can be drawn locally, nationally and internationally, the geography defined here should represent areas that are impactful for the region. Therefore, hyper local should be defined as the Local Authority District hosting the project, local defined as the County hosting the project and then impact also considered at a regional level. For example, a project located in Stowmarket will use and define its Supply Chain geography as:

- Hyper Local – Mid Suffolk (Local Authority District)
- Local – Suffolk (County)
- Regional – East of England (Region)

Supply Chain Outputs:

A defined geography from which local and regional supply chain companies could be expected to be drawn from for each distinct work phase

3. Identify skills and workforce effects during construction, operation and decommissioning

Once defined geographies and work phases have been agreed for workforce and supply chain respectively, these can then be used to identify the size of the home-based employment opportunity. This assessment should be done using a low, medium and high probability scenario for home based employment opportunities. The worst-case scenario should always be the scenario used for identifying impacts and the corresponding effect on transport, accommodation and housing and local services modelling. The probability scenario will also refer to cumulative impact.

Skills and Workforce Inputs:

The applicant will need to produce an assessment, for each distinct workforce phase of the project as defined above, this should not include the indirect and induced employment opportunities that would occur if a local company were to receive a contract on the project. These will be accounted for separately, to avoid any double counting of benefit or negative impact.

Probability of home-based employment opportunity	Descriptors
Low	<ul style="list-style-type: none">• Little or no established demand skill sets in the workforce• Reliance on market to respond• No intervention from either the applicant or any local/regional stakeholders

	<ul style="list-style-type: none"> • High employment levels leaving little to no capacity in the marketplace • Low levels of applicable skills • Low population level • Short duration of employment opportunity • Significant proportion of population in identified geography are not of working age or economically inactive • Constraints on local capacity: <ul style="list-style-type: none"> ○ The project is unique to the area, and therefore limited opportunity to create an employment pipeline ○ Comparative projects being developed in the area leading to employment saturation • Limited public transport
Medium	<ul style="list-style-type: none"> • Labour force with some appropriate skills • The usual levels of unemployment in relation to the wider economic geography
High	<ul style="list-style-type: none"> • High levels of unemployment • Significant labour force with appropriate skills • High proportion of people of working age • Long duration of employment opportunity • Plausible transport links including public transport • Comparative projects being developed in the area, with an opportunity for an employment pipeline to be created • Planned interventions from the applicant and local and regional stakeholders • Local training and education offer that can provide relevant skills

Skills and Labour Force Output

This will need to define and quantify the following:

- The definition of a worker
- The size of home-based employment opportunity
 - Low scenario will represent worst case scenario to be used in all assessment work on impact
- The size of non-home-based worker population
 - Low scenario of home-based employment opportunity is to be used, as this will represent the worst-case scenario for modelling impacts on transport, accommodation, housing, and local services

Employment should always be referred to as an *opportunity*. It cannot be assumed that just because there is an opportunity that this will result in employment happening. The job of the Councils, collaboratively with the applicant, is to fully understand the size and nature of the opportunity. If it is agreed that there is an opportunity, the Councils and applicant will then work to build a skills pipeline to help meet both current and any likely future demand, by working collaboratively with other key stakeholders to develop programmes and processes that will ensure people have the right skill at the right time, and so have an opportunity to gain employment with the project.

4. Identify Supply Chain effects during construction, operation and decommissioning

The effect on Supply Chain is quantified to allow evidenced judgements to be made in the following areas:

- contribution to the development of, and support of, local and regional businesses
- any indirect beneficial impacts for the region hosting the infrastructure, in particular in relation to use of local support services and supply chains
- any negative impacts, direct and indirect, for example potential wage inflation that would stifle growth

At this early stage of the project lifecycle there will be no supply contracts in place therefore a scenario-based approach using probability of supply should be used. The project promoter will need to evidence the supply chain opportunity across all elements of the project, considering cumulative impacts with other projects.

Supply Chain Input:

The applicant to produce an assessment that identifies the distinct supply chain opportunities within each identified work phase, businesses within each identified geography that can deliver the service or goods sought, and the likelihood of these businesses being able to take up an opportunity to compete for this work.

Probability of Supply Chain opportunity (Hyper Local, Local and Regional)	Descriptors
Low	<ul style="list-style-type: none"> • Little or no established businesses offering applicable goods or services • Reliance on market to respond • No intervention from either the applicant or any local/regional stakeholders • Short duration of opportunity • Constraints on local capacity: <ul style="list-style-type: none"> ○ The project is unique to the area, and therefore limited opportunity to create a growth opportunity ○ Comparative projects being developed in the area leading to saturation
Medium	<ul style="list-style-type: none"> • Businesses established with some appropriate skills • Businesses experiencing their usual levels of work in relation to the wider economy
High	<ul style="list-style-type: none"> • There are multiple businesses with appropriate skills • Long duration of opportunity • Comparative projects being developed in the area, with an opportunity for a growth opportunity to be created • Businesses have capability and capacity to take on additional contracts • Planned interventions from the applicant and local and regional stakeholders

Supply Chain Outputs:

- Defined list of goods and/or services that will be procured, by work phase, including any offsite fabrication/manufacture elements.
- The duration of all the identified elements
- A scenario-based approach to probability of supply from hyper local, local and regional businesses against the identified elements
- Size of hyper local, local and regional supply chain opportunity
 - Low scenario will represent worst case scenario to be used in all assessment work on impact

5. Socio-Economic Impacts

Once the above elements have been assessed satisfactorily the promoter alongside Local Authorities can now make evidenced judgements against the areas set out in NPS EN-1 (5.13.4):

- the creation of jobs and training opportunities
- the contribution to the development of low-carbon industries at the local and regional level, as well as nationally
- the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities
- any indirect beneficial impacts for the region hosting the infrastructure, in particular in relation to use of local support services and supply chains
- effects (positive and negative) on tourism and other users of the area impacted
- the impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on social cohesion depending on how populations and service provision change as a result of the development
- cumulative effects - if development consent were to be granted for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region

From: clerk@salings-pc.gov.uk
Sent: 15 May 2025 19:42
To: Hedgehog Grove Solar
Subject: Hedgehog Solar Farm Consultation - Parish Council Response

You don't often get email from clerk@salings-pc.gov.uk. [Learn why this is important](#)

Dear Planning Inspectorate Team,

Thank you for the opportunity to comment on the proposals for the Hedgehog Solar Farm. The Salings Parish Council has reviewed the plans and, whilst we understand the importance of renewable energy, we have some concerns we'd like to raise:

1. Proximity to the Flitch Way

The site sits close to the Flitch Way, which, although not formally designated, is an important local heritage asset. It's a well-loved walking and cycling route that plays a key role in the rural character of the area. We feel it deserves protection, and that any nearby development should be designed to preserve the setting and tranquillity of the route.

2. Impact on the landscape and local footpaths

This is a valued rural landscape, and the proposed site includes several public rights of way (PROWs). These paths are used regularly by local residents and visitors alike. Large-scale solar infrastructure would significantly change the character and enjoyment of these routes.

3. Loss of agricultural land

The land in question is productive farmland, and we believe it should remain so, especially at a time when food security is becoming an increasing concern. While we support renewable energy in principle, it should not come at the cost of losing land that feeds the country.

4. Cumulative impact of nearby developments

With the nearby Willows Green solar farm already approved, we are concerned about the cumulative impact of multiple developments in a relatively small area. Taken together, they could have a much larger effect on the landscape, biodiversity, and local infrastructure than considered individually.

5. Construction access

We would like more detail about how access will be managed during the construction phase. Our local roads are narrow and not built for heavy construction traffic, so this needs to be carefully planned to avoid disruption and safety risks.

6. Wildlife and nature

The area supports a range of local wildlife, and we'd want to see strong protections in place for habitats and species that may be affected. This should be properly assessed and clearly set out in the planning documents.

7. Uncertainty in the design

As the documents acknowledge, the design is still at an early stage. One example is the lack of clarity around how the site will be connected to the Braintree 132kV substation. Until this

route is confirmed, it's hard to fully understand the wider impact, and we're concerned that future changes could affect our parish.

8. Support for solar in principle

That said, we do recognise the need to move towards more sustainable forms of energy, and the contribution solar can make in reducing CO2 and tackling climate change. These are goals we share through our Neighbourhood Plan, which seeks to protect and conserve our landscape and ecological features. We just want to make sure that any development is done in the right place, in the right way.

We hope these comments will be considered and we'd welcome continued dialogue as the proposals evolve.

Kind regards



Lisa Harris

On behalf of The Salings Parish Council

Clerk to The Salings Parish Council



The Clerk's hours are flexible and part-time.
If you do not get an immediate response, please be patient.



IN COLLABORATION WITH SLCC, NALC, OVW, COUNTY ASSOCIATIONS



UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN0110021
Our Ref: 92474

Mr Jack Patten
EIA Advisor
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol, BS1 6PN

19th May 2025

Dear Mr Patten,

Nationally Significant Infrastructure Project Hedgehog Grove Solar Farm, EN0110021 Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e. an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure)

and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

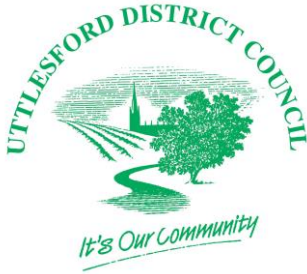
In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹, setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

¹
<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>



UTTLESFORD

DISTRICT

COUNCIL

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F.A.O. Mr Jack Patten
Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol
BS1 6PN

Wednesday 21st May 2025

Your ref: EN0110021

Our ref: UTT/25/1140/PE

Please ask for Maria Shoesmith on [REDACTED]
email: [REDACTED]@uttlesford.gov.uk

Dear Mr Patten

PROPOSAL: A solar farm generating station with a targeted export capacity of 98 MW, consisting of ground-mounted solar photovoltaic (PV) panels and mounting structures, biodiversity enhancement, highway works for vehicular access, ancillary works (such as boundary treatments, security equipment and surface water management), and associated grid connection infrastructure including underground cabling to connect the development to the Braintree 132kV substation.

LOCATION: Hedgehog Grove East Of Felsted, Frenches Green Road, Felsted Essex

I refer to your letter dated 23rd April 2025 regarding the Scoping Consultation regarding an application by Hedgehog Grove Solar Farm Ltd (the applicant) for an Order granting Development Consent for the Hedgehog Grove Solar Farm (the proposed development) and consultation on Scoping Opinion regarding the above proposed development within the administration of Uttlesford District Council.

There are a number of constraints surrounding the proposed site, namely;

- Countryside Location
- High Pressure Gas Pipes
- Flitch Way County And Local Wildlife Site,
- SSSI
- Essex Coast RAMS
- Public Rights Of Way,
- Flood Risk Zone 3,
- TPOs,
- Contamination
- Archeological Site Of Interest

- Minerals Safeguarding Areas; And
- Aerodrome Safeguarding

Principle

The impacts of the proposed development upon the level of land take and cumulative impact with other committed local schemes would need to be considered both in terms of the countryside, level of loss of agricultural land.

The site falls outside local plan and within the Felsted Local Neighbourhood Plan area.

Design

From the aspects covered by the Environmental Statement, the most pertinent with respect to Urban Design is Landscape and Visual Impact. This should be included within an Environmental Statement (ES) to assess the likely visual impact of proposals on the surrounding context.

Paragraph 3.3.10 identifies a list of affected Public Rights of Way as part of the proposed development. Details of the Public Rights of Way would need to be provided, if any will be diverted and what mitigation is proposed to protect the users of the PROWs.

Heritage

The EIA contains a section on built heritage within the scope of the cultural heritage assessment. The proposed approach is acceptable, including the 'topic-specific legislation, policy and guidance' for built heritage. This note does not include an assessment of good practice guidelines associated with archaeology. The rationale of Assessment to be Scoped in (and Scoped Out) to the EIA is acceptable.

With reference to para 10.2.9, the applicant should note that the UDC Local List is in two parts (October 2018 and April 2021), therefore both documents should be considered within the EIA. Para 10.7.1 notes the 'bare earth ZTV and supporting visualisations' are an aspect of limitation and uncertainty. The current information suggests that visibility of the development will be limited due to existing vegetative screening, however there is potential for misrepresentation of true visibility if seasonal variation etc. is not considered during the design development. It would be prudent for the EIA to consider built heritage and landscape visibility more holistically, to ensure an accurate representation of the impact of the proposed development has been tested.

The EIA Scoping Report is acceptable when considering built heritage and conservation. This does not include an assessment of archaeology.

The Scoping report identifies a number of Listed Buildings in paragraph 3.3.8. as detailed assessment should be provided to identify the areas of curtilage on a constraints plan verses mitigation measures proposed.

Whilst ECC will be commenting further on archaeology it should be noted that the area is rich in archaeology and consideration should be had to protecting and preserving historical artifacts in areas especially near Weavers Farm, Bouchiers Barn, Swards Hall Farm and Straits Farm.

Landscape

Landscape mitigation – para 12.5.6- this is essential: “Development of a comprehensive Landscape Masterplan for the Site, including landscape proposals for the solar PV arrays and substations and landscape reinstatement proposals for the chosen cable corridor” and from para 12.7.3: “Any proposed mitigation planting would be subject to a long-term management and maintenance regime for the lifespan of the Proposed Development and secured through a Landscape and Ecological Management Plan (LEMP).”

Project Background

It is noted that assessments are still required for the central site (HG2) – to provide a similar level of detail to baseline studies completed for HG1 and HG3, including but not limited to:

- Arboriculture Assessment;
- Agricultural Land Classification Surveys;
- Cultural Heritage Geophysical Survey Report;
- Baseline Ecology Report;
- Flood Risk Assessment;
- Landscape and Visual Technical Note; and
- Early Assessment of Site Access.

Project Methodology

There is one notable ambition in the EIA Scoping Report (April 2025, section 12.5.6, p. 175) that states a mitigation measure to “provide hedgerow and landscape reinstatement, and provide visual filtering and screening as appropriate”.

I don't believe sufficient screening is shown in the proposed site layout plans (although these are from July 2022 and this may be why they don't align with the EIA Scoping Report from April 2025).

For example, the Draper's Farm site layout plan (ref BSE002-PL-01), shows existing fragmented vegetation, especially to the eastern boundary of the site. The Rayleigh's

Farm site layout plan (ref BSE001-PL-01) also shows existing fragmented vegetation, especially to the southern boundaries of the site.

All site boundaries, especially those fronting the most sensitive visual receptors such as residential areas, should be sufficiently screened with vegetation.

With the above exception, it is otherwise positive to read the following stated ambitions which I think form a sound methodology:

Visual Impacts

- A Landscape and Visual Impact Assessment (LVIA) will support any future planning application and it will principally review the key sensitivities of this landscape; which include a strong rural character and the open panoramic views to surrounding areas.
- The site and its immediate surrounding landscape are generally remote from urban development and residential properties, but the northern boundary lies adjacent to the scrap recycling yard, as well as Fenton's Farm. Draper's Farm also borders the Site in the eastern section. Additional screening may need to be considered for these existing residential dwellings.
- Further screening planting can be provided in strategic locations to minimise impacts on rights of way users.
- The potential landscape and visual impacts need further assessment, as an increase in further solar arrays may impact upon the character and appearance of the local area. This will include advice on the siting and height of the proposed design and layout to reduce impacts on sensitive receptors. These include the residential properties at Fenton's Farm and Drapers Farm, PROW users, as well as wider views from the surrounding land.
- The Proposed Development will incorporate appropriate design and landscape measures wherever possible, with all reinforcement or new planting utilising native species that are in keeping with local landscape character and consider the nature of views available.
- Part of Felsted village and Bannister Green village lie on the western and southwestern boundaries of the Site. Consequently, additional screening may need to be considered for these existing residential areas. This is also considered important during the siting of the temporary compounds as well.

Landscape

- Siting and layout of the solar PV arrays and associated structures to avoid important landscape features and elements such as existing trees and hedgerows and to provide suitable buffers between the solar PV arrays and construction areas and woodland, trees, properties and PROW.

- The Proposed Development will include new native planting, management of existing planting, hedgerow enhancement, and planting of suitable seed mixes amongst the solar PV array.
- Landscape reinstatement proposals for the chosen cable corridor.

Arboriculture

- Veteran trees – include a high quality oak pollard (T96) and English oak trees T149, T158 and T159.
- The Root Protection Areas (RPAs) and veteran tree buffer zones of recorded arboricultural features should be considered sacrosanct and proposed development (e.g. infrastructure for the short to long-term construction) should be planned to avoid these areas wherever possible.
- The Root Protection Areas (RPAs), inclusive of any additional buffers, of all high and moderate-quality trees and tree groups, should be respected and avoided by any development, including solar arrays, tracks, cable routes and inverter/sub-stations.
- The arborist report (Barton Hyett Associates, September 2022) notes that in some areas of the site (such as Drapers Chase) “retaining the majority of trees will be possible” which is a positive outcome.
- However, it also notes that in other areas (such as Poplars) “there is the potential for shading to be cast across parts of the site by tree and tree group canopies. Due to the maturity of the vast majority of the arboricultural resource on the site, almost all of the trees will require consideration during the design of the solar array layout due to their size and orientation relative to the site. The objective should be to ensure that the panels will operate as effectively as required and to eliminate any post-development pressure to fell or prune retained trees.”
- There is a good opportunity to improve the long-term tree cover through appropriate new tree or woodland planting. Suitable planting alongside existing features, new boundary or infrastructure features (e.g. attenuation ponds), and establishing new wildlife corridors to link existing ponds or woodland would help with improving biodiversity and connectivity.
- Some of the RPAs associated with significant trees at the site have been heavily ploughed in the past. This will likely have been causing regular damage to roots located within the top 20cm-30cm of soil. There is therefore an opportunity to greatly improve the rooting areas associated with these trees through the amelioration of the soil and establishment of grass/wildflower pasture within their RPAs. This could assist in potentially providing a long-term benefit to the health of these trees and enhancement to the site overall.

- Once the design proposal has been agreed, an Arboricultural Impacts Assessment report should be prepared for submission to the LPA in order for the planning application to be validated and to provide the LPA with sufficient information in order to determine the application.

Improved biodiversity/BNG

- The Proposed Development will also provide biodiversity enhancements through new planting and landscaping where possible, especially if there are any significant gaps within the existing hedgerows and marginal vegetation of the Site.
- Landscape proposals would seek to deliver landscape and biodiversity enhancement, integrate and embed the Proposed Development within the existing landscape character, provide new green infrastructure that connects to the wider green infrastructure network, provide hedgerow and landscape reinstatement, and provide visual filtering and screening as appropriate.

Access

- Ensure access is retained along multiple PROWs crossing site.
- None of these PROWs will be diverted or closed as part of the construction and operation phases of the development.

Ecology

Consideration should be had to the Flitch Way as a Local and County Wildlife site. A more holistic assessment of impact on Flitch Way assuming as an improved as active travel route and particularly wildlife and ecology areas is required and covering whether the solar farm impacts on the habitat and species in terms of noise, physically, glare, traffic movements and landscape buffers etc?

Para 3.5.34 talks of BNG becoming law but it is statutory now and the scoping report must recognise that as well as the Council's draft policy requirement for 20% once the Plan is adopted early next year. Para 8.6.10 refers to a 'commitment' to 10%.

Page 69- Biodiversity – the draft Local Plan policies (CP38, CP39 AMD CP40) should be Included and also reference to the green and blue Infrastructure strategy.

Para 8.6.16 (Habitat Regulations Assessment Screening) mentions the Essex Coast RAMS and this section indicates there are no connectivity pathways, but the site is within the ZOI for Essex Coast RAMS so should some greater regard be paid to that and evidence supplied as to why no special attention need be paid eg migratory birds. The document (Table 8.6) states that 10km is the scoping out distance.

Para 6.6.7 – we should welcome this and emphasis need for continued and detailed engagement in ecological and community benefits (that relate to impact of the proposal): “By integrating biodiversity benefits into the design, engaging with

stakeholders, and aligning with global sustainability goals, the Proposed Development aims to create net positive outcomes. This approach ensures support for local biodiversity, provision of social and economic benefits, and a positive contribution to the environment.”

Amenity

A lighting survey would need to be provided to assess the impact on fauna and potential sensitive residential receptors (page28).

Light, dust, noise and vibration mitigation would need to form part of the planning submission and the ES to protect local areas’ amenity and the amenity of the residential occupiers and the users of the PROW.

Depending on the length of construction works its considered that “Residential Visual Amenity Assessment (RVAA) for properties within 250 m of the Proposed Development” should be scoping in.

Our Environmental Health Team raises no objection in terms of proposed noise monitoring locations and methodology.

Details need to be provided about the movement of soil, storage and exportation, the amount perceived, and any changes in ground levels.

Climate Change

Uttlesford District Council has declared a climate emergency in 2019. This was followed by an agreed target for the council to become carbon neutral in all its activities by 2030 and the publication of a Climate Change Strategy in which outlined a pathway to reaching this goal.

As part of the planning submission, the ability of the infrastructure should be demonstrated to help set the trajectory for the UK to achieve net zero greenhouse gas emissions by 2050 (page 22)

Section 9 could include an assessment of the impact on embodied carbon in its use of materials in particular and seek to address/minimise and this would accord with local plan draft policy CP24 although this may be outside the scope of EIA Regulations.

Fire Safety

Details of fire safety and mitigation measures proposed for the batteries and substation should be covered in the ES.

Crime Prevention

Details of crime prevention in terms of heights of fencing, CCTV, lighting etc. would need to be submitted as part of the application if not covered off in a Human Health Section in the ES. I would advise that the local Designing Out Crime Officer is consulted at Essex Police as part of the pre-app process and planning application for them to input.

Airport Safeguarding

The Airport requires special consideration in this location in terms of 'Glint and Glare' assessments, also that landscaping schemes in terms of planting and water bodies do not attract birds and create the potential for bird strike. The airport is located within circa 13km of the application site. With the vast area that is proposed to be covered standalone and cumulatively with the adjacent NSIP site. MAG would need to be consulted and feed into the scoping assessment and therefore it is considered that the study area for the glint and glare assessment is extended to cover Stansted Airport as a major airport, and therefore Stansted Airport should be scoped in as should the Assessment of Glint and Glare effects during the construction and operational phase.

Highways

Whilst highways will be covered by ECC Highways in their response the following points need to be considered. It is noted in paragraph 3.5.25 it states "*The highest traffic volumes would occur during the construction and decommissioning phases, with only minimal maintenance access required during operation. As a minimum, vehicle access would be required into the solar PV array.*" It is agreed that the initial construction and then the decommissioning stages would see the most vehicle movement. However, the Scoping would need to include a long list of committed schemes in the area that need to be assessed as part of the Transport Assessment.

Also, as part of the planning submission a construction management plan taking into account the above and having more direct vehicle movements to and from the site so villages are not blighted during the construction and decommissioning stages, especially during transportation during abnormal loads.

Decommissioning

Details of the decommissioning of the site when it reaches end of life would need to be provided to ensure the site is left cleared and in a suitable condition, able to be used for farming again without contamination.

Ideally there would need to be a bond in place to protect the public purse from decommissioning and clearing the site in the event that the site is abandoned or the company disbands.

We would be keen that the applicant looks into alternative methods of installation of the solar scheme that is less intrusive to the ground/soils and is easily reversible in terms of the site decommissioning.

Generally, UDC does not object to the methodology and topics scoped in and out subject to the above considerations.

Yours sincerely,

A solid black rectangular box used to redact the signature of Maria Shoesmith.

Maria Shoesmith
Strategic Applications Team Leader

19th Floor, 10 Upper Bank Street
Canary Wharf
London
E14 5BF

Contact: Denis Toomey
Direct
Line:
Reference: 251042
E-mail: [REDACTED]@walthamforest.gov.uk
Date: 19/05/2025

By email

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations)

CONSULTATION RESPONSE

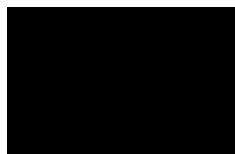
Dear

Your Reference Number: 251042
Description of Development: Order granting Development Consent for the Hedgehog Grove Solar Farm (the proposed development).
Location: Hedgehog Grove Solar Farm

I refer to your consultation under letter dated 23rd April 2025, Ref: EN0110021. We thank you for the opportunity to provide our comments and these are set out below.

The London Borough of Waltham Forest does not wish to comment further on these proposals.

Yours sincerely



Justin Carr
Assistant Director - Development Management and Building Control
London Borough of Waltham Forest

From: Drane, Sarah [REDACTED]@westsuffolk.gov.uk>
Sent: 30 April 2025 09:47
To: Hedgehog Grove Solar
Subject: EIA scoping consultation - EN0110021

You don't often get email from [REDACTED]@westsuffolk.gov.uk. [Learn why this is important](#)

Good morning,

West Suffolk Council have no comments to make on this.

Kind regards

Sarah Drane
Principal Planning Officer
Planning
Direct Dial: [REDACTED]
Email: [REDACTED]@westsuffolk.gov.uk
www.westsuffolk.gov.uk
West Suffolk Council
#TeamWestSuffolk

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