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Date: 4 August 2026
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To Whom It May Concern

Application by National Grid Electricity Transmission for an order granting development consent for the Norwich to Tilbury project

Interested Party Reference: [REDACTED]

Response to Deadline 8 – Closing Statements

This letter is sent on behalf of Longfield Solar Energy Farm Limited ("Longfield"), registered as an Interested Party for the above application.

These Closing Submissions are made in response to the Examining Authority's Deadline 8 inviting Interested Parties to submit written closing statements.

The purpose of these submissions is to summarise the position of Longfield at the close of the examination in order to assist the ExA in preparing its report and recommendation to the Secretary of State.

Longfield's Relevant Representation was submitted on 27 November 2025 (RR-2183).

1. Background

Longfield has secured the Longfield Solar Site under an Option Agreement dated 24 January 2023. Longfield has obtained development consent for the Longfield Solar Farm through the Longfield Solar Farm Order 2023 (SI 2023/734), which came into force on 18 July 2023.

The Longfield DCO authorises the construction, operation, maintenance and decommissioning of a ground mounted solar photovoltaic generating station with a gross electrical output capacity of over 50 megawatts, together with associated development including habitat management areas comprising landscape and biodiversity enhancement measures, habitat creation and management, and the laying down of permissive paths.

The Longfield DCO includes a requirement for a landscape and ecological management plan which contains minimum biodiversity net gain during the operation of the authorised development. Construction of the Longfield solar project is expected to commence in Q1 2027.

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2. **Potential Impacts of the DCO Works**

Part of the land comprised in the Longfield solar project (the "Longfield Solar Site") is included in the Order Land for the Norwich to Tilbury project. The relevant works under NGET's proposed DCO include:

- (a) the use and potential improvement of an existing access road which falls within the Longfield Solar Site. This access road is Longfield's main point of access to part of the Longfield Solar Site and runs immediately adjacent to the solar panel areas; and
- (b) potential overlap with habitat enhancement areas provided for in the Longfield DCO (in respect of proposed works for pylon modification);

as shown on Document: 2.3 Works Plans - Section F sheet 1/10 and Document: 2.3 Works Plans - Section E sheet 8/8.

The exercise of such powers by National Grid could interfere with the construction, operation and maintenance of the Longfield solar project. In particular, any works affecting the habitat enhancement areas may impact upon Longfield's ability to deliver the biodiversity net gain in accordance with its programme.

3. **Negotiations with National Grid**

Longfield has engaged with National Grid to establish the impact of NGET's use of the relevant areas on the Longfield solar project. Discussions have commenced regarding the need for protective provisions and/or a side agreement to protect Longfield's interests. However, as at the date of this submission, no heads of terms have yet been agreed between the parties.

The key matters which require resolution include:

- (a) **Access:** The impact of any upgrade or widening of the access road on Longfield's own access requirements for construction, operation and maintenance of the solar farm as well as on adjacent development areas.
- (b) **Habitat Enhancement Areas:** The extent of overlap (both in terms of works areas and programme) between the DCO works (including pylon modification works) and the habitat enhancement areas required under the Longfield DCO.
- (d) **Coordination:** Mechanisms for coordination between the two projects to minimise disruption and ensure safe working practices.

4. **Outstanding Matters**

The substantive protections necessary to address Longfield's concerns have not yet been secured. As things stand:

- (a) No protective provisions for Longfield's benefit have been included in the draft DCO. Longfield notes that the draft DCO includes protective provisions for the benefit of numerous other parties whose interests overlap with the Order Land, including Five Estuaries, North Falls, ScottishPower Renewables, East Anglia ONE, East Anglia THREE and others. Longfield's position is analogous to these parties insofar as it has a consented solar farm and associated habitat enhancement requirements which will be directly affected by the DCO works.
- (b) No side agreement has been completed to protect Longfield's interests, and no heads of terms have been agreed.

It is imperative, in the wider public interest in the role of the solar project as a generator of renewable electricity, that the NGET project should not interfere with the construction,

operation and maintenance of the Longfield solar project without appropriate protections being in place. Any uncoordinated interference with the habitat enhancement areas may also undermine the environmental commitments secured through the Longfield DCO.

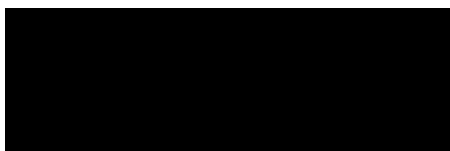
5. **Conclusion**

Longfield considers that National Grid's requirement for the use of the Longfield Solar Site and associated land can exist, to some degree, in tandem with its own requirements. That said, there may be impacts on Longfield's project, particularly in relation to access and habitat enhancement areas, and National Grid should continue to engage in full and meaningful negotiations with Longfield to document appropriate arrangements.

National Grid is encouraged to progress matters with Longfield as soon as possible and during the post-examination period, with a view to either:

- (a) the inclusion of protective provisions for Longfield's benefit in the DCO; and/or
- (b) the completion of a side agreement to protect Longfield's interests.

We respectfully request that the Examining Authority takes these submissions into account in preparing its report and recommendation to the Secretary of State.



Partner
Eversheds Sutherland (International) LLP