

Boreham Parish Council

Parish Office, Village Hall
Main Road, Boreham
CM3 3JD

Email: borehampc@hotmail.com Telephone: 01245 469941 Website: www.essexinfo.net/borehamparishcouncil



14th December 2020

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

Dear Ms King

Re: Longfield Solar Farm, Essex (Ref EN010118 LSF)

Following our meeting on Monday 30th November, Boreham Parish Council (BPC) has now considered proposals put forward for Longfield Solar Farm, including correspondence with and presentations to the general public and the EIA Scoping Report of October 2020 (EIA) and we enclose our response and comments to meet the non-statutory consultation deadline of 14th December 2020.

BPC is aware of the need to combat climate change and the need to achieve government targets for reducing carbon emissions. There are various ways we can do this from the use of offshore wind farms to increased use of nuclear power and we are cognisant of the contribution which solar power can make.

A significant area of the proposed Longfield Solar Farm is located within the parish of Boreham and it is likely that the impact, if the project goes forward, will be significant. BPC has a responsibility to represent the views and best interests of its parishioners and local businesses and to protect the desirable characteristics of the community. We do have concerns over the location, size and scale of the proposed Longfield Solar Farm and, though we appreciate the opportunity presented by this non-statutory consultation, BPC has found that the lack of detail in the materials relating to the project allows only a rudimentary sense of the likely impact of the proposal. This makes effective engagement in the consultation process very challenging. The Covid 19 pandemic has also made effective consultation very difficult and BPC requests that this is a consideration in the timing and format of future stages of consultation until the pandemic is over.

BPC requests more detail be provided in the following stages of consultation to address:

- the likely traffic impacts through Boreham village and onto the surrounding country roads;
- the environmental impact assessment covering plant delivery, construction and operational phases of the installation at the site;
- how the development will benefit the community of Boreham;
- the design of the site including access points, internal routes and placement of the sub-station(s) and battery storage elements;
- the rationale for the very large scale and location of the proposal;
- Any plans for decommissioning the site.

BPC requests an opportunity to comment on the draft Statement of Community Consultation (SoCC) and proposals for consulting local people, stakeholders and communities on future statutory consultations. The applicant has previously posted information booklets to some Boreham residents and has presented other information which differs significantly from the EIA Scope document. BPC believes the specific differences have already been drawn to your attention.

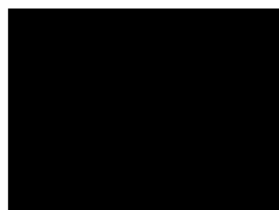
BPC supports the need for further detailed assessment to be undertaken prior to any submission of the DCO application and welcomes the opportunity to participate at all stages of the process. This includes reviewing the Agricultural Land Classification (ALC), landscape and visual impact studies, biodiversity and nature conservation proposals, flood risk and drainage, impacts of noise, vibration, glint and glare, impact on land changes, traffic and transport studies, impact on the historic environment, cumulative impacts, socio-economic impacts and community gain.

Please see the attached response. I would be grateful if you would confirm receipt of this letter and its contents. The originals are being sent by post.

Yours sincerely,



Lisa Miller
Clerk to the Council



John Galley
Chairman of the Council

Attachment.

Boreham Parish Council

Parish Office, Village Hall
Main Road, Boreham
CM3 3JD

Email: borehampc@hotmail.com Telephone: 01245 469941 Website: www.essexinfo.net/borehamparishcouncil



RESPONSE TO THE NON STATUTORY CONSULTATION

1. THE PROPOSED SITE

Boreham Parish Council (BPC) would like to understand the basis for selecting this site for the largest solar farm in the UK to date. The site, which is of an irregular shape, largely comprises good quality agricultural land organised in medium/large sized fields used for growing crops including oil seed rape, potatoes, cereals and field beans. The loss of land to food production may have a larger impact as we leave the EU. There is little detail regarding how the site will be used, the location and design of key elements and the amount and type of construction proposed. It is clear that whatever the design, the installation will be extensive and the site does not appear to be an obvious choice for such a large and industrialised solar farm.

The site is characterised by open views across the fields, interspersed with woodland and crossed in many places by public footpaths and other public rights of way. Waltham/Boreham Road currently passes through views of open fields or with sight of fields through or above existing hedgerows. Many of the footpaths and bridle paths within the designated site also pass through open fields. These footpaths and bridle paths are heavily used by locals and visitors and there will be significant loss of amenity during installation and potentially beyond. BPC would like additional details regarding how the developer proposes to maintain public access to these rights of way throughout the construction process and during operation.

BPC also notes that the maps shown in the various documents prepared to present the Longfield Solar Farm proposal do not accurately portray recent changes to the location of footpaths east of Waltham Road in Boreham.

The EIA Scope and other documentation for Longfield Solar Farm recognises that the development will fundamentally alter a key landscape characteristic (the arable farmland) and effectively transform it into a more urban landscape. The mitigation for this is to obscure the view of solar farm from the public rights of way and from dwellings adjacent to the site. High hedgerows (2.5 to 3m) are proposed to block views of the solar panels and larger elements such as battery storage, a substations and CCTV monitoring towers (c 5m). However, it is likely to take more than 5 years to develop a hedgerow system which will form an effective screen and even if this was accomplished the general effect would be to close in many footpaths which have previously enjoyed wider views over open fields.

Boreham Parish Council

Parish Office, Village Hall
Main Road, Boreham
CM3 3JD

Email: borehampc@hotmail.com Telephone: 01245 469941 Website: www.essexinfo.net/borehamparishcouncil



2. TRAFFIC AND TRANSPORTATION

Two proposed access points to the proposed site are both on Waltham/Boreham Road. The proposal is that the main construction and decommissioning access to the Site will be via road at junction 19 (A130 and B1137) of the A12. It is proposed that any abnormal loads would use these main access points. The anticipated worst-case construction traffic mentioned is 42 HGVs and an unspecified number of additional LGV movements per day for 2-3 years (Q1 2024 to Q1 2026). These estimates are based on an east west configuration of panels. No estimates are provided for different designs on the level of site traffic.

The route from junction 19 of the A12 will take traffic through Boreham village on Main Road and then up Waltham Road to the site. The report outlines the traffic anticipated for Longfield but fails to adequately consider the impact during the same period of the widening of the A12 and reconfiguration of the Boreham Interchange for the Chelmsford North East By Pass. These will almost certainly result in additional traffic through Boreham and onto Waltham Road with a high risk of congestion delays. There will be an accompanying increased risk to other road users.

The other route to the site from Essex Regiment Way via Wheelers Hill and Cranham Road is totally unsuitable for abnormal loads and HGVs. It is a country lane which is narrow in places. The report mentions a possibility of widening some country roads if required. This may be impractical. The EIA Scope document also fails to acknowledge the impact of construction of the Marriages flour mill on Cranham Road. It should also be noted that Essex Police have a facility in Waltham Road.

The total impact of all anticipated road use during the period between Q1 2024 to Q1 2026, with particular focus on 2024 as the likely peak year for construction activity, needs to be fully investigated and the associated risks assessed.

BPC notes that during public presentations on Longfield it was indicated that road traffic would be minimised by constructing access roads within the site. However, the EIA Scope document contradicts this by proposing to use the network of minor roads around the site for some deliveries in order to reduce the need to construct internal access roads.

3. THE ENVIRONMENT AND BIODIVERSITY

There is very little detail in any of the documentation regarding how proposed increases in biodiversity will be measured or achieved. There are elements of the proposed outline design and approach which may be detrimental to local flora and fauna. BPC acknowledges that agricultural land benefits from periods of resting fallow and that this may result in the re-establishment of

Boreham Parish Council

Parish Office, Village Hall
Main Road, Boreham
CM3 3JD

Email: borehampc@hotmail.com Telephone: 01245 469941 Website: www.essexinfo.net/borehamparishcouncil



wildflower meadows which benefit invertebrates but there are other elements of the scheme which are likely to be detrimental and the impact of these needs to be assessed.

A 3m high perimeter fence around the operational areas of the site would have an adverse effect on access for wildlife, particularly deer which roam freely over this part of the proposed site. Depending on the design of these fences they may also restrict other species such as brown hares.

More information is required to determine the impact of construction activity and of the solar farm itself on the birds and animals currently resident year round on the site and on seasonal visitors such as migrating geese and other waterfowl, cuckoos etc. Furthermore, there is a risk that glint, glare and noise from the installation and site lighting may also disrupt the activities of wildlife including bats and owls.

BPC would be interested in seeing the Biodiversity Management Plan in order to understand the overall impact of the site.

4. LOCAL BENEFIT

The opportunity for local benefit from Longfield Solar Farm appears limited based on what has been presented. The construction of the site will probably require specialist teams from outside the area and BPC does not anticipate any long term employment opportunities at the site for local residents. It appears more likely that many existing jobs linked to farming this land will fall away. BPC looks forward to reviewing the expected employment analysis. In addition, most of the infrastructure at the site is specialised and will be imported from overseas so there appears to be limited opportunity for local businesses. BPC would welcome information regarding the likely local benefits of Longfield.

5. RISK

The risks associated with the proposal need to be assessed when the design is more fully developed. Consideration also needs to be given to the timing and approach to decommissioning the site at the end of its life (2065). BPC trusts these elements will be developed further in preparation for the next consultation phase.

Battery storage: There are known fire risks associated with battery storage and most particularly with lithium ion battery technology.

Boreham Parish Council

Parish Office, Village Hall
Main Road, Boreham
CM3 3JD

Email: borehampc@hotmail.com Telephone: 01245 469941 Website: www.essexinfo.net/borehamparishcouncil



Biodiversity: There is a risk of disruption of the local biome and the potential for reduction in biodiversity rather than an increase as proposed. The reports also recognise the risk of introduction of non-native species.

Traffic disruption causing accident or delay: Approved developments in the Boreham area are already expected to greatly increase traffic levels on roads proposed for use by Longfield and at times of peak activity. This poses a potential risk of injury to road users and of project delays. There are no facilities for HGV parking in the area or for staging deliveries which may increase the risk of traffic congestion.

Glint and glare: The impact of glint and glare is given low priority in documents provided. Glint and glare may impact users of public rights of way, road users and may impact wildlife. There are anecdotal reports of migrating waterfowl striking panels in solar fields, mistaking them for water, although BPC is unaware of any specific evidence for this.

Noise: The EIA Scope document accepts that there will be additional noise associated with the development. The location for siting key elements of infrastructure and whether battery storage is used overnight will determine the impact on those residences close to the site boundary.

Flooding: The site has a high water table and once the design of the site is known, the impact of any hard standings or site roadways on flood risk will need to be assessed.

Planning Blight: BPC notes that, depending on the detailed site design, there is a risk of negative impact on adjacent residential and other properties (planning blight). This will be more severe for properties located in the proximity of battery storage and substation infrastructure. Use of the existing Bulls Lodge substation location may partially mitigate this risk as the land is already a brownfield site designated for this purpose.

All risks will need to be assessed and mitigated where possible.

6. CONCLUSION

BPC recognises that this non statutory consultation is the initial stage of the planning process. As a result, the information provided in the Longfield Solar Farm publications lacks detail regarding the final design of the site and location of key infrastructure elements, the technology to be used, impact assessments relating to traffic and environmental impacts, benefit to the local community (if any) and proposed increases in biodiversity. However, with regard to what has been presented

Boreham Parish Council

Parish Office, Village Hall
Main Road, Boreham
CM3 3JD



Email: borehampc@hotmail.com Telephone: 01245 469941 Website: www.essexinfo.net/borehamparishcouncil

so far, BPC is unconvinced that the selected site is suitable for such an industrialised solar farm due to the scale and scope of the proposal.

This type of development is better suited to brownfield sites or low grade agricultural land and it is difficult to foresee how the challenges outlined in points 1 to 5 above will be met. We are not able to ascertain how such a fundamental change to key landscape characteristics with the loss of amenity, loss of good quality agricultural land and potential disruption to the ecosystem over such a large area can be outweighed by the benefit of the solar power which may be generated. This may become clearer with additional detail in future stages of the consultation process.