



Longfield Solar Farm

Statement of Commonality

Deadline 1B

Document Reference : EN010118/EX/8.5(A)

Revision No. 2.0

August 2022

Longfield Solar Energy Farm Ltd

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 8(1)(b)

Table of Contents

1.	Introduction	1
1.1	Purpose of the Statement of Commonality	1
1.2	Structure of the Statement of Commonality	1
2.	Position	2
2.1	Structure of SoCGs	2
2.2	List of SoCGs	2
3.	Commonality	3
3.1	Summary	3
3.2	Positions at Deadline 1B	5
3.3	Essex County Council (ECC), Braintree District Council (BDC) and Chelmsford District Council (CCC)	5
3.4	UK Health Security Agency (UKHSA)/Office for Health Improvement and Disparities (OHID)	5
3.5	Essex Fire and Rescue Service	5
3.6	National Grid Electricity Transmission Plc (NGET)	5
3.7	National Grid Electricity Services Operator (NGESO)	6
3.8	Environment Agency (EA)	6
3.9	Natural England	6
3.10	East of England Ambulance Service	6
3.11	Historic England (HE)	6
3.12	National Highways (NH)	7
3.13	Network Rail (NR)	7

1. Introduction

1.1 Purpose of the Statement of Commonality

1.1.1 This document has been prepared to provide the Examining Authority (ExA) with the position on Statements of Common Ground (SoCG) between the Applicant and statutory consultees, statutory undertakers and other Interested Parties in relation to the proposed Longfield Solar Farm.

1.1.2 The Rule 6 letter states:

“In relation to some of the Principal Issues identified in Annex C [of the Rule 6 letter], I would be assisted by the preparation of SoCGs between the Applicant and certain Interested Parties.”

1.1.3 This document provides a position on the commonality on specific points between SoCGs at Deadline 1 (18th August 2022). This report will be updated where appropriate at future Deadlines where progress has been made on discussions with Interested Parties.

1.2 Structure of the Statement of Commonality

1.2.1 This Statement of Commonality is structured as follows:

Section 2 details the structure of each SoCG document and provides a list of the SoCGs being produced;

Section 3 sets out the commonality between SoCGs and a summary of the final position.

2. Position

2.1 Structure of SoCGs

- 2.1.1 Each SoCG adopts a standard format to ensure a consistency in the approach taken to documenting matters agreed, matters subject to ongoing discussion or matters not agreed.
- 2.1.2 Each SoCG is structured in the following way:
- Section 1 provides an introduction to the SoCG, identifying the relevant party(ies) and a description of the purpose of the document;
 - Section 2 summarises the engagement undertaken so far; and
 - Section 3 set out the issues identified in the Rule 6 letter and/or raised by the relevant party(ies) and a summary of the Applicant's position in response.
- 2.1.3 Each SoCG includes estimation as to the likelihood that disagreement on a topic will remain by the end of . This approach was guided by the Rule 6 letter to assist the ExA in assessing the areas where oral discussions may be beneficial.

2.2 List of SoCGs

- 2.2.1 The Rule 6 letter identified a number of statutory consultees, statutory undertakers and interested parties with which SoCG were to be prepared. Accordingly, SoCG have been progressed with the parties:
- Essex County Council, Braintree District Council and Chelmsford City Council (as a joint SoCG);
 - UK Health Security Agency/Office for Health Improvement and Disparities (as a joint SoCG);
 - Essex Fire and Rescue Service;
 - National Grid Electricity Transmission Plc (NGET);
 - National Grid Electricity Service Operator (NGESO);
 - The Environment Agency (EA);
 - Natural England;
 - East of England Ambulance Service (EEAST);
 - Historic England;
 - National Highways; and
 - Network Rail.
- 2.2.2 Annex E of the Rule 6 letter identifies the matters to be discussed with these parties. Each SoCG corresponds to these topics where identified to be relevant.

3. Commonality

3.1 Summary

3.1.1 This section of the Statement of Commonality provides a broad summary of the topics covered in the SoCGs submitted at Deadline 1B. It demonstrates where there is commonality in the topics or matters discussed between the Applicant and the parties, or where matters have reached a final position of 'Not Agreed' following discussions.

3.1.2 Table 4-1 lists out the topics covered across the SoCGs and the status of that matter at this deadline (Deadline 1B) for that each stakeholder. Where a topic is not relevant to a particular stakeholder the cell is greyed out. Where the topic is relevant the status is shown as follows:

Cell	Status
	All matters agreed
	Some matters agreed, some matters ongoing
	All matters outstanding
	Some matters ongoing, some matters not agreed
	All matters not agreed
	Some matters agreed, some matters not agreed
	Matter not relevant for that stakeholder

3.1.3 The colours of each cell correspond to the status table in each individual SoCG.

3.1.4 It should be noted that where a broad topic applies to more than one SoCG party the detailed matters discussed within that topic may not be directly comparable or related. Table 4-1 is therefore only intended as a general guide.

3.1.5 Following the summary in Table 4-1, Section 4.2 outlines the principal outstanding matters which are subject to further discussion before a final position can be reached.

Table 4-1: Summary of commonality with relevant stakeholders

SoCG Party	Topic																															
	EIA methodology and adequacy of assessment	Air quality	Biodiversity and ecology, including designated sites	Historic environment, archaeology	Landscape and visual receptors	Noise	Socio-economics	Traffic, transport, PROW, including SRN/protected lanes	Glint and glare	Water environment and flooding	Human health, including living conditions of residents	Agricultural land and soils	Trees, hedgerows and Ancient Woodland	Waste and minerals	Climate change	Battery safety fire and risk	Habitats Regulations Assessment	Water Framework Directive	Other issues relevant to Appropriate Assessment	Cumulatives	Policy compliance	Mitigation and effectiveness	dDCO Articles and Requirements	Effects on existing /apparatus/operations of the statutory undertaker/party	Connection matters	Protective Provisions	Environmental permits	Disapplication of relevant legislation	Impact on Boreham Interchange	Interactions with Proposed A12 to A120 DCO		
Essex County Council, Braintree District Council, Chelmsford County Council	Orange	Green	Green	Green	Orange	Green	Orange	Orange	Green	Green	Orange		Orange	Green	Orange	Green					Orange	Orange	Orange									
UK Health Security Agency	Orange									Orange																						
Essex Fire and Rescue Service															Green																	
NGET																								Green	Green							
NGESO																									Orange							
Environment Agency			Green							Green		Orange				Orange												Green	Green			
Natural England	Green		Green		Green							Green											Green									
EEAST								Orange																Orange								
Historic England	Green			Green																			Green									
National Highways								Orange														Green								Orange	Orange	
Network Rail																								Orange		Orange						

3.2 Positions at Deadline 1B

- 3.2.1 The following section provides a summary of the position reached in each of the SoCG at Deadline 1B. The Applicant intends to undertake further engagement with those parties throughout the examination on matters identified as ongoing.
- 3.2.2 The individual SoCGs provide further detail of the specific matters of discussion between the Applicant and the relevant stakeholders.

3.3 Essex County Council (ECC), Braintree District Council (BDC) and Chelmsford District Council (CCC)

- 3.3.1 The matters recorded in the SoCG have been subject to extensive discussion between the Applicant and the Host Authorities. A number of matters have been agreed between the Parties including those relating to the ecology, water environment, noise and vibration, socio-economics and land use, air quality, and human health.
- 3.3.2 The main matters subject to further ongoing discussion relate to the principle of development, cultural heritage, landscape and visual amenity, transport and access and glint and glare. An updated SoCG will be submitted at Deadline 2.

3.4 UK Health Security Agency (UKHSA)/Office for Health Improvement and Disparities (OHID)

- 3.4.1 Discussions are currently ongoing. A follow up between the Parties is scheduled for early September 2022.

3.5 Essex Fire and Rescue Service

- 3.5.1 Significant progress has been made on agreement of common ground between the Applicant and Essex Fire and Rescue Service in discussions, as reflected in the SoCG. Matters agreed primarily relate to the 24/7 access of the site, the plume assessment, minimum firewater capacity, firefighting infrastructure, the Battery Safety Management Plan and details relating to equipment procurement.
- 3.5.2 At this deadline, there are no outstanding matters subject to further discussion. A signed version will be submitted into the examination at Deadline 2.

3.6 National Grid Electricity Transmission Plc (NGET)

- 3.6.1 Several matters have been agreed through productive discussions between the Parties in relation to details concerning the NGET towers such as fencing requirements, CCTV use, minimum conductor clearance distance, maintenance access requirements and the scope of rating and thermal studies required for the cable crossing location south of Bulls Lodge Substation.
- 3.6.2 At this deadline, the only identified matter subject to further ongoing discussion relates to the provision of unrestricted access to enable NGET to carry out planned re-stringing works. This is subject to further discussion and an updated SoCG will be submitted at Deadline 2.

3.7 National Grid Electricity Services Operator (NGESO)

3.7.1 A draft SoCG has been provided to NGESO (i.e. the version submitted at this deadline) and they are considering the draft provided. It is hoped that a joint version of the SoCG will be submitted at Deadline 2.

3.8 Environment Agency (EA)

3.8.1 Various matters have been agreed between the Parties including water, soils, required consents, matters relating to groundwater and contaminated land and details relating to fisheries, biodiversity and ecology.

3.8.2 The principle matters of ongoing discussion relate to battery safety and pollution, the control of potential spills, pollution prevention, details relating to the Soil Strategy, disapplication of consents, biodiversity enhancement, habitat connectivity and severance, native tree planting and riparian planting.

3.8.3 These matters are subject to further discussion and an updated SoCG will be submitted at Deadline 2.

3.9 Natural England

3.9.1 Matters agreed through discussions between the Applicant and Natural England include environmental enhancements and biodiversity net gain, mechanisms to prevent interference with the River Ter, designated sites, embedded mitigation, EIA methodology, the Habitat Regulations Assessment (HRA), bat roost appraisal, invertebrates, the scope of the Environmental Statement, climate change, landscape and character visual amenity and soil quality.

3.9.2 Several matters are subject to ongoing discussion including the impact on protected species and habitats including badger setts, otter and water vole, wintering and breeding birds and great crested newts. These matters are subject to further discussion and an updated SoCG will be submitted at Deadline 2.

3.10 East of England Ambulance Service

3.10.1 A number of matters are subject to further discussion between the Applicant and East of England Ambulance Service, including means of transport and access, major accidents and disasters, and considerations relating to demand on EEA's services. These matters are subject to further discussion and an updated SoCG will be submitted at Deadline 2.

3.11 Historic England (HE)

3.11.1 Matters agreed through discussions between the Applicant and Historic England include the cultural heritage methodology, the scope of consultation, drainage details, the setting of heritage assets and the assessment of potential impact relating to construction, operation and decommissioning. Additional agreed matters include the scope of deposit modelling required to establish the potential for buried archaeological remains.

3.11.2 Outstanding matters are subject to further ongoing discussion involve agreeing the scope of the Cultural Heritage ES Chapter including the assessment of the significance of Parks and Gardens, the need for a closer

link between the cultural heritage and landscape / visual impact assessment, the choice of the LVIA viewpoints, the positioning of ZTV and further assessment on the impact from buried cables on archaeological remains. An updated SoCG will be submitted at Deadline 2.

3.12 National Highways (NH)

3.12.1 Significant progress has been made on agreement of common ground between the Applicant and National Highways in discussions as reflected in the SoCG. The key matters agreed between the Parties relate to consultation and engagement, the Transport Assessment and Glint & Glare Assessment, access and routing, details relating to the construction phase and impact on surrounding road network

3.12.2 Matters that are subject to ongoing discussion include: sustainable travel modes, construction traffic movements, traffic impact relating to the proposed A12 Chelmsford to A120 construction, the A12 (T) and Boreham Interchange, the proposed use of the private road to/from Bulls Lodge Substation and the overall acceptability of the application. An updated SoCG will be submitted at Deadline 2.

3.13 Network Rail (NR)

3.13.1 Several matters are under continued discussion between the Applicant and Network Rail including the details relating to compulsory acquisition powers and protective provisions. An updated SoCG will be submitted at Deadline 2.