**Longfield Solar Farm – Development Consent Order (DCO)**

**Interested Party Reference No: 20031536**

**Written Representation from Essex Area Ramblers**

## 1 Introduction

The Ramblers work to help everyone enjoy the pleasures and benefits of walking and to enhance and protect the places where people walk. We are committed to encouraging and supporting walking, protecting and expanding public rights of way (PRoW) and protecting the beauty of the countryside and other areas.

We recognise the threat posed to our countryside by climate change, which could severely alter many of our cherished landscapes. We support in principle measures to mitigate this by switching to renewable sources of energy including the use of solar photovoltaic (PV) technology.

When there is a need for large-scale solar PV arrays ('solar farms') these should be sensitively situated so that they do not damage valued landscapes. Planning authorities should seek to avoid permitting such large scale developments in National Parks, Areas of Outstanding Natural Beauty and other areas of high scenic value, instead exercising a preference for already developed areas (e.g. industrial parks and brownfield sites).

Solar farm developments usually need to be fenced to protect the solar panels from damage, and protect people from electrical equipment. Often, proposals seek to fence paths into a narrow corridor. This can spoil the enjoyment of walking on the path, and can mean the path surface is more easily damaged by use.

The Essex Area Ramblers supports the principle of Solar Farms, but are concerned that PRoWs are adequately maintained and where possible improved, during the construction, operation and decommissioning phases and have concerns about the impact on the visual amenity for the users of PRoW.

## 2 The Components of the Scheme

The boundary of the land for which DCO consent is being sought is referred to as the 'Order limits' and comprises a total area of approximately 453ha and is shown in the applicant's figure 2-5.

The 'Order Limits' is the maximum area of land required for the three phases of the scheme, namely, Construction, Operational, and Decommissioning. The 'Order limits' includes the Scheme infrastructure and any land set aside for landscaping, ecological and biodiversity enhancements, and recreational connectivity and access.

Figure 2-5 also shows the proposed locations of the works:

- The majority of the area will be used for solar PV arrays. The maximum height of the highest part of the solar PV arrays will be 3m above ground level. These areas are identified as Potential Development Areas (PDAs);

• The battery energy storage system (BESS) compounds at the southern edge of the DCO limits. The BESS containers will be up to 4.5m in height;

• The Longfield Substation: this will be located adjacent to the BESS Compound and will be a maximum of 13m in height;

• An extension to the existing Bulls Lodge substation, to the south west of the main DCO area, comprising an electricity switching station, including access, and temporary overhead line alterations; and

• Works to lay high voltage electrical cables, between the BESS and Bull's Lodge substation.

## 3 Relevant Policy

This representation makes reference to two national policy documents, NPPF and the Overarching National Policy Statement for Energy (EN-1).

**NPPF:** The development should conform to paragraph 100 at all stages:

*Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.*

**EN-1**

Paragraph 5.9.8: Landscape Impact

*Landscape effects depend on the existing character of the local landscape, its current quality, how highly it is valued and its capacity to accommodate change. All of these factors need to be considered in judging the impact of a project on landscape. Virtually all nationally significant energy infrastructure projects will have effects on the landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.*

Paragraph 5.9.18: Visual Impact

*All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites. The IPC will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project….*

Paragraph 5.9.21: Mitigation

*Within a defined site, adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within that site, design including colours and materials, and landscaping schemes, depending on the size and type of the proposed project. Materials and designs of buildings should always be given careful consideration.*

The **Essex Design Guide** also gives supplementary guidance on the design of Solar farms.

The end sentences of the PROW section includes:
*The character and amenity value of retained PROW should be maintained and buffers between paths and panels should be used. For example, for retained PROW passing within a field used for solar panels and passing between them**,** a width of 5m for the footpath, without newly planted hedgerows, would be required to provide openness and to avoid walkers feeling hemmed in; field-edge PROW should have **a** width provision of 3m and sufficient additional width for growth of any hedge used as boundary features. Individual planted trees for landscape and visual or biodiversity value could also be used at the edges of the buffer.*

## 4 Applicant's Documentation

The applicant has produced an Environmental Statement (ES) and this submission makes reference to three of the Applicant's reports within the ES, namely:

Environmental Statement [PINS Ref: EN010118] Volume 1 Chapter 10: Landscape and Visual Amenity. Document Reference EN010118/APP/6.1 and

Environmental Statement [PINS Ref: EN010118] Volume 2 Appendix 13C: Public Rights of Way Management Plan. Document Reference: EN010118/APP/6.2

Environmental Statement [PINS Ref: EN010118] Volume 4 Non-Technical Summary EN010118/APP/6.4 Revision Number: 1.0

These documents explain the Applicant's assessment on the impact on users of PRoW and the visual impact of their proposal, during the Construction, Operational and Decommissioning phases. It is anticipated that the Construction phase will last two years, the operational phase about 40 years and the decommissioning phase is expected to last two years.

## 5 Existing PRoW

There are a considerable number of PRoW which pass through or run adjacent to the Order limits including part of the Essex Way, which is promoted as a long-distance route which runs for 132km from Epping to Harwich. This route passes along part of the northern edge of the Order limits of the proposed Solar Farm, broadly following the course of the River Ter from the west. It then passes through Fuller Street, before turning south, around the edge of Sandy Wood and continuing east towards Terling, and north to Fairstead.

The Applicant's Figure 10-3, identifies the PRoW which pass through the Order limits or run adjacent to or within close proximity to the Order limits.

## 6 Impact on PRoW Users

### 6.1 Construction phase

The Applicant states that access to all existing PRoW will be retained during the construction phase, with no PRoW closures and a limited number of temporary

PRoW diversions. They intend that the PRoW will be managed throughout the construction phase to ensure that they can continue to be used safely.

The applicant accepts it is important that public safety is maintained when there are moving vehicles along the construction routes within the Solar Farm Site. The proposed construction routes through the Solar Farm Site and the relevant works will be physically separated from existing PRoW using mesh, heras, or other similar types of fencing, to maximise the safety of pedestrians and cyclists within the Solar Farm Site.

The perimeter fence around the Scheme would be implemented early in the construction phase where possible to secure the Order limits. It would consist of 2.5m high deer proof fencing comprising posts and high tensile wire mesh. This would also prevent construction activity in proximity to retained vegetation.

Proposed mitigation and management measures relating to PRoW during the construction phase include maintaining access to/ along PRoW during the construction phase with some diversions, with a minimum width of 1.5m.
This width is too constrained for comfortable walking and passing each other safely and 1.8m should be the minimum width of footpaths provided during the construction phase.

**6.2 Operational Phase**

The applicant states that existing PRoW will be unaffected during the operational phase and all PRoW will be reinstated after the construction stage is complete. The scheme is expected to be operational for about 40 years.

All PRoW will have a minimum 5m spacing (each way) between the centreline of the PRoW and any infrastructure such as solar PV fencing, and located within a minimum 10m wide undeveloped passageway. This will avoid the tunnelling issue that the Ramblers, ECC and Essex Police raised as a potential concern during statutory consultation. The Ramblers consider that these corridor widths are acceptable.

The applicant does not specify the type of fencing to be used during the operational phase but their Landscape and Visual Amenity report specifies a 2.5m high tensile wire mesh perimeter fence with a 3m high steel palisade fence enclosing the substation and the Battery Energy Storage System (BESS), and the Ramblers assume that the 2.5m high wire mesh fence will be used at the edges of all the PRoW routes.

The Ramblers request that palisade fencing is not used at the edges of PRoW routes as it is very intrusive. The fencing at the edges of PRoW routes should be no more intrusive than wire mesh fencing at a maximum height of 2.5m. The visual effect must be mitigated by hedge planting which should not encroach on the minimum footpath corridor of 10m.

The applicant should commit to keeping the PRoW routes open at the end of the operational phase.

### 6.3 Decommissioning

Decommissioning is expected to take between 12 and 24 months and for the purposes of the assessment is expected to occur after approximately 40 years of operation of the Scheme.
During the decommissioning phase, the PRoW are intended be managed in the same way as in the Construction phase. There will be no PRoW closures although some minor diversions are likely to be required to provide safe access across the Order limits whilst decommissioning activities are taking place. These diversions will be temporary and are expected to be similar in nature and duration to those during the construction phase.

A Decommissioning Environmental Management Plan and a Decommissioning Travel Management Plan will be required to be produced prior to commencing decommissioning activities on site.

## 7 Landscape and Visual Impact

### 7.1 Methodology

A Landscape and Visual Impact Assessment was undertaken by the applicant as part of the ES. The Assessment identifies the sensitivity and overall significance of landscape and visual impacts within the identified study area.

Visual receptors in the area include recreational users, such as the Ramblers. Mitigation has been included within the Scheme design to reduce the landscape and visual effects of the Scheme.

### 7.2 Construction Phase

The applicant accepts that people walking on the Essex Way, which is located on the boundary of the Order limits but with views into it, would experience adverse effects of moderate significance, resulting from construction from locations west and south of Fuller Street. These effects are considered by the applicant to be significant. However, users of other sections of the route, such as within the River Ter Valley from the north east of the study area, would experience effects which are not considered significant, due to the enclosed landform and intervening vegetation.

The assessment considers that people walking on the local PRoW network within the Order limits would typically experience major to moderate adverse effects, which are considered to be significant. These effects would result from the introduction of construction activity at close range across a wide extent of a view. People walking on the wider PRoW network beyond the Order limits would experience effects which are not significant due to the intervening landform and vegetation.

### 7.3 Operational Phase (Winter Year 1 – 2027)

Operational phase impacts have been assessed in both the first year during winter (when there are no leaves on vegetation) and in Year 15 during summertime (best case, after planting has established).

The applicant accepts that people walking on the Essex Way would experience moderate adverse effects from locations west and south of Fuller Street and from the edge of Sandy Wood during the 1st year of operation of the Scheme. These effects are considered to be significant. However, other sections of the route, such as within the valley of the River Ter from the north east of the study area, would experience no significant effects.

During the operational phase, people walking the local PRoW network within the Order limits would typically experience major to moderate adverse effects, considered to be significant. This would result from the introduction of solar arrays at close range.

The proposed Longfield Substation, BESS and Bulls Lodge Substation Extension would not be visible from close range. People walking on the wider PRoW network beyond the Order limits during year 1 of operation would experience no significant effects due to intervening landform and vegetation.

### 7.4 Operational Phase (Summer Year 15 – 2042)

The assessment assumes the establishment of the planted vegetation in Year 15 and the benefit of summertime leaf.

The assessment considers that people walking on the Essex Way would experience minor adverse effects, which are considered to be not significant. The level of effect is reduced from Year 1 because existing vegetation and established planting would be in leaf. This would filter views of the PV Arrays such that the Scheme would be unobtrusive.

However, within the Order limits, people walking on PRoW 213_19 and PRoW 113_25 would experience major adverse effects, because of close range views of the proposed PV Arrays in the immediate foreground. These effects are considered significant by the applicant.

People walking on the wider PRoW network beyond the Order limits boundary would experience no significant effects resulting from operation during year 15.

### 7.5 Decommissioning

The applicant maintains that views of decommissioning from the Essex Way would be screened by proposed and existing vegetation such that the activity would be unobtrusive and therefore the resulting effects are considered to be not significant.

However, people walking on Public Rights of Way (PRoW) 213_19 within the Order limits would experience moderate adverse effects due to close range views of decommissioning. These effects are considered to be significant, albeit short term, lasting only a number of weeks.

People walking on PRoW 213_18 and PRoW 113_25 within the Order limits would experience major adverse effects due to close range views of decommissioning.

These effects are considered to be significant, albeit short term, lasting only a number of weeks.
People walking on the wider PRoW network beyond the Order limits would experience non-significant effects resulting from decommissioning since views would be screened or heavily filtered by intervening vegetation.

## 8 Conclusions and Objection

The Ramblers accept that there will be some disruption to the PRoW and visual impact during the Construction and Decommissioning phases but are satisfied that the applicant intends to mitigate their impact as far as is practical, although footpaths should have a minimum width of 1.8m to allow for people to pass each other safely.

The Ramblers also accept that during the operational phase, all the PRoW will be reinstated with adequately wide corridors, provided that all the mitigation measures described in their Environmental Statement are implemented.

However, the Ramblers are very concerned that the Applicant has identified that there will be a significant visual impact to users of some of the PRoW during the operational stage lasting 40 years.

**The Ramblers therefore object to the application because the siting of the PV panels does not minimise the harm to the landscape as required by paragraph 5.9.8 of EN-1 and consider that the visual effects outweigh the benefits of the project. (Paragraph 5.9.18 of EN-1).**

Should the DCO be granted, the Ramblers request that :

- Footpaths should be at least 1.8 metres wide and bridleways or byways should be at least 5 metres wide to allow for users to pass each other easily.
- Trees, hedges or other plants should be planted so that fences are screened from path users and do not spoil the experience of using the path. This may mean that more width is needed to leave enough space for both planting and the path.
- The solar farm developer should provide plans for maintenance of plants and the PRoW so that the path condition and widths are maintained.
- Close boarding or metal palisade-type fencing, should not be used. The fences should be open mesh fencing, as they are less intrusive or intimidating for path users.
- Materials and designs of buildings and fencing should always be given careful consideration, including colours and materials.
- The applicant should commit to keeping the PRoW routes open at the end of the operational phase, and

- They are kept informed of progress on the scheme and be consulted as detailed plans and construction details are produced and the project is implemented.

Graham Reeve MICE, CEng, MSc, BSc.

Area Walking Environment Officer ,

Essex Area Ramblers

August 2022

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**Summary - Written Representation from Essex Area Ramblers**

The Ramblers supports the principle of Solar Farms, but are concerned that PRoWs are adequately maintained and where possible improved, and have concerns about the impact on visual amenity.

This representation makes reference to NPPF and EN-1 and to three of the reports within the ES.

There are a considerable number of PRoW which pass through or run adjacent to the Order limits.

The Ramblers accept that there will be some disruption to the PRoW during the Construction and Decommissioning phases, but are satisfied that the applicant intends to mitigate their impact as far as is practical.

The Ramblers accept that during the operational phase, all the PRoW will be reinstated with adequately wide corridors, provided that all the mitigation measures described in their ES are implemented.

The Ramblers are very concerned that the Applicant has identified that there will be a significant visual impact to users of some of the PRoW during the operational stage.

**The Ramblers therefore object to the application because the siting of the PV panels does not minimise the harm to the landscape as required by EN-1 and consider that the visual effects outweigh the benefits of the project.**

Should the DCO be granted the Ramblers request that :

- Footpaths should be at least 1.8 metres wide and bridleways or byways should be at least 5 metres wide.
- Trees, hedges or other plants should be planted so that fences are screened from path users.
- The developer should provide proposals for the maintenance of plants and the PRoW.
- Close boarding or metal palisade-type fencing should not be used.
- Materials and designs of buildings and fencing should be given careful consideration.
- The applicant should commit to keeping the PRoW routes open at the end of the operational phase and,
- The Ramblers are kept informed of progress on the scheme and be consulted as detailed plans and construction details are produced.

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