



TERLING AND FAIRSTEAD PARISH COUNCIL

Parish Clerk: Frankie Killby

18/08/2022

Longfield Solar Energy Farm (application no EN010118) -Interested Party reference 20031557

This is Terling and Fairstead Parish Council's (T&FPC) response to applicant's comments on Relevant Representations (RRs) included at Pages 8-14, using the same order as in the applicant's response.

In addition, we have taken the opportunity to consider other IPs comments which we now seek to place before the Examining Authority (EA).

In the pre-examination stage of the consultation we received 58 individual comments from the wider community.

Alternative site selection

We continue to suggest that site selection criteria has preferred to not consider ALL suitable alternatives. We request the EA robustly challenges the applicant on its continued position and preferences as to the Longfield site AND the reasons to discount them.

Amenity and Recreation

No permanent legacy/community assets included in the proposals

We acknowledge the positive response from applicant as to CBF, employment plans during the construction and operation of the scheme. However, there are no proposals for permanent community legacy assets that have been designed and promoted within the scheme suitable for a rural setting. This is a missed opportunity as opined by other IPs. We request the EA question how such provision may now be included/conditioned which is complementary to the submitted scheme and the applicant engage again with the local communities on the suggested opportunities.

BESS

The lithium ion technology proposed has inherent stability issues as evidenced by explosions both overseas and in the UK. We are told the BESS facility will be remotely monitored.

We are still to be convinced that the size of the BESS at scale (which we understand is to be the largest in the UK) and that the associated risks are low as the applicant claims.

We would request the EA brings our continued concerns, along with other expert IPs, to the attention of the applicant.



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Climate Change

We note the applicant's commentary. We also note other IPs with expert knowledge continue to challenge the applicant's response. We would request the EA brings a balance to these opposed positions in his recommendations to the Secretary of State.

Compulsory Acquisition

We now understand the applicant's technical issues and the import of the DCO process to permit such acquisition(s).

Construction

The applicant's commentary remains evasive. As the many thousands of tons of topsoil is to be removed and relocated to permit the preferred layout and aspect of the UV panels (including the avoidance of glint and glare by analysis in the applicant's EA submission), what guarantees/ bond may be given to the restoration of food producing land? The EA is requested to challenge the applicant on the physical relocation of soil and the expected recovery of food-producing land, and then evidenced re-grading use of restored food production land.

We note the hours of work are restated and our previous comments apply. As the project will proceed at night floodlighting will be required. Will there be construction camp living accommodation on-site and where? Workers travelling outside these hours would suggest the community is to have traffic flows 14 hours a day, 6 days a week. May the EA seek to bring hours of work in line with local conditions, not commence charging or running of vehicles outside those hours and seek clarity on said accommodation.

Cumulative Impacts

Other DCO's within the wider parish

We note what the applicant says on these cross engagements. Are there records of these discussions/minutes for public review? We would like to review such papers.

Longfield and other solar schemes affecting UK food security

We note the applicant's comments. Other IPs with expert knowledge and understanding have robustly challenged this position and we defer to their input and opinion.

Decommissioning

Our earlier comments and concerns have not been allayed, especially the decommissioning of the BESS and its infrastructure. (See our comments on Need.)



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We await confirmation who is/are to be the certifying compliance authority(ies) both for planning conditions as may be imposed by the EA and the ultimate restoration of the agricultural use, and the quality assurance of that reconstituted soil.

Design

The applicant's position is noted. The EA is requested to consider the size of the proposal, its ground coverage, the BESS, associated fencing and infrastructure. The efforts and proposals to mask the impact by landscape design are limited. There could easily be community assets designed into the scheme, eg cycle routes, to further mitigate its intrusion, in effect the applicant is proposing a gated and deer-fenced industrial complex and BESS.

The perimeter use of high-level CCTV, floodlighting and on-site security further demonstrates it is an industrial plant complex.

We still are of the view it is industrialisation of an agricultural rural area.

LVIA

We note the applicant's response refers to submitted DCO documents and chapter headings.

May we request the EA's series of site visits looks at the totality of the impact on both visual and associated amenity in this attractive part of Essex and that TPF&C are invited to attend these visit(s). Other IPs may well invite the EA to review their own expressed views on LVIA.

Need

This is fundamental to the DCO and the examination. Other IPs with expert knowledge major on the arguments for and against as presented to the EA and we defer to their guidance and opinions.

We would ask that the EA request the applicant enlarge on the "element of agriculture that may be retained". The response presented in the RRs remains vague and should be quantified and conditioned.

On the elements of habitats to be created within the order limits, how may the management and biodiversity plan(s) be communicated to the wider community? May the EA ascertain who is to be the monitoring authority for the duration of the scheme, its decommissioning and in perpetuity.

Other

We have reviewed the Annual Report and Accounts 31 /12/2022 for Longfield Solar Energy Farm Limited (co number 11618210) and note it remains a special purpose vehicle.



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The Directors report (of 31/12/2022) states that the forecasts are dependent on EDF Energy Renewables Limited not seeking repayment of sums due to the group of £3.398 million. The Directors acknowledge they can “place no certainty that this support will continue.... they have no reason to believe it will not do so.”

We would request the EA endeavours to provide certainty of performance for the period of the DCO and decommission. Again, we ask the EA to promote the need for a performance bond until the decommissioning is completed.

We note from the applicant’s response App 015 of the intention “Once the DCO for the Scheme is granted the final investment decision would be made by the Applicant. Following a final investment decision, the owners will commit funding to the Applicant for financing of the construction phase of the Scheme in accordance with their respective obligations under the shareholders agreement entered into by them.”

If the company’s ambition is to become a wholly owned subsidiary (From AOO 015) within the EDF Group on receipt of an acceptable DCO approval, Longfield should state as much. That would allay many concerns within the wider community. Should that not happen, what other performance certainty is the applicant set to bring forward?

Socio Economics

The applicant now acknowledges the BESS is to be used for battery storage from all sources of electricity production, not merely that generated from Longfield. As such it is a national infrastructure facility available to operate 24/7/365. We would ask the EA to ensure strict sound limits at the boundary are conditioned to the industrial areas of the BESS compound.

Transport and access

We note the proposed roadworks to provide access to the scheme. Are these improvements to be permanent and to adoptable standards? Are there set to be any weight limits or hours of operation?

Will the speed limit be 30mph? (even 20mph). Presently the roads are not restricted so speed of 60mph is the upper speed limit on these very constrained roads.

May the EA please request the applicant to clarify.

We note what the applicant now says about incorrect plans attached to leaflet distributed to the community in November 2021 which meant a further period of consultation was required expiring 8/2/22, a helpful correction.



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Additional comments

1. We have noted other IPs to this DCO, and for other Solar schemes that have been consented by Local Authorities, a discounted tariff incentive is provided to the local community. We would be keen to advance this with the applicant.
2. The Parish Council would welcome the opportunity to accompany the EA on any site visit(s)
3. The Parish Council expects to be represented at the live streaming event(s) of the examination.
4. The Parish Council would welcome informal recreation facilities eg footpaths, be established to provide safe, clean agrochemical-free areas, and a percentage of income generated be used to substantially "green" the parish, including improving/undergrounding domestic electricity supply, better mobile phone service, installation of solar heating in swimming pool, village hall, etc, and car charging facilities.

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