

Longfield Solar Energy Farm (application no EN010118)

Interested Party reference 20031508

I am a long-term resident of the Terling and Fairstead community.

I have considered the applicant's comments on Relevant Representations (RR)s included at Appendix B at pages 47-88 and respond accordingly.

The Sec of State originally called for sites in single ownerships that could support a solar farm of the area now within the DCO application. It is now clear Longfield scheme delivery will require further land acquisition, either by negotiation or by compulsory acquisition powers (CPO) as may be available after the possible approval by Sec of State. The Examining Authority (EA) is requested to advise in his recommendations which additional land has now been secured by agreement and those areas that will be advanced by CPO.

I have still to be convinced by the Longfield proposals for this a, single DCO scheme at scale(sic) is both relevant and is a significant contribution to the national energy requirement and furthermore is in kilter with NPPI guidelines and adopted policy taken as precedent in other nationally significant infrastructure applications as well as those determined on appeal by the Planning Inspectorate.

Grid connection

If the DCO is successful, then Bulls Lodge sub stations appears the pragmatic connection point.

Alternative sites

The focus of the applicant's RRs is on this area of Essex but has failed to robustly analyse and consider other sites in Essex which appear to me and other IPs to be more suitable, one of which at Bradwell is already under the control and stewardship of EDF.

Other IP's comment on land classification and loss of food production capacity in the UK set against the future energy requirements. May the EA robustly challenge the applicant's site selection criteria for other specific sites and the applicant's choice not to promote a DCO in those locations.

Community Benefits and Amenity

It is disappointing the applicant prefers not to design in any legacy assets that may be of benefit to the community, even for 40 years. May the EA seek to challenge the applicant on the scope and provision of such amenities in addition to upgrades to PRow.

BESS

For all the words used and the references the applicant makes, there appears to be continued denial that these facilities with the proposed technology have exploded in the UK and overseas. This is set to be the largest BESS in the UK. I would request the EA to robustly challenge the applicant and such experts as they may bring forward, including Essex Fire and Rescue Service, that the risk is "low". The remote monitoring of these systems is a source of further concern.

Climate Change

I note many other IPs have challenged to applicant on this and I defer to their expert analysis. The complementary farming and its quantum and extent should be conditioned in any DCO consent granted.

As considerable excavation of the topsoil will be required to facilitate the orientation of the solar panels, I would suggest the quality of the returned soils and landscaping needs to be robustly conditioned by the EA.

Construction

I note Terling and Fairstead Parish Council (T&FPC) have made recommendations to the EA on revised hours of work, access, construction camp accommodation.

In addition, T&FPC have commented on traffic access via Cranham Road and the permanency of improvements and speed. I further note what the applicant says in Transport and Access section of the RRs.

I support those requests to the EA.

Cumulative impacts

I note what the applicant has to say. To date the community has seen no engagement or liaison evidenced. May the EA seek clarity and commitment to formalise future cross engagement and communication involving the communities set to be affected.

Decommissioning

Who is set to be the enforcing authority(ies) for ensuring compliance with the applicant's stated plans and reinstatement of agricultural land? May this be advanced at examination before the EA?

Size

The economic model for both the uv panels and the associated BESS at scale(sic) remains my fundamental concern for the choice of this site. The ability to charge the BESS from solar (during the day) as well as the nighttime charging from nuclear (at night) continues to be glossed over. This is the main economic driver for the quantum and scale of the BESS and Longfield should produce evidence of this at examination. The BESS will operate 24/7/365 and generate noise from the process as well as cooling systems for the battery containers; a boundary noise condition should consider to be imposed by the EA.

Since the Longfield application, solar UV power panel schemes are being advanced within the wider Braintree area (BDC) and are progressing planning applications with the local planning authority. When combined, these appear to have the capacity of that envisaged at Longfield, with less land take.

I would ask the EA to challenge why Longfield application has to continue to be at this scale set against its stated power generating capacity in the proposed DCO under examination. These consented schemes demonstrate the contribution already established to HMG energy targets and the need for additional capacity from this sunny area of Essex should NOW be evidenced to the EA by Longfield in this DCO under examination.

Socio economic

I am heartened at the training initiatives envisaged as well as school visit liaison. As this DCO is set to be one of the biggest in UK I suggest the establishment of a visitor centre (perhaps in a similar container to the BESS) to promote solar power may complement the applicant's community initiatives.

In summary I acknowledge

HMG policy is clearly to protect valuable farmland from change of use.

The NPPF provides guidelines that clearly direct planners to protect valuable food producing land.

HMG policy on energy generation and the procurement of sites with capacity at scale to contribute to that policy, originally mandated to be in a single ownership, cannot be satisfied here without CPO powers being consented.

The Longfield proposals have made no serious attempt to consider alternative sites, and there are other of suitable areas in Essex which are not on valuable farmland (evidenced by other IPs), close to established national grid distribution infrastructure.

I have yet to be convinced by the Longfield proposals in this DCO for this a, single scheme at scale(sic) is both relevant and is a significant contribution to the national energy requirement and furthermore is in kilter with NPPI guidelines and adopted policy taken as precedent in other nationally significant infrastructure applications as well as those solar uv panel farm schemes determined on appeal.

Additional Comments

I would welcome the opportunity to attend site visit(s) by the EA.