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To: Longfield Solar Farm
Subject: ExQ1

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ExQ 1.2.5

This question is directed at the Solar Campaign Alliance (SCA) which I Chair. The statement made is that the applicant's assessment of the impacts on diversity are inadequate. In my written representation I will be addressing the issue of biodiversity in more depth. The key point that the SCA would make is that there is little to no evidence of the impact of solar farms on biodiversity (BSG Ecology 2019) until there is adequate research on the effects of solar farms on biodiversity the SCA believe it would be premature to approve schemes which could be environmentally damaging.

The SCA have analyzed the ES survey details and note that a survey of reptiles is recommended in 2022 and this is not available, the badger survey is confidential and not available, the recommendation for birds is that a significant number of extra surveys are required. The Breeding Bird Survey notes that the construction phase has the potential to affect the breeding bird assemblage and the loss of arable farmland will have an impact on the birds it supports. Flora surveys were carried out in 2020 but are only valid for 18 months and not all sites were surveyed. The report notes there is no scientific literature available on the impact to bats from solar farms in fact two studies have indicated a negative impact.

The SCA note there is 1 SSSI near the proposal and 31 non statutory sites within 2km. There are also considerable areas of valuable woodland within and near the site boundaries, There is a reference to an OLEMP but this is not available for comment.

The application refers to a BNG of 79% a figure that the SCA cannot justify and evidence will be provided in a paper on the BMG metric. It must be noted that the BNG calculations do not accord with BNG trading rules as set out in JPO 39.

In summary the notes above are the reasons the SCA state the applicant's assessment of the impacts on biodiversity are inadequate. BNG trading rules must be adhered to and more surveys are needed, existing surveys do indicate possible ecological damage. The SCA note that propose mitigation could take place in an agricultural context and funded though the government's ELMs scheme.

ExQ 1.9.4 The question has been addressed to the applicant "...sought to minimize the impact on BMV land and what alternatives have been considered. Explain how the loss of 156 ha of BMV land would be an effective use of land ref. Para. 5.10 of NPS-EN1" .

The order limits for the Longfield Solar Farm are 453 ha (nearly 4 times the figure above) and according to the definition of BMV recently confirmed by the Secretary of State George Eustice the whole area is BMV. This combined with all the other schemes in the system will lead to a very significant loss of valuable farmland which in turn will impact the UKs food security this must be a very serious issue in making in planning decisions.

In the current food supply situation, the loss of BMV land is not an effective change of land use. The inference is that the change is temporary the reality is that no one knows what will happen after 40 years and the likelihood is that the site will become a brownfield area. In any event 40 years without food production will have a big impact.

The question is asked have alternative sites have been considered. It would appear not. The developers say there is no suitable land to the north and use the strategic ALC maps to show this. These are the maps that show the current Longfield site as Grade 2 and in fact there are areas of lower grade land on these sites. The developer further says land to the south is nor convenient as they could not have a contiguous site because of various obstacles. There are many solar farms in existence that are not contiguous and easily connect together. No attempt has been made to consider this possibility. Overall, there are 30000 ha of poorer grade land in the County of Essex. The fact is a one owner site is a convenient way for the developer and alternatives have not been sought, Developments should not be permitted on BMV land especially when alternatives are available. I will provide further evidence in my written submission.

Prof. Mike Alder
Chair SCA
27/7/22