

Date: 16 August 2022
Our ref: 401689
Your ref: EN010118



Rory Cridland
The Planning Inspectorate

Customer Services
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BY EMAIL ONLY

Dear Rory Cridland

NSIP Reference Name / Code: Longfield Solar Farm / EN010118

User Code: 20031506

Thank you for your consultation on the above dated 26 July 2022 which was received by Natural England on 26 July 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Written Representation

PART I: Summary of Natural England's advice. We are satisfied that there are no areas of concern regarding nature conservation interests within our remit in relation to this proposal.

PART II: Annexes including Natural England's evidence and answers to the ExA's first written questions

Content

Part 1 – Introduction

Part 2 – Conservation Interests

Annexes - ANNEX A: Designated site maps and information

PART 1 INTRODUCTION

1.1. Purpose and structure of these representations

- 1.1.1. These Written Representations are submitted in pursuance of rule 10(1) of the Infrastructure Planning (Examination Procedure) Rules 2010 ('ExPR') in relation to an application under the Planning Act 2008 for a Development Consent Order ('DCO') for the Longfield Solar Farm ('the Project') submitted by Longfield Solar Energy Farm Limited ('the Applicant') to the Secretary of State.
- 1.1.2. Natural England has already provided a summary of its principal concerns in its Relevant Representations, submitted to the Planning Inspectorate on [01 June 2022]. This document comprises an updated detailed statement of Natural England's views, as they have developed in view of the common ground discussions that have taken place with the Applicant to date. These are structured as follows:
 - a. Section 2 describes the conservation designations, features and interests that may be affected by the Project and need to be considered.
 - b. Section 3 comprises Natural England's submissions in respect of the issues that concern it. This submission cross-refers to, and is supported by, the evidence contained in the Annexes.
 - c. Section 4 is a dedicated section answering the Examining Authority's written questions which were asked on [26 July 2022], cross-referenced to the rest of this document.
 - d. Section 5 provides a summary of Natural England's case.
 - e. The Annexes contain evidence referred to in the main body of these Representations.

2. CONSERVATION DESIGNATIONS, FEATURES AND INTERESTS THAT COULD BE AFFECTED BY THE PROPOSED PROJECT

The following is a brief summary of the interest features of the relevant designated areas of concern in this matter. Designation citations and maps are included in Annex A

2.1. International conservation designations

2.1.1. Essex Estuaries Special Area of Conservation (SAC)

The Essex Estuaries is the second largest estuarine site on the east coast of England. It contributes to the essential range and variation of estuaries in the UK as the best example of a coastal plain estuary system on the British North Sea coast. Covering an area of 472 square kilometres, this relatively undeveloped estuary complex contains the major estuaries of the Colne, Blackwater, Crouch and Roach, as well as extensive open coast tidal flats at Foulness, Maplin and the Dengie. The intertidal mudflats and sandflats within the European marine site support a wide range of typical estuarine and marine communities on sediments ranging from the finer estuarine muds and muddy sands to coarser sands and gravels.

The SAC is 9.35 km to the south-east of the Order limits. After the submission of the Habitat Regulations Assessment (EN010118/APP/6.7), Natural England is satisfied on the basis of the information submitted that, for the purposes of the Habitats Regulations, the project will not have a likely significant effect on Essex Estuaries SAC, alone or in combination with any other plan or project.

2.1.2. Blackwater Estuary (Mid-Essex Coast Phase 4) Special Protection Area (SPA)

The Blackwater Estuary SPA covers an area of 4395.15 hectares. The Mid-Essex Coast SPAs support a diverse range of species. These include internationally important populations of breeding birds, as well as internationally important assemblages of wintering waterfowl, present in both nationally and internationally important numbers. The Mid-Essex Coast comprises an extensive complex of estuaries and intertidal sand and silt flats, including several islands, shingle and shell beaches and extensive areas of saltmarsh.

The SPA is 9.35 km to the south east of the Order limits. After the submission of the Habitat Regulations Assessment (EN010118/APP/6.7), Natural England is satisfied on the basis of the information submitted that, for the purposes of the Habitats Regulations, the project will not have a likely significant effect on Blackwater Estuary (Mid-Essex Coast Phase 4) Special Protection Area (SPA), alone or in combination with any other plan or project.

2.1.3. Blackwater Estuary (Mid-Essex Coast Phase 4) Ramsar

The site, one of the largest estuarine complexes in East Anglia, consists of intertidal mudflats fringed by saltmarsh, shingle and shell banks, and offshore islands. Surrounding terrestrial habitats include a sea wall, grassland, ancient grazing marsh and associated fleet and ditch system. This rich mosaic of habitats supports an outstanding assemblage of nationally scarce plants and a nationally important assemblage of rare invertebrates. Internationally and nationally important numbers of waterbirds winter at the site.

After the submission of the Habitat Regulations Assessment (EN010118/APP/6.7), Natural England is satisfied on the basis of the information submitted that, for the purposes of the

Habitats Regulations, the project will not have a likely significant effect on Blackwater Estuary (Mid-Essex Coast Phase 4) Ramsar, alone or in combination with any other plan or project.

2.2. National conservation designations

2.2.1 River Ter Site of Special Scientific Interest (SSSI)

The River Ter is representative of a lowland stream with a distinctive floor regime. It is flashy, draining a low-lying catchment on glacial till, and has a very low base-flow discharge but high flood peaks; daily, monthly and annual flow variability are also high. In addition the site demonstrates characteristic features of a lowland stream including pool-riffle sequences, bank erosion, bedload transport and dimensional adjustments to flooding frequency.

The proposed scheme boundary is immediately adjacent to the River Ter Site of Special Scientific Interest (SSSI) notified for its fluvial geomorphology. It is important the Scheme does not interfere with the natural process of the river. Subject to the applicant satisfying EA concerns, Natural England agrees that there is no major impacts. We note the 100m near the SSSI is included for habitat enhancement and there is no development planned adjacent to the River Ter. Infrastructure will not be located within 8 m of a watercourse and there are no anticipated mechanisms for sub-surface/groundwater run-off/flow patterns.

2.2.2 Blake's Wood & Lingwood Common SSSI and Woodham Walter Common SSSI

3.73 km to the south of the Order limits and 4.35 km to the south-west of the Order Limits respectively.

Satisfactory information (section 5.2.4 -Environmental Statement, Volume 2,Appendix 8B: Preliminary Ecological Appraisal, Document Reference EN010118/APP/6.2) has been submitted with regard to environmental impact assessment to allow Natural England to advise the Secretary of State that the proposal will not damage the notified interest features of these nationally designated sites.

2.3. Protected Species

Natural England has not undertaken a detailed review of species surveys and mitigation as the applicant has advised that no licences are required. Natural England welcomes confirmation in chapter 8 of the environmental statement that Natural England's standing advice has been/will be followed in relation to species licencing.

2.4. Non-designated interests and features of concern

2.4.1. Natural England refers you to our Standing Advice on ancient woodland

[REDACTED]

2.5 Impacts on soils (including “best and most versatile land”)

We welcome that a detailed survey was undertaken to identify areas for which no land classification was available. The survey was undertaken in accordance with MAFF (1988) guidelines. The assessment of impacts on soils during construction, operation and decommissioning respectively is detailed in ES Chapter 12: Socio-economics and Land Use. Adverse impacts would be minimised through adoption of measures such as those set out and in accordance with the Outline Soil Resource Management Plan (SRMP) which is appended to the OCEMP (OCEMP) [EN010118/APP/7.10]. The Outline SRMP and SRMP will follow the principles of best practice including the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, as previously requested.

2.6 Biodiversity net gain

- 2.6.1 We note that a requirement (#9) is included in the dDCO to deliver the ecological mitigation and enhancement in the ES through implementation of the LEMP (An Outline Landscape and Ecology Management Plan (LEMP) [010118/APP/7.11]).

Natural England's concerns and advice

2.7 The principal issues

Natural England did not identify any major issues in its Relevant Representations

2.8 Conclusions

- 2.8.1 Natural England does not consider that there are any areas of remaining concern regarding nature conservation interests within our remit in relation to this proposal.

2.9 The questions received

- 2.9.1 In its Rule 8 letter dated [26 July 2022], the Examining Authority asked Natural England a question:

1.6.9 *Please confirm whether you are content that all other developments, plans and projects which have potential to result in cumulative or in combination effects together with the Proposed Development have been identified by the Applicant (Appendix 5A [APP-055]) and appropriately assessed in the Environmental Statement and Habitats Regulations Assessment?*

Natural England is not aware of any other plans and project which are likely to result in cumulative or in combination effects together with the proposed development.

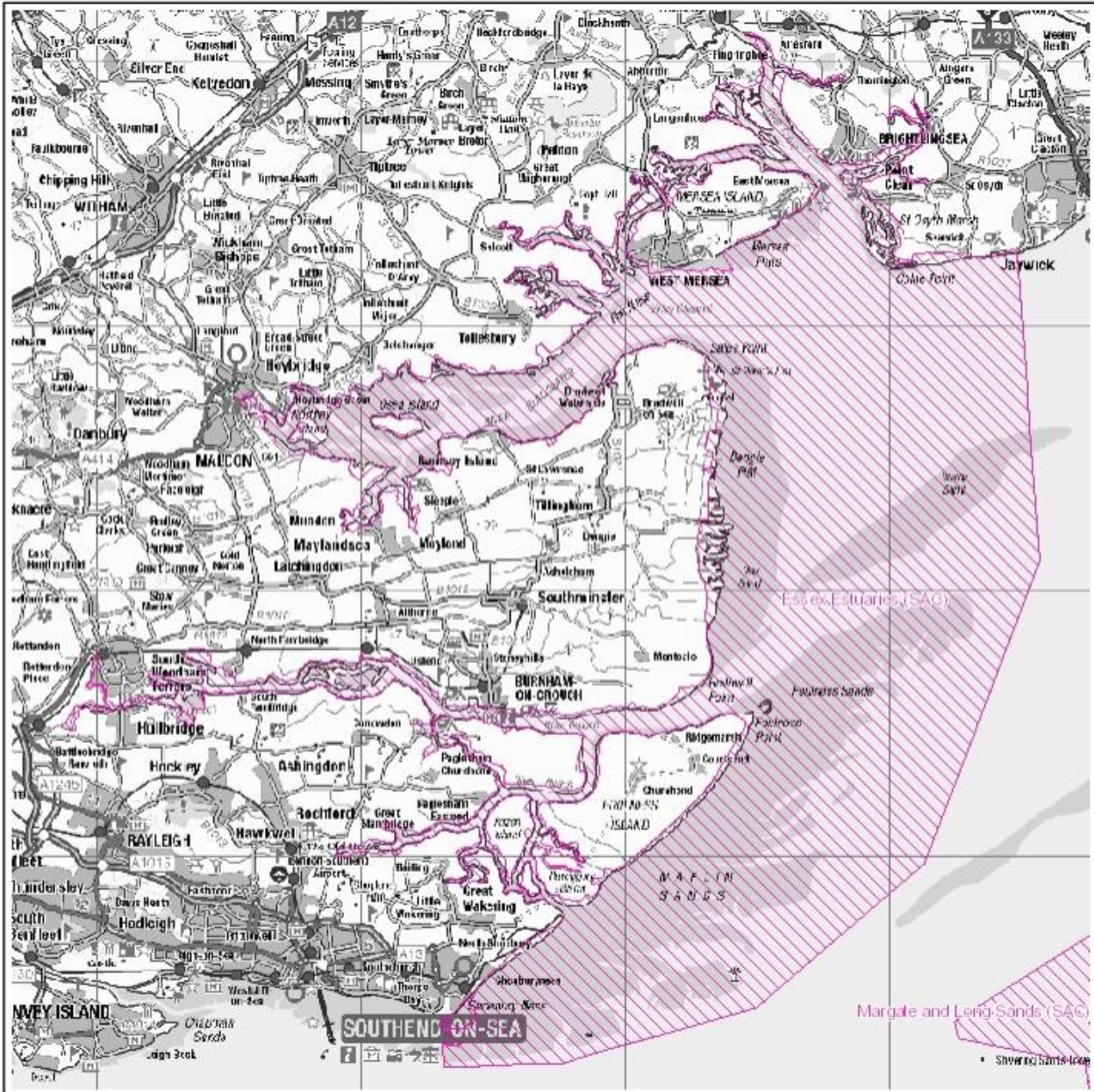
Part II: Annexes

ANNEX A: Designated site maps and information

Essex Estuaries Special Area of Conservation (SAC)
Blackwater Estuary (Mid-Essex Coast Phase 4) Special Protection Area (SPA) and
Ramsar

River Ter Site of Special Scientific Interest (SSSI)
Blake's Wood & Lingwood SSSI
Woodham Walter Common SSSI

Essex Estuaries Special Area of Conservation (SAC)



Key

 Special Areas of Conservation England © Natural England



Map Produced from WebMap2 on 08/08/22

Map Projection: British National Grid

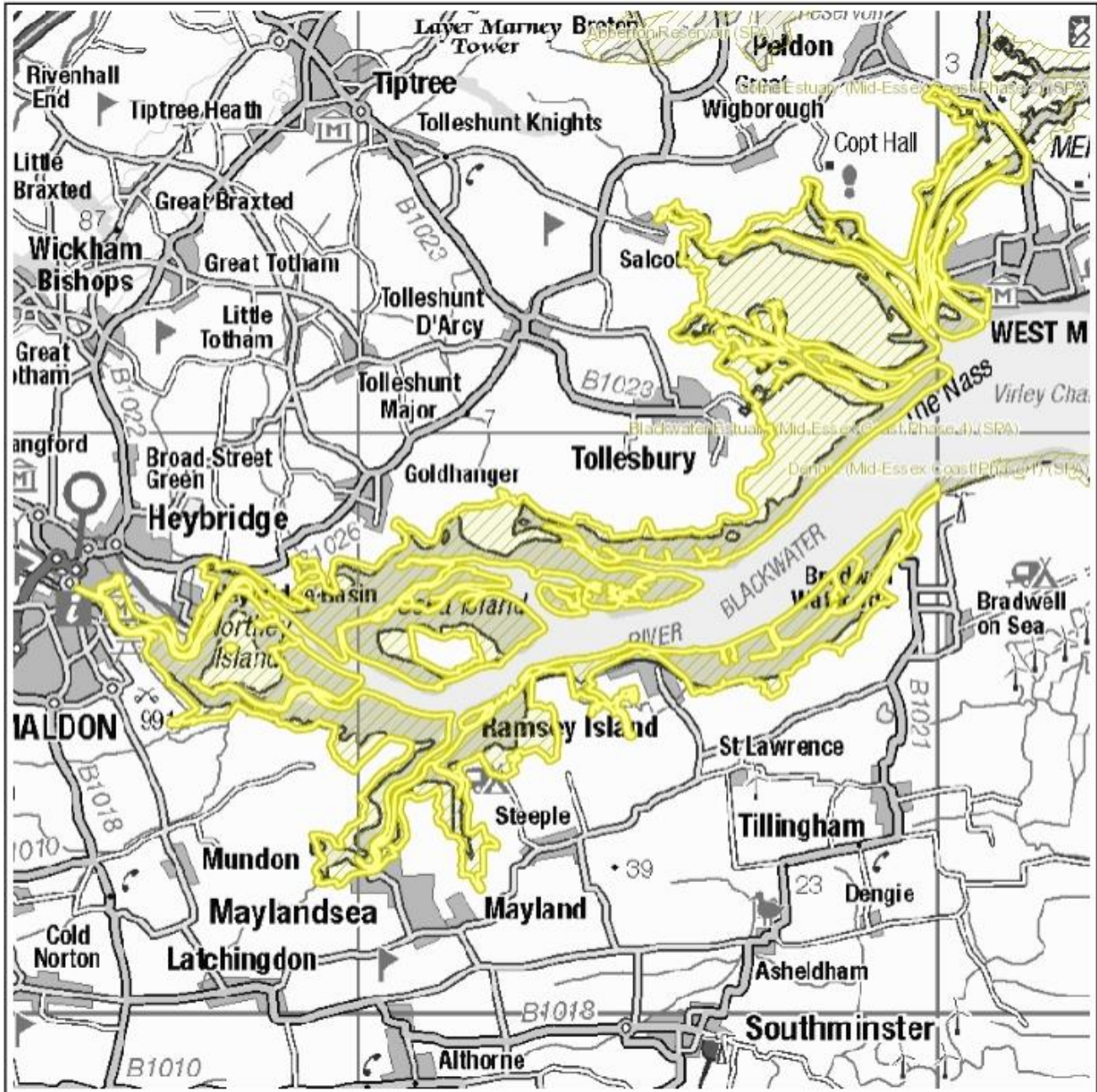
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Essex Estuaries Special Area of Conservation (SAC)

Summary information (JNCC) Link - [Essex Estuaries - Special Areas of Conservation \(jncc.gov.uk\)](https://jncc.gov.uk/essex-estuaries-special-areas-of-conservation)
 Conservation Objectives Link -

Blackwater Estuary (Mid-Essex Coast Phase 4) Special Protection Area (SPA)



Key

 Special Protection Areas England © Natural England

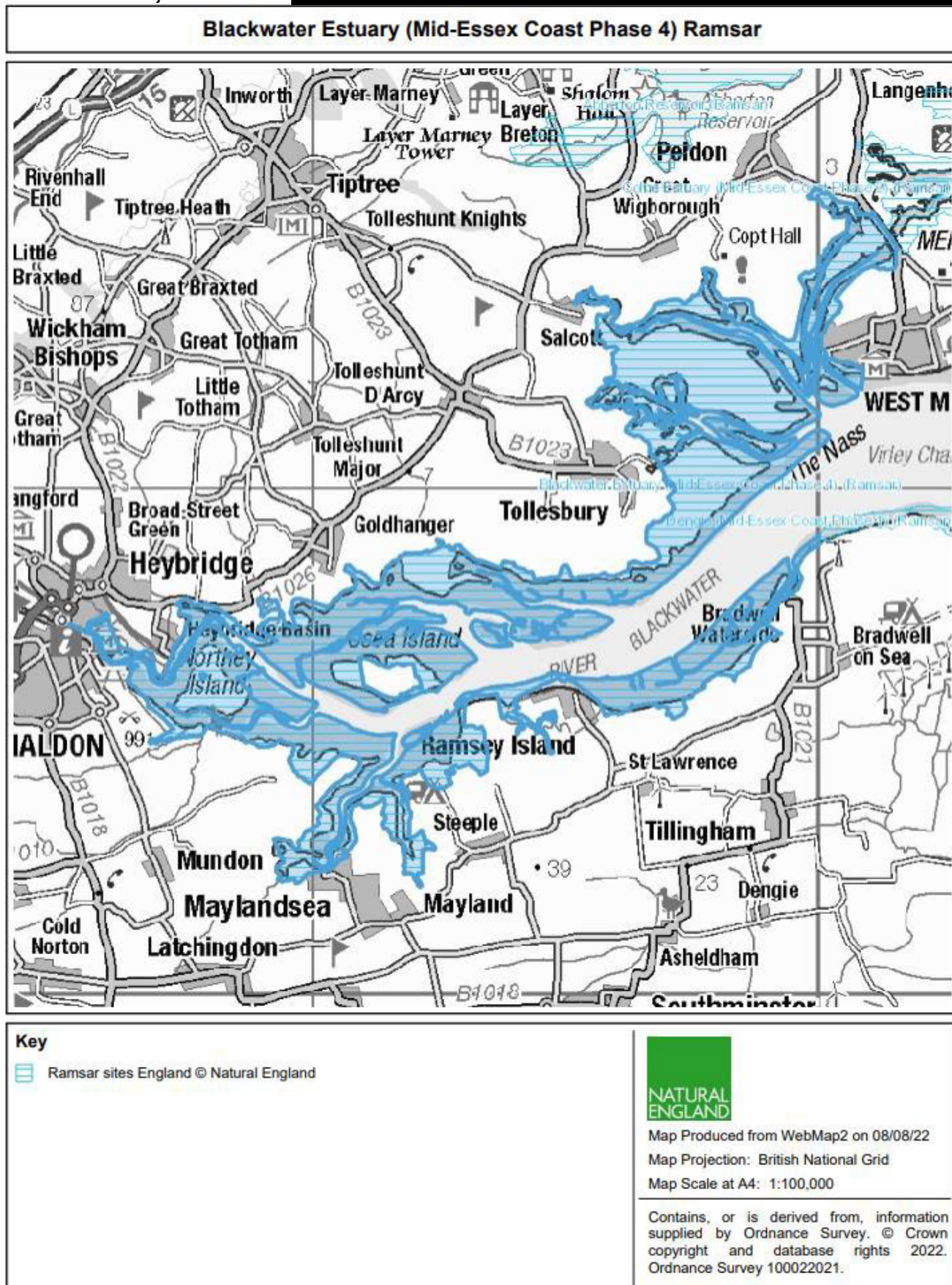


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Blackwater Estuary (Mid-Essex Coast Phase 4) Special Protection Area (SPA)

Summary information (JNCC) Link - <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9009245.pdf>




Blackwater Estuary (Mid-Essex Coast Phase 4) Ramsar

Summary information (JNCC) Link - <https://jncc.gov.uk/jncc-assets/RIS/UK11007.pdf>

River Ter Site of Special Scientific Interest (SSSI)



Key

 SSSI England Detailed © Natural England



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Map Projection: British National Grid

Map Scale at A4: 1:7,500

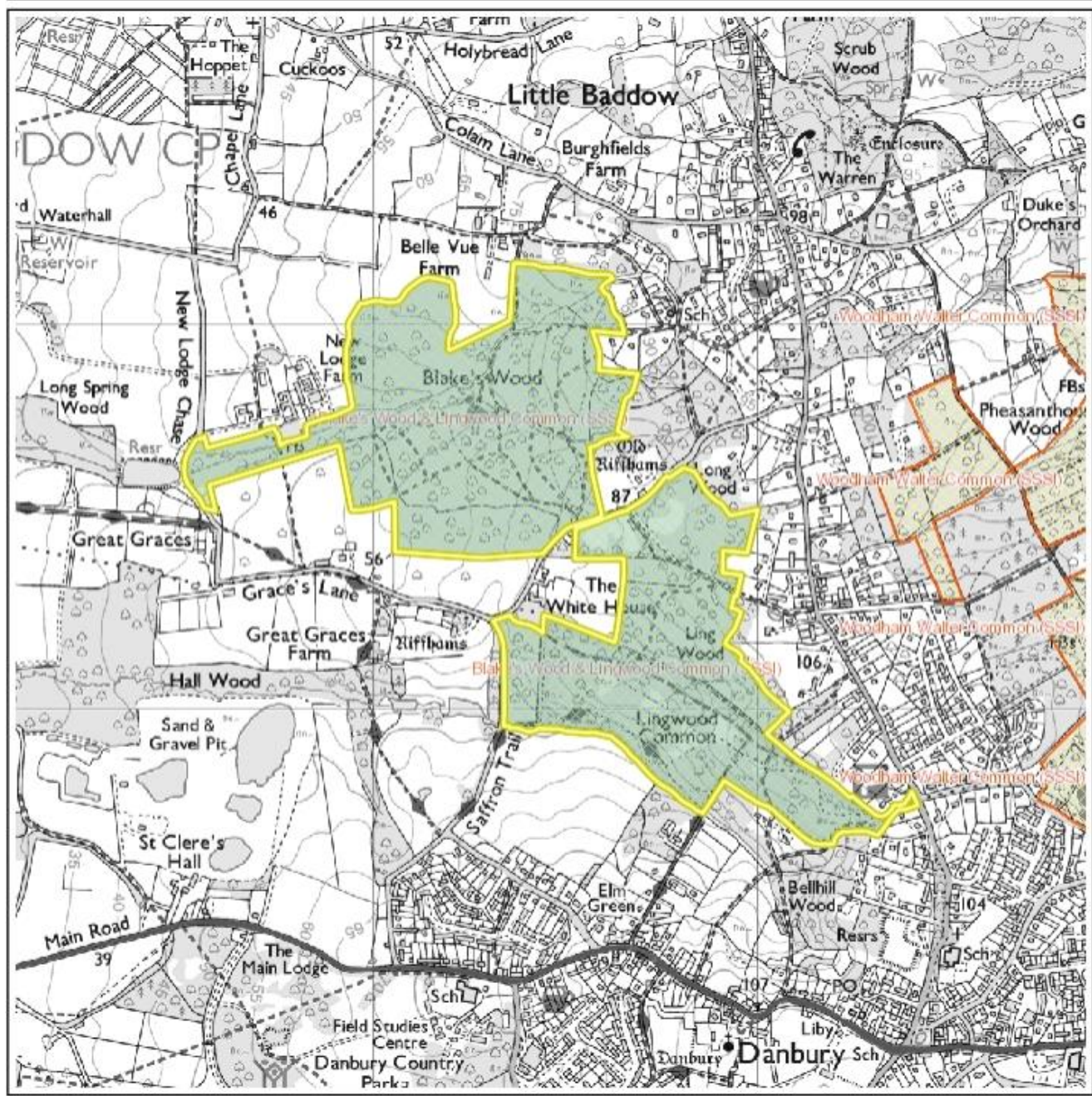
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River Ter Site of Special Scientific Interest (SSSI)

SSSI citation – [REDACTED]

List of operations likely to damage the special interest –

Blake's Wood & Lingwood Common SSSI



Key
SSSI England Detailed © Natural England

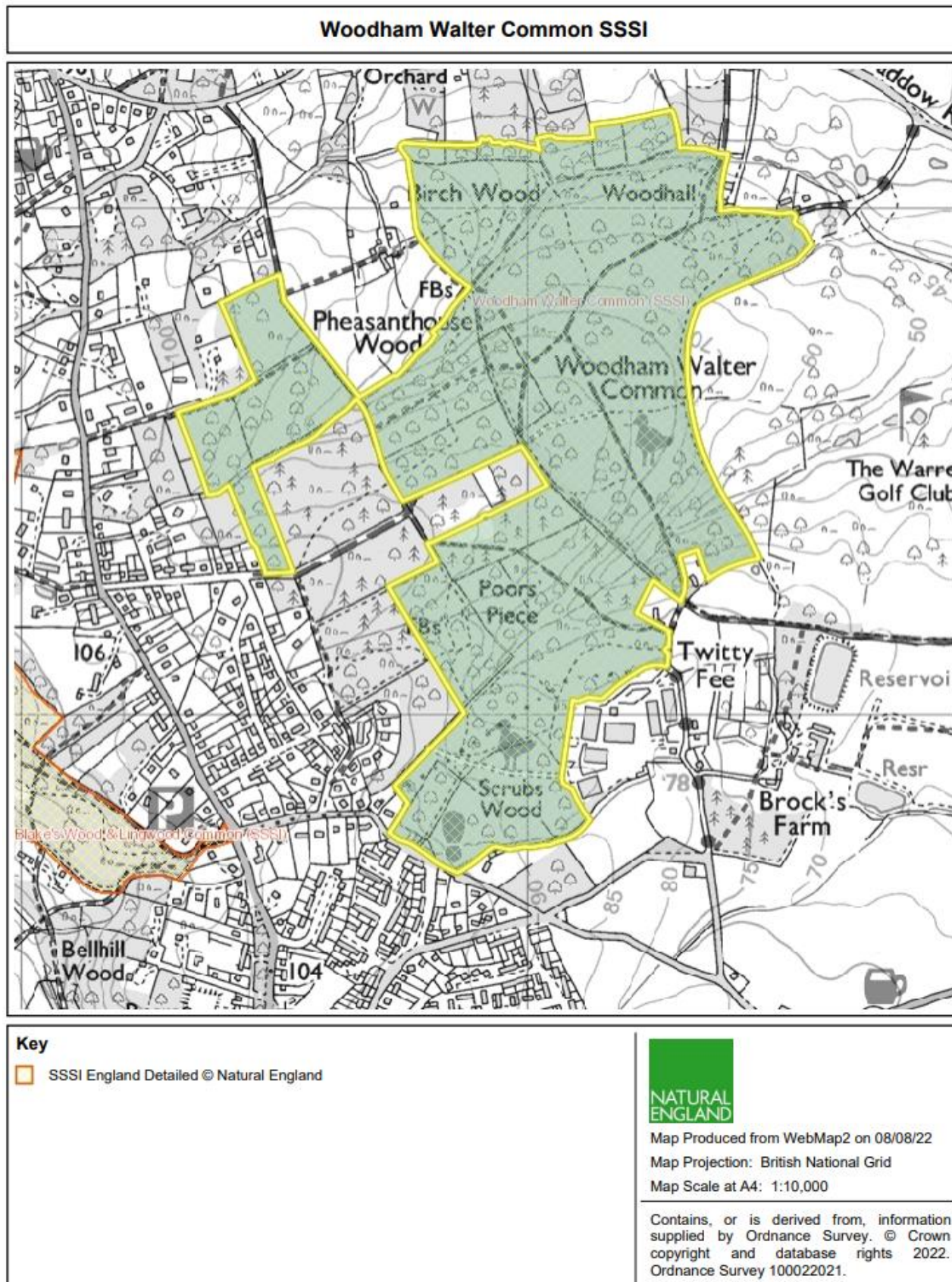


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Blake's Wood & Lingwood Common SSSI
SSSI citation –

List of operations likely to damage the special interest –



Woodham Walter Common SSSI
SSSI citation –

List of operations likely to damage the special interest –

