



Longfield Solar Farm

Statement of Common Ground – Natural England

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Longfield Solar Energy Farm Ltd

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1. Introduction

1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared as part of the proposed Longfield Solar Farm Development Consent Order (the Application) made by Longfield Solar Energy Farm Ltd (The Applicant) to the Secretary of State for Business, Energy and Industrial Strategy (the Secretary of State) pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate website.
- 1.1.3 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Longfield Solar Energy Farm Ltd as the Applicant and (2) Natural England.
- 1.2.2 Collectively, Longfield Solar Energy Farm Ltd and Natural England are referred to as 'the parties'.

1.3 Terminology

- 1.3.1 In the table in the Issues chapter of this SoCG:
 - “Agreed” indicates where the issue has been resolved.
 - “Not Agreed” indicates a final position, and
 - “Under discussion” indicates where these points will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.
- 1.3.2 Where Natural England expresses agreement, it does so only in so far as it has considered the issue with regards to its statutory remit and on the basis of the information that it is aware of. Agreement is offered without prejudice to the submissions of other interested parties who may have greater knowledge of technical methodologies or site specific issues.

2. Record of Engagement

2.1 Summary of consultation

2.1.1 The parties have been engaged in consultation from the early stages of the project. A summary of the meetings and correspondence that has taken place between Longfield Solar Energy Farm Ltd and Natural England in relation to the Application is outlined in **Table 2-1**.

Table 2.1 - Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
14 December 2020	EIA Scoping request and response	Information was provided by letter on Natural England's pre-application Discretionary Advice Service (DAS), with advice provided on EIA Scoping Requirements, including ecological aspects of an Environmental Statement, advice on internationally and nationally designated sites, regionally and Locally important sites, protected species (including links to standing advice on survey and mitigation), habitats and species of principal importance and contacts for local records. Further advice was provided on Environmental (Biodiversity) Net Gain, designated landscapes and landscape character, access and recreation, soil and agricultural land quality, air quality, climate change adaptation and cumulative and in-combination effects
26 January 2022	E-mail from Camilla Davidge, Lead Adviser, NE	The impacts on the Essex Estuaries Special Area of Conservation (SAC), Blackwater Estuary (Mid-Essex Coast Phase 4) Special Protection Area (SPA), Blackwater Estuary (Mid-Essex Coast Phase 4) Ramsar.
May 2021	Statutory consultation	Biodiversity net gain, HRA screening, impacts on River Ter SSSI and other designated sites, and methodology and approach to the assessments. Specific comments are tabulated in Table 3.1.
1 June 2022	Relevant representation on the DCO Submission	Natural England confirmed it has no objection to the project. It advises that it would not be inappropriate for the competent authority to conclude that a

likely significant effect under the Habitat Regulations Assessment can be ruled at the screening stage. Specific comments are tabulated in Table 3.1.

16 2022	August	On-line meeting with Camilla Davidge and Jamie Melvin, Natural England.	Natural England reconfirmed it has no objection to the project. Remaining issues can be flagged as agreed on the basis that the Applicant has confirmed that no licences are required, and that Natural England's standing advice has been/will be followed in relation to species licencing. It was agreed to update the SoCG using text from the Relevant Representations.
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<u>16 2022</u>	<u>August</u>	<u>Written Representation on the DCO submission</u>	<u>Natural England confirmed it is satisfied that there are no areas of concern regarding nature conservation interest within their remit in relation to this proposal.</u>
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2.1.2 It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) Longfield Solar Energy Farm Ltd and (2) Natural England in relation to the issues addressed in this SoCG.

3. Issues

3.1 Environmental impacts, enhancements and biodiversity net gain

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
1	Environmental enhancements and biodiversity net gain	<p>We note that Biodiversity Net Gain calculations will be included in the ES, with over 10% net gain to be achieved. We welcome that calculations are being undertaken to establish to what extent embedded environmental measures being incorporated into the scheme will off-set biodiversity loss and potentially achieve biodiversity net gain.</p> <p>The ES should demonstrate how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests in accordance with NPS requirements. A project of this scale should aim to make a proportionate contribution towards delivery of positive environmental outcomes, including biodiversity and environmental net gain, in accordance with the aspirations of the Defra 25 Year Environment Plan.</p>	<p>In addition to generating a substantial amount of renewable electricity, which itself is a positive environmental outcome, the Scheme will deliver significant environmental enhancements, which include:</p> <ul style="list-style-type: none"> - a cessation of agri-chemical inputs including fertilisers and pesticides across the whole site; - substantial reductions in adverse impacts to the soils, e.g. compaction and reduction in organic content; - a return towards a more natural hydrology for the Site and the benefits to the catchment and the River Ter specifically; and - significant gains in biodiversity both through measures for particular species and overall as demonstrated by the calculation of a biodiversity net gain of 79%. <p>The Outline Landscape and Ecology Management Plan (LEMP) [EN010118/APP/7.11(A)] includes new woodland, scrub, grassland and hedge habitats to buffer and enhance connectivity across the site.</p> <p>The Applicant considers that the Scheme's contribution towards delivery of positive environmental outcomes is more than proportionate.</p> <p>Requirement 9 of the draft DCO secures implementation of the LEMP, the minimum 10%</p>	Agreed

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
			BNG, and for the LEMP to demonstrate ongoing management / maintenance of measures, and how measures in the bio design strategy have been adopted in the design of the scheme.	
2	River Ter	<p>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.</p> <p>Natural England notes that whilst a section of the River Ter adjacent to the SSSI section of the River Ter is included in the Order limits, this land is included for habitat enhancement and there is no development planned adjacent to the River Ter. Whilst it is important that this habitat enhancement does not impact fluvial geomorphology upstream, Natural England considers that this is unlikely. Natural England is broadly satisfied that impacts to the River Ter SSSI can either be ruled out or that standard environmental protection measures will be implemented and adopted during construction that mitigate any potential impacts. These measures (including dust suppression and pollution prevention) will be secured the DCO.</p>	<p>Whilst a section of approximately 100 m the River Ter adjacent to the SSSI section of the River Ter is included in the Order limits this land 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. Consequently, there are no mechanisms for impacts to the river (see Section 9.8 of Environmental Statement Chapter 9: Water Environment [EN010118/APP/6.1] and Section 3.1.1 of Appendix 9B: Water Framework Directive Assessment [EN010118/APP/6.2]. The Scheme will therefore not interfere with the natural processes of the river.</p> <p>Following the SoCG review with the Environment Agency, the Environment Agency agreed that hydraulic modelling of the River Ter and Boreham Brook does not need to be undertaken.</p>	Agreed
3	Designated sites	<p>The scheme also lies within close proximity to designated nature conservation sites.</p> <p>Natural England considers it unlikely that the proposal will impact upon any nationally or internationally designated sites.</p>	<p>No impacts are predicted to nationally and internationally designated sites (see Chapter 8, Ecology, of the ES [EN010118/APP/6.1] and Habitat Regulations Assessment [EN010118/APP/6.7].</p> <p>Locally designated sites are retained and buffered and will not be impacted by the Scheme. Many of these locally designated sites adjacent to the</p>	Agreed

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
4	Embedded Mitigation	Natural England is generally supportive of the Environmental Measures to be embedded within the scheme design to mitigate adverse environmental effects, as outlined in section 8.8 of the Preliminary Environmental Information Report (PEIR). Details of these measures will need to be presented in the Environmental Statement (ES).	<p>Scheme will benefit through habitat buffers and new ecological networks within the Order limits between these sites Scheme (see OLEMP).</p> <p>The Applicant Notes Natural England's support for the embedded mitigation set out in Section 8.8 of the PEIR. This mitigation is also included in the ES (see OLEMP).</p>	Agreed

3.2 Assessments and Methodology

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
5	EIA Methodology	We are supportive of the proposed methodology for the Environmental Impact Assessment outlined in Chapter 5 of the Report and believe this generally takes into account the advice provided by Natural England in response to the EIA scoping consultation.	The Applicant notes Natural England's agreement with the proposed ES method that was set out in Chapter 5, EIA Methodology of the PEIR. The ES has also been undertaken in accordance with the agreed method	Agreed
6	EIA Methodology - Ecology	Natural England is satisfied with the desk-study and field based survey approach being taken to the assessment of impacts on biodiversity, including statutory and non-statutory wildlife sites, priority habitats and protected species. The approach outlined in Chapter 8 of the PEIR appears broadly in line with CIEEM2 best practice guidance for Ecological impact Assessment (EclA).	The Applicant notes Natural England's agreement with the proposed methods as set out in Chapter 8, Ecology, of the PEIR (see also Chapter 8, Ecology, of the ES [EN010118/APP/6.1]). The ES has also been prepared in accordance with the agreed method including CIEEM's Guidelines for Ecological Impact Assessment.	Agreed
7	HRA	We welcome that a Habitats Regulations Assessment (HRA) screening exercise is being carried out due to the presence of European sites and their relationship to the scheme. We support the proposed incorporation of embedded mitigation measures to avoid and mitigate environmental impacts including habitat loss. Natural England considers it unlikely that the proposal will impact upon any nationally or internationally designated site. With respect to the Blackwater Estuary (Mid-Essex Coast Phase 4) Ramsar, Natural England notes that the winter bird surveys identified that 35 golden plover, which are cited as an interest feature on the Blackwater Estuary (mid-Essex Coast Phase 4), are using the site. Noting the hydrological connection and given the low threshold for 'likely significant effects' an argument	HRA screening has been carried out and concludes that there are no significant effects on European Sites are likely (Habitat Regulations Assessment [EN010118/APP/6.7] . With respect to the Blackwater Estuary (Mid-Essex Coast Phase 4) Ramsar: - Golden Plover was only recorded on a single occasion and the count (35 individuals) does not represent a significant proportion of the SPA/Ramsar population of 16,083 individuals, i.e. 1%; - the Order limits are approx. 9.3 km from the SPA/Ramsar as the Golden Plover flies, the distance and availability of similar suitable habitat between the designated and the Order limits, support the conclusion the DCO site is not functionally linked to the SPA.	Agreed

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
		<p>could be made for proceeding to appropriate assessment.</p> <p>It is unclear from the information provided which areas of the site the birds were using or the degree to which those areas are to be developed. However, with reference to paragraph 3.3.7 of the Habitats Regulations Assessment, Natural England considers that a significant effect on the Ramsar remains unlikely and therefore advises that it would not be inappropriate for the competent authority to conclude that a likely significant effect can be ruled out at the screening stage.</p> <p>Natural England is broadly satisfied that impacts to statutorily designated sites including hydrological, air quality and disturbance of species can be ruled out.</p> <p>Natural England considers it unlikely that the proposal will impact upon any internationally designated sites.</p>	<p>The Applicant has concluded that:</p> <ul style="list-style-type: none">- the Scheme is not functionally important and therefore, not functionally linked to the SPA population;- there are no pathways for likely significant effect; and- the distance between the sites is significant with significant barriers between with available habitat elsewhere; and– there will be no impact to habitats within the SPA/Ramsar/SAC at this distance. <p>On this evidence, Golden Plover can be screened out.</p>	

3.3 Designated Sites and Protected Species

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
8	Designated sites	The proposed scheme lies within close proximity to several statutorily designated wildlife sites. Section 8.9.4 of the PEIR considers that construction and operation of the Scheme is unlikely to have a significant effect on any of these sites subject to implementation of the proposed standard protection mitigation measures. Other sites are considered to be too distant and/or not ecologically connected for the scheme to have any adverse impacts. Our advice is that evidence should be provided in the ES to demonstrate this.	Chapter 8, Ecology, of the ES [EN010118/APP/6.1] and the Habitat Regulations Assessment [EN010118/APP/6.7] assess the impact of the Scheme on designated wildlife sites. They conclude that no significant effects are likely on these statutorily designated wildlife sites.	Agreed
9	Protected species and habitats	Natural England generally welcomes the protected species assessment work being progressed, as presented in Chapter 8 of the report, noting that surveys for some species is ongoing. Based on survey work carried out to date section 8.10 of the PEIR concludes that whilst there will be adverse impacts to some species, through construction, these will be mitigated to ensure that impacts are not significant. The Report indicates that operational impacts to habitats and species are considered not significant and/or can be mitigated through scheme design. Evidence to confirm these initial findings, and details of any mitigation measures to address adverse impacts, will need to be presented in the ES. Natural England advises that the proposals as presented have the potential to adversely affect woodland classified on the ancient Woodland Inventory. Natural England refers the Applicant to our Standing Advice on ancient woodland.	Chapter 8, Ecology, of the ES [EN010118/APP/6.1] assesses the impact of the Scheme on protected species and habitats. It concludes that no significant effects are likely on protected species. This was informed by detailed assessments of: - flora (Appendix 8C) [EN010118/APP/6.2] ; - aquatic habitats (Appendix 8D) [EN010118/APP/6.2] ; - great crested newt (Appendix 8E) [EN010118/APP/6.2] ; - reptiles (Appendix 8F) [EN010118/APP/6.2] ; - wintering birds (Appendix 8G) [EN010118/APP/6.2] ; - breeding birds (Appendix 8H) [EN010118/APP/6.2] ; - bats (Appendix 8I) [EN010118/APP/6.2] ; - badger (Appendix 8J) [EN010118/APP/6.2] (This document contains confidential information and is only available on request to those who have a legitimate need to view it);	<u>Agreed on the basis that the Applicant has confirmed that no licences are required, and that Natural England's standing advice has been/will be followed in relation to species licencing.</u> Working towards agreement

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
		<p>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.</p>	<p>- riparian mammals (Appendix 8K) [EN010118/APP/6.2]; With respect to woodland classified on the Ancient Woodland Inventory; - there will be no panels located in ancient woodland nor any other direct effects; - indirect effects will be avoided with the creation of a buffer zone of at least 15 m around ancient woodland; - the ancient woodland will benefit from the buffer zones through natural regeneration augmenting the overall ecology of the woodlands and in the long term enabling expansion; and - the Outline Construction Environmental Management Plan (OCEMP) [EN010118/APP/7.10(A)] deals with factors such as dust. See also Chapter 8, Ecology, of the ES [EN010118/APP/6.1] and Outline CEMP [EN010118/APP/7.10(A)].</p>	
10	<p>Protected Species Licensing</p>	<p>In order to resolve any outstanding issues early in the process the Applicant is encouraged to seek advice on protected species survey, assessment and draft mitigation proposals through Natural England's DAS and PSS. PSS provides early advice on all 3 licencing tests (in relation to European protected species), before a Development Consent Order is granted. This service also extends to other protected species (such as badger and water vole), protected by domestic wildlife legislation. This early assessment provides seeks to provide confidence, where required, that Natural England, as the statutory licencing authority, has considered the appropriate issues relating to</p>	<p>The Applicant does not anticipate any works that would require a protected species licencing being undertaken (see references provided in Ref 9 above).</p>	<p><u>Agreed on the basis that the Applicant has confirmed that no licences are required, and that Natural England's standing advice has been/will be followed in relation to species licencing</u> Working towards agreement</p>

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
		<p>protected species. In order to do this, Natural England will conduct a review, based on a full draft licence application, in advance of the formal submission of the NSIP application to the Inspectorate. Following the review of the draft licence application, Natural England will either: provide a Letter of No Impediment (LONI), explaining that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued; or if there are licensing issues to address, these will be set out in writing for the applicant to resolve.</p> <p>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.</p>		
11	Bat Roost Appraisal	<p>We welcome the preliminary roost appraisal (PRA) that was undertaken of buildings and structures and mature trees, following guidance as described in the Bat Conservation Trust (BCT) 'Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd Edition' and note that Preliminary Roost Appraisal of new areas within the revised Site layout where impacts are predicted, will be undertaken. The Report assesses this site as having no potential for significant effects.</p> <p>Natural England has not undertaken a detailed review of species surveys and mitigation as the applicant has advised that no licences are</p>	<p>ES Chapter 8, Ecology [EN010118/APP/6.1] and Appendix 8H, Bat Survey Report, of the ES [EN010118/APP/6.2] confirm that no bat roosts or potential bat roosts have been identified within the Order limits. The Appendix sets out that a more detailed roost presence/absence survey will be undertaken along the cable route prior to construction. Based on the Scheme layout it is anticipated that impacts to potential roosts will be avoided.</p>	<p><u>Agreed on the basis that the Applicant has confirmed that no licences are required, and that Natural England's standing advice has been/will be followed in relation to species licencing.</u></p>

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
		<p>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.</p>		
12	Badger Setts	<p>We note that 10 badger setts have been identified as being potentially within or sufficiently close to the Scheme that they may be impacted by construction works. The scheme could impact badger through the need to destroy a sett(s) and disrupt movement for feeding.</p> <p>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.</p>	<p>ES Chapter 8, Ecology [EN010118/APP/6.1] and (Appendix 8J) [EN010118/APP/6.2] (This document contains confidential information and is only available on request to those who have a legitimate need to view it.)</p> <p>No impacts to these Badger setts are predicted as they are within buffered areas of the Scheme (i.e. hedgerows, woodlands). A re-survey will be undertaken prior to construction in case Badger setts are found within or close to the works areas and sett disturbance cannot be avoided.</p>	<p><u>Working towards agreement Agreed on the basis that the Applicant has confirmed that no licences are required, and that Natural England's standing advice has been/will be followed in relation to species licencing</u></p>
13	Otter and Water Vole	<p>No evidence of water vole was found during the surveys. Otter was found to use the River Ter, with one confirmed sighting and a number of recent desk study records nearby. The Site is assessed as of Local Importance for Otter. The scheme could impact otter by disturbance from noise, dust and lighting as well as temporary or permanent loss of riparian habitats to the Scheme.</p> <p>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.</p>	<p>ES Chapter 8, Ecology [EN010118/APP/6.1] and (Appendix 8K) [EN010118/APP/6.2].</p> <p>No evidence of water vole has been identified within the study area nor in any area that is affected by the Scheme.</p> <p>Potential impacts on otter have been considered in the ES and are demonstrated to be not significant.</p>	<p><u>Working towards agreement Agreed on the basis that the Applicant has confirmed that no licences are required, and that Natural England's standing advice has been/will be followed in relation to species licencing</u></p>

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
14	Wintering and breeding birds	Habitat loss and disturbance has the potential to impact wintering and breeding birds including a number of species of conservation concern including Lesser-spotted Woodpecker.	The impact of the Scheme on wintering and breeding birds has been considered in the ES chapter. This identifies that Lesser spotted woodpecker in woodland close to River Ter and will not be impacted. Wintering birds are identified to be present in small numbers and no significant impacts on these are predicted. Appendix 8G: Wintering Bird Survey Report and Appendix 8H: Report on surveys for breeding birds of the ES [EN010118/APP/6.2] and also Section 8.8 and Table 8-11 of the ES [EN010118/APP/6.1] provide information on this.	Working towards agreement <u>Agreed</u>
15	Invertebrates	The PEIR does not appear to assess the potential for loss of terrestrial invertebrate habitat through the scheme, but we note that section 5.4.19 of Appendix 8A- Ecological Appraisal states that based on the habitats and species recorded during the desk study, any potentially important habitats (i.e. woodland) are unlikely to be impacted by the Scheme and would be suitably buffered to avoid impacts to invertebrates, therefore detailed surveys for terrestrial invertebrates are unlikely to be required.	The only suitable habitat is the woodland and mature hedges/veteran and/or ancient trees. None of these are impacted by the Scheme. They will be suitably buffered and have therefore been scoped out of the assessment in consultation with the Applicant's invertebrate expert and ECC's ecologist. It was agreed at a meeting on 23 July 2021 that this approach is appropriate. Please refer to Appendix 8B: Preliminary Ecological Appraisal Report and Table 8.8 and Section 8.8 [EN010118/APP/6.1] and ES Chapter 8, Ecology [EN010118/APP/6.1]	Agreed
16	Great Crested Newts	The report [PEIR] identifies that further surveys (eDNA analysis) are considered necessary for ponds located outside of the Site, within a 250m Site buffer. The Habitat Suitability Index (HSI) score and any significant barriers to the Site will determine presence / likely absence of Great Crested Newt. One pond on site was determined to support two GCN. The pond will not be moved	ES Chapter 8, Ecology [EN010118/APP/6.1] and (Appendix 8E) [EN010118/APP/6.2] presents information on of Great Crested Newt. These additional ponds within 250 m have been surveyed and results are included in the ES chapter. The presence of Great Crested Newt was recorded in eight ponds outside the Order limits. None will be impacted by the Scheme. Any potential loss of associated terrestrial habitat is	Working towards agreement <u>Agreed on the basis that the Applicant has confirmed that no licences are required, and that Natural England's standing advice has been/will</u>

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
		<p>as part of the scheme and a buffer zone will be implemented.</p> <p>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.</p>	<p>assessed in this ES, although the arable agricultural land that surrounds the ponds is not generally suitable habitat for Great Crested Newt. As per the original baseline there is one pond within the Order limits, supporting Great Crested Newt and this pond along with suitable adjacent terrestrial habitat is not impacted and will be buffered from the Scheme.</p>	<p><u>be followed in relation to species licencing</u></p>
17	Macroinvertebrates	<p>We note the aquatic macroinvertebrate survey of the River Ter has been undertaken and that no macroinvertebrates of conservation importance were identified. No White-clawed Crayfish were found during the surveys however suitable habitat was present.</p>	<p>Noted. No further action is considered necessary.</p>	<p>Agreed</p>

3.4 Environmental Statement

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
18	Environmental Statement	Natural England advises that the detailed findings of all protected species survey and assessment work, and mitigation measures to address any adverse impacts, should be presented in the ES.	These are presented in Chapter 8 of the ES [EN010118/APP/6.1] and its appendices [EN010118/APP/6.2] . See also Section 9.8 of Environmental Statement Chapter 9: Water Environment [EN010118/APP/6.1] and Section 3.1.1 of Appendix 9B: Water Framework Directive Assessment [EN010118/APP/6.2] .	Agreed
19	BNG	Natural England commends the applicants commitment to deliver an overall net gain of 79% habitat units for biodiversity and 20% of hedgerow habitats. Natural England advises that this requirement should be secured by a suitably worded requirement in the DCO, if the project is approved	Noted. A requirement is included in the dDCO to deliver the ecological mitigation and enhancement in the ES through implementation of the LEMP. This is included in Requirement #9. An Outline Landscape and Ecology Management Plan (LEMP) [EN010118/APP/7.11(A)] was included as part of the DCO Submission.	Agreed
20	Climate change	We fully support the proposals outlined in Chapter 6, Climate Change, of the PEIR to assess the effects of the scheme on the environment. The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained.	Species selection for planting will take into account the changes in climate. The management of the site will be monitored (e.g. grassland habitat monitoring) and where required the management adapted to maintain the habitats ecological networks for the long-term. The OLEMP sets out proposals for monitoring and maintenance.	Agreed

3.5 Landscape Character and Visual Amenity

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
21	Landscape character and Visual Amenity	Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area	The requested information has been included. A review of published landscape character assessments was undertaken (Environmental Statement Appendix 10C: Landscape Baseline). A local landscape character assessment was then undertaken to provide a current and more detailed analysis of the landscape character in comparison to the published studies and at a scale proportionate to the scale of the Scheme. The extent and distribution of these Local Landscape Character Areas are shown on Figure 10-7 of the ES [EN010118/APP/6.3].	Agreed
22	Landscape character and Visual Amenity	The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development.	The requested information has been included in the ES. Appendix 10E and 10F of the ES [EN010118/APP/6.2] set out the potential likely landscape and visual effects in full.	Agreed
23	Landscape character and Visual Amenity	The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013... Natural England supports the publication Guidelines for Landscape and Visual Impact Assessment, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition).	The requested information has been included in line with the required guidance. As set out in the LVIA Methodology, the Guidelines for Landscape and Visual Impact Assessment, 3 rd Edition (GLVIA3) (Landscape Institute and Institute of Environmental Assessment and Management, 2013); and An Approach to Landscape Character Assessment, (Natural England, 2014) have both informed the scope and content of the LVIA.	Agreed

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
24	Landscape character and Visual Amenity	In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials.	The landscape and visual baseline of the area has informed the proposed development. The overall layout has undergone extensive review and refinement to respond to the landscape character baseline. Details of this process and the design considerations are provided in ES Chapter 10: LVIA, Section 10.7.11 – 10.7.14.	<u>Agreed</u>
25	Landscape character and Visual Amenity	The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area.	The requested information has been included in the ES. An assessment of cumulative landscape and visual effects is provided in ES Chapter 10: LVIA, Section 10.11.1 – 10.11.18.	<u>Agreed</u>
26	Landscape character and Visual Amenity	The assessment should refer to the relevant National Character Areas which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page	The LVIA has referred to National Character Areas. With reference to Figure 10-4 of the ES [EN010118/APP/6.3] , NCA 86: South Suffolk and North Essex Clayland covers the whole of the Order limits and most of the study area, other than the southernmost section of the study area, south-east of Chelmsford. NCA 111: Northern Thames Basin covers the southernmost part of the study area. Statements of Environmental Opportunities identified for each NCA have been considered and embedded into the landscape design, where appropriate.	<u>Agreed</u>

3.6 Soils and Agricultural Land Quality

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
27	Soils	The ES should provide details of how any adverse impacts on soils can be minimised. Further guidance is contained in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites.	The requested information has been included in ES Chapter 12 [EN010118/APP/6.1] taking into account the further guidance referenced. An assessment of the likely effects on agricultural land can be found in Section 12.8.	Agreed
28	Soil and Agricultural Land Quality	Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 112 of the NPPF. Natural England also recommends that soils should be considered under a more general heading of sustainable use of land and the ecosystem services they provide as a natural resource in line with paragraph 109 of the NPPF.	The approach to the assessment of impacts on agricultural land arising from the Scheme focused on considering the impact of the Scheme on BMV land arising from construction. Sections 12.8.23 to 12.8.27 in ES Chapter 12: Socio-economics and Land Use [EN010118/APP/6.1] set out the assessment and likely effect.	Agreed
29	Soil and Agricultural Land Quality	The applicant should consider in the ES the degree to which soils are going to be disturbed/harmed as part of this development and whether 'best and most versatile' agricultural land is involved. This may require a detailed survey if one is not already available. For further information on the availability of existing agricultural land classification (ALC) information see www.magic.gov.uk . Natural England Technical Information Note 049 - Agricultural Land Classification: protecting the best and most versatile agricultural land also contains useful background information.	The requested information has been included in the ES [EN010118/APP/6.1] . 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 Environmental Statement was informed by Natural England's Technical Information Note with reference made to this in ES Chapter 12: Socio-economics and Land Use Section 12.5.15.	Agreed

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
30	Soil and Agricultural Land Quality	If required, an agricultural land classification and soil survey of the land should be undertaken. This should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres.	The requested information has been included in the DCO submission. 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 and was based on one observation per two hectares, with more frequent sampling where a change in ALC category is identified. This methodology aligns with the approach presented at Scoping and Statutory Consultation and is deemed sufficient at the scale of the site to understand the presence and scale of BMV.	Agreed
31	Soil and Agricultural Land Quality	The Environmental Statement should provide details of how any adverse impacts on soils can be minimised. Further guidance is contained in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites.	The requested information has been included. The assessment of impacts on soils during construction, operation and decommissioning respectively is detailed in ES Chapter 12: Socio-economics and Land Use Sections 12.8.27, 12.8.50 and 12.8.70 [EN010118/APP/6.1] . 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(A)] . 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 stated in Table 3-7 of the OCEMP.	Agreed
32	Soil and Agricultural Land Quality	Natural England note that Chapter 12 of the Environmental Statement considers the Agricultural Land Classification of the DCO Site and shows how much land is within each category	Noted. Section 12.8 of Chapter 12 of the ES presents the loss of agricultural land. Although 150ha of BMV land is used for the Scheme, only 15ha of farmland is permanently lost during	Agreed

Ref	Sub-topic	Stakeholder Comment	Applicant's Response	Status
		<p>of the ALC assessment, with approximately 109.5ha of Best and Most Versatile (BMV) land lost for the lifetime (40 years) of the Scheme until it is Decommissioned.</p>	<p>operation and could not be farmed while the Scheme is operational; this includes 6ha of BMV land. The other BMV land is not lost, could still be used for some pastoral farming, benefits from the removal of intensive farming practices for 40 years, and is available for all types of farming again following decommissioning of the Scheme.</p>	
33	Soil and Agricultural Land Quality	<p>We consider that the proposed development, if temporary as described, is unlikely to lead to significant permanent loss of BMV agricultural land, as a resource for future generations. This is because the solar panels would be secured to the ground by steel piles with limited soil disturbance and could be removed in the future with no permanent loss of agricultural land quality likely to occur, provided the appropriate soil management is employed and the development is undertaken to high standards. Natural England would advise that a requirement should be secured by a suitably worded requirement in the DCO, if the project is approved, to safeguard soil resources and agricultural land, including a required commitment for the preparation of reinstatement, restoration and aftercare plans; normally this will include the return to the former land quality (ALC grade).</p>	<p>Noted. A requirement is included in the dDCO to safeguard soil resources and agricultural land, including a required commitment for the preparation of reinstatement, restoration and aftercare plans. This is included in Requirement #19.</p>	Agreed

4. Signatories

4.1 Overview

4.1.1 The above SoCG is agreed between Longfield Solar Farm Limited (LFS Limited) (the Applicant) and Natural England, as specified below.

Duly authorised for and on behalf of **Longfield Solar Limited**

Name

Job Title

Date

Signature

Duly authorised for and on behalf of **Natural England**

Name

Job Title

Date

Signature