



# Longfield Solar Farm

Statement of Commonality

Deadline 2

Document Reference : EN010118/EX/8.5(A)

Revision 2.0

September 2022

Longfield Solar Energy Farm Ltd

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 8(1)(b)

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# 1. Introduction

## 1.1 Purpose of the Statement of Commonality

1.1.1 This document has been prepared to provide the Examining Authority (ExA) with the position on Statements of Common Ground (SoCG) between the Applicant and statutory consultees, statutory undertakers and Interested Parties in relation to the proposed Longfield Solar Farm.

1.1.2 The Rule 6 letter states:

*“In relation to some of the Principal Issues identified in Annex C [of the Rule 6 letter], I would be assisted by the preparation of SoCGs between the Applicant and certain Interested Parties.”*

1.1.3 This document provides a position on the commonality on specific points between SoCGs at Deadline 2 (8th September 2022). This report will be updated where appropriate at future Deadlines where progress has been made in discussions with Interested Parties.

## 1.2 Structure of the Statement of Commonality

1.2.1 This Statement of Commonality is structured as follows:

- Section 2 details the structure of each SoCG document and provides a list of the SoCGs being produced;
- Section 3 sets out the status of each SoCG;
- Section 4 sets out the commonality between SoCGs and a summary of the final position.

## 2. Position

### 2.1 Structure of SoCGs

- 2.1.1 Each SoCG adopts a standard format to ensure consistency in the approach taken to documenting matters agreed, matters subject to ongoing discussion or matters not agreed.
- 2.1.2 Each SoCG is structured in the following way:
- Section 1 provides an introduction to the SoCG, identifying the relevant party and a description of the purpose of the document;
  - Section 2 summarises the engagement undertaken so far; and
  - Section 3 sets out the issues identified in the Rule 6 letter or raised by the relevant party and a summary of the Applicant's position in response.
- 2.1.3 Each SoCG includes estimations as to the likelihood that disagreement on a topic will remain. This approach was guided by the Rule 6 letter in order to assist the ExA in assessing the areas where oral discussions may be beneficial.

### 2.2 List of SoCGs

- 2.2.1 The Rule 6 letter identified a number of statutory consultees, statutory undertakers and interested parties with which SoCGs were to be prepared. Accordingly SoCGs are being prepared with the following stakeholders:
- Essex County Council, Braintree District Council and Chelmsford City Council (as a joint SoCG);
  - UK Health Security Agency/Office for Health Improvement and Disparities (as a joint SoCG);
  - Essex Fire and Rescue Service;
  - National Grid Electricity Transmission Plc (NGET);
  - National Grid Electricity Service Operator (NGESO);
  - The Environment Agency (EA);
  - Natural England;
  - East of England Ambulance Service (EEAST);
  - Historic England;
  - National Highways; and
  - Network Rail.
- 2.2.2 Annex E of the Rule 6 letter identifies the matters to be discussed with these parties. Each SoCG corresponds to these topics where identified to be relevant.

## 3. Status

### 3.1 Summary of Current Position

3.1.1 This section provides a summary of the current position of each SoCG at Deadline 2, as set below in Table 3-1.

**Table 3-1: Status of SoCGs at Deadline 2**

Document Reference	Party	Position at Deadline 1B	Position at Deadline 2
8.4(A)	Essex County Council, Braintree District Council, Chelmsford City Council	Draft submitted	Updated draft submitted at Deadline 2, with a number of matters outstanding.
8.4(A)	UK Health Security Agency/Office for Health Improvements and Disparities	Draft submitted	Updated version to be provided at later deadline.
8.4(A)	Essex Fire and Rescue Service	Draft submitted	Updated version to be provided at later deadline.
8.4(A)	National Grid Electricity Transmission Plc	Draft submitted	Updated version to be provided at later deadline.
8.4(A)	National Grid Electricity Services Operator	Draft submitted	Updated version to be provided at later deadline.
8.4(A)	Environment Agency	Draft submitted	Updated draft submitted at Deadline 2 – one matter outstanding.
8.4(A)	Natural England	Draft submitted	Updated draft submitted at Deadline 2.
8.4(A)	East of England Ambulance Service	Draft submitted	Updated version to be provided at later deadline.
8.4(A)	Historic England	Draft submitted	Updated draft submitted at Deadline 2, with a number of matters outstanding.
8.4(A)	National Highways	Draft submitted	Updated draft submitted at Deadline 2, with a number of matters outstanding.
8.4(A)	Network Rail	Draft submitted	Submission not anticipated at Deadline 2 – further discussions regarding protective provisions required.

## 4. Commonality

### 4.1 Summary

4.1.1 This section of the Statement of Commonality provides a broad summary of the topics covered in the SoCGs submitted at this deadline (Deadline 2). It demonstrates where there is commonality in the topics or matters discussed between the Applicant and the parties, or where matters have reached a final position of 'Not Agreed' following discussions.

4.1.2 Table 4-1 lists out the topics covered across the SoCGs and the status of that matter at this deadline for that stakeholder. Where a topic is not relevant to a particular stakeholder the cell is greyed out. Where the topic is relevant the status is shown as follows:

Cell	Status
	All matters agreed
	Some matters agreed, some matters ongoing
	All matters outstanding
	Some matters ongoing, some matters not agreed
	All matters not agreed
	Some matters agreed, some matters not agreed
	Matter not relevant for that stakeholder

4.1.3 The colours of each cell correspond to the status table in each individual SoCG.

4.1.4 It should be noted that where a broad topic applies to more than one SoCG party the detailed matters discussed within that topic may not be directly comparable or related. Table 4-1 is therefore only intended as a general guide.

4.1.5 Following the summary in Table 4-1, Section 4.2 outlines the principal outstanding matters which are subject to further discussion before a final position can be reached.

**Table 4-1: Summary of commonality with relevant stakeholders**

SoCG Party	Topic																															
	EIA methodology and adequacy of assessment	Air quality	Biodiversity and ecology, including designated sites	Historic environment, archaeology	Landscape and visual receptors	Noise	Socio-economics	Traffic, transport, PROW, including SRN/protected lanes	Glint and glare	Water environment and flooding	Human health, including living conditions of residents	Agricultural land and soils	Trees, hedgerows and Ancient Woodland	Waste and minerals	Climate change	Battery safety fire and risk	Habitats Regulations Assessment	Water Framework Directive	Other issues relevant to Appropriate Assessment	Cumulatives	Policy compliance	Mitigation and effectiveness	dDCO Articles and Requirements	Effects on existing /apparatus/operations of the statutory undertaker/party	Connection matters	Protective Provisions	Environmental permits	Disapplication of relevant legislation	Impact on Boreham Interchange	Interactions with Proposed A12 to A120 DCO		
Essex County Council, Braintree District Council, Chelmsford County Council	Orange	Green	Green	Green	Orange	Green	Green	Orange	Green	Green	Orange	Grey	Orange	Green	Orange	Green	Grey	Grey	Grey	Orange	Orange	Orange	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	
UK Health Security Agency	Green	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Green	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	
Essex Fire and Rescue Service	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Green	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	
NGET	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Green	Green	Grey	Grey	Grey	Grey	Grey	Grey	Grey	
NGESO	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Orange	Grey	Grey	Grey	Grey	Grey	Grey	Grey	
Environment Agency	Grey	Grey	Green	Grey	Grey	Grey	Grey	Grey	Green	Grey	Orange	Grey	Grey	Grey	Green	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Green	Green	Grey	Grey	Grey	Grey	
Natural England	Green	Grey	Green	Grey	Green	Grey	Grey	Grey	Grey	Grey	Green	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Green	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey
EEAST	Grey	Grey	Grey	Grey	Grey	Grey	Orange	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Orange	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey
Historic England	Green	Grey	Grey	Green	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Green	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey
National Highways	Grey	Grey	Grey	Grey	Grey	Grey	Orange	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Green	Grey	Grey	Grey	Grey	Grey	Green	Orange	Grey	Grey	Grey
Network Rail	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Orange	Grey	Orange	Grey	Grey	Grey	Grey	Grey	Grey	Grey

## **4.2 Positions at Deadline 2**

- 4.2.1 The following section provides a summary of the positions reached in the SoCGs at Deadline 2. The Applicant intends to undertake further engagement with stakeholders throughout the Examination with regard to matters identified as ongoing.
- 4.2.2 The individual SoCGs provide further detail of the specific matters of discussion between the Applicant and the relevant stakeholders.

## **4.3 Essex County Council (ECC), Braintree District Council (BDC) and Chelmsford District Council (CCC)**

- 4.3.1 The matters recorded in the SoCG have been subject to extensive discussion between the Applicant and the Host Authorities. A number of matters have been agreed between the Parties including those relating to the ecology, water environment, noise and vibration, socio-economics and land use, air quality, and human health.
- 4.3.2 The main matters subject to further ongoing discussion relate to the principle of development, cultural heritage, landscape and visual amenity, transport and access and glint and glare. An updated SoCG will be submitted at Deadline 2.
- 4.3.3 Further meetings were undertaken in early September to discuss cultural heritage, the draft Development Consent Order and the S106 Agreement / Deed of Obligation.
- 4.3.4 The Applicant has met with the Host Authorities following the submission of their position statement on Landscape at Deadline 1B [REP1b060 and REP1b-065]. The Applicant's response to this Landscape Statement is appended to the Deadline 2 Host Authorities SoCG. Further technical notes on glint and glare and noise are also appended to that SoCG.

## **4.4 UK Health Security Agency (UKHSA)/Office for Health Improvement and Disparities (OHID)**

- 4.4.1 Engagement between the Parties in early September has led to all matters in this SoCG being agreed. An updated draft SoCG is anticipated at Deadline 3.

## **4.5 Essex Fire and Rescue Service**

- 4.5.1 Significant progress has been made on agreement of common ground between the Applicant and Essex Fire and Rescue Service in discussions, as reflected in the SoCG. Matters agreed primarily relate to the 24/7 access of the site, the plume assessment, minimum firewater capacity, firefighting infrastructure, the Battery Safety Management Plan and details relating to equipment procurement.
- 4.5.2 At this deadline, there are no outstanding matters subject to further discussion. A signed version will be submitted into the examination at Deadline 3.

## **4.6 National Grid Electricity Transmission Plc (NGET)**

- 4.6.1 Several matters have been agreed through productive discussions between the Parties in relation to details concerning the NGET towers such as fencing requirements, CCTV use, minimum conductor clearance distance,



maintenance access requirements and the scope of rating and thermal studies required for the cable crossing location south of Bulls Lodge Substation.

- 4.6.2 Following Deadline 1B, further engagement was undertaken in relation to the provision of unrestricted access to enable NGET to carry out planned re-stringing works and this matter has now been agreed. An updated SoCG will be submitted at Deadline 3.

#### **4.7 National Grid Electricity Services Operator (NGESO)**

- 4.7.1 A draft SoCG has been provided to NGESO (i.e. the version submitted at this deadline) and they are considering the draft provided. It is hoped that a joint version of the SoCG will be submitted at Deadline 3.

#### **4.8 Environment Agency (EA)**

- 4.8.1 Nearly all matters have been agreed between the Parties including water, soils, required consents, matters relating to groundwater and contaminated land and details relating to fisheries, biodiversity and ecology. Discussions following Deadline 1B have led to the agreement of matters in relation to battery safety and pollution, the control of potential spills, pollution prevention, disapplication of consents, biodiversity enhancement, habitat connectivity and severance. An updated SoCG is submitted at Deadline 2 to reflect this.
- 4.8.2 Matters in relation to the Soil Strategy are working towards agreement. These matters are subject to further discussion and an updated SoCG will be submitted at Deadline 3.

#### **4.9 Natural England**

- 4.9.1 Matters agreed through discussions between the Applicant and Natural England include environmental enhancements and biodiversity net gain, mechanisms to prevent interference with the River Ter, designated sites, embedded mitigation, EIA methodology, the Habitat Regulations Assessment (HRA), bat roost appraisal, invertebrates, the scope of the Environmental Statement, climate change, landscape and character visual amenity and soil quality.
- 4.9.2 Following Deadline 1B, the remaining matters in relation to protected species and habitats, protected species licensing, badger setts, otter and water vole, great crested newts have been agreed. An updated SoCG is submitted at Deadline 2.

#### **4.10 East of England Ambulance Service**

- 4.10.1 A number of matters are subject to ongoing discussion between the Applicant and East of England Ambulance Service, including means of transport and access, major accidents and disasters, and considerations relating to demand on EEAST's services. These matters are subject to further discussion and an updated SoCG will be submitted at Deadline 3.

#### **4.11 Historic England (HE)**

- 4.11.1 Matters agreed through discussions between the Applicant and Historic England include the cultural heritage methodology, the scope of consultation, drainage details, the setting of heritage assets and the assessment of potential

impact relating to construction, operation and decommissioning. Additional agreed matters include the scope of deposit modelling required to establish the potential for buried archaeological remains.

- 4.11.2 Outstanding matters are subject to further ongoing discussion involve agreeing the scope of the Cultural Heritage ES Chapter including the assessment of the significance of Parks and Gardens, the need for a closer link between the cultural heritage and landscape / visual impact assessment, the choice of the LVIA viewpoints, and the positioning of ZTV.
- 4.11.3 Matters in relation to pollution or changes to water quality and their impacts on the historic environment and further assessment on the impact from buried cables on archaeological remains have been agreed. An updated SoCG is submitted at Deadline 2, with further updates anticipated for Deadline 3.

#### **4.12 National Highways (NH)**

- 4.12.1 Significant progress has been made on agreement of common ground between the Applicant and National Highways in discussions as reflected in the SoCG. The key matters agreed between the Parties relate to consultation and engagement, the Transport Assessment and Glint & Glare Assessment, access and routing, details relating to the construction phase and impact on surrounding road network.
- 4.12.2 Following Deadline 1B, matters in relation to construction traffic movements and the construction programme have now been agreed. An updated SoCG is submitted at Deadline 2 to reflect this.
- 4.12.3 Matters that are subject to ongoing discussion include: sustainable travel modes, traffic impact relating to the proposed A12 Chelmsford to A120 construction, the A12 (T) and Boreham Interchange, the proposed use of the private road to/from Bulls Lodge Substation and the overall acceptability of the application. An updated SoCG will be submitted at Deadline 3.

#### **4.13 Network Rail (NR)**

- 4.13.1 Several matters are under continued discussion between the Applicant and Network Rail including the details relating to compulsory acquisition powers and protective provisions. Discussions between the Parties are still ongoing and so an updated SoCG is not to be submitted at Deadline 2. Further updates are anticipated for Deadline 3.