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My ref: 22/00001/NSIP
Telephone: 01245 606826
Date: 15 December 2022


Dear Mr Raywood

LOSF – 002 Longfield Solar Farm

Please see attached Chelmsford City Council's response to the Examining Authorities Written Questions to ExQ3 Deadline 6.

If you should require any further information please do not hesitate to contact me on the above number.

Yours sincerely



Ruth Mabbutt
Senior Planning Officer
Planning and Development Management

Longfield Solar Farm

Chelmsford City Council

Unique reference: LOSF - 002

ExQ3 - Responses to Written Questions

Abbreviations used:

CCC Chelmsford City Council

LIR Chelmsford City Council Local Impact Report dated August 2022

SoCG Statement of Common Ground prepared between Longfield Solar Farm Limited (as the Applicant) and Braintree District Council, Chelmsford City Council and Essex County Council referred to as the Host Authorities.

ECC Essex County Council

ExQ	Respondent	Question	Chelmsford City Council response
2. Biodiversity, Ecology and the Natural Environment: Habitats Regulations Assessment			
3.2.7	Host Authorities	Table 3-3 of the SoCG between the Applicant and the Host Authorities [REP5-014] indicates that discussions are ongoing in relation to additional mitigation for ecology (Ref: ECO-11). Please provide further details of any additional mitigation being sought.	Having reviewed the comments of Natural England and CCC's Ecological Advisor, CCC is now not requiring any further additional mitigation to be provided in respect of ecology.
5. Draft Development Consent Order			
3.5.1	Host Authorities	The ExA notes that the SoCG between the Applicant and	CCC has requested some 'fine tuning' to the drafting of the dDCO, namely relating to the definition of certain wording and various minor clauses. The changes are minor in nature

		<p>the Host Authorities provided at Deadline 5 indicates a number of matters are still under discussion between the Applicant and the host authorities in relation to the drafting of the dDCO.</p> <p>Please provide details of any proposed amendments to the dDCO together with a reasoned justification.</p>	<p>and do not comprise substantive changes that would materially affect the overall content or wording of the dDCO.</p> <p>The changes are being considered by the applicant and CCC is content for the applicant to submit an amended version of the draft DCO; that has taken regard of CCC's comments, at Deadline 6.</p> <p>Due to the minor nature of the observations, CCC has not provided any details or reasoned justification to the Examining Authority.</p>
6. General Matters			
3.6.2	Host Authorities	<p>The ExA notes the draft section 106 agreement submitted at Deadline 5 [REP5-005]. Please provide a policy justification for the obligation set out in Schedule 1, explain why the HAs consider it is necessary and how it would make the Proposed Development acceptable in planning terms.</p>	<p>Policy Context</p> <p>Policy Vision</p> <p>The Vision for Chelmsford states that:</p> <p>To continue the existing successes from the growth of Chelmsford City Council's area by embracing our role as England's newest City and the Capital of Essex. Chelmsford will be a sub-regional catalyst for change, providing new sustainable neighbourhoods and attracting inward investment for a wide range of businesses across our area. This also means maximising development opportunities within a compact and vibrant City Centre. This positive change will optimise the opportunities for new and upgraded infrastructure including cultural, leisure and recreation facilities, shops, education and healthcare services and also provide even better housing and job opportunities to local residents, making places where people want to live and work to further improve their quality of life and wellbeing. This will include improving the way people move around by public transport, by bike, on foot and in private vehicles and making the most of the area's assets and opportunities such as its river valleys, and improving the built, natural and historic environment.</p>

			<p>The supporting text to the vision states that:</p> <p>By 2036, Chelmsford will continue to ... move towards a low carbon future for Chelmsford seeking to mitigate and adapt to climate change and to promote the sustainable use of natural resources and to support the rural economy with vibrant and sustainable rural areas.</p> <p>Strategic Policy S7 of the Adopted Chelmsford Local Plan relates to the Spatial Strategy.</p> <p>The Spatial Strategy applies the Spatial Principles to focus new housing and employment growth to the most sustainable locations by making the best use of previously developed land in Chelmsford Urban Area; sustainable urban extensions around Chelmsford and South Woodham Ferrers; and development around Key Service Settlements outside the Green Belt in accordance with the Settlement Hierarchy</p> <p>The policy states that all development allocations will be located to ensure existing settlements maintain their distinctive character and to avoid coalescence between them. Beyond the main settlements the Council will support diversification of the rural economy and the conservation and enhancement of the natural environment.</p> <p>The reasoned justification (RJ) to the Spatial Strategy at paragraph 6.31 states that the Council recognises the importance of social and economic services and facilities; and the impact that this has on people's lives and wellbeing. The Council will consider favourably proposals which support and strengthen local services; with a particular focus on encouraging development that improves existing deficiencies and weaknesses in services or facilities.</p> <p>Strategic Policy S10 of the Adopted Chelmsford Local Plan relates to Securing Infrastructure and Impact Mitigation.</p> <p>It states that Infrastructure must be provided in a timely and, where appropriate, phased manner to serve the occupants and users of the development and that infrastructure will</p>
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			<p>be secured through the use of planning condition and/or planning obligation and/or financial contributions through the Community Infrastructure Levy or its successor.</p> <p>In negotiating planning obligations, the Policy states that the Council will take into account local and strategic infrastructure needs and financial viability.</p> <p>The reasoned justification (RJ) at paragraph 6.70 clarifies that for the purposes of this policy the widest reasonable definition of infrastructure and infrastructure providers will be applied. The term infrastructure can include any structure, building, system facility and/or provision required by an area for its social and/or economic function and/or wellbeing including (but not exclusively): footways, cycleways, bridleways and highways; public transport; drainage, SuDs and flood protection; waste recycling facilities; education and childcare; healthcare; sports, leisure and recreation facilities; community and social facilities; cultural facilities, including public art; emergency services; green infrastructure; open space; affordable housing; live/work units and lifetime homes; broadband; and facilities for specific sections of the community such as youth or the elderly.</p> <p>At paragraph 6.71, the RJ states that it should be recognised that infrastructure improvements may be provided in various ways...when infrastructure cannot be provided within, or is not appropriate to be located on, the development site itself, developers will be expected to make a contribution to the cost.</p> <p>At paragraph 6.73, the RJ notes that some infrastructure providers will fund and deliver infrastructure themselves. Other infrastructure will be funded by developers and landowners, secured by planning obligations or the Community Infrastructure Levy (CIL) or its successor as part of the planning permission. Off-site provision will usually be secured by legal agreements and through other financial contributions.</p> <p>At paragraph 6.74 the RJ states that the Council will work with infrastructure providers through the CIL and planning obligations to facilitate the timely provision of infrastructure needed to support development.</p> <p>Adopted Solar Farm Supplementary Planning Document</p>
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			<p>The adopted solar farm SPD at paragraph 7.37 states that:</p> <p>It is important that local communities can realise the benefits associated with the project throughout its lifetime. As such, opportunities for community benefit and a positive community legacy from the development should be explored although these will not be relevant to the determination of a planning application. Opportunities could include providing jobs to local people both during construction and operation, promoting cycling, equestrian, and walking routes through the site, providing free or discounted energy to local public buildings, establishing a local Environmental Trust, installing information boards panels around the site and providing visitor/education facilities to raise awareness about renewable and low carbon energy. Further guidance is contained in BRE NSC (2015) Community Engagement Good Practice Guidance for Solar Farms 7.38 From 2021, as a result of the recommendations made from the Essex Climate Action Commission (pending adoption by ECC), it is expected that all large-scale renewable energy developments in Essex should include the offer of an element of community ownership.</p> <p>Consideration as to why the contribution is necessary to make the development acceptable in planning terms</p> <p>In relation to skills and education, there is a clear planning policy justification to support proposals that contribute towards skills, employment, education and the necessary infrastructure required to support them.</p> <p>The Vision for Chelmsford as set out above, contains a clear economic push to attract inward investment for a wide range of businesses across our area and optimise the opportunities for new and upgraded infrastructure to provide better job opportunities to local residents.</p> <p>The site is located within the countryside and is considered to form part of the rural economy in accordance with Policy S7 of the adopted Chelmsford Local Plan.</p>
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			<p>The proposal would attract a new type of business within Chelmsford and would optimise and upgrade infrastructure within Chelmsford by enabling electricity to be provided from renewable sources. The proposal would create employment, education and training opportunities within the renewable and solar industries that can be utilised by local residents in accordance with the Vision.</p> <p>At the time of writing, no solar farms have been built out with Chelmsford City (taken to include both the City of Chelmsford and its surrounding environs). The proposed change of use of the site from agricultural land to solar farm development is considered to comprise a form of economic diversification. Diversification of the rural economy is supported in principle by Policy S7.</p> <p>The Adopted Solar Farm SPD contains a mechanism for ensuring that local communities, including those within the area benefit from the scheme. Strategic Policy S10 of the Adopted Local Plan sets out the procedure/mechanism for securing off site planning contributions</p> <p>As set out in paragraph 6.272 of the Councils Local Impact Report it is estimated that 380 direct full time employment jobs would be created in the construction phase (with a total of about 428 net jobs per annum). Only 8 would become permanent roles. At decommissioning, it is assumed that a similar number of jobs would be required as construction.</p> <p>During construction and thereafter, it is intended that a Local Skills and Employment Plan would be implemented, the purpose of which would be to promote employment and training opportunities associated with the proposal. In addition, a Skills and Education Contribution to enhance the effects arising from the temporary employment generation and mitigate against the lost opportunity in agricultural employment would be provided.</p> <p>There is currently a deficit of local workforce within Chelmsford able to serve the needs of the renewable and solar farm industry within construction, operation and decommissioning of the solar farm development.</p>
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			<p>The proposed skills and education contribution as set out within the S106 would provide employment opportunities, education and training that would contribute to the creation of a sustainable, local workforce and would not encourage displacement or shortages in certain skills.</p> <p>The proposed S106 skills and education contribution would facilitate the creation of opportunities to provide jobs to local people both during construction and operation, and promoting education and skills training to raise education and awareness about renewable and low carbon energy. Eventually, the skills and education training could provide a trained local workforce able to undertake the decommissioning of the proposal.</p> <p>The contribution would enable the proposal to promote opportunities for the development and diversification of skills, education and employment associated with renewable energy development on a site outside the urban area, thereby contributing towards the rural economy.</p> <p>The training and development of the local workforce could not take place on site (the proposal is for a solar farm with no educational/employment training facilities being provided), however, there is no reason why an offsite trained local workforce could not assist with the day to day running and management of the site.</p> <p>Without the skills and education contribution, the proposal would not be able to support the diversification of the local economy and the associated strengthening of the training and education of the local workforce as required by Strategic Policy S7.</p> <p>In this regard, the Councils considers the contribution is necessary, relevant and related to planning and is in accordance with the Vision and policies S7 and S10 of the Adopted Chelmsford Local Plan and the Solar Farm Supplementary Planning Document.</p>
8. Landscape and Visual Effects			
3.8.1	Host Authorities	The ExA notes the comments from the Host Authorities in their respective LIRs in	The Host Authorities have received the review of the Glint and Glare report by its Consultants Pager Power. The independent review has been completed and the key findings of the report have been shared with the applicant. These are summarised below:

		<p>relation to Glint and Glare and the Applicant's response to the matters raised at Deadline 2 [REP2-029].</p> <p>The ExA also understands that the HAs have subsequently commissioned an independent review of the Applicant's Glint and Glare report, the outcome of which it was indicated would be submitted into the Examination at Deadline 5.</p> <p>The Host Authorities are requested to provide an update on the independent review and identify any outstanding concerns/comments in relation to Glint and Glare at Deadline 6.</p>	<ul style="list-style-type: none"> • Whether Network Rail have any concerns with the proposed development, particularly in the context of any railway signals in the area. • Whether any residential, road, or rail receptors have been excluded solely on the basis of vertical angle relative to the panel area. • Whether residential receptor 40 is predicted to experience a 'High' impact, following consideration of current visibility. If so, whether mitigation has been implemented to remove/reduce these effects. • Whether the recommended mitigation for the residential receptors is predicted to obstruct views from all floors or the ground floor only. If the ground floor only, it is recommended that the Magnitude of Impact is increased to 'Low'. • Whether the hedgerow screening is confirmed to be fully opaque year-round, or at least during the times that glare is predicted. <p>The applicant has considered the findings of the report and has responded to the Host Authorities.</p> <p>CCC notes the applicant's response and has no further comments to make. In respect of glint and glare and the effect on Highway safety, CCC defers to ECC Highways Authority as to whether the impact is acceptable.</p>
11. Water Environment			
3.11.2	Host Authorities	<p>Table 3-4 of the SoCG between the Applicant and the Host Authorities indicates that discussions are ongoing in relation to additional mitigation in relation to the Water Environment (Ref: WAT-11). Please provide further</p>	Defer to ECC.

		details of any additional mitigation being sought	
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