



Longfield Solar Farm

Statement of Commonality

Deadline 6

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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 5 (24 November 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 have been ~~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 65, as set below in Table 3-1.

Table 3-1: Status of SoCGs at Deadline 65

Document Reference	Party	Position at Deadline 1B	Position at Deadline 2	Position at Deadline 3	Position at Deadline 4	Position at Deadline 5	Position at Deadline 6
8.4(B)	Essex County Council, Braintree District Council, Chelmsford City Council	Draft submitted	Draft submitted	Not submitted	Draft submitted	Draft submitted	<u>Draft submitted</u>
8.4	UK Health Security Agency/Office for Health Improvements and Disparities	Draft submitted	Not submitted	The Interested Party wrote to the ExA on 15 September 2022 stating that they are satisfied with the assessment. Therefore, no further updates to the SoCG are required.	-	-	=
8.4(A)	Essex Fire and Rescue Service	Draft submitted	Not submitted	Final version submitted.	-	-	=
8.4	National Grid Electricity Transmission Plc	Draft submitted	Not submitted	Not submitted	Draft submitted	Not submitted	<u>Draft submitted</u>

8.4	National Grid Electricity Services Operator	Draft submitted	Not submitted	Not submitted	Not submitted	Not submitted	<u>Draft submitted</u>
8.4(A)	Environment Agency	Draft submitted	Not submitted	Draft submitted	Draft submitted	Final signed version submitted at Deadline 5	=
8.4(A)	Natural England	Draft submitted	Draft submitted	. Final version	Final signed version submitted at Deadline 4	-	=
8.4	East of England Ambulance Service	Draft submitted	Not submitted	Not submitted	Draft submitted	Not submitted	<u>Final version submitted</u>
8.4(B)	Historic England	Draft submitted	Draft submitted	.Not submitted	Final signed version submitted at Deadline 4	-	=
8.4(B)	National Highways	Draft submitted	Draft submitted	Final version	Final signed version submitted at Deadline 4.	-	=
8.4	Network Rail	Draft submitted	Not submitted	Not submitted	Not submitted	Not submitted	<u>Draft submitted</u>

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 65). 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																																		
UK Health Security Agency																																		
Essex Fire and Rescue Service																																		
NGET																																		
NGESO																																		
Environment Agency																																		
Natural England																																		
EEAST																																		
Historic England																																		
National Highways																																		
Network Rail																																		

4.2 Positions at Deadline 65

- 4.2.1 The following section provides a summary of the positions reached in the SoCGs at Deadline 65. 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 Discussions are ongoing, including in relation to the drafting of the dDCO and the Section 106 Agreement. The SoCG has been updated for Deadline 65 to reflect the latest position between the parties. A further iteration will be submitted at Deadline 76.

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

- 4.4.1 The UKHSA/OHID wrote to the ExA on 15 September [\[REP5-020\]](#) confirming that they are satisfied with the health assessment. It has been agreed with them that a the SoCG will not be developed further, as the position between the parties is clearly set out in that correspondence.

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.

~~4.5.14~~[4.5.2](#) A signed version of the SoCG was submitted into the examination at Deadline 3 and so no further update is required.

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 The only matter outstanding in discussions with NGET relates to protective provisions, which are currently under negotiation. An updated SoCG was submitted at Deadline 4 to reflect the progress [of discussions and those discussions are ongoing](#).

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 76.

4.8 Environment Agency (EA)

- 4.8.1 All matters have now been agreed between the Parties including water, soils, required consents, matters relating to groundwater and contaminated land, as well as details relating to fisheries, biodiversity and ecology, battery safety and pollution, the control of potential spills, pollution prevention, disapplication of consents, biodiversity enhancement, habitat connectivity and severance. The SoCG submitted at Deadline 2 reflected this.
- 4.8.2 A final signed SoCG [was](#) submitted at Deadline 5.

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, as well as protected species and habitats, protected species licensing, badger setts, otter and water vole, great crested newts have been agreed.
- 4.9.2 A final signed version of the SoCG was submitted at Deadline 4.

4.10 East of England Ambulance Service

- [4.10.1 All matters A number of matters are subject to ongoing discussion between the Applicant and East of England Ambulance Service, including \(means of transport and access, major accidents and disasters, and considerations relating to demand on EEAST's services\) have been agreed and this is reflected in the . These matters are subject to further discussion and a further iteration will be submitted at Deadline 6. final signed version of the SoCG submitted at Deadline 6.](#)

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, 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.
- 4.11.2 A final signed SoCG was submitted at Deadline 4.

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, as well as in relation to 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.

4.12.2 A final signed SoCG was submitted at Deadline 4.

4.13 Network Rail (NR)

4.13.1 The final matter under continued discussion between the Applicant and Network Rail relates to protective provisions, and those d. ~~Discussions between the Parties are still ongoing, and it is expected that an updated version will be submitted shortly once protective provisions have been agreed.~~