



Longfield Solar Farm

Applicant Responses to ExA Further Written Questions

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Deadline 6

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Longfield Solar Energy Farm Ltd

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1. Introduction

- 1.1.1 This report responds to the Examining Authority's (ExA) further written questions, issued on 1 December 2022 [PD-009]. It responds to each of the questions posed to the Applicant.
- 1.1.2 The Applicant has not responded to questions posed to specific Interested Parties but will review those responses once available and may comment on those at Deadline 7.
- 1.1.3 Section 2 onwards of this report is tabularised to include the ExA's questions and a response to each question as follows:
- Section 2 – Air Quality (0 questions)
 - Section 3 – Biodiversity, Ecology and the Natural Environment: Habitats Regulations Assessment (6 questions)
 - Section 4 – Compulsory Acquisition and Temporary Acquisition (6 questions)
 - Section 5 – Battery Storage Technology (0 questions)
 - Section 6 – Draft Development Consent Order (0 questions)
 - Section 7 – General Matters (2 questions)
 - Section 8 – Historic Environment (0 questions)
 - Section 9 – Landscape and Visual Effects (0 questions)
 - Section 10 – Land Use, Agriculture and Socio-economics (0 questions)
 - Section 11 – Noise and Vibration (0 questions)
 - Section 12 – Water Environment (0 questions)
 - Section 13 – Transport and Traffic (0 questions)

2. Air Quality

ExQ.	Respondent	Question	Applicant Response
N/A	N/A	N/A	N/A

3. Biodiversity, Ecology and the Natural Environment: Habitats Regulations Assessment

ExQ.	Respondent	Question	Applicant Response
3.2.1	Applicant	<p>The Applicant is requested to update Section 4 of the oLEMP to include details of the triggers which would be used to determine whether amendments to the ecological management are required. The ExA notes the Applicant's response to ExQ2.2.4 [REP4-034] but considers that relevant information should be set out in the oLEMP, in order to demonstrate how the monitoring would be used to determine whether amendments to the ecological management are required. The Applicant's attention is drawn to triggers included in the Cleve Hill Solar Park outline Landscape and Biodiversity Management Plan by way of an example.</p> <p>The Applicant should also confirm whether the Ecological Advisory Group (EAG) would have a role in discussing and agreeing whether amendments to the ecological management are required and what these amendments would comprise. If the EAG would have such a role, the Applicant should update the oLEMP to confirm this</p>	<p>The oLEMP has been updated for Deadline 6 to include details of the triggers that would be used to determine whether amendments to the ecological management measures are required.</p> <p>The updated oLEMP also confirms whether the Ecological Advisory Group (EAG) would have a role in discussing and agreeing whether amendments to the ecological management measures are required and what these amendments would comprise. In summary, the EAG would have this role. As stated in the Section 4.1 of the previous iteration of the oLEMP [REP5-009], the EAG would input into the management to achieve the stated aims of biodiversity enhancement and reviewed to provide amendments.</p>
3.2.2	Applicant	<p>In response to ExQ 2.2.5, the Applicant indicated that the further details on the role of the EAG would be provided at Deadline 5 [REP4-034]. However, the updated oLEMP submitted at Deadline 5 [REP5-009] does not appear to include any new information in relation to the EAG. Please can the Applicant provide additional information on the make-up of the group.</p>	<p>A section on the make-up and role of EAG was added to Section 4.1 of the oLEMP [REP5-009] as previously requested.</p> <p>The Ecology Advisory Group will comprise Scheme representative(s), Natural England, local host authorities, wildlife trusts, other relevant stakeholders and, if relevant, research group representative(s).</p> <p>Details of the Ecology Advisory Group will be included in the detailed LEMP with terms of reference including such aspects as scrutiny of monitoring data, adaptive habitat management, site conditions and</p>

			<p>working practices where necessary to meet the ambition for the Scheme.</p> <p>The Ecology Advisory Group will convene at least annually over the course of the 40 year consent and will:</p> <ol style="list-style-type: none"> 1. provide oversight of the implementation, surveillance, monitoring and remedial measures as described in the DCO to achieve the biodiversity enhancement predicted; 2. learn from other similar projects; 3. ensure regular communication between the Scheme, statutory agencies, research groups, local wildlife groups and other relevant stakeholders; 4. establish and oversee research projects planned for the Scheme.
3.2.4	Applicant	The ExA notes that the 'Legend' contained in the Illustrative Concept Design [REP3-041] contains an error in relation to the identification of individual trees (the green colouring appears to have been deleted). Please review and provide an updated document into the Examination.	This error has been corrected in the document and submitted at Deadline 6 (ES Figure 2-27 Construction Layout, [APP-132] and ES Figure 2-5 Illustrative Concept Design, [APP-110] .
3.2.5	Applicant	Can the Applicant explain whether there is a need for post-construction monitoring for invertebrates? This is not currently included in the monitoring programme outlined in Section 4.2 of the oLEMP.	<p>Invertebrates were scoped out of the assessment as agreed with the host authorities.</p> <p>There are no species currently identified that require monitoring. Depending on how the new habitats develop in the medium to longer term, and in consultation with the EAG, the inclusion of targeted invertebrate monitoring could be undertaken should this become of interest to the EAG (e.g. the colonisation by a notable species of local or greater interest or by an invasive species that may require surveillance). The introduction of monitoring for invertebrates would be allowed by the by the EAG; albeit it is not currently considered necessary.</p>
3.2.6	Applicant	Paragraph 2.3.18 of the oLEMP submitted at Deadline 5 [REP5-009] amends the extent of hedgerow loss from 450.6m to 830m. However, it is not clear why the extent of hedgerow loss has increased.	Apologies, this was a typing error in the previous iteration of the oLEMP [REP5-009]. The maximum hedgerow loss remains as assessed in the ES, at 450m. It has been changed back to 450m in the updated oLEMP submitted for Deadline 6.

		<p>Furthermore, the Applicant states that the extent of vegetation removal is limited to these extents by the Outline Design Principles (ODP) [REP4-012] which, in turn, states that vegetation loss will be restricted to the maximum extents shown on the Vegetation Removal Plan [REP5-006] and as described in ES Chapter 10 (Landscape and Visual Amenity). However, no corresponding update has been made to ES Chapter 10 (which still refers to 450.6m of hedgerow loss). The ExA also notes that the assessment presented in ES Chapter 8 (Ecology) is also based on a hedgerow loss of 450.6m.</p> <p>Please provide an explanation of the increase in maximum hedgerow loss in the oLEMP and explain how this affects the assessments carried out in ES Chapters 10 (Landscape and Visual Amenity) and 8 (Ecology).</p> <p>Please also explain why these maximum parameters are not explicitly included in the ODP.</p>	<p>For your information, the measured hedgerow loss based on the Illustrative Concept Design is only 379m. The 450m that has been assessed in Chapter 10 (Landscape and Visual Amenity) and Chapter 8 (Ecology) is considered to be a worst case and likely to overestimate the actual hedgerow loss. The Outline Design Principles (ODP) [REP4-012] and ES therefore do not need changing.</p>
<p>3.2.8</p>	<p>Applicant</p>	<p>The ExA notes that the oLEMP submitted at Deadline 5 [REP5-006] does not include Annex A. Please provide a complete and fully consolidated version of the oLEMP.</p>	<p>This error has been <u>corrected</u> in the document and submitted at Deadline 6.</p>

4. Compulsory Acquisition and Temporary Possession

ExQ.	Respondent	Question	Applicant Response
3.3.2	Applicant / National Grid	<p>Please provide a further update on Protective Provisions (PPs) and identify any matters outstanding (this should take the form of an agreed position statement setting out the parties' respective positions on any unresolved matters (to be submitted at Deadline 6)).</p> <p>An updated, final joint position statement should be provided at Deadline 7</p>	<p>As at Deadline 6, the protective provisions remain under negotiation but are largely in agreed form and the parties anticipate updating the dDCO at Deadline 7 with the agreed form of the protective provisions.</p> <p>The parties are continuing negotiations on a confidential side agreement, and are aiming to agree this prior to the end of the Examination.</p> <p>The outstanding matters between the parties relate to insurance and security requirements, and limited other commercial points.</p> <p>The above update has been agreed with National Grid's legal representatives, and this reflects the joint position.</p>
3.3.3	Network Rail / Applicant	<p>Please provide a further update on PPs and identify any matters outstanding (this should take the form of an agreed position statement setting out the parties' respective positions on any unresolved matters (to be submitted at Deadline 6)).</p> <p>An updated, final joint position statement should be provided at Deadline 7.</p>	<p>As at Deadline 6, the protective provisions included in the dDCO are in agreed form.</p> <p>The parties are continuing to negotiate a confidential Framework Agreement, which the parties anticipate being able to agree and enter into before the end of the Examination.</p> <p>The above update has been agreed with Network Rail's legal representatives, and this reflects the joint position.</p>
3.3.4	UK Power Networks Limited / Applicant	<p>Please provide a further update on PPs and identify any matters outstanding (this should take the form of an agreed position statement setting out the parties' respective positions on any unresolved matters (to be submitted at Deadline 6)).</p> <p>An updated, final joint position statement should be provided at Deadline 7.</p>	<p>As at Deadline 6, the protective provisions included in the dDCO are in agreed form.</p> <p>The parties are negotiating a confidential side agreement, which is in agreed form subject to confirmation of one point by the Applicant.</p> <p>The parties expect to have agreed and entered into the side agreement prior to the close of the Examination.</p>

			The above update has been agreed with UKPN's legal representatives and this reflects the joint position.
3.3.5	EA / Applicant	<p>Please provide a further update on PPs and identify any matters outstanding (this should take the form of an agreed position statement setting out the parties' respective positions on any unresolved matters (to be submitted at Deadline 6)).</p> <p>An updated, final joint position statement should be provided at Deadline 7.</p>	<p>As at Deadline 6, the protective provisions are in agreed form and there are no outstanding points between the parties with respect to protective provisions.</p> <p>The above update has been agreed with the EA's legal representatives and this reflects the joint position.</p>
3.3.6	Essex CC/ Applicant	<p>Please provide a further update on PPs and identify any matters outstanding (this should take the form of an agreed position statement setting out the parties' respective positions on any unresolved matters (to be submitted at Deadline 6)).</p> <p>An updated, final joint position statement should be provided at Deadline 7</p>	<p>As at Deadline 6, the protective provisions are in agreed form and there are no outstanding points between the parties with respect to protective provisions.</p> <p>The above update has been agreed with ECC's legal representatives (as regards the subject matter covered by the protective provisions), and this reflects the joint position.</p>
3.3.8	Applicant / Relevant Highway Authority	Please provide a certificate of completion for the adoption of the section of road formerly contained in Plot 1/1a which has been removed from the order land or state when this will be submitted into the Examination	The section of private road formerly contained in plot 1/1a will not form part of the adopted highway network. As set out in section 6.1.5 of the Applicants Written Summary of Oral Submissions At The Compulsory Acquisition Hearing [REP3-038], this section of road linked to Generals Lane which is now stopped up. The link to Generals Lane has been removed from the Order land as it no longer links into the adopted highway network. The Applicant will rely on the Radial Distributor Road (RDR) for access. Countryside Zest (Beaulieu Park) LLP set out in their Relevant Representation [RR-029] that the RDR has been constructed as part of the Beaulieu development (app ref. 09/01314/EIA). The

length of RDR the Applicant will require for access to the Scheme (shown yellow on the appended plan) is open for public use but not yet adopted. The RDR was never included within the Order limits. The Applicant has requested a copy of the certificate of completion from the Relevant Highway Authority and the developer (Countryside Zest (Beaulieu Park) LLP) although this has not yet been provided. The s106 agreement for the Beaulieu development includes an obligation to undertake the various highways works (including the RDR), and requires a highway agreement to be entered with Essex County Council. The knowledge that the RDR is constructed and open for public use, alongside the obligation in the s106 means the Applicant is confident the RDR will be available for use as required to construct and operate the Scheme.

5. Battery Storage Technology

ExQ.	Respondent	Question	Applicant Response
N/A	N/A	N/A	N/A

6. Draft Development Consent Order

ExQ.	Respondent	Question	Applicant Response
N/A	N/A	N/A	N/A

7. General Matters

ExQ.	Respondent	Question	Applicant Response
3.6.1	Applicant	Further to the Applicant's response to ExQ1.6.8 [REP1b-042] regarding the potential for cumulative or in combination effects from the Proposed Development together with the proposed East Anglia GREEN project, the ExA notes that new information has now been published regarding East Anglia GREEN (the EIA Scoping Report, November 2022). Can the Applicant confirm whether there is any change to its response to ExQ1.6.8 in light of this new information?	<p>The East Anglia GREEN EIA Scoping Report, dated November 2022, has been reviewed regarding potential cumulative effects.</p> <p>The Scoping Report sets out that the PrinciplePrincipal Project Infrastructure associated with East Anglia GREEN, proposed in the area with potential for cumulative environmental and social effects, would be pylons, overhead lines and Cable Sealing End Compounds (CSEC). These features would be located within its 'Scoping Report Corridor'. The Scoping Report Corridor <i>"aligns with the preferred corridor presented at non-statutory consultation"</i> (East Anglia GREEN EIA Scoping Report para 4.1.2) and remains broad, ranging from c. 0.5 – 1.5km in width close to Fuller Street and Fairstead. As such the latest information regarding the East Anglia GREEN project does not provide a finer level of detail regarding the proposed route alignment and therefore, on the basis of the information available, the Applicant's response provided in response to ExQ1.6.8 [REP1b-042] remains accurate.</p>
3.6.3	Applicant	The ExA notes there are some errors in ES Appendix 2A [APP-054] in relation to the Concept Design Parameters and a number of the Outline Design Principles have subsequently been updated during the Examination. Please can the Applicant review this document and update accordingly.	The Applicant has reviewed ES Appendix 2A [APP-054] and has made sure that this document is consistent with any corrections or clarifications which have been made in examination to the Outline Design Principles (ODP) [REP4-012]. These changes included adding clarification on cable trench widths, to better reflect existing text in section 2.5.107 of Environmental Statement Chapter 2 [REF]. This text makes better distinction between low voltage buried cable trenches (typically 1.5kV /1.8 kV cables), and high voltage buried cable trenches (33kv).

8. Historic Environment

ExQ.	Respondent	Question	Applicant Response
N/A	N/A	N/A	N/A

9. Landscape and Visual Effects

ExQ.	Respondent	Question	Applicant Response
N/A	N/A	N/A	N/A

10. Land Use, Agriculture and Socio-economics

ExQ.	Respondent	Question	Applicant Response
N/A	N/A	N/A	N/A

11.Noise and Vibration

ExQ.	Respondent	Question	Applicant Response
N/A	N/A	N/A	N/A

12. Water Environment

ExQ.	Respondent	Question	Applicant Response
N/A	N/A	N/A	N/A

13. Transport and Traffic

ExQ.	Respondent	Question	Applicant Response
N/A	N/A	N/A	N/A