

Katherine King
Senior EIA Advisor
on behalf of the Secretary of State

By email –

LongfieldSolarFarm@planninginspectorate.gov.uk

Our ref: BDC/LONGFIELD/EIA
SO

Your ref: EN010118-LSF

Date: 4 December 2020

Dear Ms King

RE: Environmental Impact Assessment (EIA) Scoping Opinion for Longfield Solar Farm, North West of Chelmsford

Thank you for the opportunity to respond on behalf of Essex County Council (ECC), defined as a S43 Local Authority and statutory consultee, to provide comments on the EIA Scoping Report to inform the Environmental Statement (ES) for the proposed development of a solar farm.

ECC is a key infrastructure and service provider and is responsible for delivering and commissioning a wide range of strategic and local infrastructure requirements and public services. ECC's role covers a wide range of statutory services including (but not limited to) highways and transportation, minerals, waste, surface water management, and public health. We also advise on a number of other related place-making matters to assist in the determination of planning applications.

The Growth and Development team at ECC is responsible for coordinating single corporate responses for major development schemes and Nationally Significant Infrastructure Projects to ensure that the Council's interests and responsibilities to deliver quality and sufficient infrastructure in the right places and at the right time are effectively communicated, and to support good place-making and place-keeping for existing and future communities.

ECC has reviewed the applicant's Scoping Report and has a number of comments and recommendations to make. The nature and scope of ECC's consultation response addresses the following:

- Planning and Development
- Public Health and Wellbeing
- Highways and Transportation

- Minerals and Waste Planning
- Flood Risk and Drainage
- Energy and Low Carbon
- Economic Growth, Regeneration and Skills
- Emergency Planning
- Environment and Green Infrastructure
- Historic Environment

Planning and Development

Development and Climate Change

Longfield Solar Farm is proposed to be located to the north of the county, straddling the boundaries of Chelmsford and Braintree local authorities. The proposal will include the development of ground mounted solar photovoltaic (PV) panels and battery storage, and associated infrastructure including, substations, transformers and connection to the National Grid. Landscaping and biodiversity engagement are also proposed.

The Essex Climate Action Commission¹ was established in October 2019 in response to national requirements to reduce carbon emissions and increase energy and other resource efficiencies. The purpose of the Commission is to:

- identify ways where we can mitigate the effects of climate change, improve air quality, reduce waste across Essex and increase the amount of green infrastructure and biodiversity in the county
- explore how we attract investment in natural capital and low carbon growth

The Commission is considering six core areas of focussed analysis in the first year:

- a. Adapting to an already changing climate
- b. Transport
- c. Built environment
- d. Energy
- e. Land use, green infrastructure & biodiversity
- f. Community engagement

The recommendations from the Commission will be published in March 2021 and will be a programme of targeted climate action. The work of the Commission should be referred to within the climate change chapter, as its recommendations will have an

¹ <https://www.essex.gov.uk/climate-action>

impact on future ECC policy, strategy and interventions in the near future with regards climate change.

This proposal may have the potential to contribute to the objectives of the Essex Climate Action Commission in principle, although this will be dependent on the likely environmental, social and economic impacts which will be identified through the ES.

Development Description and Extent

The Scoping Report identifies an area of c.582ha of land which incorporates agricultural land interspersed with areas of woodland. Figure 2-1 identifies the red line boundary which establishes the expected maximum extent of land that would be included within the application for a Development Consent Order (DCO). We acknowledge the applicants desire to progress with some design flexibility as referred to within the Scoping Report, and its intention to apply the Rochdale Envelope approach (paragraph 2.1.26), along with a worst-case scenario in some aspects of the scheme. It is also acknowledged that the design approach may be influenced by advances in the solar technology field. It is likely that the actual scheme red line boundary will be amended as the scheme design progresses.

At present indicative locations for all aspects of this proposed development have been shown within the Scoping Report, which will each require more detailed consideration in terms of their scale, design, access for maintenance, landscape and visual impact given its rural location, impact on the biodiversity, flood risk and drainage, and amenity impacts such as noise. This will be necessary to identify the preferred location for this equipment on a consistent basis.

As an example, there are three potential locations for the required substation, and hence at present no known connection routes to the Grid, as indicated in paragraph 2.3.2. These will require further discussion with National Grid and assessment and consultation prior to them being refined, as acknowledged by the applicant. ECC will require the impact of these powerlines to be assessed in relation to the visual and landscape impact, in addition to the amenity impact on existing communities, strategic allocations such as Chelmsford Garden Community (c.10,000 homes) in Chelmsford City Council's adopted Local Plan 2020, and the Chelmsford North East Bypass (CNEB).

Section 2.4 accepts that the phasing of the scheme will be subject to a number of factors, resulting in the peak construction assessment year being reviewed as the anticipated construction programme is considered in more detail during design development. The Scoping Report states that a full justification for the reasonable worst- case scenario that is assessed will be provided in the ES. ECC has identified

that the area to the north east of Chelmsford (Chelmsford Garden Community) will be subject to significant committed development during the peak construction period.

Given the planned growth/ development in proximity to the proposed development, ECC considers it critical that the ES clearly sets out the proposed phasing of all works and include details, such as the anticipated timescales associated. Such detail will be relevant to assessments in the ES. This should include information on how the timescales of the substation and grid connection is related to the phasing of the main development site.

In addition, there is still uncertainty with regards the preferred access to the site during particularly the construction phase, as indicated in paragraph 13.5.5. ECC acknowledges that the scheme is at an early stage and will evolve in time. However, it has been difficult to provide meaningful comments on such matters, and hence re-scoping may be necessary once the preferred scheme and its elements have been identified. It is appreciated that any scheme requires flexibility but these matters are critical to the scheme, and particularly ECC, as highway authority.

The recent Scoping Opinion by the Inspectorate to Bradwell B stated in paragraph 2.3.1:

“The uncertainty and lack of detailed information provided in the Scoping Report has constrained the ability of the Inspectorate, and potentially consultees, to provide meaningful comments on its content and in some cases (particularly in relation to the likely impacts associated with off-site elements) has prevented the Inspectorate from being able to agree to scope matters out of the assessment at this time.”

Consequently, the ES in the description of the development will need to clearly explain the changes to the location (including any changes to the red line boundary) and design of the proposed development that have occurred since the time of scoping and detail how such changes affect the baseline assessments, as previously set out and defined in this Scoping Report. The relevant assessments and figures should be presented in the ES.

Where uncertainty exists and flexibility is sought, this should be explained not only in terms of the maximum parameters but also the anticipated limits of deviation, the dimensions, locations, and alignments of the various project elements, including points of access and key structures, such as the substation, location of panels and supporting infrastructure (e.g. switchgear) and the connection to the Grid. This information is important to ensure that the likely significant effects associated with the construction and operation stages have been appropriately assessed. The ES should provide figures to support the project description and depict the necessary detail.

At this stage there is therefore an element of uncertainty around the potential direct and indirect impacts of the proposed development and a worst-case scenario will need to be considered in terms of implications for ECC's infrastructure and service responsibilities. ECC request that the applicant make every effort to narrow the range of options and explain clearly in the ES which elements of the proposed development are still to be finalised and provide the reasons. At the time of application, any proposed development parameters should not be so wide-ranging as to represent effectively different developments.

If changes to the proposed scheme are so wide-ranging it may be necessary to revisit the scoping of the scheme.

Policy Context

As the Minerals and Waste Local Planning Authority for both Chelmsford and Braintree local authorities, we welcome reference to the Essex Minerals Local Plan (2014) and the Essex and Southend-on-Sea Waste Local Plan (2017) in paragraph 1.2.10.

We note that reference is made to the relevant local development plan documents for Braintree and Chelmsford local authorities and recommend that these references are up to date and consistent throughout (for example at paragraph 13.3.1). We also recommend that the Hatfield Peverel Neighbourhood Plan is referenced in this section, as it is in paragraph 7.3.6 under Culture Heritage. The Neighbourhood Plan was 'made' at Full Council on 16 December 2019, and therefore forms part of the development plan for Braintree District.

Public Health and Wellbeing

As noted above, there is flexibility built into the scheme red line boundary identified in Figure 2-1, and there are a number of local communities in close proximity to this area, including Terling, Hatfield Peverel and Boreham, as referred to in paragraph 2.1.7. This creates an element of uncertainty on the extent and magnitude of the potential impact on local residents.

We would like to point out that the maximum extent of land identified in Figure 2-1 is also in close proximity to the Chelmsford Garden Community identified in Chelmsford City Council's adopted Local Plan 2020, and this should be acknowledged within the ES given that the operational life of this scheme could extend beyond the 40 year design life (paragraph 2.6.1).

Whilst it is positive that human health is not proposed to be scoped out of the ES, we are disappointed to note that health is not proposed to have a separate chapter

within the ES, particularly given the aforementioned uncertainty. Health and wellbeing are key cross-cutting issues as identified in paragraph 14.6.1 and we feel this could be a missed opportunity to draw together all health-related aspects in a clear and concise manner.

Highways and Transportation

ECC is the Highway Authority for Braintree and Chelmsford local authorities.

It is noted that a Transport Scoping Note and Access Strategy will be prepared (paragraph 13.1.1). This should be shared with ECC and Highways England (HE) as soon as possible to agree the scope of the Transport Assessment and Construction Environmental Management Plan (CEMP).

CEMP

The CEMP will need to set out vehicle routing, site accesses, proposed temporary traffic management/highway improvements, wheel washing, minor road crossing points and public rights of way (PROW) management.

The CEMP will need to include how maintenance of the highway is to be dealt with during the construction and de-commissioning periods. For example, condition surveys are likely to be required prior to commencement of construction and de-commissioning, and on-going maintenance of carriageways, verges and margins will be required during construction and de-commissioning, together with making good following completion of construction/de-commissioning. This may involve payment of Maintenance Bonds.

The CEMP will need to cover the de-commissioning aspect as well as the construction traffic particularly if abnormal loads are involved. For example, if any mitigation measures are required on the highway network to accommodate abnormal loads during construction, will these be permanent measures; or if they are temporary what the process will be to agree mitigation to accommodate traffic during the decommissioning.

ECC would welcome early engagement in this process.

Transport Assessment

ECC, as highway authority, welcomes the need to agree the scope and approach of the Transport Assessment (TA) for the impact of the scheme. Reference should be made to the TA covering the construction, operation and decommissioning phase of the scheme. The TA will need to be summarised in the ES. The ES should describe

in sufficient detail the anticipated impacts, the resulting effects, any mitigation measures proposed (permanent/temporary) and the significance of residual effects.

Early discussions will need to take place with ECC highways regarding road proposals in the vicinity of the site which would affect not only routing of the construction traffic, but would also affect the timing of construction to avoid major conflict on the road network. For example:

- Beaulieu Radial Distributor Road (RDR) from Essex Regiment Way (ERW) to Boreham Interchange including a new bridge over the railway line and A12 northbound on-slip.
- Boreham Interchange developer improvement scheme including construction of “Hamburger” at Generals Farm roundabout, relocation of Generals Lane roundabout, improvement to Drovers Way roundabout, improvement to A12 slip Roads and connection to RDR.
- Chelmsford NE Bypass (CNEB) connecting from RDR to A131 including new overbridges to accommodate side roads such as Cranham Road
- The proposal for Radial Distributor Road 2 (RDR2) which is included in Chelmsford Local Plan for access to Chelmsford Garden Community, including a connection to CNEB and reconfiguration of the ERW/ Wheelers Hill roundabout as well as an amended link to Cranham Road.
- HE proposals for A12 widening, which is already mentioned in the Scoping Report.

The above committed highways schemes identified above will need to be factored into the TA, and should also be considered in the ES, particularly with regards their cumulative impact given their timescales being similar to the scheme.

The preferred access to the site should be identified early in the process as this will influence the basis of assessments required for the ES. ECC’s preferred route would be from the Boreham Interchange vis RDR to ERW and Wheelers Hill, to avoid HGV traffic travelling through the villages of Boreham and Hatfield Peverel, hence the need for early discussions with ECC and HE.

It is noted that a significant number of PROWs will be affected by the proposals. The following will need to be considered:

- The public’s rights and ease of passage over public footpaths / bridleways / byways should be maintained free and unobstructed at all times to ensure the continued safe passage of the public on the definitive right of way.
- If PROWs have to be temporarily or permanently diverted then no development should not commence on site until an Order securing the diversion of the existing definitive right of way to a route has been agreed and

has been confirmed with ECC and the LPA; and the new route has been constructed.

The scope of the transport modelling will need to be agreed with ECC and HE at an early stage.

Other matters

With regards the criteria to be used for assessing the environmental impacts of road traffic identified in paragraph 13.6.7, additional criteria to those listed could include:

- potential capacity of any road, having regard to amenity and resilience;
- bus passenger delay;
- cyclist delay;
- journey time reliability; and
- noise and air pollution from transport sources be factored into determining the magnitude of change.

Reference is made to 'accidents and safety'. The preferred reference is to 'collision' rather than 'accident'. ECC would welcome prior discussion regarding the identification of specific collision clusters and hotspots within the area of influence.

Road safety audits will be required for any proposed new accesses, minor road crossings or highway improvements/modifications associated with the proposal.

There will need to be cross-referencing to other technical assessments where any potential and/or significant effects are identified. For example, in relation to air quality, visual effects (including 'glint and glare') and any impact on heritage assets.

ECC recommends consideration is given to the design, alignment and movement of the solar panels, as this will have potential implications on the impact of the proposal through 'glint and glare' on the existing communities, CNEB and Chelmsford Garden Community. This will impact on visual amenity to new and existing residents and potential road safety along the new bypass, and potentially A12.

It is imperative that discussions with ECC occurs as early as possible given the significant development in terms of new homes and highway/transport infrastructure that is planned in proximity to the site.

Minerals and Waste Planning

ECC is the Minerals and Waste Local Planning Authority for Chelmsford and Braintree local authorities.

As shown in Appendix 1 of our response, the vast majority of the current extent of the application site is within a Mineral Safeguarding Area (MSA), meaning that it is subject to Policy S8 of the Essex Minerals Local Plan 2014 (MLP), see Appendix 3.

The MSA is a planning constraint and should therefore be included within Figure 2-1 although it is recognised that this would clutter the map.

The intention to produce a high-level CEMP to support the DCO application, with a more detailed CEMP to be produced prior to construction, is noted (paragraph 2.4.7).

Paragraph 2.6.1 states that the design life of the scheme is expected to be at least 40 years, although the operational life could be much longer than this. As such, the scheme does not fall under the exclusionary criteria of the proposal being for 'Applications for temporary buildings, structures or uses (for up to five years)' with regards to the application of Policy S8 of the MLP.

Paragraph 14.5.3 states that details of land designated for Mineral Safeguarding will be included in a Phase 1 Preliminary Risk Assessment (PRA). From this, it is not possible to understand the extent to which details will be provided and the context within which conclusions, if any, will be drawn.

As set out in Policy S8 of the MLP, applications for non-mineral development in land designated as a Minerals Safeguarding Area are required to be supported by a Minerals Resource Assessment (MRA). Further detail is provided in Appendix 3 of this response. It is assumed that the PRA is not intended to substitute for the requirements of MRA.

With reference to Table 14.1, it is stated at Row 6 (Waste) that "*Waste materials will be disposed of by the contractor(s) to appropriate recycling facilities or appropriately licensed landfills in line with a Construction Resource Management Plan (equivalent to a Site Waste Management Plan)*". This is supported. Information within or accompanying the ES should also quantify the volumes of waste re-used on site and leaving the site, as well as demonstrate how the amount of waste forecasted to leave the site has been proactively minimised at construction, operation and deconstruction stages by incorporating sustainable working practices, including a consideration of the material used and their procurement. Waste arising from the site should be assessed in light of the available capacity to manage it where such an assessment can be made.

We would prefer that minerals and waste matters were considered as part of a standalone chapter, contrary to paragraph 14.9.4, even if this mainly serves to signpost other relevant documents.

That aside, paragraph 14.9.1 states that “*A description of the potential streams of construction waste and estimated volumes will be described within the description of development chapter of the ES*” but that “*the CEMP, which would be produced following receipt of a DCO, will set out how waste will be managed on-site, and opportunities to recycle waste will be explored*”. It is questioned how the ES can comment on volumes of waste arising ahead of the consideration of how waste will be managed on-site and recycling opportunities explored. Those issues set out to be assessed following DCO consent should instead be addressed as part of the Framework CEMP and submitted at the same time as the ES such that the description of development chapter of the ES is suitably informed.

Table 16.1 scopes out effects on MSAs. The justification is presented as “*the only part of the Site within a Mineral Safeguarding Zone would be for potential cable route to the existing Bulls Lodge Substation*”. It is considered that this assessment has potentially confused Mineral Consultation Areas (designated around mineral infrastructure) with Mineral Safeguarding Areas (designated around mineral bearing land).

Appendix 1 of this report shows that the vast majority of the scheme is located within a MSA, and that this proposal will potentially sterilise a considerable amount of mineral resource. The volume which would be sterilised is many times over that which would be allocated within a Minerals Local Plan. The proposal is therefore subject to Policy S8 of the MLP, see Appendix 3.

Flood Risk and Drainage

All information associated with surface water drainage and risk of flooding should be included as part of the DCO application. However, there is no need for additional information to be supplied as part of an EIA.

Energy and Low Carbon

Although the impact of greenhouse gas (GHG) emissions has been identified as a national and global issue (paragraph 6.2.3), it should also be noted that it will have local impacts and the project impacts should also consider the aspirations of the Essex Climate Action Commission (set out above) and Essex’s upcoming decarbonisation targets and move to net zero and alignment of the project with these.

Given the proximity of this proposed development to multiple local communities, it is imperative that local residents have the opportunity to realise the benefits throughout the lifetime of the project, which could exceed 40 years. We recommend that a minimum expectation would be the opportunity for part community ownership as well as an ongoing community benefit fund that allows the resident to actively engage

with the development. Consideration could be given to such benefits/ opportunities within the socio-economics and land use chapter.

Economic Growth, Regeneration and Skills

The socio-economics and land use chapter should also take into account other local economy/growth policies including:

- Essex Construction Growth Report 2020-2040
- Essex Prosperity and Productivity Plan 2020
- Essex Skills for Growth Strategy 2019
- North Essex Economic Strategy (Propositions) 2019
- South East Local Economic Partnership (SELEP), Smarter Faster, Together: Towards a Local Industrial Strategy 2018

We would expect to see stronger commentary on the need to support economic growth and productivity in the two districts and the region, taking into account both local business needs and wider opportunities for development.

There is no mention of any initial analysis to estimate likely construction workforce numbers, including peak construction numbers, and therefore no baseline to assess and/or mitigate against any disruption to the local labour market. This also suggests that there is no baseline against which the ES will encourage local skills development and employment.

Emergency Planning

We have no specific comments to make at this stage.

Environment and Green Infrastructure

ECC currently provides advice on green infrastructure schemes (GI) for major developments. ECC have been consultee on GI since the 2018. Although there are no statutory requirements for GI, the 25 Year Environment Plan and emerging Environment Bill will place significant importance on protecting and enhancing GI, accessibility and biodiversity net gain.

In providing advice we look to ensure that adequate provision, protection and improvements of high-quality GI comply with the objectives and planning principles set out in the following documents:

- Relevant Local Plan policies and supporting evidence for Chelmsford and Braintree local authorities regarding their approach to GI provision

- Essex Green Infrastructure Strategy 2020² which aims to enhance the urban and rural environment, through creating connected multi-functional GI that delivers multiple benefits to people and wildlife. It meets the Council's aspirations to improve GI and green spaces in our towns, cities and villages, especially close to areas of deprivation

ECC GI position

The UK Government's position on power is set out in the Overarching National Policy Statement for Energy (EN-1), which recognises the importance of understanding and addressing landscape and visual impacts (Department of Energy and Climate Change, 2011). It includes a section on criteria for "good design" for energy infrastructure, which states that:

"Applying "good design" to energy projects should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area."

Furthermore, Para 2.4.2 of the National Policy Statement for Renewable Energy Infrastructure (EN-3) also states *"Proposals for renewable energy infrastructure should demonstrate good design in respect of landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology."*

There are a number of elements associated with a solar farm development which have the potential to influence the significance of the impacts on landscape character and visual amenity. These include:

- Height and layout of the panels
- Colour of the panel's surrounding frames
- Treatment of the ground below and between the panels
- Perimeter fencing

The Scoping Report sets out the proposed scope of the Landscape and Visual Impact Assessment (LVIA) to be included within the ES. It refers to appropriate guideline documents such as the Guidelines for Landscape and Visual Impact Assessment (GLVIA) Third Edition (Landscape Institute and Institute of Environmental Management and Assessment) and gives an outline as to how the report will be set out and the impacts assessed.

² <https://www.placeservices.co.uk/resources/builtenvironment/essex-gi-strategy/>

Moving forward, we would recommend the following are considered as part of the EIA and masterplanning process:

1. To help inform the landscape baseline, we would expect a detailed landscape audit to be provided. This should include details of existing landscape features present across the development sites. Assets should include but not be limited to; existing trees, hedgerows, woodlands/copses and grassland habitats.
2. The landscape and visual receptors need to be submitted and approved by the LPAs prior to the assessment being undertaken. Supporting Zone of Theoretical Visibility mapping should also be provided to ensure longdistance views outside the assessment study area need to be considered.
3. All visual representation with any submitted Landscape and Visual Impact Assessment (LVIA) should be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019) to ensure the assessment of visual impact is accurate and in turn an appropriate judgement of the assessed impacts can be made.
4. We welcome reference to the Essex GI Strategy. We would also recommend appropriate consideration is given to relevant guidance on managing the site and improving biodiversity around solar farms, including BRE guidance, which may be of assistance with the ES.
5. Solar farms can have an impact on PROWs (see earlier comments). From a GI perspective, we would therefore expect adequate mitigation and screening to be provided. GI corridors (both recreational and wildlife) should also be appropriate widths and not be confined to narrow corridors formed by security fencing and dense planting, which contrast with the open nature of the landscape.
6. Security lighting should also be minimised; passive infra-red (PIR) technology should be designed and installed to minimise glare, light pollution and impacts on biodiversity (particularly bats).
7. Bio-solar techniques should be explored. For example, site buffers and spacings between array rows should be planted with appropriate wildflower mixes and foraging plants to encourage biodiversity.
8. Details of how surface water run-off will be managed will need to be provided alongside the DCO applications (see earlier comments), especially given the amount of new track proposed. Where possible, we would encourage soft engineered approaches to ensure landscape character is not impacted further and to enhance the GI network.

Historic Environment

There are a large number of listed buildings within the area, many are farmhouses and farm buildings dating to between the 13th and 19th centuries, including the manorial sites of Toppinghoe Hall and Ridley Hall. They illustrate the settlement and agricultural history of the area over a period of seven centuries and also reveal the well preserved historic landscape in which the solar farm is proposed. The site also contains ancient woodland and likely historic hedgerows. Other known archaeological sites are recorded from aerial photographic evidence and include ring ditches, trackways, enclosures and field boundaries which could span dates from the prehistoric to the postmedieval period. Little archaeological investigation has taken place within the vicinity of the proposed site, however long-lived excavations at the adjacent site of Bulls Lodge Quarry have demonstrated prehistoric and medieval settlement and activity within this landscape.

The Scoping Report includes a chapter on Cultural Heritage which will be scoped in to the ES to be provided alongside the DCO application. This chapter sets out the approach to the assessment of the scheme's impacts on cultural heritage (comprising built heritage, archaeology and the historic landscape). The comments below are with regard to the archaeological resource and relate to below ground impact.

The Cultural Heritage Chapter states:

"In regard to archaeology, the Scheme requires only a small amount of heavy foundations (for the inverters etc.), with the solar panels themselves requiring less intensive piled foundations limiting the potential for effects on below-ground heritage features. However, a geophysical survey will be undertaken which will provide information about buried archaeological assets and will be used to inform the design" (paragraph 7.5.3)

However, the Scoping Report states that there may be a requirement for "*more complex foundation designs*" for the solar panels and there may be localised trenching for cabling and solar stations, in addition to the concrete bases for the supporting infrastructure. Connection to the main grid may also use underground cabling and there may be further below ground disturbance from construction compounds and access roads. The solar farm covers a large area and cumulatively these impacts on below ground archaeological deposits could be high. It would be preferable to mount solar panels on steel frames that are pile driven into the ground and to keep cabling above ground where possible, there would be a cumulative effect of many metres of cabling on below ground archaeological remains. Similarly, Overhead Power Lines would be preferred from this perspective to avoid impact on the archaeological resource.

Under sources of information the Scoping Report states:

“Field investigation will be undertaken to refine and augment the desk-based data. The scope and specification of the field investigations has been set out in a Written Scheme of Investigation (WSI), which was agreed with the County Advisor at Essex County Council (ECC). As a minimum, it is anticipated that geophysical (magnetometer) survey will be undertaken in areas of interest, and, where required, to be followed by evaluation trenching post-consent. Further information will be provided regarding building and construction, cabling, infrastructure.” (paragraph 7.6.10)

There has been early engagement regarding the archaeological methodology which has facilitated input from the curatorial officer. A Written Scheme of Investigation (WSI) for geophysical investigation has been submitted and approved and the scope of the field investigations has been discussed. It has been recommended that a programme of aerial rectification be completed to allow for greater accuracy of known cropmark features and the potential for the identification of any unrecorded aerial cropmark features. The scope and specifications of the field investigations has not yet been formalised as an approved WSI for the scheme and evaluation trenching post consent has not been agreed.

The combination of geophysics and aerial photography should allow greater understanding of the nature and significance of any potential archaeological remains, however, these methods, by their nature, can only provide confidence in larger and long lived archaeological features and the proportion of unidentified archaeological remains within the area could be significant. In order to ‘assess the value’ of the heritage assets that may be impacted on there will also need to be an element of intrusive archaeological investigation in order to ground truth the results of the geophysics and aerial photography.

The adoption of the above methodology would provide confidence in the information submitted with any future application and will allow consideration of the nature and scale of the potential impacts arising from the Scheme, the details of which may not be decided until a much later date.

Conclusion

We recommend that the ES takes into account the comments provided in relation to ECC’s statutory and non-statutory services. I hope the above is of assistance – if you require further information on the contents of this single response, please contact Natalie Hayward (Principal Planner) as detailed below. When a decision is made on the applicant’s EIA Scoping Report, any opinion should be sent through to ECC upon publication.

Yours sincerely



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