

LONGFIELD SOLAR FARM CONSULTATION
1 JUNE – 13 JULY 2021
SOME NOTES ON THE SCHEME PROPOSALS

INTRODUCTION

It is important that as many people as possible respond to the statutory consultation for the Longfield Solar Farm. Local residents have been sent a brochure and questionnaire. Anyone can go to www.longfieldsolarfarm.co.uk and get involved in the consultation. Respondents can comment on any aspect of the proposal but probably the two most important issues are the use of good agricultural land and the overall negative impact on biodiversity. Other important issues would include landscape and visual impact as well as Health & Safety issues. Longfield have carried out an EIA (Environmental Impact Assessment) and this lists 16 topics as part of this process.

THE SCALE OF LONGFIELD SOLAR FARM

Within the boundary of the scheme Longfield state there are 459 hectares (1102 acres).

They say there are 432 hectares (1036 acres) for the solar farm of which 292 hectares (760 acres) will be under Photo Voltaics (PVs). This is 64% of the total; the consultation brochure says 60%.

Landscape works are said to occupy 129 hectares (309 acres) and ancillary works and compound areas 11 hectares (26 acres).

It is not possible to identify from the maps or commentary in the consultation brochure where the 129 hectares of landscape works are located.

Overall the fact is that the scale of development is currently the largest single site solar farm proposal in the UK.

AGRICULTURAL LAND LOSS

Agricultural land is subject to a classification system – Agricultural Land Classification (ALC). This grades land into 6 categories (1, 2, 3a, 3b, 4 & 5). Grades 1, 2 and 3a are called BMV (Best & Most Versatile) land. BMV land has a strong degree of protection in planning guidance. The NPPF (National Planning Policy Framework) as well as other government policies make the protection of BMV land a priority. The NPPF states that “where significant development of agricultural land is demonstrated to be necessary planning authorities should seek to use areas of poorer quality land in preference to that of higher quality. There is also a strong case for protecting 3b land as this can produce reasonable yields of a range of crops and planning guidance (EN-1) needs strengthening to cover what some would regard as a planning loophole.

All the land on the Longfield site was classified as grade 2 on the ALC maps. These maps are 1:250,000 and are regarded as suitable for strategic purposes. Developers normally commission a more detailed ALC for planning applications and there are detailed guidelines for this process.

Longfield has carried out an ALC and now state that:

55 hectares is Grade 2 (132 acres)
103 hectares is Grade 3a (247 acres)
274 hectares is Grade 3b (657 acres)

This means that 37% of the area is BMV and 63% 3b.

- Longfield state in the non-statutory consultation there was concern about the overall scale of development and the potential loss of agricultural land. They state they have reduced the use of BMV land (p.16 "*we have reduced the use of BMV by 60%*"). There are no figures to explain or justify this statement. It would appear that changes since the first consultation have been minimal.
- Page 21 of the consultation states the potential loss of BMV land is expected to have a significant adverse impact and states that in mitigation they have sought to reduce the use of BMV land. There is no evidence to support this statement.
- It is noted in one of the more detailed reports in the Preliminary Environmental Information (PEI) that an ALC report will be presented as an appendix in the Environmental Statement (ES). The ES has not yet been prepared but will be presented when the proposals are submitted for a Direct Consent Order (DCO). It is therefore not possible to know if the detailed metrics have been properly followed in downgrading land from Grade 2 to Grade 3b. It should be noted that ALCs carried out for developers often downgrade land to achieve planning approvals and it is therefore of great importance to verify the ALC methodology.
- In the PEI, para. 6.8.15, it states the permanent effect of the scheme on BMV land is assessed as having major adverse effects during the operation of the site which is considered significant.
- As stated, planning guidelines say that developers should look for sites on less valuable agricultural land. Para 3.1.2 of the PEI, a technical report refers to a 'site search exercise'. No details are provided for this.

Land Loss Conclusion

- Planning guidance and government policy gives strong protection to BMV sites; 37% of Longfield Solar Farm is BMV.
- Grade 2 land has been reclassified as Grade 3b; there is no way at this stage of checking the methodology used.
- At an overall total of 459 hectares the Longfield Solar Farm is massive in scale.
- There is no evidence that the developer has done a search for alternative sites.

Overall Land Use Context

The UK is losing farmland to other uses at an alarming rate. This is leading to a probably food importation in the UK of 50% within the next 10 years creating a significant food security issue. There are 3 NSIP (Nationally Significant Infrastructure Projects) in the process of being approved. It

is estimated that there are 270 solar farms under construction or awaiting approval. Renewable energy is important. Off-shore wind will provide most of our renewable needs. The government has set a target of providing electricity for every home by wind by 2030 (2020 Energy White Paper).

BIODIVERSITY AND LONGFIELD SOLAR FARM

Biodiversity is of major importance and is central in the decision making process for planning approval for such schemes as the Longfield Solar Farm.

In 2019 DEFRA confirmed that the delivery of biodiversity net gain would be a mandatory requirement for all new development in England. Biodiversity 2020 is a national strategy for England and the Environment Act 2020 includes the mandatory approach to ensure biodiversity net gain. These points are well covered in NPPF guidance.

Solar farms do impact on biodiversity. In 2019 a survey by BSG Ecology stated *“evidence of solar farms impact on biodiversity remains limited... there is little empirical data on the subject”*. Natural England recommends the avoidance of solar developments in or near to areas of high ecological value. In the same report it was stated that *“the lack of evidence available relating to the ecological impact of solar farms is concerning”*.

Specific Comments on Consultation Documents

- The PEI report is only provisional and it will change (para. 1.4); this makes consultation ineffective.
- The consultation brochure identifies 1 SSSI near the site, 31 non statutory sites within 2 km.
- There is reference to an OLEMP (On-line Landscape & Ecology Management Plan). This could be an important document but is not available for comment.
- The Preliminary Ecological Appraisal;

Flora – *“Some habitats within the site have the potential to support notable flora species such as those associated with arable field margins and wetland”*. There is a statement that further investigation is required. Therefore going ahead with the proposals has possible adverse consequences on the flora.

Para. 5.4.8: *“The scheme has the potential to result in the direct loss of habitat need by protected and notable bird species”*. There is a recommendation that a significant number of extra surveys are required.

Para. 6.1.1: Breeding Bird Surveys – *“The construction of the scheme in the absence of avoidance or mitigation has the potential to affect the breeding bird assemblage within the site boundary. These potential effects include;*

- *habitat loss and fragmentation*
- *displacement and/or loss of breeding populations*
- *increase in noise causing disturbance and visual distortions.”*

Para. 3.3.4: Reptiles – *“The ecological data is only valid for short periods due to the transient nature of the subject”*.

Para. 3.3.3 notes that not all habitats were surveyed in detail.

Para. 7.2.1: Great Crested Newts – *“At this stage it is not possible to determine the full impacts of the scheme on Great Crested Newts and to design an appropriate mitigation strategy”*.

Para. 3.5: Aquatic Ecology notes survey limitations.

Para. 5.3.1: Wintering Birds notes that arable farmland is the current predominant habitat and this supports Golden Plover and Lapwing as well as seed-eating passerines including Skylark, Yellowhammer and Linnet. Also noted is that game cover crops support Reed Bunting and Dunnock. Overall 76 bird species, of which 38 are of conservation importance, are noted.

Para. 5.2.4: Bats – The report states *“there is currently no scientific literature available on the impacts to bats from solar farms”*. This statement is not true. There were two studies that showed a negative impact on bats and Natural England concluded research was inconclusive but raised overall concerns.

Para. 5.2.5 noted the potential impact on bats from:

- disturbance of habitats
- loss of habitats (mainly agricultural land)
- changes to bat foraging and commuting habits.

Para. 5.2.9: Reptile Survey – notes the loss of reptile foraging habitat.

Biodiversity Conclusions

- It is clear there will be mitigation and enhancement proposals in the Longfield Solar Farm proposals; these are to be welcomed.
- If the mitigation and enhancement were to be applied in an agricultural context, as they could be in the government’s Environmental Land Management (ELM), then the biodiversity gains could be greater.
- It is clear from all the reports that more work is needed on ecology and biodiversity.
- It is difficult to comment on incomplete evidence.
- The existing site is of significant value with its woodland areas, ponds, proximity of valuable sites and the range of species identified in the surveys.

Overall Biodiversity Conclusion

There is a probable negative impact on biodiversity and more ecological study is needed. It would be premature to give approval for large scale solar schemes such as the Longfield Solar Farm proposals as after a few years considerable ecological damage could be achieved that would be difficult to correct. Current advice from organisations such as Natural England is to site solar farms away from areas of value. The Longfield Solar Farm site would be classed as an area of value.

LANDSCAPE AND LONGFIELD SOLAR FARM

Longfield Solar Farm will have a significant impact on the landscape and a visual impact on what is a beautiful part of the Essex countryside. This is identified in the consultation booklet p.21 *"We have identified potential impacts on views into the site from a number of points during the construction, operational and decommissioning phases"*.

Specified points to note regarding landscape are:

Para. 4.1.9, Plate 1 – not very flattering photos of what is actually a very attractive landscape.

Landscape in the construction phase – the reports admit there will be adverse effects which are considered significant and notes there is not much mitigation that can be done.

Para. 6.6.19 notes: *"The scheme would result in an alteration to landscape character"*.

Para. 6.6.21 notes: *"Moderate adverse effects on landscape character which is considered significant"*.

Para. 6.6.55 – this is a significant statement: *"The residual landscape and visual effects are due to the change of land use and the massing of the panels and associated structures. It would not be possible to mitigate every adverse effect due to the requirements of the scheme"*.

Overall Landscape Conclusions

Landscape and visual impact will be very significant. Mitigation will have little impact since trees and hedgerows that will be planted to try and limit the adverse impacts will have little effect through the early part of the scheme.

OTHER ISSUES WITH LONGFIELD SOLAR FARM

The report lists a range of issues which are considered in the EIA. These are:

- Air quality
- Glint and glare
- Ground conditions
- Human health and wellbeing
- Major accidents and disasters
- Noise and vibrations
- Telecommunications
- Television reception and utilities
- Transport and access
- Waste
- Water environment

There are some points to note:

Security fences and CCTV receives little to no mention, but Plate 2 illustrates typical deer and security fencing and if this were typical it would certainly not allow access for a range of mammals.

Para. 6.3.13 notes significant effects of the proposals on non-archaeological assets.

Para. 6.3.15 notes the impacts from security lighting and states details and further assessment will be in the ES making any consultation comment impossible at this time.

- Human health EMF (Electro-Magnetic Fields) again noted that this will be considered in the ES.
- p.29 – Enhanced waterscape. Booklet says River Ter is failing on phosphate levels and says this is because of overshadowing and agricultural run-off. In fact it is believed this is from pollution coming from Great Leighs sewage works.
- Para 6.5.4 states flood risks associated with the scheme are considered negligible. This is a challengeable proposition.

SOME KEY QUESTIONS TO LONGFIELD SOLAR FARM

1. On the assumption that the consultation will result in changes to the DCO (Direct Consent Order) submission, will consultees be given access to the revised document? to the consultation response? to the ES and appendices? to subsequent ecological surveys?
2. What exactly will happen in the biodiversity trial area? Presumably there will be PVs in this area?
3. Is it possible to see the methodology associated with the ALC? It clearly exists since revised maps could not have been produced without metrics.
4. Where is the detail on the fencing, CCTV and security lights?
5. *“We have reduced the area of BMV by 60%”* - please explain.
6. Reference is made to an Online Landscape Ecology Management plan. Can we see this in order to comment?
7. Can the 129 hectares of landscaped works be located and how is the area calculated?
8. Does the total area of 459 hectares include the woodlands located within the area?
9. Where are the species rich grassland areas? The only one that can be seen appears to be by the River Ter?
10. Can details of the site search exercise be provided?

FINAL CONCLUSIONS

The Longfield Solar farm should not go ahead. Renewable energy is important and most of the UK's requirement will come from wind. If land is to be used for energy then bioenergy crops are more efficient. If solar is to be a part of the equation then there are plenty of options and one of them is not good agricultural land.

The overall context of the proposal is the national picture of nearly 300 solar farms being built or seeking planning approval.

Nevertheless, Longfield Solar Farm will almost certainly apply for a DCO. It is therefore hoped they will dramatically reduce the area under PVs by removing at the very least all BMV land from the scheme and PVs near existing housing. The scheme will almost certainly have adverse effects of biodiversity and significantly alter attractive landscapes.