



TERLING AND FAIRSTEAD PARISH COUNCIL

Parish Clerk: Frankie Killby

3 Pilgrims Court, Cuckoo Hill, Bures, Essex CO8 5LF

Tel: 01787 227700 · Email: clerk@terlingandfairsteadpc.co.uk · www.terlingandfairstead.org.uk

30th May 2022

Terling and Fairstead Parish Council

Longfield Solar Energy Farm (application no EN010118)

Interested Party reference 20031557

The Parish Council (PC) has attended presentations/webinars during the pre-application and application stages. It has considered newsletters, both soft and hardcopy documents deposited. Its Councillors have walked the perimeter of the proposals and its footpaths, with many residents. It has encouraged the community to make their separate representations as an Interested Party to HMPI.

The PC will seek to make further and specific commentary during the examination by HMPI.

Text of submission to HMPI:

The PC refers to its submission of 23/11/21 at the statutory pre-application consultation (26-10/21-27/11/21), included in the DCO submission. A copy of this document is at the end of this submission.

The Secretary of State originally called for sites in single ownership to support solar farms of over 50 MW. It is clear now there will be additional land acquired to deliver this scheme “at scale”.

The DCO extends to Cranham Road connecting to the Chelmsford NE bypass. The last Longfield newsletter plan did not show this, their preferred access route. It is unclear if the acquisition of necessary land will be in advance of any physical works on the Longfield scheme.

Longfield is very large, the associated BESS of a scale proportionally larger; its impact/massing in this rural/agricultural location, even with the mitigations suggested, do little to ameliorate long-term land industrialisation for future generations.

The PC is not convinced by Longfield’s proposals; a single scheme at scale is both relevant and contributes to the national energy requirement, and questions the suggested efficiency of solar farms and the proportionate loss of high yield food producing land. The EIA is evasive concerning the removal of topsoil (at construction phase) suggesting any re-instatement for agricultural use requires robust conditions in any DCO consent.



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The economic model charging the BESS from solar (daytime) then night-time alternatives has been glossed over. This is the main economic driver for the quantum and scale of the BESS - Longfield should evidence this. The PC intends to challenge the battery technology and Essex Fire and Rescue responses as to future community risk, which it believes to be significant.

Alternative sites which may have been considered are dismissed as those that “may come forward in addition to Longfield in due course”, one is already in the control of EDF (Bradwell). The PC will challenge this view at examination. The proposal includes several Chelmsford City Council/Braintree District Council designated and adopted ‘protected lanes’. The PC is extremely concerned about the negative effect on landscape/visual amenity in this attractive part of Essex for its community, and Chelmsford’s expanding population.

The construction/de-construction impacts the community’s amenity significantly. Longfield advise 600 personnel at times with associated vehicle movements. Will there be a construction camp and hours of work conditioned as Monday to Friday 0730-1700, Saturday 0730-1300 with no work on Sundays?

The PC is still to be convinced of the carbon factors stated in the manufacture, construction, operation and decommissioning of the scheme as well as the negative carbon footprint of any associated activity.

The PC notes that no permanent legacy community assets are included within the proposals.

The PC has concerns on the applicant’s financial status. The PC requests the re-instatement of land to agricultural use be conditioned by a performance bond.

The PC has two other DCOs (pre-statutory consultation stage); A12 widening and National Grid East Anglia Green and the proposed Chelmsford Garden Village is close to the site. The PC seeks evidence of collaborative approaches to programming these significant impacts within the Parish.

The cumulative effect of the Longfield proposals and all other solar schemes will affect the UK's food security. The local landscape will suffer and the PC recommends **this** DCO should not be granted.

In summary, the PC’s combined community view is the scheme is too large and in the wrong place.

END OF SUBMISSION TEXT – TO FOLLOW – LETTER TO PLANNING INSPECTORATE 23RD NOVEMBER 2021



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23 November 2021

Longfield Solar Farm; Development Consent Order - Additional Statutory pre-application consultation 26 October 2021 to 23 November 2021 under section 42 of Planning Act 2008

Please find set out below Terling and Fairstead Parish Council's response to Longfield Solar Farm's letter of 25 October 2021 addressed to the Clerk and attached Newsletter.

Terling and Fairstead Parish Council (The Council) is a statutory consultee.

General update

The Council's Planning Committee held a public meeting on 10 November 2021 and invited all parishioners via its website and village hub to respond to both the above letter and Newsletter via the Clerk of the Council.

The Council's formal response now includes those expressed opinions of the wider community.

The Council is aware of two major infrastructure schemes that will affect and impact the subject application proposals namely:-

- A12 widening proposals being advanced by a DCO application by National Highways and presently before the Planning Inspectorate, which may now be registered.
- Chelmsford NE bypass being advanced by Essex Highways (ref cc/Chl/85/21) to Essex County Council.

The Council is concerned by the apparent lack of reported public engagement to demonstrate joined-up thinking between these separate applications and the Longfield team, with its consequent effects on the loss of amenity and enjoyment to the lives of our parishioners.

The Council is aware that National Highways is commencing a further series of public consultations on its proposals to widen the A12. The Council will be making representations to National Highways regarding the need for a joined-up approach for these proposals, to allay its concerns and encourage a comprehensive and inclusive approach to these major infrastructure schemes.

The stated construction programmes for the separate schemes appear to have become combined and will seriously impact on many residents and parishioners, especially to the west of the community.

Communication

The Council is concerned to note that Longfield's Newsletter of 25 October 2021 had not been received by many members of the Terling community. Indeed, if it had not been for the Council's monitoring of the Longfield website, the wider community would have remained in ignorance of the



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additional consultation. The Council will be bringing this lack and lapse of the statutory consultation process to the attention of the Planning Inspectorate.

Please note the reference on the Longfield website to locate the October Newsletter was confusing. Longfield has demonstrated no effort to garner wider publicity with posters or leaflet drops to publicise and inform parishioners of the proposed changes prior to the time of writing, which is disappointing.

Should further consultation and Newsletters be produced by the Longfield team, we would request and encourage a more inclusive consultation process.

Infrastructure proposals, access and traffic management

The Council notes that there are significant changes to access now proposed. They are convenient to Longfield's commercial aspirations and not the wider community. The Council will, in due course, comment on the suitability of the enlarged scheme in this location, and the defective rationale for this site's selection. We will also be analysing suggested alternative site appraisals for comparison, with less impact to the continued quiet enjoyment of the wider Terling community and combined detrimental effect on our environment and continued wellbeing. We shall continue to question the loss of c 1172 acres of land capable of food production.

The proposed revision to the DCO application boundary now includes Wheelers Hill and Cranham Road but only to the extreme width of the carriageway and footpath as may be extended. There is no supporting data supplied, and certainly the Longfield communications of 25 October 2021 does not include reference to any residential properties that continued amenity is set to be impacted by this proposed revision. Is it the intention that these changes to the roads will be permanent or will Longfield reinstate to present configurations on operation of the Longfield facility?

The revision to this application is silent in relation to Drakes Lane, which the Council suggests is set to become an alternative route of access to the western approaches to the Terling settlement, via Birds Farm Lane and Noakes Farm Lane (which combine to Waltham Road).

The Chelmsford NE bypass planning application [direct to Essex County Council (ECC)], does not appear to take into consideration in section 1B of that application, the revisions now proposed by Longfield for Cranham Road and Drakes Lane. The Council has made representations to ECC drawing attention to this apparent disconnect in comprehensive data provision.

Battery Storage

The Council is now aware the proposed enlarged battery storage facility at Bulls Lodge substation is now being advanced as the preferred location. We continue to seek further information as to the safety of the proposed technology for battery storage, conversion (DC to AC and AC to DC). It appears the storage



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facility is now even closer to the A12 (which will be 6 lanes when widened). The battery storage is also closer to Boreham village.

The Council is increasingly concerned as to the size and installation of more battery technology and the explosion risk from such a concentration of battery enclosures. The Council is very uncomfortable about the robustness of the responses to its enquiries to the Fire Authorities and the Longfield team.

Additional Solar Farms within 8 kms of the Longfield site

The Council has been monitoring the proposed solar farm and battery storage scheme at Links Farm to the south of Braintree (BDC ref 21/01878, 9 June 2021). This is c163 acres and stated to be capable of producing 35Mw and is pending consideration by Braintree District Council at the time of writing.

Observation has been made that if c163 acres of land at Links farm is stated as producing 35Mw of generated power, why is the Longfield site (as now enlarged and re-stated as being c1172 acres) only capable of producing 50Mw?

Concluding comments

To say changes in the revised proposal and this additional statutory consultation are consequent as mere “refinements” to the new Longfield proposal, is disingenuous.

Stating that the further consultation is ... “purely changes to the scheme boundary in order to allow for our preferred grid connection route.” and “these changes will not affect the outcomes of the PEIA set out in the PEIR...”, the Council contends is Longfield seeking to mitigate previous scheme errors in its initial round of public consultation resulting in the earlier DCO submission. The Council now questions the deliverability of the wider and much enlarged Longfield scheme.

Parishioners have commented that when the Secretary of State first approached the wider UK market seeking site proposals for a 50Mw solar farms and battery storage installations, it was clearly stated the sites proposed should already be in a single ownership or controlled by the respondents, evidently from the information supplied in the Longfield October letter this is not now the case.

There is no confirmation the additional land has been acquired or rights acquired to deliver the Longfield proposal as has now become enlarged. There is commentary that the necessary land has to be so controlled (perhaps by compulsory purchase) but it appears there is no certainty given as to programme or agreement. Additionally, the existing HV pylons and distribution infrastructure is already in excess of 60 years old, and the expected life cycle of the existing pylons suggests replacement during the expected period of operation of the Longfield installation; should, even now, an underground network of cables to future proof the facility, be advanced for public consultation?



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The proposed revisions to the western access routes, the siting of the enlarged battery store closer to the A12 and the village of Boreham, require further justification and evidence to both the PEIA and PEIR (as these may require), to be updated and available for wider community comment.

Only when such reassessments and revised risks analysis, as appraised by the Longfield team, may be considered by this Council, can the next stage of the DCO application process be permitted to advance.

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