

## **Consultation Comments for 23/00532/FUL**

### **Application Summary**

**Application No:** 23/00532/FUL  
**Address:** Land South Of Southlands Cottages Runwell Road Runwell Wickford Essex  
**Proposal:** Installation of a solar farm with battery storage and associated infrastructure

### **Basildon District Council**

Comment submitted on 18 Apr 2023

Thank you for your consultation in respect of the above planning application.

I would like to make the following comments on behalf of Basildon Council which borders the application site to part of the western boundary.

The impact on the Green Belt will need to be balanced alongside the benefit of renewable energy as outlined in the NPPF 2021.

It is noted that the site is highly visible particularly when viewed from Runwell Road adjacent to 2 Southlands Cottages where the land steeply rises and also those parts closest to Runwell Road (i.e. the far north-eastern parcel).

There is concern that the proposal will spoil the view from the public right of way network which run in an east-west direction to the north of the River Crouch (Runwell 8 and Rettendon 23 public footpaths) and will be detrimental to the enjoyment and experience of members of the public which use these footpaths and benefit from the currently open landscaped setting. Erecting fencing either side of the public footpaths will introduce a man-made industrial feature into the natural landscape, detrimental to the landscape character. We would ask that Place Services Landscaping are consulted if they haven't been already and that views from the Wickford Memorial Park are taken into consideration.

Please can these comments be passed onto the relevant case officer.

### **Runwell Parish Council**

Comment submitted on 17 May 2023

Runwell Parish Council have a policy to object to inappropriate development of the greenbelt. Residents and Councillors have raised the following comments: 1. Glare and glint effects on livestock in adjoining fields; 2. Issues with the Public Right of Way which crosses through the

proposal ' safety of the walkers using the path (consider a safer diversion); 3. Re-instatement of surfaces following completion of the installations; 4. Drainage ' ways of improving natural drainage; 5. Concerns about chemical release when washing the solar panels; 6. Devaluation of material assets (homes) of neighbouring properties; 7. Untested health implications to those living in close proximity to the solar farm and loss/impairment of Health & Well-being due to the visual amenity being lost (majority of native trees and hedges are deciduous and do not obscure the view all year round); 8 loss of agricultural land (sheep have never been grazed on this land previously uncertainty of suitability); 9 A review of similar renewable energy project applications, it is noted that under very special circumstances similar projects have been approved as there is a benefit for local residents.

## **Essex County Council Highways**

Comment submitted on 3 Nov 2023

Your Ref: 23/00532/FUL

Our Ref: CO/EGD/SD/RM/CHL/23/532/56301

Date:- 3rd November 2023

Recommendation Issue 2.

The Highway Authority has reconsidered the Glint & Glare Impact Assessment and amended the conditions accordingly:

' The Solar Panels used in this proposal, would have a tracking capability, to track the sun's path across the sky.

' The existing established vegetation adjacent to A130 and the A132 Runwell Road together with the additional planting proposed would mitigate the impact of the proposal.

From a highway and transportation perspective the impact of the proposal is acceptable to the Highway Authority subject to the following conditions:

1. The additional planting shown, shall be provided and planted clear of the highway boundary extent as shown in the:

i. Proposed Site Plan, drawing no. RC3-02-P02, Revision 04.

ii. Southlands Farm- Detailed Landscape Plan, drawing no. P22-1918\_EN\_003C.

Reason: In the interest of highway safety and to protect the integrity of the highway in accordance with policy DM1.

2. The submitted Construction Traffic Management Plan (CTMP), October 2022 shall be adhered to throughout the construction period. The CTMP provides for in particular;

i. vehicle routing,

ii. construction access restricted to left in left out vehicle access and turning movements,

iii. the parking of vehicles of site operatives and visitors,

iv. loading and unloading of plant and materials,

v. storage of plant and materials used in constructing the development,

vi. Turning facility for articulated 18.55 metre in length heavy goods vehicles,

vii. wheel and underbody washing facilities.

Reason: To ensure that vehicles can enter and leave the highway in a controlled manner, to ensure that vehicles can enter and leave the highway in a forward gear, to ensure that on-street parking of these vehicles in the adjoining roads does not occur, to ensure that loose materials and spoil are not brought out onto the highway in the interests of highway safety and Policy DM1 and DM19 and to avoid inappropriate HGV movements through the built up areas.

3. A before and after condition survey (Highways Dilapidation Survey), to identify defects to highway in the vicinity of each of the vehicular access in 4 below, and where necessary ensure that repairs are undertaken at the developer expense, where the damage is caused by the developer to the satisfaction and, at no cost of the Highway Authority.

Reason: To preserve the integrity of the highway, in the interests of highway safety and Policy DM1.

4. Prior to commencement, the Solar Farm Vehicular Access, which would be used for the Construction and future Maintenance, shown in principle the Proposed Site Plan, drawing no. RC3-02-P02, Revision 04 and detail design and construction shown in the submitted Construction Traffic Management Plan (CTMP), October 2022 3 above, shall be constructed as shown in principle at Appendix A, Proposed Site Access Arrangement On A132 at Existing Field Access, drawing no. SK01, Revision A. with subsequently submitted Heavy Goods Vehicle 18.55 metres long Swept Path drawing number SK03 2201-018 and SK04 2201-018. The vehicular access shall be provided with an appropriate vehicular crossing of the highway verge to accommodate all vehicle movements for the construction phase, details to be agreed in writing with the Local Planning Authority and the Highway Authority .

Reason: To ensure that vehicles can enter and leave the highway in a controlled manner in the interest of highway safety in accordance with policy DM1.

5. The visibility splays in both directions to the highway vehicular access shown in principle the Proposed Site Plan, drawing no. RC3-02-P02, Revision 04, pass over highway land. The applicant shall ensure that the foliage within the verge is cleared and to Maintain these visibility splays in perpetuity, as measured from and along the nearside edge of the carriageway.

Reason: To provide adequate inter-visibility between vehicles using the road junctions/accesses and those in the existing public highway in the interest of highway safety in accordance with policy DM1.

6. No unbound material shall be used in the surface treatment for each of the three vehicular accesses in 5 above, within 20 metres of the highway boundary.

Reason: To avoid displacement of loose material onto the highway in the interests of highway safety in accordance with policy DM1.

7. There shall be no discharge of surface water from the development onto the Highway.

Reason: To prevent hazards caused by water flowing onto the highway and to avoid the formation of ice on the highway in the interest of highway safety to ensure accordance with policy DM1.

8. The gates provided at the vehicular accesses in 4 above, shall be inward opening only and shall be set back a minimum of 20 metres from the back edge the carriageway.

Reason: To enable vehicles using the access to stand clear of the carriageway whilst gates are being opened and closed and to allow parking off street and clear from obstructing the adjacent footway/cycleway/carriageway in the interest of highway safety in accordance with policy DM1.

9. The public's rights and ease of passage over public right of way; footpath, 8 (Runwell Parish 231), shall be maintained free and unobstructed at all times.

Reason: To ensure the continued safe passage of the public on the definitive right of way and accessibility in accordance with Policies DM1 and DM11.

10. If it deemed necessary for public footpath 8 (Runwell Parish 231), to be closed for safety reasons, during the construction phase or to be diverted, no development shall be permitted to commence on site until such time as a Legal Order(s) have been obtained, by agreement with the Essex County Council Public Rights of Way Team (see the Informatives below), securing

the diversion of the existing definitive right of way, be it temporary or permanent, to a route to be agreed with the Local Planning Authority. The new route(s) must be constructed to the satisfaction of the Local Planning Authority. Hedges other vegetation or foliage must not encroach upon the width of footpath 8. This responsibility lies with the applicant and it is not the responsibility of the Highway Authority to maintain the hedges other vegetation or foliage clear of footpath 8.

Reason: To ensure the continued safe passage of pedestrians on the public right of way and accessibility in accordance with Policies DM1 and DM11.

#### General

I. Prior to any works taking place in public highway the developer shall enter into an appropriate agreement with the Highway Authority to regulate construction works. This will include the submission of detailed engineering drawings for approval with the submitted Stage 1 Road Safety Audit with designer's responses for vehicular access in 4 above. The designers' responses will be reviewed by the Highway Authority Engineers and where deemed necessary; the applicant may be required to make additional considerations with follow up actions to make the use of the vehicular access safe from a highway and transportation perspective.

II. The Highway Authority cannot accept any liability for costs associated with a developer's improvement. This includes design check safety audits, site supervision, commuted sums for maintenance and any potential claims under Part 1 and Part 2 of the Land Compensation Act 1973. To protect the Highway Authority against such compensation claims a cash deposit or bond may be required.

III. The above to be provided at no cost to the Highway Authority.

IV. The above to be imposed on the planning permission (if granted) by planning obligation or condition, as necessary.

Please include the Informative:

All work within or affecting the highway is to be laid out and constructed by prior arrangement with, and to the requirements and satisfaction of, the Highway Authority, details to be agreed before the commencement of works.

i. The applicants should be advised to contact the Development Management Team by email at [development.management@essexhighways.org](mailto:development.management@essexhighways.org):

ii. The Essex County Council Public Rights of Way team by email at [highway.status@essexhighways.org](mailto:highway.status@essexhighways.org)

#### Comment submitted on 30 Oct 2023

Your Ref: 23/00532/FUL

Our Ref: CO/EGD/SD/RM/CHL/23/532/56301

Date:- 30th October 2023

From a highway and transportation perspective the impact of the proposal is acceptable to the Highway Authority subject to the following conditions:

1. The additional planting to mitigate potential Glint & Glare, to users of the A130 carriageway to the east and the A132 Runwell Road to the north as shown in:

i. Proposed Site Plan, drawing no. RC3-02-P02, Revision 04.

ii. Southlands Farm- Detailed Landscape Plan, drawing no. P22-1918\_EN\_003C. The planting shown in the Site Plan.

shall be provided to ensure all the existing gaps in the existing hedges and foliage surrounding the proposed Solar Farm Park Sites within the site curtilage and clear of the adopted highway,

with species of the planting to be agreed in writing with the Local Planning Authority (LPA) and the Highway Authority, that would grow to a height of 3 metres, to the satisfaction of the LPA and the Highway Authority. The hedge/screen planting shall be of appropriate density to prevent glint and glare to users of the highway; the A130 and A132 Runwell Road. The aim is to provide continuous unbroken screening (without gaps), between the Solar Farm and the highway, to prevent glint and glare distraction to all highway users.

The proposed temporary screening shall be 3 metres height, above the carriageway levels. The temporary screening must remain in place, until the new planting and any additional planting to enhance the existing established planting, is completely established to the satisfaction of the LPA and the Highway Authority.

Reason: To ensure that users of the highway are not subjected to glint, glare and dazzle in the interest of highway safety and in accordance with Policy DM1.

2. In the event of an extraordinary event, where the screening along the perimeter of the Solar Farm in 1 above, is partially or completely removed or destroyed, an Emergency Plan shall be provided that identifies:

- i. the procedure to instate temporary screening, with an associated Construction Management Plan
- ii. permanent remedial actions;
- iii. clearly identify the party or party's responsible;
- iv. provision of any Traffic Management required to the A130 and A132 Runwell Road, as required by the LPA and the Highway Authority;
- v. Full details, to be agreed in writing with the Local Planning Authority and the Highway Authority prior to commencement.

Reason: To ensure that users of the highway are not subjected to glint, glare and dazzle in the interest of highway safety and in accordance with Policy DM1.

3. The submitted Construction Traffic Management Plan (CTMP), October 2022 shall be adhered to throughout the construction period. The CTMP provides for in particular;

- i. vehicle routing,
- ii. construction access restricted to left in left out vehicle access and turning movements,
- iii. the parking of vehicles of site operatives and visitors,
- iv. loading and unloading of plant and materials,
- v. storage of plant and materials used in constructing the development,
- vi. Turning facility for articulated 18.55 metre in length heavy goods vehicles,
- vii. wheel and underbody washing facilities.

Reason: To ensure that vehicles can enter and leave the highway in a controlled manner, to ensure that vehicles can enter and leave the highway in a forward gear, to ensure that on-street parking of these vehicles in the adjoining roads does not occur, to ensure that loose materials and spoil are not brought out onto the highway in the interests of highway safety and Policy DM1 and DM19 and to avoid inappropriate HGV movements through the built up areas.

4. A before and after condition survey (Highways Dilapidation Survey), to identify defects to highway in the vicinity of each of the vehicular access in 5 below, and where necessary ensure that repairs are undertaken at the developer expense, where the damage is caused by the developer to the satisfaction and, at no cost of the Highway Authority.

Reason: To preserve the integrity of the highway, in the interests of highway safety and Policy DM1.

5. Prior to commencement, the Solar Farm Vehicular Access, which would be used for the Construction and future Maintenance, shown in principle the Proposed Site Plan, drawing no. RC3-02-P02, Revision 04 and detail design and construction shown in the submitted Construction Traffic Management Plan (CTMP), October 2022 3 above, shall be constructed as



shown in principle at Appendix A, Proposed Site Access Arrangement On A132 at Existing Field Access, drawing no. SK01, Revision A. with subsequently submitted Heavy Goods Vehicle 18.55 metres long Swept Path drawing number SK03 2201-018 and SK04 2201-018. The vehicular access shall be provided with an appropriate vehicular crossing of the highway verge to accommodate all vehicle movements for the construction phase, details to be agreed in writing with the Local Planning Authority and the Highway Authority .

Reason: To ensure that vehicles can enter and leave the highway in a controlled manner in the interest of highway safety in accordance with policy DM1.

6. The visibility splays in both directions to the highway vehicular access shown in principle the Proposed Site Plan, drawing no. RC3-02-P02, Revision 04, pass over highway land. The applicant shall ensure that the foliage within the verge is cleared and to Maintain these visibility splays in perpetuity, as measured from and along the nearside edge of the carriageway.

Reason: To provide adequate inter-visibility between vehicles using the road junctions/accesses and those in the existing public highway in the interest of highway safety in accordance with policy DM1.

7. No unbound material shall be used in the surface treatment for each of the three vehicular accesses in 5 above, within 20 metres of the highway boundary.

Reason: To avoid displacement of loose material onto the highway in the interests of highway safety in accordance with policy DM1.

8. There shall be no discharge of surface water from the development onto the Highway.

Reason: To prevent hazards caused by water flowing onto the highway and to avoid the formation of ice on the highway in the interest of highway safety to ensure accordance with policy DM1.

9. The gates provided at the vehicular accesses in 5 above, shall be inward opening only and shall be set back a minimum of 20 metres from the back edge the carriageway.

Reason: To enable vehicles using the access to stand clear of the carriageway whilst gates are being opened and closed and to allow parking off street and clear from obstructing the adjacent footway/cycleway/carriageway in the interest of highway safety in accordance with policy DM1.

10. The public's rights and ease of passage over public right of way; footpath, 8 (Runwell Parish 231), shall be maintained free and unobstructed at all times.

Reason: To ensure the continued safe passage of the public on the definitive right of way and accessibility in accordance with Policies DM1 and DM11.

11. If it deemed necessary for public footpath 8 (Runwell Parish 231), to be closed for safety reasons, during the construction phase or to be diverted, no development shall be permitted to commence on site until such time as a Legal Order(s) have been obtained, by agreement with the Essex County Council Public Rights of Way Team (see the Informatives below), securing the diversion of the existing definitive right of way, be it temporary or permanent, to a route to be agreed with the Local Planning Authority. The new route(s) must be constructed to the satisfaction of the Local Planning Authority. Hedges other vegetation or foliage must not encroach upon the width of footpath 8. This responsibility lies with the applicant and it is not the responsibility of the Highway Authority to maintain the hedges other vegetation or foliage clear of footpath 8.

Reason: To ensure the continued safe passage of pedestrians on the public right of way and accessibility in accordance with Policies DM1 and DM11.

General

I. Prior to any works taking place in public highway the developer shall enter into an appropriate agreement with the Highway Authority to regulate construction works. This will include the submission of detailed engineering drawings for approval with the submitted Stage 1 Road Safety Audit with designer's responses. The designers' responses will be reviewed by the Highway Authority Engineers and where deemed necessary; the applicant may be required to make additional considerations with follow up actions to make the use of the vehicular access safe from a highway and transportation perspective.

II. The Highway Authority cannot accept any liability for costs associated with a developer's improvement. This includes design check safety audits, site supervision, commuted sums for maintenance and any potential claims under Part 1 and Part 2 of the Land Compensation Act 1973. To protect the Highway Authority against such compensation claims a cash deposit or bond may be required.

III. The above to be provided at no cost to the Highway Authority.

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Please include the Informatives:

All work within or affecting the highway is to be laid out and constructed by prior arrangement with, and to the requirements and satisfaction of, the Highway Authority, details to be agreed before the commencement of works.

The applicants should be advised to contact the Development Management Team by email at [development.management@essexhighways.org](mailto:development.management@essexhighways.org):

i. SMO2 - Essex Highways, Springfield Highways Depot, Colchester Road, Chelmsford CM2 5PU.

ii. The Essex County Council Public Rights of Way team by email at [highway.status@essexhighways.org](mailto:highway.status@essexhighways.org)

## **Public Health & Protection Services**

Comment submitted on 18 Apr 2023

Provided the recommended mitigation is employed as outlined in the acoustic report, it appears that the noise levels from the operation of the development will be satisfactory.

## **Environment Agency**

Comment submitted on 20 Jul 2023

INSTALLATION OF A SOLAR FARM WITH BATTERY STORAGE AND ASSOCIATED INFRASTRUCTURE

LAND SOUTH OF NATIONAL GRID CHELMSFORD ROAD, RAWRETH, ESSEX

Thank you for your consultation dated 29 June 2023. We have reviewed the application as submitted and are able to remove our holding objection, detailed in our letter, referenced AE/2023/128277, dated 12 May 2023.

We now have no objection to this planning application, providing that you have taken into account the flood risk considerations which are your responsibility. We have highlighted these in the flood risk section below. Flood Risk

Our maps show the site lies within fluvial Flood Zone 3a defined by the 'Planning Practice Guidance: Flood Risk and Coastal Change' as having a high probability of flooding, although the

majority of the site does fall within flood zone 1. The proposal is for the installation of a solar farm with battery storage and associated infrastructure land south of national grid, which is classified as an 'essential infrastructure' development, as defined in Annex 3: Flood Vulnerability classification of the Planning Practice Guidance. Therefore, to comply with national policy the application is required to pass the Sequential and Exception Tests and be supported by a site-specific Flood Risk Assessment (FRA).

Flood Risk Assessment To assist you in making an informed decision about the flood risk affecting this site, the key points to note from the submitted FRA Addendum, referenced P23\_174 and dated 23 June 2023, version 1.0, are:

- o The site lies within the flood extent for a 1% (1 in 100) annual probability event, including an allowance for climate change.
- o It is proposed that the panel stowage height shall be at 2m, which is above the 1% (1 in 100) annual probability flood level including climate change of 0.15m AOD and therefore dry in this event. The panels will also be above the 0.1% (1 in 1000) annual probability flood level of 1.35m AOD.

**Other advice: Other Sources of Flooding**

In addition to the above flood risk, the site may be within an area at risk of flooding from surface water, reservoirs, sewer and/or groundwater. We have not considered these risks in any detail, but you should ensure these risks are all considered fully before determining the application. We trust this information is useful.

## **Ramblers Association**

Comment submitted on 18 Apr 2023

Thank you for advising the Ramblers of this planning application. On behalf of the Ramblers Association we wish to make the following comments:-

The Design and Access Statement (paragraph 2.6) refers to PRoW 231\_8, running in an east-west orientation, but NOT to PRoW 229\_23, which continues the PRoW up to and beyond the A130. These should BOTH be fully annotated within the relevant submitted documentation, including the Location Plans and Landscape Proposals.

The Design and Access Statement (paragraph 11.6) confirms that the existing PRoWs within the site will remain open and available at all times during construction, operation and decommissioning. This should be Conditioned in any Town Planning approval.

## **ECC Historic Environment Branch**

Comment submitted on 20 Apr 2023

Dear Sir/Madam,

RE: 23/00532/FUL - Installation of a solar farm with battery storage and associated infrastructure

Land South Of Southlands Cottages, Runwell Road, Runwell, Wickford

The above application has been identified on the weekly list by the Historic Environment Advisor to Chelmsford City Council as having archaeological implications.

As attested by the submitted Heritage Statement and the Essex Historic Environment Record (EHER), the proposed development site is in an area with a high potential to contain archaeological remains. Two important archaeological excavations have previously been



undertaken in close proximity to the proposed development. Beachamps Farm, located 350m to the south of the development, exposed an extensive multi-period settlement site, ranging in date from the Late Bronze Age to the Medieval period. An Iron Age settlement and associated cemetery, a Roman military camp (possibly a fort), a later Roman villa and evidence of Saxon occupation were all uncovered during the excavations (EHERs 7532-7540). 600m to the north of the proposed development, another multi-phase settlement site was uncovered during excavations at the former Runwell Hospital. This site uncovered evidence of Late Neolithic occupation, an Iron Age settlement enclosure ditch and a medieval roadside working area (EHER 15657).

This office agrees with the Heritage Statement's conclusions of the archaeological potential of the site. The undertaken geophysical survey has not identified areas of any intensive occupation, but extramural activity related to the settlement areas identified nearby is likely to extend into the proposed development site, and more ephemeral prehistoric activity is also likely to be present.

Given the above, this office recommends that the following conditions are placed on any consent, in line with the National Planning Policy Framework, paragraph 205:

**RECOMMENDATION:** Archaeological trial-trenching and excavation

1. No development or preliminary groundworks of any kind shall take place until a programme of archaeological investigation has been secured in accordance with a Written Scheme of Investigation which has been submitted by the applicant, and approved in writing by the local planning authority.
2. No development or preliminary groundworks of any kind shall take place until the completion of the programme of archaeological trial-trenching evaluation identified in the Written Scheme of Investigation defined in Part 1 and confirmed by the local planning authorities archaeological advisors.
3. A mitigation strategy detailing the excavation / preservation strategy shall be submitted to the local planning authority following the completion of the archaeological evaluation.
4. No development or preliminary groundworks can commence on those areas containing archaeological deposits until the satisfactory completion of fieldwork, as detailed in the mitigation strategy, and which has been approved in writing by the local planning authority.
5. The applicant will submit to the local planning authority a post excavation assessment (to be submitted within six months of the completion of the fieldwork, unless otherwise agreed in advance with the Planning Authority). This will result in the completion of post excavation analysis, preparation of a full site archive and report ready for deposition at the local museum, and submission of a publication report.

The work should be carried out by an accredited archaeological contractor and will initially comprise an archaeological trial-trenching evaluation of the proposed development site. This evaluation should ensure to target the anomalies identified by the geophysical survey. Depending on the results of this evaluation, it may be followed by a further scheme of archaeological open-area excavation and/or archaeological monitoring, or in situ preservation of remains, as appropriate.

An archaeological brief will be produced from this office detailing the work required, on request, and should be acquired prior to the submission of a Written Scheme of Investigation.

If you have any questions please do not hesitate to contact me.

## **Planning Listed Buildings & Conservation**

### Comment submitted on 9 May 2023

The application site covers approximately 60 hectares of agricultural land north of the Wickford to Battlesbridge railway line, west of the A130, south of Runwell Road and east of Runwell itself.

The proposals comprise solar panels and associated inverters/transformers, battery storage, traces, fencing and cctv. Access is from Runwell Road.

The heritage assessment submitted with the application scopes out 24 listed buildings within 3km of the site on the basis of distance, screening and lack of historic associations. This is concurred with.

The heritage assessment considers three designated heritage assets in more detail; St Mary's Church Runwell (grade I listed), All Saints Church Rettendon (grade I listed) and the granary at Rettendon Place (grade II) listed. It finds no harm to the setting of St Marys Church, on the basis that there is no ground level inter visibility and a small change to its wider setting. This view is concurred with. It finds no harm to the setting of All Saints Church on the basis that there is a small change to its wider setting. However, the site would feature in views from the churchyard, where the wider rural settings is relevant and would also impact up views of the church tower from PROW8 to the east of the site. This would impact on key views which contributes to the significance of the listed building and erode part of the wide rural setting. This would amount to less than substantial harm, given that only part of the wider setting is impact upon, it would be a low level of harm. This harm is nonetheless a matter of great weight. It would be possible to reduce, but not avoid, the harm by introducing a landscape corridor allowing views to the church tower from PROW8. The granary has its strongest association with the immediate rural settings, so no harm to its significance is agreed.

The heritage assessment doesn't include assessment of built non designated heritage assets. There are two pillboxes within the western part of the site, one adjacent the railway line and within the east-west field boundary separating the western field. They are part of a series of features forming the GHQ defence line constructed in 1940, to slow a possible German invasion. Both are FW3/24 types made of concrete and brick. They form part of a group of defences on the western side of an anti tank ditch now filled in, although there are other pillboxes to the northeast and southeast, now separated by the A130. The inter visibility between the pillboxes, lines of fire and landscape setting are important to the setting of the pillboxes and contributes to their significance. This would be eroded by the solar installation, adversely affecting their setting. This would be a moderate level of harm , taking account of other changes in the setting. It would be possible to partly, but not fully, offset this harm by having a condition for a condition survey, schedule of repairs and agreed timescale to carryout the work. To the north there is the Toby Carvery, a former mid nineteenth century small county house, which due to its architectural and historic interest should be considered as a non designated heritage asset. The rural setting contributes to its significance. The northeast part of the site contributes to it setting, even though it is severed by the busy Runwell Road and screened, there would be a low level of harm to its setting.

## **H.S.E East Anglia Area**

Comment submitted on 25 Apr 2023

Advice : HSL-230420110954-46 Does Not Cross Any Consultation Zones

Your Ref: 23/00532/FUL

Development Name: Land South Of Southlands Cottages Runwell Road Runwell Wickford Essex

Comments:

The proposed development site which you have identified does not currently lie within the consultation

distance (CD) of a major hazard site or major accident hazard pipeline; therefore at present HSE does not need to be consulted on any developments on this site. However, should there be a delay submitting a planning application for the proposed development on this site, you may wish to approach HSE again to ensure that there have been no changes to CDs in this area in the intervening period.

This advice report has been generated using information supplied by Alex Sadowsky at Chelmsford District (B) on 20 April 2023.

### **Anglian Water Services Ltd**

Comment submitted on 17 Apr 2023

Good afternoon,

Thank you for your email consultation on the planning application for 23/00532/FUL.

The Planning & Capacity Team provide comments on planning applications for major proposals of 10 dwellings or more, or if an industrial or commercial development, 500sqm or greater. However, if there are specific drainage issues you would like us to respond to, please contact us outlining the details.

The applicant should check for any Anglian Water assets which cross or are within close proximity to the site. Any encroachment zones should be reflected in site layout. They can do this by accessing our infrastructure maps on Digdat. Please see our website for further information:

<https://www.anglianwater.co.uk/developers/development-services/locating-our-assets/>

Please note that if diverting or crossing over any of our assets permission will be required. Please see our website for further information:

<https://www.anglianwater.co.uk/developers/drainage-services/building-over-or-near-our-assets/>

Kind regards

**Essex County Fire & Rescue Service**

Comment submitted on 26 Apr 2023

Dear Sir

Whilst Essex County Fire and Rescue Service (ECFRS) is not a statutory consultee in relation to the project at this stage, we will work and engage with the developer as this project develops to ensure it complies with statutory requirements that will be enforceable when they fall under our authority.

Approved Document B Volume 2: Buildings other than dwellings - Regulation 38: Fire Safety Information states:

"ensure that the person responsible for the building has sufficient information relating to fire safety to enable them to manage the building effectively"

ECFRS advises that the developer produces fire safety and risk reduction strategies as the responsible person for the scheme. We would also propose that safety measures and risk mitigation are developed in collaboration with the Service.

The strategies should cover the construction, operational and decommissioning phases of the project.

During the construction phase the number of daily vehicle movements in the local area will significantly increase. The Service would like to view the transport strategy to minimise this impact and prevent an increase in the number of road traffic incidents. Any development should not negatively impact on the Service's ability to respond to an incident in the local area.

ECFRS recognise the use of batteries (including lithium-ion) as Energy Storage Systems (ESS) is a new and emerging practice in the global renewable energy sector. As with all new and emerging practices within UK industry the Service would like to work with the developers to better understand any risks that may be posed and develop strategies and procedures to mitigate these risks.

The developer must ensure the risk of fire is minimised by:

Procuring components and using construction techniques which comply with all relevant legislation.

Including automatic fire detection systems in the development design.

Including automatic fire suppression systems in the development design. Various types of suppression systems are available, but the Service's preferred system would be a water drenching system as fires involving Lithium-ion batteries have the potential for thermal runaway. Other systems would be less effective in preventing reignition.

Including redundancy in the design to provide multiple layers of protection.

Designing the development to contain and restrict the spread of fire using fire-resistant materials and adequate separation between elements of the BESS.

Developing an emergency response plan with ECFRS to minimise the impact of an incident during construction, operation and decommissioning of the facility.

Ensuring the BESS is located away from residential areas. Prevailing wind directions should be factored into the location of the BESS to minimise the impact of a fire involving lithium-ion batteries due to the toxic fumes produced.

The emergency response plan should include details of the hazards associated with lithium-ion batteries, isolation of electrical sources to enable firefighting activities, measures to extinguish or cool batteries involved in fire, management of toxic or flammable gases, minimise the environmental impact of an incident, containment of fire water run-off, handling and responsibility for disposal of damaged batteries, establishment of regular onsite training exercises.

The emergency response plan should be maintained and regularly reviewed by the occupier and any material changes notified to ECFRS.

Environmental impact should include the prevention of ground contamination, water course pollution, and the release of toxic gases.

The BESS facilities should be designed to provide:

Adequate separation between containers.

Provide adequate thermal barriers between switch gear and batteries,

Install adequate ventilation or an air conditioning system to control the temperature. Ventilation is important since batteries will continue to generate flammable gas as long as they are hot. Also, carbon monoxide will be generated until the batteries are completely cooled through to their core.

Install a very early warning fire detection system, such as aspirating smoke detection/air sampling.

Install carbon monoxide (CO) detection within the BESS containers.

Install sprinkler protection within BESS containers. The sprinkler system should be designed to adequately contain and extinguish a fire.

Ensure that sufficient water is available for manual firefighting. An external fire hydrant should be located in close proximity to the BESS containers. The water supply should be able to provide a minimum of 1,900 l/min for at least 2 hours. Further hydrants should be strategically located across the development. These should be tested and regularly serviced by the operator. If the site is remote from a pressure fed water supply, an Emergency Water Supply (EWS) meeting the above standard should be incorporated into the design of the site e.g. an open water source and/or tank(s). If above ground EWS tanks are installed, these should include facilities for the FRS to discharge (140/100mm RT outlet) and refill the tank.

The site design should include a safe access route for fire appliances to manoeuvre within the curtilage (including turning circles). An alternative access point and approach route should be provided and maintained to enable appliances to approach from an upwind direction.

A Premises Information Box (PIB) should be located at the designated 'main' access point, to hold the Emergency Response Plan, to include water supplies for firefighting, drainage plans highlighting any Pollution Control Devices (PCDs) / Penstocks etc for the FRS.



Ideally, an Automatic Fire Alarm (AFA) slave/repeater panel presented as a MIMIC panel should also be located here.

As large-scale BESS facilities are a relatively new technology, associated risks may or may not be captured in current guidance such as the Building Regulations 2010 (as amended) and fall outside of the auspices of the Regulatory Reform (Fire Safety) Order 2005. For this reason, we strongly recommend applying the National Fire Protection Association (NFPA) 855 Standard for the Installation of Stationary Energy Storage Systems.

NFPA 855: Standard for the Installation of Stationary Energy Storage Systems

Yours sincerely

Susan Askew  
Protection  
Essex County Fire and Rescue Service

## **Police - Designing Out Crime**

### Comment submitted on 25 Apr 2023

Essex Police comments pursuant of the National Planning Policy Framework 2019 (NPPF) and Chelmsford City Council policies.

NPPF section 8 "Promoting Healthy and Safe Communities" paragraph 91(b), and section 12 "Achieving Well Designed Places" paragraph 127(c) address creating places that are safe. Chelmsford Local Plan DM23 & DM24 addresses security through "High Quality Design" and

"Place Shaping" with a reasoned justification 9.6 - "The layout and design of a development are important in creating a safe environment where people are comfortable to live, work and visit".

We welcome the considerations given to crime within the Design and Access Statement however we would dispute the impact of Solar Farm crime. It should be noted that other parts of the country have seen an exponential rise in crime in relation to solar farms with everything from solar panels to cabling, batteries and ancillary equipment being targeted. To comment further we would require the finer detail such as any proposed lighting, compound access control and physical security measures.

We would welcome the opportunity to consult on this development to assist the developer demonstrate their compliance with these policies.

Comment submitted on 1 Dec 2023

Essex Police comments pursuant of the National Planning Policy Framework 2019 (NPPF) and Chelmsford City Council policies.

NPPF section 8 "Promoting Healthy and Safe Communities" paragraph 91(b), and section 12 "Achieving Well Designed Places" paragraph 127(c) address creating places that are safe. Chelmsford Local Plan DM23 & DM24 addresses security through "High Quality Design" and "Place Shaping" with a reasoned justification 9.6 - "The layout and design of a development are important in creating a safe environment where people are comfortable to live, work and visit".

We note within the Planning Inspectorate - Appeal Decision that at paragraph 73 it states in relation to security of the development "Furthermore, this could be suitably addressed through agreement of the specification of robust boundary treatment and CCTV coverage by planning condition" We would therefore request that the content of our original comment is taken into consideration and that we are consulted with, in order that agreed robust security measures are included within the design of this solar farm.

## **ECC Minerals & Waste Planning**

Comment submitted on 25 Apr 2023

Dear Sir / Madam

Nature of Response: To address minerals and waste safeguarding implications arising through Application 23/00532/FUL.

Proposal: Installation of a solar farm with battery storage and associated infrastructure.

Location: Land South Of Southlands Cottages, Runwell Road, Runwell, Wickford, Essex.

Thank you for your email received 13th April 2023 consulting the Mineral and Waste Planning Authority (MWPA) on the above proposals.

The 'project area' forms the basis for the minerals and waste safeguarding assessment set out below.

This response deals with mineral policy matters and waste policy matters in turn. A spatial representation of the project area and the matters discussed can be found in Appendix One.

### **Mineral Matters**

#### **Safeguarding Mineral Resources**

Part of the project area is located within land which is designated as a Mineral Safeguarding Area (MSA) and therefore the application is subject to Policy S8 of the Essex Minerals Local Plan 2014 (MLP). The MLP can be viewed on the County Council's website via the following link:

<https://www.essex.gov.uk/minerals-waste-planning-policy/minerals-local-plan>

Policy S8 of the MLP requires that a non-mineral proposal located within an MSA which exceeds defined thresholds must be supported by a Minerals Resource Assessment to

establish the existence, or otherwise, of a mineral resource capable of having economic importance. This will ascertain whether there is an opportunity for the prior extraction of that mineral to avoid the sterilisation of the resource, as required by the National Planning Policy Framework (Paragraph 210). The same paragraph encourages the prior extraction of mineral where it is practical and environmentally feasible.

It is however noted that the proposal is for a solar farm and that there would not be any significantly intrusive ground works required to establish the development. It is further noted that the Planning Statement date March 2023 states at Paragraph 3.1 that the proposed development is temporary in nature. The MWPA has no objection, providing that the proposed development site will be returned to its 'former use' upon expiration of permission, concluding that the mineral subject to the MSA is not at risk from permanent sterilisation.

If this is not the case, then a Minerals Resource Assessment (MRA) is required to establish the practicality and environmental feasibility of the prior extraction of mineral such that the resource is not sterilised where this can be avoided. If found to be practical and environmentally feasible, prior extraction is expected to take place ahead of sterilisation by non-mineral development.

#### Mineral Infrastructure Matters

With regard to Mineral Consultation Areas, Policy S8 of the MLP seeks to ensure that existing and allocated mineral sites and infrastructure are protected from inappropriate neighbouring developments that may prejudice their continuing efficient operation or ability to carry out their allocated function in the future. Policy S8 of the MLP defines Mineral Consultation Areas as extending up to 250m from the boundary of an infrastructure site or allocation for the same. The application site does not pass through a Mineral Consultation Area (MCA) and therefore, a Mineral Infrastructure Impact Assessment (MIIA) would not be required as part of a planning application on this site.

#### Waste Matters

##### Safeguarding Waste Infrastructure

Policy 2 of the WLP seeks to ensure that existing and allocated waste sites and infrastructure are protected from inappropriate neighbouring developments that may prejudice their continuing efficient operation or ability to carry out their allocated function in the future. Policy 2 defines Waste Consultation Areas as extending up to 250m from the boundary of existing or allocated waste infrastructure, unless they are Water Recycling Centres, where the distance increases to 400m.

The WLP can be viewed on the County Council's website via the following link:

<https://www.essex.gov.uk/minerals-waste-planning-policy/waste-local-plan>

The application site does not pass through a Waste Consultation Area (WCA) and therefore, a Waste Infrastructure Impact Assessment (WIIA) is not required as part of the planning application.

## Network Rail

### Comment submitted on 5 May 2023

Dear Sir/Madam,

Thank you for consulting Network Rail (NR) regarding the above planning application.

Please see below the informative suggested by our Asset protection Team (ASPRO)

Item 1. - Environmental pollution (Dust, noise etc.) on operational railway.

#### Reasons/Mitigations:

The design and siting of installations should take into account possible effects of noise, vibration and generation of airborne dust in regard to the operational railway. Contractors are expected to use the 'best practical means' for controlling pollution and environmental nuisance complying all current standards and regulations. The design and construction methodologies should consider mitigation measures to minimise the generation of airborne dust, noise and vibration in regard to

the operational railway. Demolition work shall be carried out behind hoardings and dust suppression systems are to be employed to risk to the operational line.

Item 2 Collapse of lifting equipment adjacent to the NR boundary fence/line.

Reasons/Mitigations:

Operation of mobile cranes should comply with CPA Good Practice Guide 'Requirements for Mobile Cranes Alongside Railways Controlled by Network Rail'. Operation of Tower Crane should also comply with CPA Good Practice Guide 'Requirements for Tower Cranes Alongside Railways Controlled by Network Rail'. Operation of Piling Rig should comply with Network Rail standard NR/L3/CIV/0063 - 'Piling, Drilling, Crane, MEWP and SMPT operations adjacent to the Railway' Collapse radius of the cranes should not fall within 4m from the railway boundary unless possession and isolation on NR lines have been arranged or agreed with Network Rail.

Item 3 - Potential impact on the adjacent railway infrastructure from the construction activities

Reasons/Mitigations:

The OP shall provide all construction methodologies relating to the works that may import risks onto the operational railway and potential disruption to railway services, the assets and the infrastructure for acceptance prior to commencing the works. All works must also be risk assessed to avoid disruptions to the operational railway. Existing railway infrastructures including embankment and bridges should not be loaded with additional surcharge from the proposed development unless the agreement is reached with Network Rail. Increased surcharge on railway embankment imports a risk of instability of the ground which can cause the settlement on Network Rail infrastructure (Overhead Line Equipment/gantries, track, embankment, boundary fence, etc). All works, both temporary and permanent, should be designed and constructed, so that they will have no influence on the stability of NR's existing.

Item 4 - Collapse of temporary work

Reason/Mitigations:

Where, in the temporary condition, structural collapse of any temporary works which may be constructed which would include scaffolding and access towers could result in any element falling within 4m of the railway boundary or a NR asset.

Item 5 - Effect of artificial lighting and human factor effects from glare on Train Drivers

Reasons/Mitigations:

Any lighting associated with the proposed work must not interfere with the sighting of signalling apparatus and/or train drivers' vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway. The developers should obtain Network Rail's Asset Protection Engineer's approval of their detailed proposals regarding lighting.

Item 6 - Structural stability and movement of Network Rail Assets which will affect the Track Support Zone.

Reasons/Mitigations:

Please also note that the 'track support zone' is defined in Network Rail standard 'NR/L2/CIV/177

- Monitoring track over or adjacent to Construction Works' and any proposal which may require works to be conducted within this zone must be identified by the outside party and subsequent consultation with Network Rail must take place. Should criteria be met within this standard, a track

monitoring plan will have to be agreed with Network Rail to ensure that movement, settlement, cant, twist, vibration etc are mitigated the risk to the operational railway

Item 7 - Piling adjacent to the railway infrastructure (if any). with ground movement affecting the track geometry and surrounding ground and structure stability.

Reasons/Mitigations:

The developer must ensure that any piling work near or adjacent to the railway does not cause an

operational hazard to Network Rail's infrastructure. Impact/Driven piling scheme for a development

near or adjacent to Network Rail's operational infrastructure needs to be avoided, due to the risk of

a major track fault occurring. No vibro-compaction/displacement piling plant shall be used in development.

Item 8 - Proximity of the development to the Network Rail infrastructure and boundary fence and adequate space for future maintenance of the development.

Reasons/Mitigations:

It is recommended that all works be situated at least 3 metres from NR boundary fence, to allow construction and any future maintenance work to be carried out without involving entry or encroachment onto Network Rail's land. Where trees exist on Network Rail land, design of any foundations close to the boundary must take into account the effects of root penetration in accordance with the Building Research Establishment's guidelines.

Item 9 - Proximity of OLE Risk/Catenary cables (if any) to proposed work.

Reasons/Mitigations:

No works may be carried out where there is a risk of any plant or element, temporary or permanent,

coming within 3.5m of the Overhead Live Electricity (if any). The proximity of the development to the 25kV high voltage Overhead live cables (and the associated steel stanchion supports), will require an electromagnetic compatibility (EMC) assessment to be undertaken by the OP to assess

the potential impact on the residents, the level of electrical interference or emissions of electromagnetic fields (EMF) due to the railway equipment. EMF reduces at an exponential rate over distance, so the measured values will drop significantly at 7 meters below any buildings limit

as set out by the UK or EU Standards.

Item 10. - Construction activities at height.

Reasons/Mitigations:

Any works at height or within 3.0 metres of the OLE infrastructure will require isolation of the overhead lines and possessions. The use of scaffolding within the close proximity to NR assets introduces high risk to individual when the railway is in operation and the overhead line is energised

Item 11- Stability of railway infrastructure and potential impact on the services.

Reasons/Mitigations:

Existing railway infrastructures including embankment should not be loaded with additional surcharge from the proposed development unless the agreement is reached with Network Rail.

Increased surcharge on railway embankment imports a risk of instability of the ground which can

cause the settlement on Network Rail infrastructure (Overhead Line Equipment / gantries, track, embankment etc.). Any works within the railway boundary shall be carried out following Network Rail standard 'NR/L2/MTC/089 - Arrangements for the exchange of asset data and the continuing

maintenance of assets undergoing change'.

Item 12.- Trespasses and unauthorised access through an insecure or damaged boundary fence.

Reasons/Mitigations:

Where required, the developer should provide (at their own expense) and thereafter maintain a substantial, trespass proof fence along the development side of the existing boundary fence, to a

minimum height of 1.8 metres. Network Rail's existing fencing/wall must not be removed until it is agreed with Network Rail.

Network Rail strongly recommends the developer contacts the Asset Protection Team



AssetProtectionAnglia@networkrail.co.uk prior to any works commencing on site, and also to agree an Asset Protection Agreement with us to enable approval of detailed works. More information can also be obtained from our website <https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/assetprotection-and-optimisation/>

I trust the above clearly sets out Network Rail's position on the planning application. Should you require any more information from Network Rail, please do not hesitate to contact me.

## **Historic England**

Comment submitted on 27 Apr 2023

T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990

LAND SOUTH OF SOUTHLANDS COTTAGES, RUNWELL ROAD, RUNWELL, WICKFORD,  
ESSEX SS11 7QH

Application No. 23/00532/FUL

Thank you for your letter of 13 April 2023 regarding the above application for planning permission.

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>

It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

Yours sincerely

Rosa Teira Paz  
Inspector of Historic Buildings and Areas  
E-mail: [rosa.teirapaz@historicengland.org.uk](mailto:rosa.teirapaz@historicengland.org.uk)