

[insert contact details]

13 November 2025

Dear Sir / Madam

LONGFIELD FARM ORDER 2023 – NON-MATERIAL CHANGE APPLICATION

SECTION 153 OF THE PLANNING ACT 2008 AND REGULATION 7 OF THE INFRASTRUCTURE PLANNING (CHANGES TO, AND REVOCATION OF, DEVELOPMENT CONSENT ORDERS) REGULATIONS 2011

The enclosed notice relates to a 'non-material change' application (the "**application**") being made to the Secretary of State for Energy Security and Net Zero (the "**Secretary of State**") for the Longfield Solar Farm Order 2023 (as corrected by the Longfield Solar Farm (Correction) Order 2023 (the "**Order**") by Longfield Solar Energy Farm Limited ("**Longfield**"). We act for Longfield in relation to the application.

The Order includes provision authorising the construction, operation, maintenance and decommissioning of a solar photovoltaic electricity generating facility and Battery Storage Energy System with a total capacity exceeding 50MW and associated infrastructure (the "**Scheme**"). Longfield seeks to make four non-material changes (the "**NMCS**") to the Order.

Change 1 – amending Work No. 4A of Schedule 1 of the Order to facilitate the installation of a dual circuit

Work No. 4A of Schedule 1 of the Order authorises, at paragraph (i), works including the installation of one 400 kilovolt cable circuit connecting Work No. 3 (the new onsite substation) to Work No. 5 (the extension to the existing substation).

For resilience purposes, Longfield is seeking to install a second 400 kilovolt cable circuit as part of these works. Longfield is therefore proposing to amend the description of Work No. 4A of Schedule 1 of the Order to authorise this dualling.

Change 2 – amending Article 6 of the Order to modify the Hedgerows Regulations 1997

Article 6 of the Order identifies extant legislation that is authorised to be modified or disappplied by virtue of the Order being made.

However, the list of legislation in Article 6 of the Order does not include the standard modification of the Hedgerows Regulations 1997 in relation to the carrying out of development for the Scheme. This results in a requirement for Longfield to submit a Hedgerow Removal Notice under the Hedgerows Regulations 1997 every time that any hedgerow needs to be removed, including those already identified and assessed in Schedule 12 of the Order. This is an onerous and complex process that restricts the flexibility of the detailed design of the Scheme and poses a risk to the timing of phases of the Scheme due to determination timescales, and was clearly not the intention of the drafting of the Order. Longfield notes that this amendment will not result in uncontrolled hedgerow removal, as this continues to be controlled by the corresponding and relevant parts of the Order – for example, the vegetation removal plan, which is a certified document under Schedule 13 of the Order.

Pinsent Masons LLP

30 Crown Place London EC2A 4ES United Kingdom

T +44 (0)20 7418 7000 F +44 (0)20 7418 7050 DX 157620 Broadgate

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Longfield is therefore proposing to amend Article 6 of the Order to include the modification of the Hedgerows Regulations 1997. This approach has been consented in recent solar DCOs, including the Oaklands Farm Solar Park Order 2025.

Change 3 – amending Requirement 9 of Schedule 2 of the Order to require one submission of the BNG Strategy

Requirement 9 of Schedule 2 of the Order requires Longfield to submit (for approval by the relevant planning authority) a landscape and ecological management plan (“**LEMP**”) for each phase of the Scheme. As currently written in the Order, each LEMP requires the submission of a Biodiversity Net Gain (“**BNG**”) Strategy to detail how the Scheme is achieving the minimum 87% BNG during the operation of the Scheme.

However, a targeted LEMP has been submitted for various permitted preliminary works (including vegetation removal) without containing a BNG Strategy, as information regarding BNG was not available at the time of the submission of that LEMP (as the landscape design for the Scheme had not yet been developed, nor did it form part of the works to which that LEMP related). Therefore, Requirement 9 of Schedule 2 of the Order has only partially been discharged in relation to that LEMP, which represents an inefficient process.

Longfield is therefore proposing to amend Requirement 9 of Schedule 2 of the Order to alter the approach such that only one site-wide BNG Strategy is required to be submitted as part of the site-wide LEMP for the Scheme’s main site construction works (which are the works that give rise to BNG considerations).

Change 4 – amending Article 6(4) of the Order to address interactions with other planning applications

There are four small areas of overlap between the Order and two adjacent planning permissions relating to the extraction of minerals at Bulls Lodge Quarry (i.e. in proximity to the existing substation). The overlaps are de minimis and neither the Order nor the other planning permissions are prejudiced from ongoing implementation.

However, for the sake of clarity and good order, Longfield is proposing to amend Article 6(4) of the Order to expressly provide for these overlaps to occur. Longfield notes that Article 6(4), as currently written in the Order, already addresses one of the areas of overlap, which lies directly to the north of the existing substation. The proposed change is to ensure that all of the overlaps are covered by Article 6(4), making the Order explicit in this regard whilst continuing to not prejudice the ongoing implementation of the Order and the other planning permissions.

Overall

The NMCs proposed to the Order by Longfield are necessary for the reasons set out above. None of the NMCs will give rise to any materially new or materially different environmental effects to those originally assessed as part of the application for the Order, nor would they require additional compulsory acquisition of land, nor would they have new or different effects on local residents or business or any additional implications in respect of habitats regulation assessment; therefore, Longfield considers that the proposed changes are non-material in nature.

Consultation

Before a decision can be made by the Secretary of State, Longfield must consult with various persons in accordance with the requirements of the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 (the “**2011 Regulations**”).

You have been identified as a consultee for the purposes of Regulation 7(2) of the 2011 Regulations. In addition, we draw your attention to the Regulation 7(3) letter published by the Secretary of State on 5 November 2025, enclosed with this letter.

The enclosed Regulation 6 notice contains details of how you can access the application documents and how to respond to the consultation. Any representation about the application must be made by email to: LongfieldSolarFarm@planninginspectorate.gov.uk or in writing to:

National Infrastructure Planning, the Planning Inspectorate, Temple Quay House, 2 The Square, Bristol, BS1 6PN.

As set out in the notice, the consultation ends on 22 December 2025. Therefore, the deadline for receipt of your views about the application is **11:59pm on 22 December 2025**.

Yours faithfully

Pinsent Masons LLP

On behalf of

LONGFIELD SOLAR ENERGY FARM LIMITED

Alexander House

1 Mandarin Road

Rainton Bridge Business Park

Houghton Le Spring

Sunderland

England

DH4 5RA

Enclosures:

- (i) Copy of a notice pursuant to Section 153 of the Planning Act 2008 and Regulation 6 of the Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011.
- (ii) Regulation 7(3) letter from the Secretary of State, dated 5 November 2025.