



Date: April 2025

EcoPower Suffolk by email

**Planning Act 2008: EcoPower Suffolk solar NSIP**

**RESPONSE OF BABERGH AND MID SUFFOLK DISTRICT COUNCILS**

This is the response of Babergh and Mid Suffolk District Councils to the non-statutory public consultation, between 10 March and 22 April 2025, undertaken by Eenergy for the proposed EcoPower Suffolk solar NSIP.

Although they remain two separate sovereign councils, since 2013 Babergh and Mid Suffolk District Councils have been working together to deliver services and they share a Chief Executive, management team and joint workforce who work across both authorities. The comments below are submitted on behalf of both councils except where they are specifically attributed to a single council.

**Introduction**

Babergh and Mid Suffolk District Councils consider their role of protecting and promoting the interests of the districts' communities, businesses, heritage, environment and tourism to be of utmost importance and recognise the contribution Babergh and Mid Suffolk make to the unique character and quality of Suffolk and the wider eastern region.

The councils acknowledge the government's net zero and Clean Power 30 objectives, and are mindful of related energy security, carbon reduction and energy poverty issues. However, the considerable and potentially devastating impacts of large-scale energy development are of significant concern. The comments in this response are offered in context with how these impacts may affect the districts.

Babergh and Mid Suffolk District Councils continue to engage with Eenergy to represent the interests of the districts.

**Principle of development**



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The councils acknowledge the contribution the scheme would make to increasing renewable energy generation, required to meet net zero targets. The councils also appreciate the developer's early engagement with communities and the commitment to an iterative design process, informed by further survey work and feedback from the community.

However, as the limited information available at this stage affects the detail and completeness of any responses offered, the councils are concerned that the project timeline does not allow for meaningful, substantive and fully informed engagement with affected stakeholders. The councils urge Econergy to allow sufficient time to consult and complete survey work.

The sheer number of energy generation, storage, stability and transmission proposals coming forward in the eastern region, including within Mid Suffolk and Babergh districts, makes the need for a coordinated, strategic approach to energy development critical in order to effectively assess cumulative impacts and to safeguard the interests of host communities and environments. The councils acknowledge Ofgem's introduction of RESP but have concerns that projects seeking to deliver at speed will not be effectively accounted for in strategic planning.

In particular, the numerous connections to the new Yaxley substation and the potential cumulation of development in the area must be carefully planned.

The following key matters and technical are offered at this stage and are not exhaustive. The full text of technical advice is included in Appendix 1 to this document.

## **Key issues**

The development will have a range of impacts, some of which involve technical matters that fall within the responsibility of either the district or county councils. The following are some of the main issues that the councils wish to highlight in this response. Please refer to full details of the technical officers' advice at Appendix 1.

This list is not exhaustive and does not prejudice the consideration of any other issue at this time or in the future.

## **General**

- The scale of the development as currently shown is of significant concern and the impact of domination and engulfing the small rural communities of the surrounding area is unacceptable. There is a need to clarify and refine the cable corridors and land parcels needed for the development and to eliminate those that would result in the greatest impact to host communities and the environment.



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- The developer must ensure that existing residential amenity is protected by excluding the most impactful land parcels from the scheme design and including separation from residential property boundaries of at least 400m.
- The health and safety of local communities and the surrounding area is paramount. The development proposal should include a full and thorough assessment of battery safety, noise, glint and glare and emergency response including an explanation of embedded design and mitigation. The developer should further commit to ensuring the latest safety standards and regulations are adhered to throughout the lifetime of the development, including construction, operation and decommissioning.
- Working with other stakeholders, the developer should ensure the scheme design includes an appropriate permanent resolution of the access to Yaxley substation and the battery storage area that does not rely on Leys Lane.
- In addition to expected biodiversity net gain, the scheme design should include deliverable and effective wildlife corridors to ensure existing commuting routes of all species are maintained and connectivity improved.
- The significant public health and amenity value of the extensive rights of way network in the area must be recognised and respected by the development with appropriate solutions to protecting and improving rights of way.
- The project should include substantive and deliverable community benefits that respond to meaningful dialogue with local communities.
- In refining the land parcels to be used, the project should avoid the use of best and most versatile agricultural land and ensure soil quality for the lifetime of the development, including decommissioning and appropriate reinstatement.
- This part of Mid Suffolk has a history of surface water drainage issues. The scheme must appropriately assess and manage flood risk from all sources, having regard to the impacts of climate change.
- The historic significance of affected landscape and assets must not be underestimated, including appropriate assessment of all designated and non-designated assets, below ground assets and heritage landscape features.
- Given the number of other large-scale projects looking to deliver in the same area and timeframe as this development, the potential for cumulative effects is high. The developer must demonstrate effective coordination of delivery with other projects. This should include, but is not limited to, traffic movement including construction traffic and



ALLs, with consideration of haul routes rather than reliance on the existing, limited highway network, sourcing, accommodating and socially integrating workforce, visual effects and kinetic views, especially having regard to other proposals along the A140 and A143 corridors.

### Biodiversity:

- Environment Statement must set out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats.
- The Environment Statement should include the following:
  - Potential impacts upon Wortham Ling SSSI and Redgrave Lopham Fens SSSI.
  - Internationally designated sites and accompanying Habitats Regulations Assessment.
  - Potential impacts should be considered upon the Site of Special Scientific Interests
  - Considerations for European Protected Species, even if they are subsequently scoped out.
  - Considerations for Hazel Dormouse
  - Considerations for European Otters
  - Considerations for Badgers
  - Assessment of the likelihood of reptile species
  - Considerations for Water Vole in the River Dove and suitable ditch systems.
  - Considerations for Schedule 1 birds within the assessment, notably Barn Owl.
  - Appropriate precautionary measures for all nesting birds should be set out within the Environment Statement/Outline Construction Environment Management Plan.
  - Considerations for Priority species should be undertaken, even if they are subsequently scoped out.
  - Considerations for Priority habitats.
  - Consideration should be provided for Native Hedgerows and Arable Field Margins.
  - Impacts upon notable invertebrate species / assemblages, with specialist surveys undertaken at key locations where appropriate.
  - The Statutory Biodiversity Metric – Calculation Tool, with condition assessments.
- Ecological assessments should identify any ecological risk from developing on the proposed site, with consideration to mitigation hierarchy.
- a Habitats Regulations Assessment required.



- Local designated sites as listed within response must be included within the scope of the assessment.
- Consideration of impacts upon ancient woodland must be based upon government advice
- Ecology and arboriculture statements must also consider impacts upon veteran and ancient trees
- The ecological assessment must include a Ground Level Tree Assessment of any trees which are proposed to be removed or modified on the site
- Bat Activity Surveys must be completed
- If bats are determined to be present and affected, then an EPS mitigation licence from Natural England may be required.
- Wildlife sensitive lighting will be required to avoid impacts to foraging and commuting bats if lighting is proposed
- A Habitat Suitability Index assessment for Great Crested Newts (GCN) should be conducted for all ponds within 500 metres.
- If Badger activity is confirmed then the potential impacts on badgers, then a mitigation strategy must be provided in a separate badger report.
- A Breeding Bird Survey should be conducted which should contain particular consideration for ground nesting birds, notably Skylark
  - If priority farmland birds are identified as a result of the survey then appropriate mitigation options should be recommended
- Considerations should be made to any non-native invasive species or risks posed by the development to native species present in the locality
- Botanical surveys by a suitably qualified botanical specialist to assess whether there is any notable flora present across the proposed order limits should be provided.
- Ecological assessments should consider wider ecosystem services and benefits of natural capital when designing enhancement measures.
- A 10% biodiversity net gain for each relevant biodiversity unit (Habitat units, Hedgerows and Lines of trees units and Watercourse units) should be delivered for the proposals, with this ideally secured within the proposed Order limits.
- The Indicative Cable Corridor areas are extremely expansive and could have quite a cumulative impact for local ecology. Therefore, this will require future consideration, with cable routes designed to minimise impacts upon biodiversity in line with the mitigation hierarchy

#### Heritage:

- The proposal would cause at least a less than substantial harm to various designated heritage assets, ranging from very low up to medium, because proposed development would likely
  - detract from the traditional rural and agricultural setting of various heritage assets that contributes to their significance through reflecting their historic situation and/or functions



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- and/or would obscure/detract from views to/from various heritage assets that contribute to their significance
  - and/or introduce harmful noise impacts into their settings, that would harm their significance.
- Recommend that consideration is given to reducing the extent of development, with particular focus on where it would cause the most harm, and to the siting of the BESS and other associated infrastructure, to reduce its impact on heritage assets.
  - Consideration should be given to the omission of certain areas from the proposal site, particularly to provide distinct undeveloped parcels of land around designated heritage assets, ideally still in agricultural use
    - Where omission of areas is not possible, then consideration should be given to providing suitably strong vegetation buffers, to at least reduce the visual impact of the development
  - Consideration as to whether it would be appropriate for an application to set out whether any other nearby sites for a solar farm (either ground or building mounted) have been considered and if so, why they have not been pursued, in relation to Joint Local Plan Policy LP25.
  - A suitable Heritage Statement would be required
  - CGIs/verified views could also be submitted to more clearly illustrate the visual impacts
  - Encourage avoiding running cable routes directly through any Conservation Areas or the grounds of listed buildings

#### Landscape:

- Most of site is within Class 2 area and given low proportion of Class 2 land within Mid Suffolk with much more Class 3 land, greater effort should be made to locating sites in areas of Class 3 land to avoid the loss of the BMV land.
- The combined impact of each of these sites will each have a degrading impact on the landscape and therefore the cumulative impact between each of the site and connecting cable corridors should be carefully reviewed.
- Further information is required regarding the indicative location/s of the cable corridor, including what form it will take and how this impact will be managed and mitigated.
- Location of indicative cable corridors cable requires further consideration, especially when combined with the site section and location of the most rural and isolated sites, in particular sites 3, 4 and 2C.
- A Landscape and Visual Impact Assessment is required.

#### Public health and safety:

- Noise assessment required



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- We expect noise impact assessments to reference if affected by noise from other ongoing/existing/planned schemes in the area that have/will/ affect background noise levels giving rise to cumulative differences, in areas affected, background noise shall be taken as that before the installation of these linked power generation, transmission and linking schemes. Original noise levels from other applications may be used for this purpose with the proper references supplied.
- Construction hours to be controlled
- Construction management plan required
- External lighting to be restricted

Other:

The councils encourage National Grid to engage with local communities throughout the pre-submission stage via in-person discussions and other media, including sharing the feedback from this consultation.

The councils refer to the comments of Suffolk County Council in respect of technical matters that fall within their function.

Kind regards,



Tom Barker  
Assistant Director Planning and Building Control  
Babergh and Mid Suffolk District Councils



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<b>Environmental Protection: Noise/Odour/Light/Smoke</b>	
<b>Application Number</b>	DC/24/02748
<b>Location</b>	CONFIDENTIAL - Eco Yaxley 1 - NSIP
<b>Proposal</b>	CONFIDENTIAL - NSIP - Energy Storage System; PV Array (Photo Voltaic/solar)
<b>EP team reference</b>	WK/349074
<b>Overall Recommendation</b>	No objection subject to recommended conditions (see below).
<b>Comments</b>	<p>The Applicant has requested replies for each area separately, however comments are the same for each part of the scheme, so please replicate the same conditions for all parts of the scheme.</p> <p>It is important to note that we do expect that the Noise Impact Assessments will need to reference if affected by noise from other ongoing/existing/planned schemes in the area that have/will affect background noise levels giving rise to cumulative differences, in areas affected. Background noise shall be taken as that before the installation of these linked power generation, transmission and linking schemes. Original noise levels from other applications may be used for this purpose with the proper references supplied.</p>
<b>Conditions</b>	<p><u>CONSTRUCTION HOURS (ONGOING REQUIREMENT)</u></p> <p>Operations related to the construction (including site clearance and demolition) phases) of the permitted development/use shall only operate between the hours of 07.30 and 18.00hrs Mondays to Fridays and between the hours of 08.00 and 13.00hrs on Saturday. There shall be no working and/or use operated on Sundays and Bank Holidays. There shall be no HGVs arriving at or departing the site outside of these approved hours.</p> <p>Reason: to minimise detriment to nearby residential amenity.</p> <p><u>CONSTRUCTION MANAGEMENT PLAN</u></p> <p>No development shall commence until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. The Construction Management Plan shall include details of:</p>



- Details of the scheduled timing/phasing of the development for the overall construction period.
- Means of access, traffic routes, vehicle parking and manoeuvring areas (site operatives and visitors).
- protection measures for footpaths surrounding the site.
- Loading and unloading of plant and materials.
- Wheel washing facilities.
- Lighting.
- Location and nature of compounds, Portaloo's, and storage areas (including maximum storage heights) and factors to prevent wind-whipping of loose materials
- Waste storage and removal
- Temporary buildings and boundary treatments
- Dust management measures
- Method of any demolition to take place, including the recycling and disposal of materials arising from demolition.
- Noise and vibration management (to include arrangements for monitoring, and specific method statements for piling)
- Measures to minimise the impact on air quality, for example the use of the cleanest construction equipment available, the use of zero emission machinery, HGVs serving the site avoiding routes through Air Quality Management Areas, prohibitions on vehicles/machinery idling.
- Litter and waste management during the construction phases of the development. Thereafter, the approved construction plan shall be fully implemented and adhered to during the construction phases of the development hereby approved, unless otherwise agreed in writing by the Local Planning Authority.
- In addition to the Construction Management Plan, details of all monitoring to be undertaken for dust, noise and vibration are to be submitted by the provision and use of a system with access provided to a web-based function which monitors the above parameters in real time.
- The system selected should be specific for this application site and shall have regard to proximity of the nearest noise sensitive receptors, existing measured background noise level and be installed and monitored by a suitably qualified company or individual in acoustics and environmental monitoring. Such systems are readily available through an online search or contact with an acoustics company.
- Limits for noise, vibration and dust shall be submitted to and agreed in writing with the LPA and a warning level will be set which shall be communicated in real time to the designated officer from the LPA.

Note: The Construction Management Plan shall cover both demolition and construction phases of the above development. The applicant should have regard to BS 5228:2009 Code of Practice of Noise and Vibration Control on Construction and Open Sites in the Construction Management Plan.

Reason: to minimise detriment to nearby residential amenity.

### REQUIREMENT FOR NOISE ASSESSMENT

The application shall not be determined/ the development shall not commence until full details of all mechanical plant (not limited to air handling plants, air source heat pumps, mechanical ventilation and other machinery) to be installed have been subject to a noise assessment which is to:

- Be undertaken by a suitably competent and qualified individual in acoustics.
- Include precise acoustic details of the system operating at full capacity and simultaneous manner on both the site itself and having regard to any nearby/adjacent sites
- Include details of the current existing background level, to be based on methodology as given in the current version of British Standard BS4142 in order to allow the likelihood of loss of amenity for the nearest noise sensitive receptor (s) (which are to be identified), to be determined.
- Consider the impact of low frequency noise from the operation of the systems.
- Consider both daytime and the night-time periods.
- Provide the findings and proposals for any mitigation in writing to the LPA for consideration and agreement.
- Unless otherwise agreed, the level to be achieved is 5dB below the representative background noise level.

Reason: to minimise detriment to nearby residential amenity.

### EXTERNAL LIGHTING

Prior to the commencement of development, a written scheme shall be submitted to and agreed in writing by the local planning authority that specifies the provisions to be made for the level of external illumination of the site and to control light pollution. The scheme shall be implemented prior to beneficial use of the approved development and maintained for the lifetime of the approved development and shall not be altered without the prior written approval of the local planning authority. The scheme shall demonstrate that all lighting of the development (including resultant sky glow, light trespass, source intensity and building luminance) fully complies with the figures for the environmental zone and advice specified in the Institution of Lighting Professionals Guidance Note for the reduction of obtrusive light 2021. The submitted scheme shall include a polar luminance diagram.

Reasons: to minimise detriment to nearby residential amenity.

Environmental Protection: Land Contamination	
<b>Application Number</b>	DC/24/02748
<b>Location</b>	CONFIDENTIAL - Eco Yaxley 1 - NSIP
<b>Proposal</b>	CONFIDENTIAL - NSIP - Energy Storage System; PV Array (Photo Voltaic/solar)
<b>EP team reference</b>	WK/349441
<b>Overall Recommendation</b>	No objection.
<b>Comments</b>	<p>For clarity, these comments only pertain to matters of land contamination.</p> <p>We are writing to inform you that we have no comments to make regarding the consultation from the perspective of land contamination. At this time, we do not require any further consultation on this matter. However, should there be any changes in the plots of land being utilized by the scheme moving forward, we would then require reconsultation on land contamination. We only request that the Local Planning Authority (LPA) be contacted in the event of unexpected ground conditions during construction. The following minimum precautions should be undertaken until the LPA responds to the notification. Additionally, the developer should be made aware that the responsibility for the safe development of the site lies with them.</p> <p><b>Minimum requirements for dealing with unexpected ground conditions being encountered during construction</b></p> <ol style="list-style-type: none"> <li>1. All site works at the position of the suspected contamination will stop and the Local Planning Authority and Environmental Health Department will be notified as a matter of urgency.</li> <li>2. A suitably trained geo-environmental engineer should assess the visual and olfactory observations of the ground and the extent of contamination, and the Client and the Local Authority should be informed of the discovery.</li> <li>3. The suspected contaminated material will be investigated and tested appropriately in accordance with assessed</li> </ol>

	<p>risks. The investigation works will be carried out in the presence of a suitably qualified geo-environmental engineer. The investigation works will involve the collection of solid samples for testing and, using visual and olfactory observations of the ground, delineate the area over which contaminated materials are present.</p> <ol style="list-style-type: none"> <li>4. The unexpected contaminated material will either be left in situ or be stockpiled (except if suspected to be asbestos) whilst testing is carried out and suitable assessments completed to determine whether the material can be re-used on site or requires disposal as appropriate.</li> <li>5. The testing suite will be determined by the independent geo-environmental specialist based on visual and olfactory observations.</li> <li>6. Test results will be compared against current assessment criteria suitable for the future use of the area of the site affected.</li> <li>7. Where the material is left in situ awaiting results, it will either be reburied or covered with plastic sheeting.</li> <li>8. Where the potentially contaminated material is to be temporarily stockpiled, it will be placed either on a prepared surface of clay, or on 2000-gauge Visqueen sheeting (or other impermeable surface) and covered to prevent dust and odour emissions.</li> <li>9. Any areas where unexpected visual or olfactory ground contamination is identified will be surveyed and testing results incorporated into a Verification Report.</li> <li>10. A photographic record will be made of relevant observations.</li> <li>11. The results of the investigation and testing of any suspect unexpected contamination will be used to determine the relevant actions. After consultation with the Local Authority, materials should either be: <ul style="list-style-type: none"> <li>• re-used in areas where test results indicate that it meets compliance targets so it can be re-used without treatment; or</li> <li>• treatment of material on site to meet compliance targets so it can be re-used; or</li> <li>• removal from site to a suitably licensed landfill or permitted treatment facility.</li> </ul> </li> <li>12. A Verification Report will be produced for the work.</li> </ol>
<b>Conditions</b>	

## Consultation Response Pro forma

1	<b>Application Number</b>	DC/24/02748	
2	<b>Date of Response</b>	16 <sup>th</sup> April 2025	
3	<b>Responding Officer</b>	Name:	Richard Parmee
		Job Title:	Biodiversity Manager
		Responding on behalf of...	Climate and Nature Recovery Team
4	<b>Summary and Recommendation</b>	<p>1. The sites and connections between them will have varied impacts on the ability to deliver nature recovery, as set out in the emerging Suffolk Local Nature Recovery Strategy, both positive and negative. On the basis that not all of the five sites will be progressed, consideration of the impacts on LNRS delivery is seen as a relevant consideration in determining which sites are to be progressed.</p> <p>2. The sites will all result in the loss of agricultural land. Given that the vast majority of the district is comprised of Class 3 land, it is unfortunate that the location of the Yaxley substation is close to some of the relatively few areas of Class 2 land. Retention of Class 2 land is preferable and weight should be given to the extent of loss of such land when determining which sites progress.</p>	
5	<b>Discussion</b>	<p>In responding, I will consider the emerging LNRS as this identifies potential measures within the landscape to support nature recovery. The solar farm locations may conflict with or possibly support these. I am not sure how much weight we can give to the LNRS yet as it is not published, and there is scope for the current mapping and proposals to change. However, it seems wrong not to pay attention to this given that the draft mapping is available and unlikely to alter that significantly. I will also consider agricultural land classification.</p> <p>Other matters such as impacts on existing non-designated habitat, protected species and landscape would, I assume, be addressed once further surveys have taken place.</p> <p>Agricultural Land Classification</p> <p>Some of the sites look to be substantially within Class 2 areas, which given the majority of the local landscape is Class 3, seems to be avoidable. Particular concern is raised for:</p> <ul style="list-style-type: none"> <li>• Site 2 Eye, which is almost entirely Class 2</li> <li>• Site 4 Occold, which appears to be about 50% Class 2</li> <li>• Site 5 Thrandeston, which also appears to be about 50% Class 2</li> <li>• Site 1 Brome does contain a significant area of Class 2 land to the south</li> <li>• Only site 3 Gislingham is entirely on Class 3 land</li> </ul> <p>Given the relatively low proportion of Class 2 land within Mid Suffolk, with much more Class 3 land, greater effort should be</p>	



	<p>made to locating sites in areas of Class 3 land only to avoid the loss of the Best and Most Versatile (BMV) land.</p> <p>Site Location in Relation to the LNRS</p> <p>Site 1 Brome</p> <p>The majority of the site is not on land identified as Areas that Could become of Particular Importance for Biodiversity (ACB). The exception is the section to the east of the A140, which is identified as having potential for woodland creation, although grassland and wood pasture area also included in a range of potential habitat creation possibilities. Use of this section for a solar farm would clearly prevent woodland creation. However, the development of a species-rich sward beneath panels would to some extent fit with the proposal to create grassland and, in combination with other habitat creation such as hedge and tree planting, would support proposals to create a mosaic of habitats, wood pasture and new veteran trees.</p> <p>Site 2 Eye</p> <p>Almost the entire site is identified as ACBs, apart from the southern-most section close to the town. The majority of proposals are for woodland creation, which would be incompatible with use as a solar farm. Grassland creation, along with hedge and tree planting, would be beneficial, but if the entire site were to become a solar farm, this would severely limit nature recovery proposals in this location</p> <p>Site 3 Gislingham</p> <p>The majority of this site is identified as ACBs, the exceptions being land closest to Gislingham and the north-west section. Again, woodland creation is the preferred habitat creation, apart from the section closest to Mellis where mosaic habitat is proposed. Use as a solar farm would potentially be compatible with mosaic habitat, but with the largest central area proposed as woodland, the solar farm would limit nature recovery across at least 50% of the site.</p> <p>Site 4 Occold</p> <p>This site contains very few ACBs, with those present limited to linear features. Use of this site for a solar farm would be unlikely to constrain nature recovery and mitigation / enhancement work would likely deliver some of the LNRS ambitions through strengthened hedgerow connections.</p> <p>Site 5 Thrandeston</p> <p>The northern section of the site is within an ACB that proposes the expansion of existing lowland meadows and pastures. The creation of a species rich sward as part of the solar farm would be compatible with this, more so if grazing could be included</p>
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	<p>beneath the panels. The southern section is largely clear of ACBs, so use as a solar farm would not constrain nature recovery ambitions.</p> <p>Underground Connection Corridors</p> <p>Without clear information on how cables would be installed underground, it is difficult to assess impacts. I assume that cut and fill would be required, though I cannot be sure on the width of excavation required, working space or access.</p> <p>I assume that all cable routes would require an easement, limiting habitat creation, in particular tree and woodland planting along their length. Working on that basis:</p> <ul style="list-style-type: none"> <li>• Connections between sites 1 and 2 appear to mostly avoid areas that are proposed for woodland creation</li> <li>• The connection between site 1 and the Yaxley substation passes through a woodland ACB at the northern end, but is otherwise clear of ACBs</li> <li>• Connections between sections of site 2 and between site 2 and site 4 would pass through ACBs for woodland creation close to site 2, but would be less constraining towards site 4</li> <li>• Connections between site 4 and site 3, and site 4 and the Yaxley substation, could be routed mostly to avoid any woodland creation ACBs. Care is needed around the north of Thornham Park as part of the connection corridor is shown passing through Lady Henniker Wood, which is designated as a County Wildlife Site</li> <li>• Connection between site 3 and Site 5 includes a section of Mellis Common on the southern side, which is a County Wildlife Site. The northern side passes through ACBs proposed for woodland creation. Ideally, the connection corridor may need to be located between the two to minimise habitat damage and constraints on nature recovery</li> <li>• The connection corridor between site 5 and Yaxley substation is mostly clear of any ACBs</li> </ul> <p>Given the above, site 3 Gislingham appears to be the least likely to result in loss of BMV land and connections to this site are feasible without compromising the LNRS significantly. The LNRS ambitions would be compromised by the solar farm, preventing woodland creation, but not to such a great extent as site 2.</p> <p>It must be noted that if LNRS ambitions for site 2 are delivered, this would also result in BMV land being taken out of production.</p> <p>Site 1 Brome also looks to be less of a constraint on the LNRS both in terms of habitat creation within the site and connections to other sites and the substation. Some Class 2 land would be lost, but a smaller amount than at sites 2, 4 and 5.</p>
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		<p>Site 5 would see some loss of Class 2 land but use as a solar farm would help meet LNRS ambitions and connection corridors are feasible without major constraint on the LNRS.</p> <p>Sites 2 and 4 appear to be the most limiting on the LNRS and would result in significant loss of Class 2 land. They would also require the longest connections to the Yaxley substation, with greater potential for habitat damage and constraints on the LNRS.</p>
6	<b>Amendments, Clarification or Additional Information Required</b>	
7	<b>Recommended conditions</b>	



15<sup>th</sup> April 2025

Bron Curtis  
Mid Suffolk District Council  
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By email only

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*Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.*

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**Application:** DC/24/02748  
**Location:** Eco Yaxley 1 - NSIP  
**Proposal:** Energy Storage System; PV Array (Photo Voltaic/solar)

Dear Bron,

Thank you for consulting us on the pre-engagement proposals for 300MW solar and battery storage (likely 40-year consent), point of connection to Yaxley substation GSP on existing 400kv overhead transmission line (4YM) on four site parcels, totalling approximately 600ha, at various locations near Eye, Occold, Gislingham and Mellis.

This letter sets out our response with regard to the ecology considerations of the pre-engagement proposals and how any future proposal can demonstrate compliance under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife Countryside Act 1981 (as amended) and the Protection of Badgers Act 1992, the Environment Act 2021, as well as consideration of non-statutory obligations.

Comments within this response are based on the following plans and information:

- EcoPower February Newsletter,
- Environmental Designations plan,
- Indicative Cable Corridor Areas of Search plan,
- Cultural Heritage plan,
- Ecology and Biodiversity plan,
- Environmental Designations Site 1-5 plan,
- Public Rights of Way plan,
- Water Environmental plan.



### **Ecological reporting:**

It is presumed that the development will be subject to an Environmental Impact Assessment. As a result, in line with Overarching National Policy Statement for Energy (EN-1), the applicant should ensure that the Environment Statement clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance (including those outside England), on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats.

The applicant's ecological assessments should identify any ecological risk from developing on the proposed site, with consideration to mitigation hierarchy. Furthermore, any reporting accompanying a planning application should follow CIEEM guidelines. This includes Guidelines for Ecological Impact Assessment v1.3 (September 2024) and Guidelines for Ecological Report Writing 2<sup>nd</sup> Edition (December 2017).

Furthermore, a Habitats Regulations Assessment will also be required as part of the Environment Statement to determine the implications of the proposals upon Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), as well as other sites afforded the same level of protection:

- (a) potential Special Protection Areas and possible Special Areas of Conservation;
- (b) listed or proposed Ramsar sites; and
- (c) sites identified, or required, as compensatory measures for adverse effects on any of the other sites covered by this paragraph.

Ecological assessments should take data search records & survey information and use professional judgement to come to reasoned conclusions as to the likelihood of species being present and affected by the proposed development. The ecological datasearch from Suffolk Biodiversity Information Service should inform the scope of surveys needed for protected and Priority species and any designated sites with Impact Risk Zones (on MAGIC maps) which may be greater than 10km. All surveys must be undertaken by suitably qualified ecologists at the appropriate time of year using standard methodologies.

### **Internationally Designated sites:**

The proposed order limits are just over 5km from Waveney & Little Ouse Valley SAC and Redgrave & South Lopham Fens Ramsar. This has not been outlined within the Ecology and Biodiversity plan and Environmental Designations Site 1-5 plan.

Therefore, we recommend that these internationally designated sites must be included within the scope of the Environment Statement and accompanying Habitats Regulations Assessment.

### **Nationally Designated sites:**

We note that the Ecology and Biodiversity plan and Environmental Designations Site 1-5 plan identifies the following Statutory designated sites near to the potential order limits:

- Gypsy Camp Meadows, Thranderson Site of Special Scientific Interest (SSSI)
- Major Farm Braiseworth SSSI
- Burgate Wood SSSI
- Hoxne Brick Pit SSSI





We note that none of these national designated sites are present within the potential order limits, nevertheless potential impacts should be considered upon the Site of Special Scientific Interests. We also recommend that potential impacts upon Wortham Ling SSSI and Redgrave Lopham Fens SSSI are also considered within the scope of the Environment Assessment, which are located to the north of the proposals but have not been included within the Ecology and Biodiversity plan and Environmental Designations Site 1-5 plan.

**Locally Designated sites:**

We note that the following locally designated sites are within or close proximity of the potential order limits:

- Broome Field County Wildlife Site (CWS)
- Mellis Common CWS
- Thornham Estate Woods CWS
- Stuston Common CWS
- Thrandeston Marsh CWS
- Railway Meadows CWS
- River Waveney Meadows CWS
- Clint Farm Woodland CWS
- Redlingfield Wood CWS
- Coldham Wood CWS
- Little Wood CWS
- The Pennings, Eye Local Nature Reserve (LNR)

The Ecology and Biodiversity plan and Environmental Designations Site 1-5 plan only indicates that only The Pennings, Eye LNR is present within the potential order limits. County Wildlife Sites haven't been included within the submitted documents. However, none of the County Wildlife Sites are order limits and therefore potential impacts upon these local designated sites are reduced.

Nevertheless, we recommend that these local designated sites are included within the scope of the assessment.

It is also highlighted that there is no Roadside Nature Reserves present are within or close proximity of the potential order limits.

**Irreplaceable Habitat:**

There are three types of Irreplaceable habitat present within the local area, as defined by The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024. This includes ancient woodland, ancient / veteran trees and lowland fen.

The Ecology and Biodiversity plan and Environmental Designations Site 1-5 plan indicates that a number of ancient woodlands is present within proximity of the potential order limits. However, none of the ancient woodlands are present within the potential order limits within at least 100m.

Therefore, whilst considerations of ancient woodland must be included within the scope of the Environment Statement. We are pleased that the potential order limits have been designed to avoid impacts upon any ancient woodland, which is line with the government's policy for ancient and native trees and woodlands in England. Nevertheless, there may be some woodlands which are not included



within the ancient woodland inventory due to being less than 2ha in size, which may still need to be reviewed. Consideration of impacts upon ancient woodland must be based upon government advice: <https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions>.

Ecology and arboriculture statements must also consider impacts upon veteran and ancient trees. It is expected that proposals should demonstrate that all veteran and ancient trees will be protected through the lifetime of the development, with protection measures in line with British Standard BS 5837: Trees in relation to design, demolition and construction.

In terms of Lowland Fens, it is indicated that Wortham Ling SSSI and Redgrave Lopham Fens SSSI will likely be classified as Irreplaceable habitat. These nationally designated sites (and associated internationally designated sites) are outside of the order limits, but consideration of impacts should be included as part of the potential order limits.

#### **European Protected Species:**

Considerations for European Protected Species should be undertaken within the Environment Statement, even if they are subsequently scoped out.

#### **Bats:**

It is indicated that the ecological assessment must include a Ground Level Tree Assessment of any trees which are proposed to be removed or modified on the site, to determine the likelihood of bats being present and affected. This assessment categorises the roosting habitats present and determines whether further surveys are required to determine the presence/likely absence of bats or to categorise a roost site.

It is indicated that research has been undertaken which highlights impacts may be caused by ground-mounted solar photovoltaic sites on bat activity<sup>1</sup>. Therefore, we consider it necessary that Bat Activity Surveys must also be completed to assess the baseline levels of bat activity and identify any sensitive foraging and commuting routes.

All bat surveys should follow BCT Guidelines<sup>2</sup> unless updated government guidance is issued and must be completed by suitably qualified ecologists. If bats are determined to be present and affected, then an EPS mitigation licence from Natural England may be required.

Wildlife sensitive lighting will be required to avoid impacts to foraging and commuting bats if lighting is proposed, which should be in line with BCT & ILP Guidelines<sup>3</sup>. Where pole mounted CCTV facilities are proposed the location of these facilities should be carefully considered to minimise impact. If lighting is necessary, it should be minimised and directed away from areas of likely habitat.

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<sup>1</sup> Tinsley, E., Froidevaux, J., Zsebők, S. and Szabadi, K. (August 2023). Renewable energies and biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity. *Journal of Applied Ecology*. 60(9), pp.1752-1762. [Online]. Available at: <https://doi.org/10.1111/1365-2664.14474> [Accessed 7 September 2023].

<sup>2</sup> Collins, J. (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines*. 4th edition. Bat Conservation Trust, London.

<sup>3</sup> Bat Conservation Trust and Institute of Lighting Professionals (2023) *Guidance Note 08/23: Bats and artificial lighting in the UK*. ILP, Rugby



### ***Great Crested Newts***

It is indicated that records of Great Crested Newts have been recorded within the potential order limits and the site falls partly within an 'amber risk zone' for Great Crested Newt, as outlined on the GCN Risk Zones (Essex).

As a result, it is recommended that a Habitat Suitability Index assessment for Great Crested Newts (GCN) should be conducted for all ponds within 500 metres to determine the likelihood of Great Crested Newts in the local area with further presence / absence surveys or population surveys being completed as required to inform the need of a licence.

Alternatively, the applicant may be interested to know that Natural England's District Level Licensing for GCN is now available in Norfolk and Suffolk – see <https://www.gov.uk/government/publications/great-crested-newts-district-level-licensing-schemes> - where sites can be registered to be covered by this strategic mitigation scheme. Guidance for developers and registration forms to join the scheme are available and the LPA will need a countersigned agreement with Natural England as evidence of site registration prior to determination where this European Protected Species is likely to be present and affected by development.

### ***Hazel Dormouse***

It is indicated that there are no known records of Hazel Dormouse within 5km of the site. Nevertheless, an absence of records may indicate a lack of survey information. As a result, we would expect that considerations for Hazel Dormouse are included within the Environmental Statement.

### ***Otter***

Given that pipeline routes will cross the River Dove, we expect that considerations for European Otter will be included within the Environmental Statement. If impacts to the river will be avoided via the provision of horizontal directional drilling (HDD), then considerations of Otter may be required as breeding and resting places of Otter can be habitat away from watercourses. Consideration of the wider landscape usage by Otter should be considered to ensure that important foraging locations and ecological networks are retained and enhanced where possible.

### **UK Protected species:**

Considerations for protected species should be undertaken within the Environment Statement, even if they are subsequently scoped out.

### ***Badgers***

It is recommended that the Environment Statement should include considerations for Badger. It is advised that Badger activity should be recorded for at least 30 metres from the working area. If Badger activity is confirmed then the potential impacts on badgers, then a mitigation strategy must be provided in a separate badger report.

### ***Reptiles***

It is recommended that an Environment Statement should include assessment of the likelihood of reptile species being present within the site. Reptile surveys should be conducted where suitable



habitat is present, to establish the presence/population size of reptiles present on site and inform appropriate mitigation and compensation measures.

### ***Water Vole***

It is recommended that the Environment Statement should include considerations for Water Vole in the River Dove and suitable ditch systems.

Alternatively, it is indicated that a conservation payment towards the East Anglia Water Vole Species Conservation Strategy. This is a new District Level Licence issued by Natural England which will be live in the next 3 months. The conservation payment will go towards Mink control measures across East Anglia, as this is preserved as the main limiting factor to increasing Water Vole population levels.

### **Schedule 1 Birds and Nesting Birds**

It is recommended that the Environment Statement should include considerations for Schedule 1 birds within the assessment, notably Barn Owl.

All nesting birds (including ground nesting birds) are protected under the Wildlife and Countryside Act 1981 (as amended). As a result, we would expect that the appropriate precautionary measures are set out within the Environment Statement / Outline Construction Environment Management Plan to minimise potential impacts to nesting birds.

### **Priority species:**

Considerations for Priority species should be undertaken within the Environment Statement, even if they are subsequently scoped out.

### ***Priority Farmland Birds***

A Breeding Bird Survey should be conducted to establish whether Priority farmland bird species will be present and affected by a development. Any surveys conducted should preferably follow the Bird Survey Guideline<sup>4</sup>, which is in line with BTO Methodology. Therefore, reasonable justification should be provided if less than 6 visits are proposed. If priority farmland birds are identified as a result of the survey then appropriate mitigation options should be recommended to avoid impacts to all Priority farmland bird species facilitating the site.

This should contain particular consideration for ground nesting birds, notably Skylark. This is because, based on research in Montag et al 2006<sup>5</sup>, there is little evidence to show that Skylark will regularly nest between closely spaced Solar panels and it is difficult to determine the exact benefit of increasing foraging habitat will have on local Skylark populations, even though emerging research clearly shows Solar Farms can provide important foraging resources. A CIEEM In Practice article<sup>6</sup> outlines that large displacement of Skylark territories from Solar Farms will likely affect Skylark populations if the wider landscape does not have the carrying capacity to support the displaced population. As a result, impacts upon Skylark must be carefully considered as part of the Environment Statement.

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<sup>4</sup> <https://birdsurveyguidelines.org/>

<sup>5</sup> Montag H, Parker G & Clarkson T. (2016). The effects of solar farms on local biodiversity. A comparative study. Clarkson and Woods & Wychwood Biodiversity.

<sup>6</sup> Fox, H. (September 2022). Blithe Spirit: Are Skylarks Being Overlooked in Impact Assessment?. In Practice. 117, pp.47-51



### ***Invertebrates***

The impacts upon notable invertebrate species / assemblages should be considered within the Environment Statement, with specialist surveys undertaken at key locations where appropriate.

### **Priority Habitats**

Considerations for Priority habitats should be undertaken within the Environment Statement. If Priority Habitats is to be affected then appropriate considerations, in line with the mitigation hierarchy, should be provided within the report. It is indicated that if Priority Habitat needs to be removed to facilitate the development, then appropriate compensation must be outlined as part of the biodiversity metric calculation tool.

Particular consideration should be provided for Native Hedgerows and Arable Field Margins to ensure this Priority habitats are conserved and enhanced. It should also be understood whether Native hedgerows are important hedgerows under the Hedgerows Regulations 1997.

### **Schedule 9 – Non-native invasive species (NNIS):**

Considerations should also be made to any non-native invasive species or risks posed by the development to native species present in the locality.

### **Habitat Classification and notable plant species**

We would expect that all habitat classification is undertaken in line with UK Habitats Classification (version 2). This should be accompanied by botanical surveys by a suitably qualified botanical specialist to assess whether there is any notable flora (i.e. BSBI - [Rare Plant Registers](#)) present across the proposed order limits.

### **Biodiversity Net Gain:**

The applicants' ecological assessments should consider wider ecosystem services and benefits of natural capital when designing enhancement measures.

Whilst biodiversity net gain requirements are not a mandatory requirement for National Strategic Infrastructure Projects. The Overarching National Policy Statement for Energy (EN-1) is clear that the proposals should follow the principles in the Environment Act 2021. Therefore, a 10% biodiversity net gain for each relevant biodiversity unit (Habitat units, Hedgerows and Lines of trees units and Watercourse units) should be delivered for the proposals, with this ideally secured within the proposed Order limits. It is recommended that the Statutory Biodiversity Metric – Calculation Tool is used the biodiversity metric calculation tool, with condition assessments included with the Environment Statement.

Whilst a 10% biodiversity net gain is considered the minimum requirement. It is indicated that Solar farms have the potential to increase the biodiversity value of a site, especially if the land was previously intensively managed. In some instances, this can result in significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains which is encouraged.

Any habitat creation or enhancement delivered including linkages with existing habitats for compensation or biodiversity net gain should generally be maintained for a minimum period of 30 years, or for the lifetime of the project, if longer. Where it is not proposed that significant





enhancements will not be secured for 30 years, we would expect justification as to why this is considered appropriate.

It is indicated that the Suffolk Local Nature Recovery Strategy (LNRS) is not currently published. However, this should be used to inform locations for preferred habitat creation / enhancement, biodiversity priorities and strategic significance of habitats within the Statutory Biodiversity Metric – Calculation Tool. In the interim period before the strategy has been published, it is expected that professional judgement should be used.

**Proposed Order Limits Design:**

We appreciate that the information provided is indicative. Nevertheless, we welcome that the EcoPower Suffolk Land Area will be limited to arable land, which will have minimal ecological impacts. However, some of the proposals order limits will still include hedgerows, woodland, ponds and watercourses. Therefore, it would be useful to understand the potential impacts upon these habitats with maps showing the extent of habitat clearance.

The Indicative Cable Corridor areas are extremely expansive and could have quite a cumulative impact for local ecology. Therefore, this will require future consideration, with cable routes designed to minimise impacts upon biodiversity in line with the mitigation hierarchy.

If you have any queries regarding the information stated above, please do not hesitate to contact us.

Yours sincerely,

**Hamish Jackson ACIEEM BSc (Hons)**

Senior Ecological Consultant

[placeservicesecology@essex.gov.uk](mailto:placeservicesecology@essex.gov.uk)

**Place Services provide ecological advice on behalf of Mid Suffolk District Council**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

## Consultation Response Pro forma

1	<b>Application Number/Name</b>	EcoPower Suffolk Solar NSIP Non-Statutory Consultation (DC/24/02748)	
2	<b>Date of Response</b>	03/04/2025	
3	<b>Responding Officer</b>	Name:	Thomas Pinner
		Job Title:	Senior Heritage Officer
		Responding on behalf of...	Heritage Team
4	<b>Summary and Recommendation</b>	<p>1. I consider that the proposal would likely cause at least:</p> <ul style="list-style-type: none"> <li>• Less than substantial harm to various designated heritage assets, ranging from very low up to medium, because proposed development would likely <ul style="list-style-type: none"> <li>○ detract from the traditional rural and agricultural setting of various heritage assets that contributes to their significance through reflecting their historic situation and/or functions</li> <li>○ and/or would obscure/detract from views to/from various heritage assets that contribute to their significance</li> <li>○ and/or introduce harmful noise impacts into their settings, that would harm their significance.</li> </ul> </li> </ul> <p>2. I would recommend that consideration is given to reducing the extent of development, with particular focus on where it would cause the most harm, and to the siting of the BESS and other associated infrastructure, to reduce its impact on heritage assets.</p>	
5	<b>Discussion</b>	<p>The proposal is for a solar farm, including a Battery Energy Storage System (BESS), spread across five sites on what is currently predominantly agricultural land. Full details of the development are not provided at this stage. The heritage concern relates to the potential impact of the works on the significance of nearby listed buildings, scheduled monuments, conservation areas and (built) non-designated heritage assets.</p> <p>PRINCIPLE OF DEVELOPMENT</p> <p>The in-principle potential negative impacts on the significance/character and appearance of relevant heritage assets would likely be from:</p> <ul style="list-style-type: none"> <li>- The change in character of the land from the solar panels and other physical structures. Almost all heritage assets in this part of Suffolk are located in a rural environment, with fields in close proximity, and this is generally considered to form part of their historic character/significance. In many cases, the heritage assets also likely historically had a direct functional relationship</li> </ul>	

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		<p>with the land – e.g. the land holdings of farmhouses. Although field boundaries and the exact use of farmland (e.g. pastoral vs. arable) often changed over time, the general physical character of the land is likely still reflective of its historic appearance. Solar panels and associated infrastructure are distinctively different in character and appearance, having a more industrial character, and therefore would erode the current character of the land and thus its contribution to the significance of the heritage assets.</p> <ul style="list-style-type: none"> <li>- The visual impact of the panels and associated physical structures. This is related to the point above, but even where the land does not currently make a particularly positive contribution to the significance of a heritage asset, panels may still be a prominent intrusive addition into views to/from/including heritage assets and/or physically block such views. The visual impact does not have to be confined to static views or the public realm to cause harm and may change over time, e.g. with seasonal changes in vegetation.</li> <li>- Noise impacts, particularly in regard to the BESS. The audial setting of a heritage asset may also make a positive contribution to its significance/character and appearance. The noise generated by a modern BESS is unlikely to reflect anything traditionally heard in their settings and thus could also cause erosion of their significance/character and appearance where present in the same context.</li> <li>- Physical damage resulting from excavation of the land to install the underground cables linking the panels to the National Grid Substation. This would be particularly relevant for land-based heritage assets, e.g. conservation areas or scheduled monuments.</li> </ul> <p>In addition, impacts on heritage assets may be cumulative, where the proposed works would be in close proximity to other existing or proposed similar developments/harmful works.</p> <p><b>IMPACT ON SPECIFIC HERITAGE ASSETS</b></p> <p>Below is my assessment of the likely impact of the development on relevant heritage assets, based upon the above factors and a site visit in March 2025, and the information currently provided, assuming a standard 3m tall panel system, located across the entirety of the sites, for each of the five sites:</p> <p><b>Site 1 – Land South of Stuston</b></p> <ul style="list-style-type: none"> <li>- Home Farm House, Thrandeston - Grade II - Approx. medium level of less than substantial harm. The building would be considerably surrounded to the north by the part of 1C west of Abbey Close, right up to its boundary. The</li> </ul>
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		<p>site visit highlighted good intervisibility of the listed building and the site from the road to the west, as well as views from the listed building over the site. As a historic farmhouse, the adjacent agricultural land is considered to be a particularly important element of its setting. The building would lose all direct proximity to undeveloped farmland. The 1830s Tithe Map shows that many of the fields now combined into this single field were in the same ownership and occupation as the house at this point. The unlisted barn to the east, now a separate dwelling, likely formed part of its historic farmstead, and thus impact on this building is also considered to cause some harm to the significance of Home Farm House.</p> <ul style="list-style-type: none"> <li>- Church of All Saints, Stuston, Grade II* - Approx. low level of less than substantial harm - Google Streetview images suggest that there would be some intervisibility of the church tower with the northeast part of 1B, west of B1077, particularly when vegetation cover is reduced, when approaching Stuston along the B1077 from the south, and from the public footpath to the southwest. At the time of the site visit, the tower was not visible from this location and present vegetation cover was quite dense. As with many historic churches in the area (also applicable to other churches referred to below) the tower is designed partly to be a landmark and its visibility over fields highlights its rural village location. As the site would be off to one side in this view, rather than directly within it, the harm is considered somewhat less in this case.</li> <li>- Warren Hill Farmhouse, Brome, Grade II – Approx. low level less than substantial harm. The farmhouse is somewhat separated from Site 1D by a large pond and vegetation, but this site is nonetheless considered to fall within its historic agricultural setting, as a farmhouse. The fields now forming 1D were in the same ownership as the farmhouse at the time of the 1830s Tithe Map, but the occupier is different. It is still possible that the land was historically related to the farmhouse before this.</li> <li>- I also consider that an approx. very low level of less than substantial harm would likely occur to other heritage assets as the development would likely be somewhat perceptible within their settings. This includes: <ul style="list-style-type: none"> <li>o Heale Cottage, Brome, Grade II – particularly from the southern end of 1D.</li> <li>o Hauntons Farm House, Stuston, Grade II – particularly from northern end of 1B. Some of the northern part of 1B was in the same ownership as Hauntons Farm House in the 1830s, but there is more separation from the site than for Home Farm House, for example.</li> <li>o Maltings Farm House, Thrandeston, Grade II, from western part of 1C.</li> </ul> </li> </ul>
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		<p>Site 2 – Land North of Eye</p> <ul style="list-style-type: none"> <li>- Conifer Cottage, Eye, Grade II – Approx. medium level less than substantial harm. Conifer Cottage is surrounded by 2B, which directly abuts its boundary (in fact, it seems to be included within the site, though this is assumed to be an inaccuracy). There are various views afforded over 2B from the house and vice versa, including from the public footpath that runs northward to the east of The Cottage next door. The occupier of the house in the 1830s is not the same as for the adjacent land, but Conifer Cottage may historically have been a farmworker's dwelling, still with a direct connection to the adjacent land.</li> <li>- Mustardpot Barn, Eye, Grade II – Approx. medium level less than substantial harm. There is also clear intervisibility between the much of the same parts of 2B and Mustardpot Barn, a former barn, now dwelling, which is just the other side of Brome Avenue. The footpath running northward provides good views back toward the barn, and views are equally afforded from the barn over the fields to the north. The panels would be very visible in the foreground and may considerably obscure the listed building. As a historic barn, a clear physical and visual relationship with surrounding farmland is considered an important element of its significance. This part of the site is the clearest visual link between this building and its agricultural setting.</li> <li>- Park Farm Barn, Eye, Grade II – Approx. medium level less than substantial harm. Similar to Mustardpot Barn, the agricultural setting of this former barn, now dwelling, is considered to contribute to its significance. The eastern extent of 2B runs directly to its boundary, while other parts of 2A and 2B would also fall within its setting to the north/northeast, and southeast. I consider that this combination increases the harm beyond that caused by each site in isolation. There are various areas of intervisibility between this listed building and the site, including along the approach to the building along Brome Avenue, the footpath adjacent to The Cottage, and from the building itself, the latter in all directions. The former adjacent farmstead, including the farmhouse, although not listed, is considered to contribute to the significance of the listed former barn, so even where the other buildings may sit between the listed building and the site, this would not entirely remove the impact on the former barn. The occupier of the farmhouse and farmstead in the 1830s is also listed as the occupier for parts of the proposal site to the west, north and southeast, suggesting a historic functional relationship between the former barn and this land.</li> </ul>
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		<ul style="list-style-type: none"> <li>- The Bungalow, Brome and Oakley, Grade II, and potential non-designated heritage assets related to the former Brome Hall – Approx. low level less than substantial harm. The Bungalow is listed as a C19 former Estate Lodge Cottage for Brome Hall, a C16 hall that was demolished in the C20. I did not access this site, so am not able to confirm the extent of surviving structures on site that may be non-designated heritage assets. However, the HER entry mentions a surviving stable block - <a href="https://heritage.suffolk.gov.uk/Monument/MSF12431">https://heritage.suffolk.gov.uk/Monument/MSF12431</a>, and there is a good quality Banham brick garden wall fronting the site along Upper Oakley road. The grounds of the former hall may also survive well enough to be considered a non-designated heritage asset. Although the loss of Brome Hall means that some of the historic context of the setting of the ancillary buildings has already been lost, the historic agricultural setting of the grounds of the former Brome Hall is still considered to form part of their historic context. I consider that the eastern half of 2A particularly would erode this setting and thus cause harm to these heritage assets.</li> <li>- Beaver Cottage/'The Granary Approximately 50 Metres North of Iron Gates and Lavendar Cottage', Eye, Grade II, and Iron Gates and Lavendar Cottage, Eye, Grade II – Approx. low level less than substantial harm. Parts of 2B, to both the north and southeast, would likely have intervisibility with these listed buildings and fall within their settings, but not in principal views of these listed buildings, and with undeveloped agricultural land retained in between in both directions.</li> <li>- I also consider that an approx. very low level of less than substantial harm would or may occur to other heritage assets as the development would likely be somewhat perceptible within their settings. This includes:</li> <li>- Church of St Peter and St Paul, Eye, Grade I. Approx a very low level of less than substantial harm. Good views of the church tower are possible from land to the north of the site, including from the public footpath that runs south from Brome Avenue to the west of Mustardpot Barn, and corresponding views are also thus likely in the other direction. The part of 2B located to the east of this footpath, particularly the southern corner, would be seen in the foreground of some of these views. However, they would not be directly in front of the church tower, and further to the south good views of the church tower would still be afforded after passing the proposal site.</li> </ul> <p>Site 3 – Land North of Gislingham</p> <ul style="list-style-type: none"> <li>- Church of St Mary Gislingham – Grade I – Approx. medium level of less than substantial harm. The site visit</li> </ul>
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		<p>highlighted good views of the tower of St Mary's church, highlighting the historic rural location of the church, from the north, including from Mellis Road, Burgate Road and the public footpath across the two. Therefore, views from the church over this land also seem likely. The dropping of the land toward the south, before it raises again toward the church, increases the prominence of the tower within the landscape. Panels across the southern part of Site 3 would likely be very prominent in the foreground of all of these views and erode all good views of the church tower from the north. At present, these are likely the best views of the church tower, as they are not so obscured by other buildings, as the village extends to a greater extent in other directions. The harm to this asset may be cumulative with the proposed Norwich to Tilbury pylon proposal, which would cross this area.</p> <ul style="list-style-type: none"> <li>- West End Farmhouse, Mellis, Grade II – Approx. low to medium level less than substantial harm. The northeastern part of Site 3 would considerably surround West End Farmhouse and at close proximity. As a former farmhouse, surrounding agricultural land is considered to form part of its historic setting and thus significance. The 1830s Tithe Map shows that the occupier of this farmhouse also occupied many of the surrounding fields at this time, including parts of the site. Although at present there is dense evergreen vegetation on the western boundary of the property, obscuring views from the ground, views may still currently be possible from the attic level of the building over the vegetation. There is also no guarantee that this vegetation would remain, nor, potentially, is it sympathetic anyway, as historically the farmhouse may have had a stronger visual connection with the surrounding fields – so its potential future loss may be advantageous.</li> <li>- Pountney Hall and Pountney Hall Barn, both Grade II, Mellis – Approx. medium level less than substantial harm. Similar to West End Farmhouse, but the current vegetation is more reduced here. In addition, in regard to Pountney Hall, its front elevation faces north, which is directly over part of the site, with limited vegetation in this area. Site 3 also extends further around the grounds of these two buildings. Again, the Tithe Map suggests the occupier of this building at the time also occupied many of the surrounding fields.</li> <li>- Mellis Conservation Area – Approx. low to medium level less than substantial harm (but see also Site 5 below). The Mellis Conservation Area Appraisal (2008, p.17 of 22) highlights its important historic connection with the surrounding countryside, which is well preserved. There are good views in and out of the western half of Mellis Common – which forms the focal point of the</li> </ul>
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		<p>Conservation Area and is a particularly large well-preserved historic common - that reinforce its historically rural setting, including from Mellis Road and Public Footpath 9, as identified in the Mellis Conservation Area Appraisal (2008, p.17 of 22) that would be considerably eroded by the northeastern extent of Site 3. (See also Site 5, below). There may also be cumulative harm with the Norwich to Tilbury pylon proposal, which would also pass to the northwest of the Conservation Area.</p> <ul style="list-style-type: none"> <li>- Ivy House Farmhouse, Gislingham, Grade II* - Approx. low level of less than substantial harm. The proposal site is somewhat separated from Ivy House Farmhouse by a wooded area, that appears to be historic, and at the time of the site visit there was little direct intervisibility, but the vegetation could be lost, and the surrounding fields are still considered to form part of its wider agricultural setting as a farmhouse/former farmhouse.</li> <li>- Stubbings Entry, Burgate – Grade II House and Scheduled Monument – Approx. a very low level of less than substantial harm from northwestern part of Site 3, as there would be a degree of separation.</li> </ul> <p>Site 4 – Land North of Occold</p> <ul style="list-style-type: none"> <li>- Church of St Michael, Occold, Grade II* - Approx low to medium level less than substantial harm. Good views of the church tower are afforded when approaching Occold along the B1077 from the south, and from the public footpath to the east, across fields that form part of the site, reinforcing its historic rural setting. Corresponding views out from the tower may also be afforded. Panels located on these fields, particularly the southwestern part of 4B, would likely be considerably prominent in these views.</li> <li>- Cranley Hall, Eye, Grade II* + Moated Site Scheduled Monument + Grade II Garden House and further Moated Site Scheduled Monument to southeast + Grade II barns to north – Approx low level less than substantial harm for all. Modern barns lie between many of these assets and the site, and would likely obscure most potential direct views between the heritage assets and the site, so the harm is considered reduced. Nonetheless, they still form part of the same farmstead so when experienced in the round, I consider that the panels, particularly the northwestern part of 4A, would still be seen as an intrusion into the historic agricultural setting of the farmstead, including associated heritage assets. The southeastern Scheduled Monument moated site would be located much closer to the panels, though it is also not such a prominent feature in the landscape.</li> <li>- I also consider that an approx. very low level of less than substantial harm would or may occur to other heritage</li> </ul>
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		<p>assets as the development would likely be somewhat perceptible within their settings. This includes:</p> <ul style="list-style-type: none"> <li>○ Church of St Peter and St Paul, Eye, Grade I. Long range views of the church tower are possible from the footpath north of Occold Church, where panels would be seen in the same context, but as with views of this church from the north, there are still good views of the church from the south after the panels would be passed, particularly from the B1077. The cumulative harm from both Sites 2 and 4 would probably still only result in a very low level of less than substantial harm.</li> <li>○ Town Farmhouse, Eye, Grade II.</li> <li>○ Church Farm, Occold – Grade II.</li> <li>○ Three Bottles, Occold – Grade II.</li> </ul> <p>Site 5 – Land south of Thrandeston and north of Mellis – including BESS</p> <p>The impacts from this site are more difficult to assess, as I am less sure what form the BESS may take, how much of the site it would need to cover, and what kind of noise it would generate. Visually, it could be more intrusive than solar panels. In regard to noise, much of the surrounding area would appear to have a particularly tranquil setting at present, plus any noise generated is unlikely to reflect anything historically heard in the area, and thus could cause harm to multiple heritage assets, including ones not currently listed below. Thus, this is likely to cause additional harm to that identified below.</p> <ul style="list-style-type: none"> <li>- Ostler's Barn, Mellis, Grade II – Approx. medium level of less than substantial harm. The southwestern portion of 5C would extend close to Ostler's Barn, where there is currently strong intervisibility between the building and its agricultural setting, that reinforces its historic location and function, and that does not exist in any other direction. The panels would also be highly visible in the approach to Ostler's Barn along its drive to the north – which at present this provides good views of the building - to the extent that this listed building may be considerably obscured.</li> <li>- Mellis Conservation Area – Approx. very low to low level of less than substantial harm. The part of the setting of Mellis Conservation Area to the northeast (Site 5C) did not appear to be as prominent within the Conservation Area or visible from Mellis Common. Nonetheless, the rural approach to Mellis Conservation Area along Thrandeston Road and rural setting to Ostler's Barn, located within Mellis Conservation Area, would still be eroded. In addition, the northern arm of the Conservation Area, north of The Lodge, appears to focus on the wooded former grounds of The Lodge. The Lodge</li> </ul>
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		<p>appears to be Georgian in date – appearing on the 1830s tithe map – but at this time the land to the north is shown as fields. By the 1890s map it had become part of the grounds of The Lodge. It is assumed to be included within the Conservation Area at least partly due to it historically (though perhaps not originally) forming part of the grounds of The Lodge, though it may also be partly due to the quality of the trees here (which is outside of my remit). The woodland makes this area fairly self-contained and provides a degree of buffer from the rest of the Conservation Area, but there likely still would be a degree of intervisibility with parts of 5C from this area that would add somewhat to the harm. The cumulative impact on Mellis Conservation Area in combination with the harm from Site 3 would likely result in approx. a medium level of less than substantial harm.</p> <ul style="list-style-type: none"> <li>- Thrandeston Conservation Area – Approx. very low to low level less than substantial harm. The northern part of Site 5A would extend to the west of Thrandeston Conservation Area. This Conservation Area appears fairly contained around the green, without particularly important views over the fields to the west, and there is also a degree of separation between 5A and the Area Boundary, but the wider agricultural setting is still considered to make a positive contribution to its character and appearance, as suggested in the Conservation Area Appraisal (2008, p.17 of 22). This includes in the approach from Mellis Road from the south, and Public Footpath 12 (as per the Appraisal) from the west.</li> <li>- Manor House, Thrandeston, Grade II* - Approx. a very low to low level less than substantial harm. Similar to Thrandeston Conservation Area, though this building does not benefit from as close a connection to an agricultural setting in other directions. The modern house to the west would seem to somewhat separate its physical connection to the field beyond, and a historic functional relationship is not as evident in this case.</li> <li>- Elm Tree Farmhouse, Mellis Grade II, a very low to low level of less than substantial. Although this building is now ‘separated’ from the southwestern part of 5C by Ostler’s Barn (now a dwelling), it seems likely that historically the two listed buildings were related, and formed part of a single farmstead, and that this can still be read. As such, I consider that panels on the southwestern part of 5C would still erode the historic agricultural setting of Elm Tree Farmhouse to some extent.</li> <li>- The Lodge, Mellis – Potential NDHA – A low level of less than substantial harm. As the wooded area to the north does not originally appear to have formed part of its grounds, its contribution to the significance of this building is potentially less, plus it provides a buffer between the</li> </ul>
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	<p>building itself and the nearest parts of Site 5C. Nonetheless, it still potentially provides some contribution and as such, as with the impact on this part of Mellis Conservation Area, there would be some harm to this potential non-designated heritage asset.</p> <p><b>MITIGATION</b></p> <p>I would initially request that consideration is given to the omission of certain areas from the proposal site, particularly to provide distinct undeveloped parcels of land around designated heritage assets, ideally still in agricultural use. This would both likely notably reduce the visual impact for the development and retain areas reflective of the historic setting of the heritage assets immediately adjacent to them. As such, please see the map sent with this response which I have marked up to show roughly the areas of the development I consider would likely cause the most harm (roughly anything above low), and where primary consideration to removal should be given, as well as secondary areas (approximately relating to areas that would cause a low level of the less than substantial harm).</p> <p>Where omission of areas is not possible, then consideration should be given to providing suitably strong vegetation buffers, to at least reduce the visual impact of the development. However, vegetation could in itself cause more harm, for example obscuring views to and/or from heritage assets that would not be obscured by the development itself, so careful consideration should be given to its siting. For example, where an undeveloped area would be retained between a heritage asset and the site, then in general the vegetation buffer should be located on the boundary of the latter, not the former, or it may disturb more of the setting of the heritage asset than the development itself.</p> <p>Fencing and walls could also be considered. They could provide a more solid and permanent visual buffer than planting. However, at the same time, they may be more out of keeping with the setting of the heritage asset than planting, somewhat subject to scale, design and location, so they would also need to be carefully considered and may not provide the best mitigation option.</p> <p>I would also query whether it would be appropriate for an application to set out whether any other nearby sites for a solar farm (either ground or building mounted) have been considered and if so, why they have not been pursued, in relation to Joint Local Plan Policy LP25.</p> <p><b>FUTHER INFORMATION</b></p> <p>Primarily, more detail would be required on the precise locations, scale and design of the panels, BESS and other associated infrastructure before I could review the proposal further. I would</p>
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	<p>also request Noise and Lighting Assessments, as BMSDC Environmental Health has also requested. These should consider the noise and lighting impacts on the significance of all relevant heritage assets, not just the amenity of dwellings. I may seek the advice of BMSDC Environmental Health to assess the content of the reports.</p> <p>A suitable Heritage Statement would be required. This should consider in more detail the contribution the site makes to all relevant heritage assets and how this would be impacted by the development, also taking into consideration potential cumulative impacts from nearby existing or proposed developments.</p> <p>CGIs/verified views could also be submitted to more clearly illustrate the visual impacts of the development on relevant heritage assets. Advice on the best locations for these can be provided upon request.</p> <p><b>CABLE ROUTES</b></p> <p>The areas for cable routes appear to be roughly drawn at this point. The indicated areas include listed buildings, but it is assumed that it would not be intended to actually alter or demolish any buildings to run the cables. Assuming the cables are only to be located where there are currently no buildings, and would be installed underground and land returned to its current form once installed, then any harm would be temporary. Nonetheless, I would encourage avoiding running them directly through any Conservation Areas or the grounds of listed buildings, to minimise the temporary harm further.</p> <p>Joint Local Plan Policy LP19:  <i>5. When considering applications where a level of harm is identified to heritage assets (including historic landscapes) the Councils will consider the extent of harm and significance of the asset in accordance with the relevant national policies. Harm to designated heritage assets (regardless of the level of harm) will require clear and convincing justification in line with the tests in the National Planning Policy Framework.</i></p> <p>The less than substantial harm to the significance of a designated heritage asset should be weighed against the public benefits of the proposal, as per para.215 of the NPPF.</p> <p>The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application, as per para.216 of the NPPF, as well as the policies in the Local Plan.</p> <p><i>Decision-takers should be mindful of the specific legal duties of the local planning authority with respect to the special regard to the desirability of preserving the listed building or its setting or</i></p>
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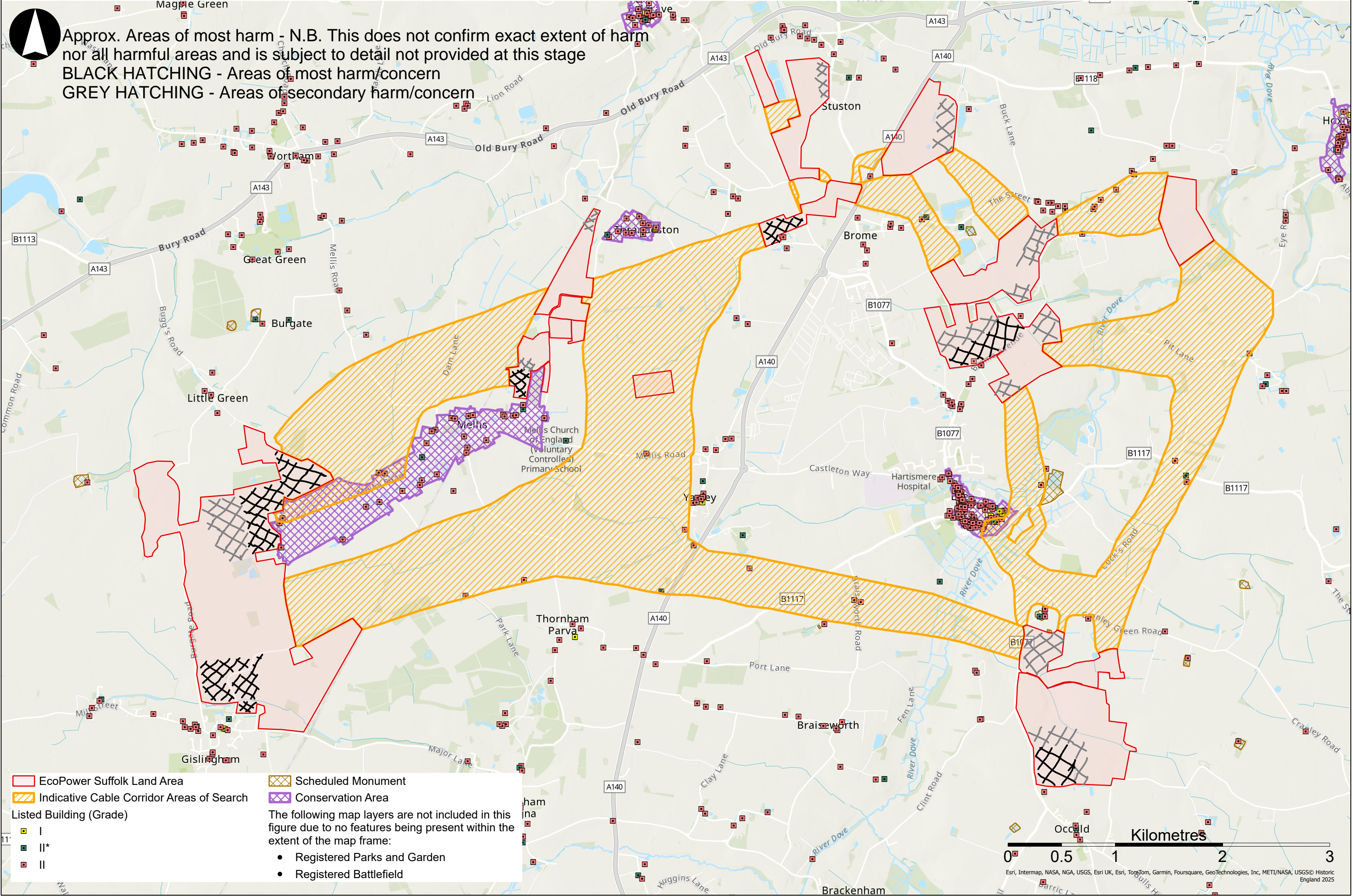
		<p><i>any features of special architectural or historic interest which it possesses, as set out in section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.</i></p> <p><i>Decision-takers should be mindful of the specific legal duties of the local planning authority with respect to the special attention which shall be paid to the desirability of preserving or enhancing the character and appearance of the Conservation Area, as set out in section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.</i></p>
6	<b>Amendments, Clarification or Additional Information Required</b>	
7	<b>Recommended conditions</b>	

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Approx. Areas of most harm - N.B. This does not confirm exact extent of harm nor all harmful areas and is subject to detail not provided at this stage  
BLACK HATCHING - Areas of most harm/concern  
GREY HATCHING - Areas of secondary harm/concern



- EcoPower Suffolk Land Area
- Indicative Cable Corridor Areas of Search
- Listed Building (Grade)
- I
  - II\*
  - II

- Scheduled Monument
- Conservation Area
- The following map layers are not included in this figure due to no features being present within the extent of the map frame:
- Registered Parks and Garden
  - Registered Battlefield





Planning Services  
Babergh and Mid Suffolk District Councils  
Endeavour House  
8 Russell Road  
Ipswich  
IP1 2BX

07/04/2025

For the attention of: Bron Curtis

**Ref: EcoPower Suffolk (Econergy International Solar/Battery NSIP) MSDC ref DC/24/02748)**

Thank you for consulting us on the pre-engagement proposals for 300MW solar and battery storage (likely 40-year consent), point of connection to Yaxley substation GSP on existing 400kv overhead transmission line (4YM) on four site parcels, totalling approximately 600ha, at various locations near Eye, Occold, Gislingham and Mellis.

This letter sets out our response regarding the landscape matters and how any future proposal should relate and responds to the landscape setting and context. This response follows a site visit dated 26/03/2025.

Comments within this response are based on the following plans and information:

- EcoPower February Newsletter,
- Environmental Designations plan,
- Indicative Cable Corridor Areas of Search plan,
- Cultural Heritage plan,
- Ecology and Biodiversity plan,
- Environmental Designations Site 1-5 plan,
- Public Rights of Way plan,
- Water Environmental plan.

**National Policy Statement for renewable energy infrastructure (EN-3)**

Solar NSIPs are covered by National Policy Statement for Renewable Energy Infrastructure (EN-3). The following paragraphs are relevant to this application.

Para 2.5.2 'Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity...'

Para 2.10.29 While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible.'

Para 2.10.35 Applicants will need to consider the suitability of the access routes to the proposed site for both the construction and operation of the solar farm with the former likely to raise more issues.

Para 2.10.43 Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.

Para 2.10.44 Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way.

Para 2.10.48 Applicants should consider the need to minimise the impact on the landscape and the visual impact of security measures.

Para 2.10.74 Applicants should provide information on relevant impacts as directed by this NPS and the Secretary of State.

Para 2.10.86 Given the temporary nature of solar PV farms, sites should be configured or selected to avoid the need to impact on existing drainage systems and watercourses.

Para 2.10.94 The approach to assessing cumulative landscape and visual impact of large-scale solar farms is likely to be the same as assessing other onshore energy infrastructure. Solar farms are likely to be in low lying areas of good exposure and as such may have a wider zone of visual influence than other types of onshore energy infrastructure.

Para 2.10.97 Applicants should carry out a landscape and visual assessment and report it in the ES. Visualisations may be required to demonstrate the effects of a proposed solar farm on the setting of heritage assets and any nearby residential areas or viewpoints.

Para 2.10.98 Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays.

Para 2.10.99 Whilst there is an acknowledged need to ensure solar PV installations are adequately secured, required security measures such as fencing should consider the need to minimise the impact on the landscape and visual impact (see paragraphs 2.10.46 – 2.10.48 above).

Para 2.10.100 The applicant should consider as part of the design, layout, construction, and future maintenance plans how to protect and retain, wherever possible, the growth of vegetation on site boundaries.

Para 2.10.131 Applicants should consider the potential to mitigate landscape and visual impacts through, for example, screening with native hedges, trees and woodlands.

Para 2.10.132 Applicants should aim to minimise the use and height of security fencing. Where possible applicants should utilise existing features, such as hedges or landscaping, to assist in site security, or screen security fencing.

Para 2.10.133 Applicants should minimise the use of security lighting. Any lighting should utilise a passive infra-red (PIR) technology and should be designed and installed in a manner which minimises impact.

### **Review of Submitted Information**

In terms of Landscape impact, there are opportunities for biodiversity enhancement across the various sites, however the impact if the indicative proposals will be significant. The introduction of solar panels and supporting ancillary infrastructure, (including security fencing) are incompatible with the existing landscape and setting. The combined impact of each of these sites will each have a degrading impact on the landscape and therefore the cumulative impact between each of the site and connecting cable corridors should be carefully reviewed.

Key considerations should also be considered to determine appropriate site boundaries and setbacks from roads and PROWs, BNG enhancements and landscape and visual mitigation.

Further information is required regarding the indicative location/s of the cable corridor, including what form it will take and how this impact will be managed and mitigated. The location of the indicative

cable corridors requires further consideration, especially when combined with the site section and location of the most rural and isolated sites, in particular sites 3, 4 and 2C.

In terms of supporting information, a Landscape and Visual Impact Assessment (LVIA) which follows the principles set out on the third edition of "Guidelines for Landscape and Visual Impact Assessment" (GLVIA3), should be undertaken and submitted as part of any future work and should include specific reference to:

- Context and character appraisal
- Landscape constraints and opportunities
- Analysis of visual impact from key viewpoint locations for each parcel and key receptors based on an accurate and appropriately identified Zone of Theoretical Visibility (ZTV)
- Mitigation proposals and recommendations

All visual representation with any submitted Landscape and Visual Impact Assessment (LVIA) should be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019) to ensure the assessment of visual impact is accurate and in turn an appropriate judgement of the assessed impacts can be made with viewpoint photographs should be formatted accordingly. Viewpoint locations should be agreed with the local Planning Authority. The LVIA should be carried out by a suitably qualified or experienced practitioner.

## **Site analysis**

### **Sites 1 (A, B, C and D) Land North of Brome and West of Stuston**

Landscape Character Areas:

Rolling Valley Claylands (sites 1A, 1C), Rolling valley farmlands & furze (site 1D) with site 1B being divided into Rolling Valley Claylands (to the southern portion of the site and Rolling valley farmlands & furze, (to the Northern section).

This site consists of four separate locations west of the A140 (Sites A, B and C) with site D to the east of the A140. Sites 1A, 1B and 1C surround the connecting roads and lanes to the west of the A140 and B1077.

Views to the existing sites 1A and 1B from Old Bury Road are limited to occasional views between gaps in the mature tree/hedgerow boundary planting. From the B1077, views west to site 1B are much more prominent and open. The topography of the road at this point helps to reduce views to the site when travelling north. Views to the sites 1A and 1B from the south are again limited to occasional views between gaps in the mature tree/hedgerow boundary planting.

Sites 1C and 1B are accessed by to a series of PROWs running through or adjacent to each of the sites. This impact development will have on the PROW network will need to be carefully considered.

The eastern portion of site 1C is open and visible from the east along the A140. Some tree planting lines the eastern edge of the field boundary but view remaining prominent. The western portion of site 1C is more contained, however there are a number of substantial gaps in the hedgerows which facilitate open views into and across the site.

Typical of the Rolling Valley Claylands Character, the sites demonstrate the narrative of the LCA which states:

“As these valleys are a focus of settlement, they are often exposed to adverse change through intrusive valley side developments or changes of land use, especially, the expansion of garden curtilages and the widespread introduction of horse grazing. However, they also have within them many areas of landscape in good condition that provide the appropriate context for the adjacent valley floor landscapes.”

Site 1D falls within the Rolling valley farmlands & furze character area. This site follows the eastern edge of the A140 and (apart from a small open area to the south), is largely screened from the road by a mature hedge and tree planting.

## **Sites 2 (A, B and C) Land South and East of Brome**

Landscape Character Areas:

Site 2A falls entirely within the Rolling Valley Claylands, site 2B is split between two-character areas, Rolling Valley Claylands (north) and Ancient Plateau Claylands to sections of the site to the south. Site area 2C again falls within two-character areas. Rolling Valley Claylands to the North and Wooded Valley Meadowlands and Fens to sections of the site to the south.

Sites 2A and 2B are located to the east of the Eye Airfield commercial business park. The landscape within this location has been fragmented by existing development from the commercial park as well as isolated farm and residential settlements. The nearby wind turbines create a landmark highlighting the commercial business park. Views to existing sites 2A and 2B are largely limited from the B1077 and Brome Hall Lane mainly due to the setback location of the sites and the existing mature woodland/hedgerows which line the local road network.

Site 2C is in an isolated location, located further east from the other two sites. The site is typical of the Landscape Character it falls within. The existing site is in a setback location from Upper Oakley limits views to and from the site. However, the isolated site location will create additional negative impact on the landscape when considering the indicative cable connection corridors.

As set out within the Landscape Character Assessment, this character area is stated as;

“As these valleys are a focus of settlement, they are often exposed to adverse change through intrusive valley side developments or changes of land use, especially, the expansion of garden curtilages and the widespread introduction of horse grazing. However, they also have within them many areas of landscape in good condition that provide the appropriate context for the adjacent valley floor landscapes.”

Sites 2A and 2B are largely contained but several PROWs intersect the proposed development area. The wider site will be seen with the landscape as a combined area and read as a single, significant development.

## **Site 3 Land North of Gislingham**

Relevant Landscape Character Areas:

Plateau Claylands (small southerly most section) and Ancient Plateau Claylands (majority of the site).

The site is exposed to open with rising plateau views from Thornham Road (looking north), Mellis Road (all directions) and Burgate Road (looking west). There is minimal existing hedgerows and tree planting, resulting in long and unbroken views across and beyond the site. It is noted that the indicative redline site boundary is drawn to the immediate road edge.

The site is typical of the Landscape Character of the Plateau Claylands, with the LCA stating:

“The overall experience is of open views that are only sometimes confined by hedges and trees. Slight changes in slope can have a profound effect on what and how much of the landscape can be seen and in the small valleys it is possible to find quite confined landscapes with intimate views. However, the lasting impression is generally the wide, open views of arable land with small clusters of trees and houses on the horizon.”

Mellis Road, which dissects the site, is slightly lower level than the adjacent fields on either side of the road. Views from Burgate Road are the most prominent. Views from this location are wide and open across the entire site, broken only by a narrow tree and hedge corridor which contains the PROW running east-west from Mellis Road to Burgate Road. The lack of any significant tree planting, woodland or hedgerow/field boundary combine to create a very open landscape. Only the far north-

eastern portion of the site benefits from some existing woodland and tree/hedge planting (following the field pattern) but this site is typical of the LCA and still large open and exposed.

Unbroken long views without any significant existing tree and boundary planting combine to make this site exposed to significant change with opportunities for mitigation very limited considering the overarching Landscape Character. This point is reinforced within the conclusion of the Plateau Claylands Character, which states:

“Outside the settlement clusters there is little sense of development except for the industrial buildings on the old airfield sites or those associated with intensive pig and poultry production. Suburbanisation has, so far, had very little impact in this landscape and it remains, like the Fens and much of the Estate Sandlands, a working, farmed, countryside.”

The isolated location of site 1 will create further negative impact on the landscape when considering the indicative cable connection corridors. In particular, the impact the cable connection corridor will have on the Mellis Common Nature Reserve.

From a Landscape and visual perspective and based on the information submitted, it is considered that development on this site will have significant negative visual impact. The openness of the site, the lack of any substantial existing woodland, hedgerow or tree planting together with the overarching Landscape Character will limit opportunities for a Landscape Character led mitigation strategy. The north-eastern edge of the site will have a negative impact on the Mellis Common Nature Reserve and Conservation Area.

#### **Sites 4 (A and B) Land North of Occold**

Landscape Character Areas:

Plateau claylands site 4A, with Plateau claylands with Rolling valley claylands running through the lower/central area of site 4B.

This site consists of a series of connecting large fields to the immediate north of the village of Occold. The site is bounded by Redlingfield Road to the east, B1077 to the west and Cranley Green Road to the north. (Although this site 4A is set back from the northern boundary road by a series of fields outside of the site area.

The site is typical of the Plateau Claylands Landscape Character type with open and exposed views framed with/by a backdrop of woodland and mature tree planting.

“The overall experience is of open views that are only sometimes confined by hedges and trees. Slight changes in slope can have a profound effect on what and how much of the landscape can be seen and in the small valleys it is possible to find quite confined landscapes with intimate views. However, the lasting impression is generally the wide, open views of arable land with small clusters of trees and houses on the horizon.”

This Rolling Valley Claylands character is stated as:

“As these valleys are a focus of settlement, they are often exposed to adverse change through intrusive valley side developments or changes of land use, especially, the expansion of garden curtilages and the widespread introduction of horse grazing. However, they also have within them many areas of landscape in good condition that provide the appropriate context for the adjacent valley floor landscapes.”

Site 4 is located across a series of connected fields. All of which are open and exposed to long views across the landscape as seen from the B1077 and Redlingfield Road. A PROW is located through the central southern section of the site, connecting back to the B1077 along the line of the valley, the visual impact upon of the PROW will also be significantly impacted. The isolated location of site 4 will create further potential negative impact on the landscape when considering the indicative cable connection corridors.

From a Landscape and visual perspective and based on the information submitted, it is considered that development on this site will have significant negative visual impact. The openness of the site, the lack of any substantial existing woodland, hedgerow or tree planting together with the overarching Landscape Character will limit opportunities for a Landscape Character led mitigation strategy.

The isolated land exposed location of site 4 will create further negative impact on the landscape when considering the indicative cable connection corridors. (Currently indicated to the north and west of the site.)

### **Sites 5 (A, B and C) Land North of Mellis**

Landscape Character Areas:

Ancient Plateau Claylands (southern areas, sites 5C and 5B), Rolling valley farmlands & furze site 5A.

Site 5 consists of three separate parcels, each utilising the existing field boundaries. Each of the sites follow each side of Thrandeston Road, (5B to the east) and (5C and 5A) to the west. Parcels 5C and 5A back onto the railway line to the west, with the other parcels forming irregular sites, skirting the ribbon residential development and woodland areas along Thrandeston Road.

Site 5C lies directly adjacent onto the boundary with the northern section of the Mellis conservation area. It is also noted that the indicative cable corridor (in this location) overlaps with the Mellis conservation area.

Sites 5C and 5B are typical of the Ancient Plateau Claylands Landscape Character type with open and exposed views framed with/by a backdrop of woodland and mature tree planting.

“On the more extensive plateau areas to the north of the Gipping the views are frequently open, though with some woodland present in the views. Occasionally there can even be a feeling of exposure. To the south there is a stronger feeling of enclosure with big hedges supplementing the ancient woods to give the landscape a distinctly ‘woodland’ feel.”

Site 5A falls within the Rolling valley farmlands & furze Landscape Character Area. The reduced tree and woodland cover within the area creates a very open landscape with long unbroken views. These views are typically open (due north) from Thrandeston Road. The cumulative impact of development on both sites 5A and 5B will be significant as the sites will be viewed as one. The topography of the sites along Thrandeston Road will add to this impact where this higher point creates open views across the site and the railway line beyond.

Views to the site from the north along Mellis Road are limited due to the mature hedgerow and tree planting, limiting views to short glimpses due to the occasional gaps in the hedgerow. Notwithstanding the impact this development will have on the Mellis Conservation Area and Mellis Common Nature Reserve, the three areas of site 5 are very open and exposed to views from Thrandeston Road.

If you have any queries regarding the information stated above, please do not hesitate to contact us.

Yours sincerely,

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Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.