



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,

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