



Committee Report

Application no. DC/21/5550/FUL

Location

Land At Park Farm
Loudham Hall Road
Loudham
Woodbridge
Suffolk
IP13 ONW

Statutory determination date 11 March 2022

Agreed extension date 28 November 2025

Application type Full Application

Applicant BSR Energy

Parish Pettistree

Proposal Erection of a solar photovoltaic (PV) array, with a total export capacity of up to 21 MW. Each of the solar panels will be mounted on a fixed panel system. The panels are covered by high transparency solar glass with an anti-reflective coating which minimises glare and glint, while aiding in the maximum absorption of the available sunlight. The panels are dark grey/blue in colour and are mounted on a frame of anodized aluminium alloy and galvanized steel.

Case Officer Katie Fowler

katie.fowler@eastsoffolk.gov.uk

Authorising Officer Kathryn Oelman

Determination route The Head of Planning Services referred this application to Planning Committee for determination because in their opinion the application is of significant public interest; would have a significant impact on the environment; or should otherwise be referred to Members due to its significance in some other respect.

1.0 Summary

- 1.1 The application seeks planning permission for a 21 MW solar farm comprising ground mounted solar PV panels, vehicular access from Loudham Hall Road with internal access tracks, landscaping and associated infrastructure including security fencing, CCTV cameras and grid connection infrastructure including inverter and substation buildings.
- 1.2 This application was originally determined by the Planning Committee South held on 28th May 2024 whereby the application was resolved to be approved subject to conditions. A decision notice was subsequently issued to that effect on 17th June 2024. Following the determination of the application, a claim was lodged with the Planning Court for a judicial review in respect of East Suffolk Council's decision to grant planning permission.
- 1.3 The Claimant was aggrieved by the grant of planning permission and alleged that:
 - (1) The Defendant [East Suffolk Council] failed to have regard to a material consideration: the extent of any impact on designated heritage assets in the vicinity of the application site; and
 - (2) The Defendant's Officer's report misled the committee as to the impact of the development on The Lodge.
- 1.4 East Suffolk Council accepted that it failed to have regard to the extent of any impact on the Grade II* listed Loudham Hall and it was agreed that on this basis, the planning permission should be quashed and the application be returned to the Planning Committee for redetermination. On this basis, the Claimant accepted it unnecessary for the proceedings of the Planning Court to pursue Ground 2.
- 1.5 On 2nd September 2024 the Planning Court determined that the Claimant's claim be allowed, and the planning permission granted by East Suffolk Council on 17th June 2024 under application reference DC/21/5550/FUL was quashed (this decision is provided as Appendix 1 to this report).
- 1.6 It is on this basis that the application appears before the Planning Committee for its re-determination. Whilst it was agreed that East Suffolk Council had failed to have regard to the impact upon the Grade II* listed Loudham Hall, the quashing of the decision requires that application is to be re-determined in its entirety.
- 1.7 Having re-assessed the application, officers conclude that the proposal would accord with the development plan. It is noted that the development would result in the production of renewable energy and that, whilst this would give rise to benefits which attract significant weight, the harms arising from the proposed development must also be carefully considered. On balance, officers conclude that the collective benefits would outweigh the harms identified and that material considerations would not indicate that a decision be taken otherwise; therefore, the application is recommended for approval subject to conditions.

2.0 Site Description

- 2.1 The application site comprises an area of approximately 37.08 hectares and is situated within the countryside to the south east of Wickham Market and east of Pettistree. It lies within the Parish of Pettistree and shares its western boundary with the A12. The site consists of agricultural land with a tree copse to the centre of the site (which is outside of the red line site boundary). Two sets of electricity pylons run diagonally through the site. The site would be accessed off Loudham Hall Road, immediately to the south. The topography of the site falls within the tip of the northern boundary and rises up towards the south; beyond the tree copse, the site plateaus out. Outside of the site boundaries, the topography declines.
- 2.2 There is a Public Right of Way (PROW) (footpath 7) which enters approximately halfway down the western boundary and then travels in a south easterly direction to Loudham Hall Road. Going west this PROW crosses the A12 and joins up with Chapel Lane leading into Wickham Market. Further from the site, the wider PROW network includes a route to the north of the site (approx. 120m away at its closest point) and also to the east (approx. 240m at its closest point). A permissive footpath previously penetrated through the northern boundary, but this has now been closed up.
- 2.3 The surrounding area is mainly rural, consisting of agricultural land separated by boundary hedgerows. Areas of woodland are located close to the eastern, and adjacent to the south western, edges of the site. There are a number of small farms and isolated houses in the vicinity.
- 2.4 The application site is entirely located within Flood Zone 1 with a small pocket of surface water flooding located between the tree copse and the southern boundary. The site is located within the Impact Risk Zone of Sites of Special Scientific Interest (SSSI), the closest being Sandlings Forest approx. 3.64km to the south-east. Sandlings Forest is also the closest Special Protection Area (SPA) to the application site. There is a Ramsar site located approx. 4.17km to the south (Deben Estuary).

3.0 Proposal

- 3.1 Planning permission is sought for a proposed solar photovoltaic ('PV') farm that would generate up to 21 megawatts ('MW') of output capacity. The proposed development would also include infrastructure associated with this use. The proposal would comprise of the following elements:
- Rows of solar PV panels (minimum height of 0.8m and maximum height of 2.6m). The PV panels would be finished in an anti-reflective coating in a dark grey/blue colour and mounted on a frame of anodized aluminium alloy and galvanised steel;
 - 10no. transformers (measuring approx. 3.1m in height, 3.4m in depth and 2.1m in width) positioned at intervals throughout the site;
 - 1no. Distribution Network Operator (DNO) switchgear station (measuring approx. 5.165m in depth, 5.39m in width and 4.275m in height). The external walls of the building would be fitted with LED PIR security lighting and emergency fluorescent bulkhead lights and would be located within the south-west corner of the site;
 - Substation compound located within the south-west corner of the site, comprising of:

- 1no. private switchgear comprising of a concrete base (measuring approx. 3.15 in depth, 6.15m in width) and an enclosure (measuring approx. 3m in depth, 6m in width and 3.277m in height). The enclosure would comprise of LED PIR security lighting and emergency fluorescent bulkhead lights;
- 1no. Aux transformer (measuring approx. 2.4m in height, 1.6m in depth and 2.1m in width);
- 1no. welfare unit (measuring approx. 6.1m in width, 2.44m in depth and 3.2m in height) with 2no. 4G masts attached to the roof;
- 2no. spares containers (measuring approx. 12.2m in width, 2.4m in depth and 3.2m in height);
- Perimeter fencing located around the PV panels, transformers and substation. The fencing would measure approx. 2.5m in height and would be of a post and rail format with timber fence posts and galvanised steel wire. The top of the fence is stated as being finished in plain or barbed wire;
- Access gates to the substation and to each parcel of PV panels measuring approx. 6m in width and 2.5m in height. The materials of the gate have not been specified;
- CCTV cameras spaced in intervals of between approx. 15m – 45m along the perimeter fencing (mounted on poles at a height of 3.5m);
- Internal access tracks (also referred to as transformer access track);
- DNO access track;
- Point of connection to the grid;
- Internal underground cabling to connect the panels to the equipment;
- Landscaping works and proposed planting.

3.2 The site would be accessed from Loudham Hall Road via a new vehicular crossover along the southern boundary of the site. The access would be located approx. 88m west of the existing access to Loudham Hall.

3.3 The proposed PV array would be connected to the Grid via a 33kV overhead line which is located within the site. The applicant has confirmed that the works to connect the solar farm to the grid would be completed under the General Permitted Development Order.

3.4 It is noted that the Planning Statement confirms that the development would have a lifespan of 40 years. At the end of the useful life of the facility, it would be decommissioned and all associated equipment removed, with the land reverted back to agricultural use.

3.5 Over the course of the application, a series of amendments have occurred. The former officer report notes those amendments undertaken up to the point at which the application was determined by the Planning Committee. Following the quashing of the decision, the applicant submitted the following new information, which was the subject of a full consultation with consultees and third parties, the most recent of which was August 2025:

- Submission of Statement of Clarification
- Submission of heritage impact assessment
- Submission of site selection statement
- Submission of section showing the application site and Sandpit Cottage
- Updated reports including:
 - Ecology reports (including protected species surveys)
 - Landscape visual assessment

- Flood risk assessment
- Tree survey
- Arb planning statement
- Public right of way management plan
- Noise assessment
- Agricultural land classification
- Statement of community involvement
- Landscape masterplan (to add visibility splays)

3.6 However, further amendments have taken place since the most recent consultation which are summarised below:

- Reduction in height of the CCTV camera poles from 6m to 3.5m;
- Revised landscape masterplan to remove the red line boundary and to include a hedgerow along the perimeter fencing adjacent to Sandpit Cottage;
- Amendment to the welfare container elevations to show the correct size as depicted by the proposed site layout;
- Amendment to fence elevations to show the wildlife holes discussed within the application;
- PROW management plan amended to include temporary diversion route.

3.7 These amendments broadly involved the reduction in scale of elements of the proposal. Where the amendments involved the introduction of something (namely the hedgerow adjacent to Sandpit Cottage), officers had direct correspondence with the adjacent owner and occupier to notify them of the matter and give them opportunity to make comment.

4.0 Environmental Impact Assessment

4.1 The application has been previously screened under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 whereby the Local Authority adopted a Screening Opinion (ref: DC/21/2387/EIA) that negatively screened the development and considered it to not constitute Environmental Impact Assessment (EIA) development.

4.2 However, given the time that has passed since this screening opinion was issued, it has been necessary to re-screen the development in accordance with the EIA Regulations. The development falls within the description of Schedule 2 development under the Regulations by virtue of category 3(b). The Regulations are clear that development which falls within column 1 and exceeds the threshold contained within column 2 of Schedule 2, should be screened.

4.3 Since the Screening Opinion was issued the Towns Farm Solar Farm has been granted consent to the north of Saxmundham (ref: DC/21/5515/FUL). On the 22nd July 2022, Sizewell C was also granted a Development Consent Order (DCO) (ref: DC/22/3775/DCO). Albeit this was granted after the original Screening Opinion was issued, the officer did anticipate the impacts of Sizewell C within their consideration of the cumulative effects. Additionally, it is recognised that Loudham Hall, a Grade II* listed building was not considered by the previous Screening Opinion. As such, each of these factors have now been considered by the Local Authority in reaching an updated Screening Opinion.

- 4.4 In line with the criteria set out in Schedule 3 of the Regulations, the Local Planning Authority has taken into account the nature, scale, magnitude and location of the development. Having considered the potential for significant effects on the environment, including cumulative impacts, it is concluded that the proposal would not be likely to have significant environmental effects within the meaning of the Regulations.
- 4.5 Accordingly, the development does not require an Environmental Impact Assessment.

5.0 Relevant Planning History

- 5.1 Application No. DC/21/2387/EIA – EIA Screening Opinion – Proposed development of a 21MWp solar PV development – EIA Not Required

6.0 Consultees

- 6.1 The previous officer report published on 17th June 2024 details all the previous consultee responses. This report is available on Public Access; the link for which is provided below: [DC/21/5550/FUL | Erection of a solar photovoltaic \(PV\) array, with a total export capacity of up to 21 MW. Each of the solar panels will be mounted on a fixed panel system. The panels are covered by high transparency solar glass with an anti-reflective coating which minimises glare and glint, while aiding in the maximum absorption of the available sunlight. The panels are dark grey/blue in colour and are mounted on a frame of anodized aluminium alloy and galvanized steel. | Land At Park Farm Loudham Hall Road Loudham Woodbridge Suffolk IP13 0NW](#), it is also provided in Appendix 2 to this Report.
- 6.2 Responses from consultees received after the committee in 2024, and in response to the new information provided, have been reported here and are summarised below:

| Consultee | Date consulted | Date reply received |
|---|----------------|---------------------|
| Campsea Ashe Parish Council | 17 July 2025 | 02 September 2025 |
| <p>Summary of comments:</p> <p>Opposed to the development in the sensitive setting of the Deben Valley. There are no relevant changes to the original application and hence concerns are maintained about the impact on the key landscape settings in the area.</p> <p>We are also principally opposed to the use of arable land for such purpose when the provision of renewable energy could be advanced more intelligently by mandatory roof top solar on new build.</p> | | |

| Consultee | Date consulted | Date reply received |
|--|----------------|---------------------|
| Pettistree Parish Council | 17 July 2025 | 26 August 2025 |
| <p>Summary of comments:</p> <p>The panels and associated infrastructure will be highly visible from a significant number of viewpoints in the surrounding parishes. These include promoted public rights of way within and</p> | | |

beyond the river valley, roads (lanes and the A12) and residential properties. The development will have an adverse visual impact on the setting of several designated and non-designated heritage assets. Photographic evidence will be provided.

Within the Statement of Clarification, BSR appears to misunderstand the guidance on what amounts to a 'valued landscape' under the NPPF Paragraph 187 a. PPC believe that the site qualifies as valued landscape because it conforms with a number of the criteria listed in the Landscape Institute guidance. This including includes a river valley landscape and associated buildings of heritage value. It is also of importance to note that under the previous SCLP the whole of the valley landscape fell into Special Landscape.

The inadequacy of the plans in relation to the location of the fencing and proposed mitigations.

The risk of flooding from run off onto Loudham Hall Road, an on-going problem which will be accentuated by the runoff and drainage from the panels.

The vast number of documents that have now been filed, making the process of analysis and commenting very complex for residents and putting them at a disadvantage in terms of access to the ESC decision-making process.

There are significant traffic and safety implications for Loudham Hall Road. The need for traffic management has not been addressed.

The traffic implications for Wickham Market, given that is already having to deal with the increase in traffic caused by Sizewell C.

The cumulative impact of this site added to the very many other solar sites currently in construction or proposed for Suffolk and the lack of any genuine benefit for residents who will bear all the inconvenience of these developments, whilst profits go to international companies with no other stake in our communities

| Consultee | Date consulted | Date reply received |
|-----------------------|----------------|---------------------|
| Ufford Parish Council | 17 July 2025 | 25 August 2025 |

Summary of comments:

1. Impact on the landscape – Expressed strong concern that the proposed development would negatively impact the visual appeal of the Pettistree area. The sloping nature of the site and elevation panels would dominate existing hedgerows, transforming the rural landscape into an industrial one. Development would be out of character with the countryside.
2. Agricultural land – No mention of agricultural land classification in the ecological appraisal. Object to the agricultural land being taken out of food production.
3. Flood risk – Inadequate flood management plan. Lack of detail of the proposed SuDS scheme. Run off from the site would flow into River Deben and potentially impact Ufford. Concurs with the advice provided by the Internal Drainage Board.
4. Impact on local residents - Support the residents of Pettistree that would be significantly affected by the increase of traffic. Construction traffic would need to join the A12 through Ufford and therefore Ufford residents would also be affected.

| Consultee | Date consulted | Date reply received |
|--|----------------|---------------------|
| Wickham Market Parish Council | 17 July 2025 | 01 August 2025 |
| <p>Summary of comments:</p> <p>Having considered the application we believe that the development would contravene Policies SCLP9.1 Low Carbon and Renewable Energy, SCLP10.1 Biodiversity and Geodiversity and SCLP10.4 Landscape Character.</p> <p>We believe that the development will cause a significant adverse impact on both the Landscape and Visual Impacts and flora and fauna. The scheme is visible from many vantage points both within and across the valley and only offering hedge screening is totally inadequate. The fence drawings do not show that they would be raised for badgers to pass through.</p> <p>The BNG document does not take into account the Local Plan Landscape Appraisal and hence the subjective assessments are perhaps flawed. The propose development does not demonstrate that it maintains, restores or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity. While the proposed landscape mitigation would go in some way to mitigate the impact, it is felt that they are totally inadequate for a development of this size.</p> <p>The development does not protect or enhance the area in anyway.</p> <p>Wickham Market Parish Council therefore objects to the planning application.</p> | | |

| Consultee | Date consulted | Date reply received |
|---|----------------|---------------------|
| Ward Councillor – Cllr Sally Noble | 17 July 2025 | 21 July 2025 |
| <p>Summary of comments:</p> <p>Objection still stands. The site is totally unsuitable for reasons already explained – heritage impact, impact on river valley, a valued landscape, visual effects on the residents of Sandpit Cottage and Loudham Hall Estate.</p> | | |
| | 17 July 2025 | 02 September 2025 |
| <p>Summary of comments:</p> <p>Objection still stands and fully support other objections. There are serious omissions in this application in relation to valued landscape, drainage and flooding, not to mention heritage issues and the overall impact on local communities.</p> | | |

| Consultee | Date consulted | Date reply received |
|-----------|----------------|---------------------|
| | | |

| | | |
|---|--------------|-------------------|
| Suffolk County Council Highways | 17 July 2025 | 21 July 2025 |
| Summary of comments: | | |
| No objection subject to conditions being imposed. | | |
| | 17 July 2025 | 24 September 2025 |
| Summary of comments: | | |
| Confirmation that a construction traffic management plan should be conditioned. | | |

| | | |
|--|----------------|---------------------|
| Consultee | Date consulted | Date reply received |
| Suffolk County Council Public Rights of Way | 17 July 2025 | 01 August 2025 |
| Summary of comments: | | |
| Holding objection due to discrepancy between the stated and illustrated widths of the PROW. The PROW Management Plan mentions gates which would not be permitted. The Management Plan mentions a temporary closure and a permissive alternative route is strongly encouraged during the construction period. | | |
| | 17 July 2025 | 06 October 2025 |
| Summary of comments: | | |
| No objection to the application subject to conditions which require the provision of a section of the PROW, details of signage and a temporary Traffic Regulation Order being submitted. | | |

| | | |
|--|----------------|---------------------|
| Consultee | Date consulted | Date reply received |
| Suffolk County Council Lead Local Flood Authority | 17 July 2025 | 07 August 2025 |
| Summary of comments: | | |
| Holding objection to allow for the applicant to confirm any material changes to the FRA and drainage strategy from the prior revision. | | |
| | 17 July 2025 | 01 September 2025 |
| Summary of comments: | | |
| No objection subject to conditions. | | |

| | | |
|-----------|----------------|---------------------|
| Consultee | Date consulted | Date reply received |
|-----------|----------------|---------------------|

| | | |
|--|--------------|--------------|
| Suffolk County Council Archaeology | 17 July 2025 | 30 July 2025 |
| <p>Summary of comments:</p> <p>No objection subject to conditions being imposed.</p> | | |

| | | |
|--|----------------|---------------------|
| Consultee | Date consulted | Date reply received |
| Environment Agency | 17 July 2025 | 28 July 2025 |
| <p>Summary of comments:</p> <p>All new development at the site including solar panel units, access tracks and welfare unit have been sited within Flood Zone 1, land with a low probability of flooding as defined by the PPG. A small area to the east of the site falls within Flood Zone 3, but all development has been sequentially sited away from this land.</p> <p>The area proposed for new development will remain in future Flood Zone 1 when climate change is considered.</p> <p>The access/egress route for the site also falls within Flood Zone 1.</p> <p>[Officer clarification: a small area of the site did lie within Flood Zone 3 but this was removed from within the red line boundary prior to the application being previously determined. It now falls part of the blue line.]</p> | | |

| | | |
|--|----------------|---------------------|
| Consultee | Date consulted | Date reply received |
| Natural England | 17 July 2025 | 04 August 2025 |
| <p>Summary of comments:</p> <p>No comment.</p> | | |

| | | |
|--|----------------|---------------------|
| Consultee | Date consulted | Date reply received |
| Historic England | 17 July 2025 | 03 September 2025 |
| <p>Summary of comments:</p> <p>The designated heritage assets falling under our remit for comment are far enough from the proposed development and screened by woodland, so their significance is unlikely to be directly harmed. However, they note the presence of the former lodge to Loudham Hall along with remnants of historic parkland and request that these are given due consideration and weight in the decision making process. They note the Council's conservation team has raised concerns and</p> | | |

suggested mitigation, which the Historic England supports. Historic England do not wish to object to the application.

| Consultee | Date consulted | Date reply received |
|---|----------------|---------------------|
| East Suffolk Council Ecology | 17 July 2025 | 04 August 2025 |
| Summary of comments: No objection subject to conditions being imposed. | | |

| Consultee | Date consulted | Date reply received |
|---|----------------|---------------------|
| East Suffolk Council Environmental Protection | 17 July 2025 | 23 September 2025 |
| Summary of comments: No objection to the application subject to conditions being imposed. | | |
| | 17 July 2025 | 26 September 2025 |
| Summary of comments: Confirmation that Environmental Protection request a Construction Management Plan be conditioned. | | |

| Consultee | Date consulted | Date reply received |
|---|----------------|---------------------|
| East Suffolk Council Design and Heritage | 17 July 2025 | 11 August 2025 |
| Summary of comments: Further information is needed as to whether the areas identified along Loudham Hall Road will be appropriately and sensitively screened. Following the provision of appropriate screening measures, I will have no objection to this application. | | |
| | 17 July 2025 | 11 September 2025 |
| I have reviewed the Heritage Impact Assessment submitted by the Loudham Hall Estate and the new Impact Assessment written in response by the applicant. I believe the application does indeed cross from a minor to a moderate degree of less than substantial harm. Nevertheless, my judgement on the effects of the proposed development on any other heritage assets, designated or otherwise, remains unchanged. In the event of approval being granted, I would strongly advise that a condition or other suitable provision is made for the applicant to provide a comprehensive long term hedge management plan. This will ensure that any screening measures are maintained throughout the stated duration | | |

of the solar farm's presence and will not result in a delayed visual impact to the setting of Loudham Hall and the curtilage listed lodge.

| Consultee | Date consulted | Date reply received |
|--|----------------|---------------------|
| East Suffolk Council Trees and Landscape | 17 July 2025 | 15 August 2025 |

Summary of comments:

The addendum report, which assesses the visual impact of the development upon properties which were not included in the original assessment, is appropriate and I am largely in agreement with their conclusions that visual effects will be limited by topography and existing vegetation.

Other than this, the current submission is materially unchanged from the original application, therefore my previous response remain relevant. I agree that this is not a valued landscape in terms of Para 170 of the NPPF.

Overall, I remain concerned that the proposed development would have a major impact on the character and visual qualities of this section of the Deben Valley which cannot initially be mitigated. However, the extent of these impacts is largely limited to the site itself and its immediate surrounds, and if the planting is successful as predicted, they should be temporarily limited. If the Council elects to approve the proposed development, full landscape planting details and their maintenance and long-term management and an arboricultural method statement should be sought by condition.

| Consultee | Date consulted | Date reply received |
|-------------------|----------------|---------------------|
| UK Power Networks | 17 July 2025 | 12 August 2025 |

Summary of comments:

Please note there are HV/LV underground cables on the site running within close proximity to the proposed development. There are also overhead cables on the site. Prior to commencement of work accurate records should be obtained from UKPN.

| Consultee | Date consulted | Date reply received |
|------------------------|----------------|---------------------|
| Suffolk Wildlife Trust | 17 July 2025 | 24 July 2025 |

Summary of comments:

Suffolk Wildlife Trust raise no objection to this proposal but highlight that changes to the Biodiversity Net Gain Calculations are required, an ongoing program of biodiversity monitoring should be considered alongside precautionary measures for hazel dormice.

| | | |
|--|--------------|-------------------|
| | 17 July 2025 | 24 September 2025 |
|--|--------------|-------------------|

Summary of comments:

Confirmation that concerns have been addressed through communication with ESC Ecology team.

| Consultee | Date consulted | Date reply received |
|-------------------------------------|----------------|---------------------|
| East Suffolk Water Management Board | 17 July 2025 | 22 July 2025 |

Summary of comments:

The site is partly within the Internal Drainage District. The advice of the Lead Local Flood Authority should be followed.

| Consultee | Date consulted | Date reply received |
|----------------------|----------------|---------------------|
| Suffolk Constabulary | 17 July 2025 | 27 August 2025 |

Summary of comments:

Growing risk of crime which effects solar farms. Suggested measures to put in place to deter crime taking place.

| | | |
|--|--------------|-------------------|
| | 17 July 2025 | 29 September 2025 |
|--|--------------|-------------------|

Summary of comments:

Confirmation that they are happy with the applicant's proposed approach and confirms that they raise no objection.

7.0 Third Party Representations

- 7.1 As noted above, this report contains a summary of third party responses which have been received in relation to the consultation which began on 17th July 2025. The previous officer report contains all previous comments received from third parties.
- 7.2 Since the previous committee, 19 representations have been received raising objections to the application, from a total of ten addresses. Representations from Sandpit House included a detailed appraisal of its historic significance as a non-designated heritage asset. Representations from Loudham Hall Estate included a Built Heritage Statement prepared by Dr David Dickie with the intention of providing an independent assessment on this issue. Representations from Ms Anne Westover included photomontages of landscape views. Representations received also included objections from the Ipswich Ramblers Society and the River Deben Association.
- 7.3 Some of the comments received are of considerable length, therefore in the interests of brevity it has not been possible to provide full details of their concerns within this report. However, the key issues raised have been summarised below:

- Sandpit House is the only remaining house from Loudham Village. Sandpit House should be identified and recognised as a non-designated heritage asset which would be adversely affected by the development proposals.
- Sandpit House is low lying compared to the development site. A detailed section through the site should be provided, to allow the finished height of the development relative to Sandpit House to be appreciated.
- The development would be extremely intrusive and materially affect the setting of Sandpit House and Loudham Hall.
- The development will have considerable impacts upon the landscape. Sections/elevations through the site relating to the relevant public viewpoints (particularly up and down Loudham Hall Road and from within the area of Sandpit House) should be provided.
- All the photographs seem to be taken within the site, thus giving no indication at all as to their impact on views from the public highway or from Sandpit House.
- Development is in too close proximity to heritage assets.
- Unacceptable impact on Grade II* listed Loudham Hall and curtilage listed lodge.
- Disregard of the impact upon the Scheduled Ancient Monument of Campsey Priory and listed buildings at Ashe Abbey.
- Historic views of Grade II* St Peter and Paul Church Pettistree not considered.
- Concern over HGV impacts and potential subsidence to Hall Farm House and Stone Cottage caused by vibration from construction HGVs.
- Traffic management proposals are vague and a detailed traffic management plan is required to clearly set out how traffic coming from each direction will be held back to avoid coming into head to head contact. This will seriously disadvantage residents/agricultural traffic.
- The proposal will reduce the value of the PROW through the site. If the application is permitted, the PROW must be maintained and open for use at all times.
- Loss of PROW during construction.
- Loss of agricultural fields for food production.
- Industrialisation of the countryside, harm to valued landscape and agricultural land.
- The solar array will be detrimental to the visual aspect of the countryside.
- Site forms part of a valued landscape.
- Disagreement that the landscape harm would be limited to the site itself.
- Lack of cumulative landscape assessment.
- The development does not benefit the community.
- Insufficient consideration of the amenity impacts to the Lodge at Loudham Hall.
- Glint and glare study has not considered the PROW or the Lodge.
- Insufficient information regarding flooding and transport.
- Concerns over flooding.
- Proposal would result in noise pollution.
- Concerns over crime being brought into the area.

8.0 Publicity

The application has been the subject of the following press advertisement:

| Publication | Published date | Expiry date | Reason |
|--------------------------|----------------|-------------------|------------------------------|
| East Anglian Daily Times | 28 August 2025 | 18 September 2025 | Public Right of Way Affected |

| | | | |
|-----------------------------|----------------|-----------------|---|
| | | | Major Application Affects Setting of Listed Building |
| East Anglian Daily Times | 6 January 2022 | 27 January 2022 | Public Right of Way Affected Major Application Listed Building |

9.0 Site Notices

| Site Notice Type | Date Posted | Expiry date | Reason |
|---------------------|-----------------|-----------------|--|
| General Site Notice | 17 July 2025 | 7 August 2025 | Public Right of Way Affected Major Application Listed Building |
| General Site Notice | 14 January 2022 | 4 February 2022 | Listed Building Listed Building Public Right of Way Affected Major Application |

10.0 Planning policy

National Planning Policy Framework 2024

National Policy Statements 2025

SCLP3.2 – Settlement Hierarchy (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP3.3 - Settlement Boundaries (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP4.5 – Economic Development in Rural Areas (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP7.1 - Sustainable Transport (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP9.1 - Low Carbon & Renewable Energy (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP9.5 - Flood Risk (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP9.6 - Sustainable Drainage Systems (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP10.1 - Biodiversity and Geodiversity (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP10.3 - Environmental Quality (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP10.4 - Landscape Character (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP11.1 - Design Quality (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP11.2 - Residential Amenity (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP11.3 – Historic Environment (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP11.4 – Listed Buildings (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP11.6 – Non-Designated Heritage Assets (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

SCLP11.7 - Archaeology (East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020)

Historic Environment SPD (2021)

11.0 Planning Considerations

Principle of Development

- 11.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise. The Council's Development Plan in the context of this application consists of the East Suffolk Council – Suffolk Coastal Local Plan ('the Local Plan'), adopted September 2020.
- 11.2 The National Planning Policy Framework (December 2024) ('NPPF') is committed to achieving sustainable development. One of the overarching objectives is the environmental aspect which seeks to use natural resources, minimise waste and pollution, mitigate and adapt to climate change and move to a low carbon economy (Paragraph 8).
- 11.3 Paragraph 168 of the Framework outlines that when determining planning applications for renewable and low carbon development, local planning authorities should not require

applicants to demonstrate the overall need for renewable or low carbon energy and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions. Additionally, Paragraph 168 states that local planning authorities should give significant weight to the benefits associated with renewable and low carbon energy generation.

11.4 Paragraph 013 of the Planning Practice Guidance on renewable and low carbon energy details that the deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes. However, the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively. As such, the following should be considered by local planning authorities:

- Encouraging the effective use of land by focussing large scale solar farms on previously developed and non-agricultural land, provided that it is not of high environmental value.
- Where a proposal involves greenfield land whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encouraged biodiversity improvements around arrays.
- That solar farms are normally temporary structures and planning conditions can be used to ensure that the installations are removed when no longer in use and the land is restored to its previous use.
- The proposal's visual impact, the effect on landscape of glint and glare and on neighbouring uses and aircraft safety.
- The extent to which there may be additional impacts if solar arrays follow the daily movement of the sun.
- The need for and impact of security measures such as lights and fencing.
- Great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of large-scale solar farms on such assets. Depending on their scale, design and prominence, a large-scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset.
- The potential to mitigate landscape and visual impacts through, for example, screening with native hedges.
- The energy generating potential, which can vary for a number of reasons including, latitude and aspect.

11.5 Turning to the proposed development specifically, the application site is located outside of any settlement boundary, meaning that it is located within the Countryside for the purposes of Policies SCLP3.2 (Settlement Hierarchy) and SCLP3.3 (Settlement Boundaries). For development in the Countryside, Policy SCLP3.2 says that development requirements will come forward through Neighbourhood Plans and windfall sites in accordance with other policies in the Local Plan. Policy SCLP3.3 does not reference developments in the Countryside outside employment, town centre, or residential uses.

- 11.6 Policy SCLP9.1 (Low Carbon and Renewable Energy) states that the Council will support low carbon and renewable energy developments where the following criteria can be met:
- a) They can evidence a sustainable and, ideally, local source of fuel;
 - b) They can facilitate the necessary power connections required for functional purposes; and
 - c) They are complementary to the existing environment without causing any significant adverse impacts, particularly relating to the residential amenity, landscape and visual impact, the natural beauty and special qualities of the AONB, transport, flora, fauna, noise and air quality, unless those impacts can be appropriately mitigated.
- 11.7 The proposal involves the provision of renewable energy and would produce enough renewable electricity to power just over 5000 homes per year. With regards to the principal requirements of Policy SCLP9.1, the proposed development would convert readily available solar energy to electricity, thereby satisfying criterion a) referenced above.
- 11.8 Regarding criterion b), the applicant has stated the connection to the grid is via an overhead line on site, thereby satisfying criterion b).
- 11.9 The remaining requirements set out under criterion c) of Policy SCLP9.1 relate to the environmental impacts of the proposed development which are discussed under the subsequent headings of this report.
- 11.10 Policy SCLP9.1 concludes by stating that when renewable energy developments are no longer operational, there is a requirement for the development to be decommissioned and removed, with the site completely restored to its original condition. It is proposed that the solar farm would have an operational lifespan of 40 years, after which point the development would be decommissioned, removed, and the site completely restored to its original condition in accordance with Policy SCLP9.1. A condition is recommended to secure this requirement.
- 11.11 The principle of low carbon and renewable energy development is well established within both national and local planning policy and guidance. Applications for renewable energy schemes within East Suffolk should therefore be supported in line with planning policy requirements and local commitments.
- 11.12 To summarise, the principle of the proposed development is considered to be acceptable under the provision of Policy SCLP9.1. Likewise, the principle of the proposed development would be consistent with the relevant objectives contained within the NPPF, whilst also contributing towards the achievement of local and national climate change targets.

Alternative Sites Assessment – Agricultural Land and Brownfield Land

Agricultural Land

- 11.13 The PPG (paragraph 013) sets out that LPAs should have consideration for ensuring agricultural land has been shown to be necessary for use and poor-quality land has been used in preference to higher quality land.

- 11.14 Policy SLP10.3 (Environmental Quality) states that development proposals will be expected to protect the quality of the environment, by amongst other matters, giving consideration to the impacts upon soil and loss of agricultural land.
- 11.15 Paragraph 187 of the NPPF explains that planning policies and decisions should contribute to and enhance the natural and local environment by, amongst other matters, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services, including the economic and other benefits of the best and most versatile agricultural land. Footnote 65 to paragraph 188 of the NPPF advises that, where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.
- 11.16 Annex 2 of the NPPF defines best and most versatile (BMV) agricultural land as that within grades 1, 2, and 3a of the Agricultural Land Classification.
- 11.17 The application is accompanied by an Agricultural Land Classification report prepared by ADAS and dated July 2021 which identifies that the land comprises Grade 3b and Grade 4 agricultural land. Grade 3b land is moderate quality agricultural land, with Grade 4 land comprising poor quality agricultural land. Neither of these classifications fall within the BMV agricultural land classification.
- 11.18 Within the Site Selection Statement, the applicant acknowledged that the use of moderate quality land (Grade 3) is discouraged. However, the applicant has also demonstrated that there is limited Grade 4 (~11.9%) and Grade 5 (~0.3%) within Suffolk. As such, it is accepted that due to constraints around grid capacity, some loss of higher quality land would be likely. Nevertheless, some limited harm would still arise from the loss of medium quality land (Grade 3b) and the effects of taking it out of agricultural food production.
- 11.19 The submitted Planning Statement notes that once decommissioned, the site can be reverted to agricultural use. On this basis, any grant of consent should be conditioned for a soil management plan to be submitted to ensure that the soil is safeguarded during construction activities and in the longer term, therefore its quality can be safeguarded during this period.
- 11.20 In this regard, the proposal would be broadly in accordance with Policy SCLP10.3 which requires consideration to be given to the impacts of development on soil quality and the loss of agricultural land. However, the loss of agricultural fields for food production should be given some weight.

Brownfield Land

- 11.21 The Written Ministerial Statement (WMS) published in 2015 was explicit in stating that solar farms should make effective use of previously developed land and, where a proposal involved agricultural land, being quite clear this is necessary, and that poorer quality land is to be used in preference to land of a higher quality. Only where land is identified as BMV land would advice contained within the WMS be relevant. Given that the application site is made up by Grade 3b and 4 land, it would not be necessary to apply the brownfield sequential test in this instance.

Built Heritage

Designated Heritage Assets

- 11.22 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Paragraph 212 of the NPPF is clear that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Paragraph 213 goes on to say that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Finally, paragraph 215 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 11.23 Policy SCLP11.3 (Historic Environment) sets out that the Council will work to conserve and enhance the historic environment and to ensure where possible, development makes a positive contribution to the historic environment. It says that the policies of the NPPF will be applied in respect of designated and non-designated heritage assets, and it requires that all development proposals which have the potential to impact on heritage assets or their settings be supported by a Heritage Impact Assessment. The level of detail of a Heritage Impact Assessment should be proportionate to the scheme proposed and the number and significance of heritage assets affected.
- 11.24 Policy SCLP11.4 (Listed Buildings) states that proposals which affect the setting of a listed building will be supported where they (amongst other considerations) (a) demonstrate a clear understanding of the significance of the building and its setting alongside an assessment of the potential impact of the proposal on that significance; (b) do not harm the character of the building or any architectural artistic, historic or archaeological features that contribute towards its special interest; and (c) are of an appropriate design, scale, form, height, massing and position which complement the existing building.
- 11.25 There are no designated heritage assets within the site. There are however several heritage assets nearby to the site which the proposed development has the potential to impact the setting of:
- Loudham Hall, Loudham Hall Road – Grade II* (list entry no. 119956) located approximately 300m south of the southern boundary;
 - Church of All Saints, Wickham Market – Grade II* (list entry no. 1377135) located approximately 700m north-west of the northern boundary;
 - Mill House, The Mill, Campsea Ashe – Grade II* (list entry no. 1030830) located approximately 500m east of the south-east corner of the site;
 - Barn, The Priory, Campsea Ashe – Grade II (list entry no. 1030829) located approximately 550m east of the south-east corner of the site;
 - Abbey House, The Priory, Campsea Ashe – Grade II* (list entry no. 1030828) located approximately 560m east of the south-east corner of the site;

- Site of Campsey Priory – Scheduled Monument (list entry no. 1005998) located approximately 530m east of the south-east corner of the site;
- Church of St Peter and St Paul, Pettistree (list entry no. 1377418) located approximately 900m west of the western boundary of the site.

- 11.26 A Built Heritage Statement has been prepared by Pegasus Group (ref: P24 1832_HT_R001v6_SB dated May 2025) and is submitted with the application. The Built Heritage Statement ('BHS') has reviewed the above-mentioned designated heritage assets and considers that those which have the potential to be sensitive to the development proposals are Loudham Hall and the Church of All Saints, Wickham Market. The BHS therefore goes on to assess this further. The four other assets (amongst other designated heritage assets not mentioned above) were ruled out from further assessment as the site was not considered to form part of the setting that positively contributes to their overall heritage significance due to the nature of the asset and a lack of visual connections, spatial relationships and historic connections. The BHS details the full rationale behind excluding those designated heritage assets.
- 11.27 The Council's Built Heritage Officer has reviewed the BHS and agrees with its finding in this regard. In their response, the Built Heritage Officer has stated that the BHS is satisfactory in considering the context of the application and the scope of the works proposed.

Loudham Hall – Assessment of significance

- 11.28 While the BHS considers the site to not possess a high degree of significance in its own right, the site is located within the setting of multiple heritage assets. The most prominent of these is the Grade II* Listed Building, Loudham Hall.
- 11.29 Loudham Hall is a Country House which serves as the principal residence of the Loudham Hall Estate. The building possesses a 16th century core but has seen significant changes and alterations over the following centuries, particularly in the mid to late 18th century. The building itself is orientated towards the south-east and would have originally been formally approached from this direction. Today Loudham Hall is accessed via Loudham Hall Road which is located along the northern boundary of the estate. This access is marked by an entrance gate and lodge, which is a curtilage listed building and therefore extends the setting of the Listed Building further into this northern area.
- 11.30 The application site has historically been associated with Loudham Hall as part of its wider estate which formerly encompassed a significant amount of agricultural land in this area, as well as the hamlet of Loudham itself. The application site would have likely functioned as agricultural land for at least the last two centuries.
- 11.31 As a large Country House, Loudham Hall has been clearly designed to emphasise its prominence and implied ownership of the surrounding landscape. As a result, Loudham Hall's special interest expands to cover not only its historic association, fabric and architectural design but also its position as a landmark in the surrounding agricultural setting. This is reflected in the elevated grading of the building as Grade II*.
- 11.32 Development has occurred in some areas throughout the former extent of the estate, including the addition of the A12 towards the north and west, as well as electricity pylons which are visible when looking westwards from Loudham Hall. There is also a small-scale

solar farm (1.068MW) to the south-east of the Listed Building (application no. DC/14/2236/FUL). Aside from these elements, the immediate grounds of Loudham Hall and Loudham Park remain largely unaltered with most of its curtilage intact.

Setting of Loudham Hall – Impacts and effects arising

- 11.33 The proposed development is substantial in size and would involve a clear departure from the agricultural appearance of the existing fields. Despite this, the intervisibility between the principal structure of Loudham Hall and the proposed development is limited due to its position largely behind substantial tree cover. This was observed by officers on site at Loudham Hall on 14th March 2025.
- 11.34 Nevertheless, the closer proximity of the curtilage listed lodge by extension places the application site within Loudham Hall's setting. On this basis, coupled with the nature and scale of the proposal, the Built Heritage Officer has concluded that the proposal would have an unavoidable impact to the setting of Loudham Hall in this context.
- 11.35 The submitted BHS highlights that there are some gaps within the vegetation along the southern boundary of the application site which the Built Heritage Officer has stated must be appropriately filled with additional planting to mitigate some of the impact of the change of character of the application site. It has been agreed with the Built Heritage Officer that it would be reasonable for a condition to be imposed which requires details and agreement of such planting. Aside from the benefits in landscape terms, the addition of this planting would go some way to ensuring the development is disguised and that the change to the agrarian setting is not superficially obvious.
- 11.36 The BHS concludes that the impact of the proposed development on the heritage significance of Loudham Hall as a result of development within its setting would be at the lower end of the scale of less than substantial harm. However, Loudham Hall Estate have submitted an independent review of the applicant's BHS, which has identified the harm to be at the upper end of the range of less than substantial harm. Having reviewed this submission and the applicant's response, the Council's Built Heritage Officer now considers that the proposal would result in a moderate degree of less than substantial harm.

Church of All Saints – Assessment of significance

- 11.37 The immediate setting of the Church, a Grade II* Listed Building, comprises the burial ground bound by walls and railing through which an informal path passes. Its wider and extended setting comprises domestic and commercial buildings and spaces that form part of the settlement of Wickham Market.
- 11.38 The submitted BHS identifies that given the topography of the land surrounding the church, as well as it being located within a built-up area, any longer distance views from the church or its immediate surrounds are prevented. Meaning the application site is not visible from this designated heritage asset or its setting.
- 11.39 However, as highlighted by the BHS, the height of the spire of the church allows it to be seen from some vantage points within and across the application site. While, the topography of the site means that opportunities to view it are limited, it does align with the PROW footpath which runs through the site. This footpath was first shown within the

site in the late 19th century, suggesting that the footpath did link Loudham Hall road with the settlement at Wickham Market. The BHS identifies that the church spire would have therefore acted as a wayfinder. The BHS notes that the construction of the modern A12 by-pass with no formal pedestrian crossing has also changed the footpath and its connection to Wickham Market.

- 11.40 The BHS outlines that the heritage significance of the Church is principally embodied in its physical fabric and its architectural interest, particularly its spire. The Church also derives communal value as a place of worship and activities for past and present communities. Whilst the setting of Church by way of the burial ground and settlement of Wickham Market are considered to contribute towards its setting, this is less significant than its historic fabric.
- 11.41 The BHS finds that there is no historic functional association with the application site and the church. The limited ability to view the church and the intervening distance, means that the church is not a highly prominent feature in views from the application site. The BHS concludes that the application site makes a neutral contribution to the heritage significance of the Church via setting.

All Saints Church – Impacts and effects arising

- 11.42 The proposal would result in the change in appearance of agricultural fields in the extended setting of the Church, albeit the application site cannot be seen from the Church.
- 11.43 While the Church spire is visible in some views from the PROW footpath and from across the site in some parts, the ability to see the spires would not be entirely lost as a result of the proposed development. The BHS sets out that the topography of the site and the omission of solar panels in the western part of the site, would ensure that views of the spire would be retained. On this basis, the BHS concludes that the proposal would not detrimentally affect how the Church is experienced, nor its heritage significance and therefore the proposed development would have a neutral impact on the significance of the Church.
- 11.44 The Council's Built Heritage Officer has reviewed the assessment of All Saints Church and agreed with its findings. The proposed development would therefore be considered to have a neutral impact upon the designated heritage asset of All Saints Church.

Extent of Harm

- 11.45 As identified above, it has been concluded that the proposed development would have a neutral impact upon the setting of All Saints Church, a designated heritage asset.
- 11.46 However, the proposed development would be considered to result in less than substantial harm to the special interest of Loudham Hall through development in its general setting. The degree of harm has been identified as moderate. In accordance with paragraph 215 of the NPPF, where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. Accordingly, the proposal must be justified following a balanced judgement.

11.47 The Council's Built Heritage Officer has advised that in the event of approval being granted a condition or other suitable provision is made for the applicant to provide a comprehensive long-term hedge management plan.

Heritage Balance

- 11.48 The Council's Built Heritage Officers considers that the proposed development would result in less than substantial harm to the designated heritage asset of Loudham Hall through changes to its wider setting. This harm has been identified to be moderate on the less than substantial scale. As directed by the NPPF, the harm associated with this designated heritage asset should be given great weight (paragraph 212).
- 11.49 The proposal would deliver a renewable energy facility that would create up to 21MW of power. The benefits of renewable energy are significant and are detailed elsewhere in this report. It is considered therefore that the harm to the heritage asset caused by development within its setting does possess a clear and convincing justification.
- 11.50 Having given great weight to the conservation of the asset (Grade II* listed Loudham Hall) it is considered that the harm to its significance would be outweighed by the considerable public benefits identified. As such, officers consider that the heritage balance would be satisfied as the proposal would result in public benefits and would therefore not conflict with Policy SCLP11.3 of the Local Plan nor the NPPF, in this regard.

Non-Designated Heritage Assets

- 11.51 Policy SCLP11.6 (Non-Designated Heritage Assets) states that applications which result in the harm to the significance of a Non-Designated Heritage Asset (NDHA) will be judged based on the balance of the scale of any harm or loss, and the significance of the heritage asset. Paragraph 216 of the NPPF states that the effect of an application on the significance of a NDHA should be taken into account in determining the application. In weighing applications that directly or indirectly affect NDHAs, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 11.52 The Council does not hold a list of NDHAs but does have criteria based on the archaeological, architectural, artistic and/or historic interest of the asset to assist in their identification. Upon scoping the submitted BHS, the Council's Built Heritage Officer raised three potential buildings which may be considered as NDHAs:
- Sandpit Cottage, located immediately adjacent to the eastern boundary;
 - The Cottage, Fowls Watering located approximately 100m north of the northern boundary;
 - Old House, Fowls Watering located approximately 100m north of northern boundary.
- 11.53 Based on the information submitted and the BHS, it is the view of the Built Heritage Officer that Sandpit Cottage and the Old House would meet the criteria as set out by East Suffolk Council¹ to be considered as NDHAs. The rationale behind not viewing The Cottage as a NDHA is due to it not possessing the relevant criteria in order to be considered as such.

¹ [Non-designated heritage assets » East Suffolk Council](#)

Sandpit Cottage (also known as Sandpit House)

- 11.54 The Built Heritage Officer has set out that the reason for Sandpit Cottage being considered to constitute its status as a NDHA is due its architectural interest (aesthetic value) by way of it remaining a valuable example of 17th century vernacular design. It is also due to its historic interest (association) as it falls within the former bounds of the estate of Loudham Hall, with which it was historically associated until the late 20th century.
- 11.55 The submitted BHS discusses that there are limited opportunities to view Sandpit Cottage from within the application site, with it only becoming visible along the eastern boundary. Given the lack of functional association and the limited intervisibility, the BHS finds that the site only makes a minor positive contribution to its significance. The Built Heritage Officer has not raised objections to the conclusions reached regarding the contribution or effects of the development upon Sandpit Cottage.

Old House, Fowls Watering

- 11.56 The Built Heritage Officer has reached the view that Old House can be considered a NDHA due to its architectural (aesthetic value) and historic interest (representativeness). The building retains interesting historic vernacular features, including a hipped roof with a central Dutch gable. Old House appears to retain its historic footprint and overall appearance, presenting a surviving representation of an 18th century vernacular farmhouse.
- 11.57 Historic estate maps and tithe apportionment confirm that the application site was not historically connected with Old House and there is no known current association either. The application site is visible in views with Old House and it is likely that the site can be viewed from some parts of Old House, particularly first floor windows, albeit this would be at a distance. The submitted BHS states that Old House can be seen in filtered views from within some western parts of the site. While the BHS does not highlight this, it was noted that there are also views of Old House available from along the northern boundary.
- 11.58 The BHS finds that the site makes a minor positive contribution to the significance of Old House. Despite the omission of its views along the northern boundary, the Council's Built Heritage Officer is content that the BHS has drawn an accurate conclusion on the contribution that the application site makes to the heritage significance of Old House.

Impacts and Effects Arising

- 11.59 The submitted BHS identifies that the proposed development would result in minor harm to the significance of Sandpit Cottage and Old House from the change within the setting of these NDHAs. This would predominantly result from the change in outlook associated with the heritage assets. Having had regard to the scale of this harm or loss and the significance of these heritage assets (in accordance with paragraph 216) it is concluded that this would amount to limited weight.

Landscape Character and Visual Impact

- 11.60 Policy SCLP10.4 (Landscape Character) notes that development proposals will be expected to demonstrate their location, scale, form, design and materials will protect and enhance

the special qualities and features of the area; the visual relationship and environment around settlements and their landscape settings; distinctive landscape elements; visually sensitive skylines, seascapes, river valleys and significant views towards key landscapes and cultural features; and the growing network of green infrastructure. It goes on to note that proposals should include measures that enable a scheme to be well integrated into the landscape and enable connectivity to the surrounding green infrastructure and Public Rights of Way network. It also states that development will not be permitted where it will have a significant adverse impact on rural river valleys.

- 11.61 Paragraph 135 of the NPPF requires that planning decisions ensure that developments are visually attractive as a result of appropriate and effective landscaping and that they are sympathetic to local character and historic, including the surrounding landscape setting, while not preventing or discouraging appropriate innovation or change. Further, paragraph 187 states that planning decisions should contribute to and enhance the natural and local environment by: (a) protecting and enhancing valued landscapes and (b) recognising the intrinsic character and beauty of the countryside.
- 11.62 The PPG advises on some particular considerations that relate to large scale ground-mounted solar farms. Paragraph 013 states that the development of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes. However, the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively. Policy SCLP9.1 (Low Carbon and Renewable Energy) states that renewable energy development should be complementary to the existing environment without causing any significant adverse impacts to landscape and visual impact.
- 11.63 Large-scale solar array development can have significant impacts on both landscape character and visual amenity. There is a distinction to be made between impact on landscape character, which should be treated as a resource, and impact on visual amenity which is the effect on people observing the development in places where the development can be viewed, such as villages, roads, public rights of way and individual dwellings.

Landscape Character

- 11.64 The application site is made up of three agricultural fields (or part thereof) with a tree copse within the centre, but which lies outside of the red line boundary. The application site and fields to the south-east of the site are predominantly used for arable farming. In comparison to the land directly south and to the north-east which are used as meadow/fallow fields.
- 11.65 The boundaries of the application site are typically defined by a network of ditches with intermittent vegetation and hedgerows. While some of the hedgerows are relatively dense, there are a number of instances where the sparse screening gives rise to open views of the site. This is particularly the case towards the northern end of the site.
- 11.66 The submitted Landscape Visual Impact Assessment (LVIA) identifies the application site as falling within the Suffolk Coastal Landscape Character Assessment (2018) B7 Deben Valley Landscape Character Area (LCA) with a small southern section of the site falling within N1 Boulge Park and Bredfield Rolling Farmland LCA. The submitted assessment concludes,

having considered a range of factors, that the *value* of the site and its immediate surroundings is 'Medium'.

- 11.67 The LVIA goes onto assess the degree of *susceptibility* of the site (i.e. the ability of the landscape to accommodate the development without undue consequences for the maintenance of its existing qualities). This is judged to be 'Medium' because there would be direct impact on the physical features of the site. It should be noted however that the change in character of the landscape would be viewed within the context of the existing pylons which project through the site and form part of its baseline landscape character, making the immediate landscape less sensitive to solar development.
- 11.68 In terms of overall *sensitivity* (combining *value* and *susceptibility*), the LVIA considers this to be 'Medium' given that the landscape is not of local or regional recognition of importance and is therefore able to accommodate some change. The landscape character effects mostly relate to the application site and its immediate surrounds, rather than the wider landscape character area. The Landscape Officer has considered that 'Medium' sensitivity is a realistic conclusion.
- 11.69 While the site would ultimately be decommissioned and returned to its existing state, this would be over a fairly substantial time period.
- 11.70 Considering the operational phase, the proposed development would include additional planting that would increase the overall hedgerow length of the site. This is regarded as beneficial to landscape character by the Landscape Officer. The report acknowledges that the presence of the solar farm would fundamentally alter the character of the landscape of the site and its immediate surrounds. The LVIA records this as a 'Major Adverse' change both on completion and after 15 years, solely in respect of the local context of the site. The Landscape Officer has agreed with this conclusion also.
- 11.71 In respect of wider published landscape character area/types, these effects are considered to be negligible for the national classification and slight for the district level assessment. This is largely due to the topography of the application site and surrounding area which allows for the proposed planting to effectively screen proposed development. The presence of hedgerows along field margins is not out of character for the LCA and therefore the proposal would be considered to have a slight impact at most.
- 11.72 The anticipated construction phase is relatively short (3 to 6 months) and there would be some additional impacts over this phase, but these would have a minor adverse impact given their short term and low scale.
- 11.73 The applicant's addendum to the LVIA also assesses the likely cumulative effects of the development in combination with other projects in the 500m study area. It concludes that effects would range from 'Negligible adverse' to 'Neutral' and that these effects are generally confined and effectively mitigated.
- 11.74 The overall impacts to the landscape character are judged to be 'Moderate' when weighing the 'Major' local impacts against the 'Negligible' wider impacts on the landscape character area. The harm would mostly occur between year 1 and year 8 but would reduce over time. This 'Moderate' harm will need to be weighed in the wider planning balance as detailed in later sections of this report.

Visual Impact

- 11.75 Visual amenity relates to the direct visual impacts on receptors (people) and the magnitude of those changes rather than on the landscape.
- 11.76 The visual receptors with greatest sensitivity would be users of the local PROW network especially the footpath that crosses the site. A number of viewpoints around and within the site have been selected, all of which are located on points of public access.
- 11.77 In respect of the users of the footpath that runs through the site (Pettistree 7), the solar array would cause a 'Major Adverse' magnitude of change to the view with 'Major' effects in the early years after installation. These effects would only moderate as the new hedge planting either side of the footpath matures. Through the course of the application, the PROW corridor was widened to 10m which would allow for views over the wider landscape and would prohibit the proposed development from forming a narrow visual corridor. On this basis it is considered that the effect to PROW users would be 'Major Adverse' at year 1 which would then be reduced overtime to 'Moderate-Minor-Adverse' as a result of the proposed planting and the width of the corridor.
- 11.78 A number of concerns have been raised in relation to the public rights of way to the north/east of the site, particularly from PROW 10 and PROW 17. Views from these PROWs have been picked up within the LVIA (as depicted by viewpoints 7 and 8 of the LVIA) which shows that they are frequently interrupted by intervening vegetation which would be supplemented in some places by new hedgerow planting to reduce 'Moderate' effects to 'Minor'. While new planting is not proposed along the eastern boundary which is visible from PROW 17, it is considered that due to the distance between this route and the application site, the extent of dense intervening vegetation and the direction that people would be travelling along this route, the proposal would largely have a negligible impact on visual receptors of the PROW footpaths.
- 11.79 Viewpoint 7 is also representative of views from the residential properties of Old House and The Cottage (Nos. 1 and 2 Fowl Watering). It is anticipated that views from the principal rooms would suffer 'Moderate Adverse' effects initially, reducing to 'Minor' over time as new planting matures.
- 11.80 In respect of road users in cars, Slight effects would be experienced by those on Loudham Hall Road with only glimpsed views as planting matures. Other road users are unlikely to experience any meaningful effects.
- 11.81 Sandpit Cottage has now been considered within the addendum to the LVIA. It is noted as being at a lower level than the receiving land, with mature trees and scrub between the garden boundary and the proposed panels. There would be very limited views into the site with only the ends of a limited number of panels potentially visible through understorey scrub in winter. The Landscape Officer agrees with the submitted assessment of 'Moderate' level of effect (assumed adverse). During the course of the application, planting has been proposed along the perimeter fencing which would reduce the impacts of the proposal to 'Slight' as planting matures.

- 11.82 The addendum also assesses the visual impact on other properties that were not included in the original assessment. The Landscape Officer has advised that the additional visual impact assessments are appropriate. The addendum concludes that the visual effects would be limited by topography and existing vegetation which is agreed with. Where adverse effects are noted, it is agreed that these could be moderated over time as new screen planting establishes and grows.
- 11.83 A landscape masterplan has been submitted which generally covers enhanced site boundary planting and management of existing hedges to enhance the screening ability. New planting is also proposed either side of the PROW that runs through the site. Other measures to enhance ecological value are also included. The details submitted are largely agreeable with a condition being required for specific planting details to be provided.
- 11.84 It should also be noted that landscape maintenance and long term management should be sought by condition. This should include agreement of the management of the proposed planting adjacent to Sandpit Cottage to ensure it is maintained to an acceptable height.
- 11.85 A "Photograph Document" has been submitted by a Ms Anne Westover. The document largely highlights that views of the proposal would be possible if nothing changes from the current landscape scenario. However, the landscape masterplan (drawing number 1051074-BSR9001-TOW-L-007 Rev 12, received 7th October 2025) which has been submitted seeks to mitigate the impacts of development by retaining and gapping-up exiting hedgerows and managing them at a height between 3-4 metres in the south, by re-establishing a hedgerow along the northern boundary and by retaining existing vegetation within the site and providing a scrub area on the western boundary.
- 11.86 In spite of this, it is not the case that the applicant or officers are of the view that the proposal would not still be visible from some viewpoints. The LVIA seeks to identify those viewpoints with the highest sensitivity and magnitude of change, as it cannot investigate every possible viewpoint in detail. These viewpoints were agreed with the Landscape Officer and have been explored in order to ensure the significance of that effect is understood. It should be noted that the landscape mitigation proposed as a result of this assessment will combine to reduce the visibility of the development in the main as well. As such, the key conclusions drawn above remain appropriate and the most relevant.
- 11.87 In conclusion, the proposed development would introduce localised changes to visual amenity which would generally be confined and effectively mitigated. Overtime, mature vegetation and boundary enhancements would further minimise these impacts. The overall harm to visual amenity is judged as 'Moderate'.

Valued Landscape

- 11.88 Paragraph 187 of the NPPF places emphasis on protecting 'valued landscapes', although these are not defined. Although all landscapes could be valued by an individual or group of people, it is considered that in order to be considered a 'valued landscape' for the purposes of the NPPF, the landscape must exhibit and be valued for its demonstratable physical attributes, which elevate it above just open countryside but perhaps below those areas that are formally designated, such as National Parks or National Landscapes. A landscape does not have to be nationally or locally designated to be a valued landscape for the purposes of the NPPF. It is a matter of planning judgement and depends on whether

the area is more than mere countryside, having physical attributes which take it out of the ordinary.

- 11.89 The LVIA sets out that the landscape of the site is not valued for the purposes of the NPPF as it is not covered by any statutory designations or identified as high quality in any of the development plan documents or public evidence landscape character study documents. The Landscape Officer has considered this within their response and agreed with the findings of the LVIA in this regard. As such, in terms of paragraph 187 of the NPPF, the application site is not considered by officers to form part of a valued landscape.
- 11.90 However, this does not mean that the landscape has no value; the LVIA has been informed by, and is sympathetic to, the special qualities and features that it contains. In this case, the surrounding landscape is defined in part by the river to the north and east. Views of the development within this context have been carefully assessed and the impacts noted above. However, the existence of the pylons and A12 behind the site to the west are also influential in this context and this effects both the scenic beauty and tranquillity of this setting. In short, officers consider it cannot be said that the of landscape potentially affected by this development is of 'elevated' quality or perceived to be 'out of the ordinary' in this regard.

Residential Amenity

- 11.91 Policy SCLP11.2 (Residential Amenity) states that when considering the impact of development on residential amenity, the Council will have regard to; (a) privacy/overlooking; (b) outlook; (c) access to daylight and sunlight; (d) noise and disturbance; (e) the resulting physical relationship with other properties; (f) light spillage; (g) air quality and other forms of pollution; and (h) safety and security. Development will not cause an unacceptable loss of amenity for existing or future occupiers of development in the vicinity.
- 11.92 The application site is directly adjoined by Sandpit Cottage along the eastern boundary. This is the only residential property which directly adjoins to the site, however there is a significant land level change between the application site and Sandpit Cottage as recognised by the submitted illustrative section (drawing no. 1051076-ADAS-XX-XX-DR-2001). To the south of the site is Loudham Hall; the application site is separated from Loudham Hall by the intervening road. The dwelling is also set back within the plot and as such, there would be a separation of some 280m between Loudham Hall and the application site. To the north of the site are two residential properties known as Old House and The Cottage. They would remain separated from the site by agricultural fields, measuring some 100m between the application site and the two dwellings.

Construction Impacts

- 11.93 The main impacts to residential amenity would arise during the construction and decommissioning periods. Policy SCLP10.3 (Environmental Quality) states that development proposals will be expected to protect the quality of the environment to minimise, and where possible, reduce all forms of pollution and contamination; this includes air quality and noise pollution.

- 11.94 During the construction phase there is potential impacts from noise and dust emissions. However, a noise and dust management scheme secured through a Construction Management Plan ('CMP') would be capable of reducing the risk. The provision and implementation of the CMP shall be secured through condition. The condition should also require the mitigation measures identified (or alternative measures) are employed during decommission. The Council's Environmental Protection Officer has agreed that subject a CMP being conditioned, the proposal would be capable of appropriately controlling noise and dust during construction and when the site were decommissioned.
- 11.95 Concerns have been raised in relation to the impacts of vibration during the construction period upon the nearby residential properties, particularly Sandpit Cottage due to the change in land levels and geological composition (sand) of the soil. These concerns were shared with the applicant, and they confirmed that prior to construction, a ground survey would be undertaken the scope of which would include the following testing:
- Boreholes including window sampling and discrete pile testing;
 - Trial pits and trenches;
 - In-situ testing covering resistivity testing;
 - Geotechnical laboratory testing including corrosivity, moisture, particle size, distribution, shear box, thermal resistivity/water content/sulphate suite.
- 11.96 The survey would be completed to understand the makeup of the ground. Should the surveys identify areas of instability, appropriate measures such as piling or alternative ground-stabilisation methods would be implemented. The applicant has confirmed that solar panels would only be installed on land that meets the required stability standards.
- 11.97 A condition should therefore be imposed which requires the ground survey, its findings and any necessary measures to be submitted to and agreed by the local planning authority prior to construction works. The Environmental Protection Officer has also confirmed that a condition should be imposed which requires a vibration assessment to be undertaken to ensure that the construction works would not result in a statutory nuisance. Subject to these conditions being imposed, officers are satisfied that the matters which fall within the scope of a planning application will have been adequately considered and any residual impacts would be a civil matter between the applicant and the relevant property owner to be resolved.

Operational Impacts

- 11.98 A Noise Assessment Report (ref: 2060448-RSK-RP-001-(04)) dated June 2025 has been submitted with the application. It is understood that amendments have been previously made to the scheme to reduce the number of inverter stations from 21 to 10 to lessen the noise impacts of the scheme. The inverter stations have also been amended to be located further from noise sensitive receptors, with four of the inverters between installed with acoustic barriers in a "U" shape between 3.5 – 4m in height. It is also understood that the solar farm would not be operational at night (23:00 to 07:00 hours) and would not have any associated battery storage facilities or associated mechanical services plant. An exception to the operational hours may occur during a relatively short summer period when there is enough sunlight in the period of 05:00 to 07:00 for the system to be operational, the Noise Assessment has also considered this period.

- 11.99 The Council's Environmental Protection Officer has reviewed the Noise Assessment Report and agrees that in both daytime and 05:00 to 07:00 operational periods, the operational rating noise level from the proposal is predicted to be more than 10dB below the existing ambient sound levels and at most receptors, considerably below. This is indicative of a low impact from noise.
- 11.100 Subject to the imposition of the conditions requiring a validation noise survey, details of the acoustic barriers to be provided and for the development to be carried out in accordance with the agreed operational hours, the proposed development would not be considered to have unacceptable impacts of noise, in accordance with Policy SCLP11.2 and Policy SCLP10.3.
- 11.101 Given the separation between the residential dwellings of Old House, The Cottage, Loudham Hall (including the Lodge) and the application site, it is not considered that the proposed development would be overbearing or dominant upon occupiers to a degree that would be considered unacceptable. Similarly, given the topographical changes between the application site and Sandpit Cottage, as well as the separation between the boundary and the actual development, the proposal would not be considered dominant upon the occupiers of Sandpit Cottage.
- 11.102 As discussed above, views of the proposal from the nearby residential properties would be possible and would be considered to result in some adverse visual impacts. These impacts would be somewhat mitigated through intervening planting to soften the outlook onto the application site as depicted by the landscape masterplan. However, it is acknowledged that the effectiveness of this planting would vary with views potentially being more prominent in winter months when leaf coverage is lower, this would be particularly the case for the Lodge, Sandpit Cottage, Old House and The Cottage.
- 11.103 The proposed site layout plan details CCTV cameras in regular intervals along the perimeter fencing. The layout does not depict the finalised position or angles of the CCTV cameras. To ensure privacy is still attributed to the nearby residential properties, a condition should be imposed requiring the exact location, position and sight line of the cameras to be agreed.
- 11.104 In other respects, the proposed development would not result in unreasonable harm by way of being unduly dominating or otherwise unacceptably impacting living conditions as a result of the scale and proximity to nearby residential dwellings described above. It is considered that the development would not dominate or overshadow nearby dwellings to the detriment of residential amenity.
- 11.105 It is acknowledged that the proposal would result in a change in character to the application site and the concerns raised by neighbouring owners and occupiers have been carefully considered. However, the proposed solar farm would not be considered to result in any detrimental impacts to the residential amenity of the nearby residential properties in accordance with Policy SCLP11.2.

Glint and Glare

- 11.106 The PPG on Renewable and Low Carbon Energy at Paragraph 013, advises planning authorities to consider the visual impact of large scale ground-mounted solar farms,

specifically the effect on the landscape of glint and glare, as well as on neighbouring uses and aircraft safety.

- 11.107 A Glint and Glare Study has been prepared by PagerPower dated January 2025. Importantly, the solar panels have been proposed to make use of an anti-reflective coating which minimises glint and glare, therefore reflections would be reduced over a standard reflective surface.
- 11.108 The Glint and Glare Study has considered the potential impact of reflection upon nearby residential properties. The assessment identifies there are 21 residential dwellings that could possibly face reflections from the solar arrays. However, the assessment goes on to conclude that for all dwellings where reflections are geometrically possible, screening in the form of existing vegetation or buildings has been identified. No views of the reflective area are possible, and no impact is expected. This is likely due to the solar reflections only being geometrically possible within spring, summer and autumn months where foliage would act as effective screening. Whereas solar reflections during winter months when vegetation would be sparser would not be geometrically possible according to the Glint and Glare Study. Further mitigation in the form of hedgerow planting and infilling has been proposed to ensure reflections during the spring, summer and autumn months would not occur. Subject to a condition being imposed requiring the planting and maintenance of these hedgerows, it is considered that the effects of glint and glare on these residential dwellings would not be significant.
- 11.109 An addendum Glint and Glare Study submitted and dated July 2024 considered the potential impacts of glint and glare upon the Lodge. The addendum has considered that solar reflections from panels to the east of the Lodge would be geometrically possible, but that screening in the form of existing vegetation would significantly obstruct views such that no impact is predicted. It is noted that Loudham Hall are not satisfied with the results of this assessment as it has focused (they say) on the west facing windows rather than the north facing windows. However, reflections into the north facing window would not be geometrically possible, as detailed by the assessment. It is therefore considered unlikely that the proposal would result in an unacceptable degree of solar reflections to the occupiers of the Lodge.
- 11.110 In respect of receptors other than residential dwellings, the Glint and Glare Study has identified roads and PROW users as facing potential impact. Of the 14 identified road receptors along the A12, the assessment predicts that 11 would not be affected when factoring in existing screening. For three receptors, marginal views may be possible. However, it is predicted that the reflective area would be outside of the field of view for drivers travelling north or south along the A12. In relation to the B1438, reflections would be geometrically possible to all 10 road receptors. However, no impact is considered when screening is considered.
- 11.111 The assessment sets out that local roads have not been taken forward for geometric modelling as any solar reflections would be considered low impact. Given there is mature intervening vegetation, the road users of Loudham Hall Road are unlikely to face significant impacts of glint or glare. In the instance some impacts were felt, as road users are moving this would be a glint encounter as most rather than a long term impact. However, given the existing hedgerow and the geometry of the site in respect of Loudham Hall Road, these impacts are unlikely.

- 11.112 In relation to PROW, the assessment details that reflections would be geometrically possible towards eight of the 18 receptors. Of these eight, only five would have visibility of the reflective area and experience reflections in practice. The assessment has judged the impacts of this to be low when taking into account other environmental considerations.
- 11.113 Overall the proposed development would not be considered to result in unacceptable impacts reflections from the panels, such that no mitigation is required. A condition is recommended to ensure that the panels used are blue/grey in colour with an anti-reflective coating. The proposal would therefore not be considered to conflict with policy in this regard.

Design

- 11.114 Policy SCLP11.1 (Design Quality) establishes a general requirement for all new development to reflect local distinctiveness and incorporate high-quality design principles with regards to appearance, scale, layout and landscaping.
- 11.115 From a purely design and appearance perspective (as opposed to the landscape, visual and built heritage impacts which have been discussed above) the proposed development would involve the installation of a large number of solar panels in a series of rows, oriented east to west which would be of a scale, design and appearance typical for a solar farm and not objectionable.
- 11.116 In regard to the design of the arrays, each of the solar panels would be mounted on a fixed panel system. The panels would be covered by high transparency solar glass with an anti-reflecting coating which minimises glint and glare, while aiding the maximum absorption of the available sunlight. The panels would be dark grey/blue in colour and mounted on a frame of anodized aluminium alloy and galvanised steel.
- 11.117 The DNO, substation compound and associated equipment would be located within the south-western corner of the site. Transformer stations would be positioned at intervals throughout the site. These elements would have a utilitarian appearance, but which would be acceptable in the context of a solar development. The elevation plans for fencing depicts an option between plain or barbed wire and it is considered that plain wire would be more sympathetic to the character of the area and therefore a condition should be imposed to that effect.
- 11.118 Notwithstanding the assessment made in relation to the landscape, visual and built heritage impacts, the design of the proposed development when viewed in isolation would be acceptable and in accordance with Policy SCLP11.1. It is however recognised that the proposal would result in other impacts given the siting of the development as set out within this report.

Ecology

- 11.119 Policy SCLP10.1 (Biodiversity and Geodiversity) states that development will be supported where it can be demonstrated that it maintains, restores or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity through the creation of new habitats and green infrastructure and improvement to

linkages between habitats. New development should provide environmental net gains for both green infrastructure and biodiversity as well as ecological enhancements and should provide a biodiversity net gain that is proportionate to the scale and nature of the proposal.

11.120 Chapter 15 of the NPPF is also clear that planning decisions should contribute to and enhance the local environment by minimising impacts on providing net gains for biodiversity.

11.121 The site is not located within an area which is subject to any statutory ecological designations but does fall within a SSSI Impact Zone. The nearest statutory designated sites are as follows:

- Suffolk and East Coast Heaths National Landscape – approx. 2.6km to the southeast.
- Sandlings Forest (SSSI and SPA) – approx. 3.5km to the southeast.
- Deben Estuary (Ramsar, SSSI, SPA) – approx. 4.5km to the south.
- Grimston Warren Pit (SSSI) – approx. 4.56km to the east.

11.122 There are also eight County Wildlife Sites (CWS) within 2km of the site, the closest of which is Ashe Abbey Decoy Pond which is approximately 0.4km from the site.

11.123 Impacts are considered unlikely upon statutory or non-statutory designated sites due to the distance with the application site and given the nature of the development being non-residential.

11.124 There are a number of habitats within the site which have been highlighted by the Preliminary Ecological Appraisal (PEA) as having the potential to support protected and priority species. Several updated ecology reports have been provided as the site contains suitable habitats for foraging/commuting bats, badgers, breeding birds, wintering birds, reptiles, hedgehog, amphibians, water vole and otters. Mitigation measures are included in these reports which should be secured through the imposition of a condition.

11.125 The development is exempt from mandatory 10% biodiversity net gain (BNG) as the application was submitted prior to the introduction of mandatory BNG in early 2024. Despite this, a BNG Assessment has been submitted which demonstrates that the development could result in a net gain of 74% in habitat units, 25% in hedgerow units and 43% in watercourse units.

11.126 The previous case officer report noted that the findings of the applications Shadow HRA (ADAS, August 2021) were acceptable and were subsequently adopted as the LPA's HRA conclusion. Natural England and the Council's Ecology Officer have not raised any matters which suggest that the circumstances surrounding the HRA have changed and therefore the previously adopted HRA is assumed to remain relevant.

11.127 Lighting is only proposed to the buildings within the substation. A condition should be imposed requiring details of this lighting to be submitted and agreed to ensure it would be sensitively designed given the ecological considerations on and adjacent to the site.

11.128 Taking into account the above and subject to the implementation of the conditions mentioned and those recommended by the Council's Ecology Officer, the proposed

development would not be considered to adversely affect ecology or biodiversity in accordance with Policy SCLP10.1. Additionally, the proposal would be likely to result in a net gain to the biodiversity of habitat units and hedgerow units, which is a benefit in this regard.

Arboriculture

- 11.129 Policy SCLP10.4 (Landscape Character) states that, amongst other matters, development proposals will be expected to demonstrate that their location, scale, form, design and materials will protect and enhance distinctive landscape elements including trees, hedgerows and field boundaries, and their function as ecological corridors. Paragraph 136 of the NPPF highlights the importance of trees for helping to mitigate against and adapt to climate change and requires existing trees to be retained wherever possible.
- 11.130 An updated Arboricultural Planning Statement (ADAS, May 2025) has been submitted to assess any changes to the features on site. It was established that updated measurements including stem diameters, heights and crown spreads were required to be recorded and that since the initial survey, the group previously referenced as G19 had been removed. The application site therefore now contains 70 tree features, consisting of 46 individual trees, 19 groups of trees and five hedgerows which have the potential to be impacted by the development. Of these trees, nine were recorded as Category A trees, 40 as Category B trees, 20 as Category C trees and one as Category U.
- 11.131 The Arboricultural Planning Statement confirms that the development would not require the removal of any trees to facilitate the proposal. However, a circa 12.5m section of one category B tree group (G17) would require removal to facilitate construction of the new access off Loudham Hall Road. The landscape masterplan (drawing number 1051074-BSR9001-TOW-L-007 Rev 12, received 7th October 2025) depicts that a proposed hedgerow would be planted to mitigate the hedgerow that would be removed to facilitate the access construction. This will be secured through a landscape condition.
- 11.132 To ensure that the proposed development would not result in harm to any trees on site (besides the section of G17 which requires removal) various tree protection measures would be provided during the construction phase and are detailed within Section 6.0 of the report. Subject to the development being carried out in accordance with those tree protection measures, the proposal would accord with Policy SCLP10.1.

Archaeology

- 11.133 Policy SCLP11.7 (Archaeology) states that an archaeological assessment proportionate to the potential and significance of remains must be included with any planning application affecting areas of known or suspected archaeological importance to ensure that provision is made for the preservation of important archaeological remains. Where proposals affect archaeological sites, preference will be given to preservation in situ unless it can be shown that recording of remains, assessment, analysis report and/or deposition of the archive is more appropriate. Archaeological conditions or planning obligations will be imposed on consents as appropriate. Measures to disseminate and promote information about archaeological assets to the public will be supported.

- 11.134 The application is accompanied by an Archaeological Desk-Based Assessment prepared by ADAS and dated September 2021. This was previously reviewed and after investigation, SCC Archaeology Services concluded that the application was acceptable subject to conditions being imposed requiring further works to record and advance the understanding of the significance of any heritage assets before construction works take place.
- 11.135 SCC Archaeology Services have not raised any reason to suggest that the assessment requires updating. As such, with the appropriate conditions provided to safeguard archaeological assets within the application site, the proposal would be considered acceptable and to accord with Policy SCLP11.7.

Flood Risk

- 11.136 Policy SCLP9.5 (Flood Risk) notes that proposals for new developments will not be permitted in areas at high risk of flooding unless the applicant satisfies the safety requirements in the Flood Risk National Planning Policy Guidance. Developments should exhibit the three main principles of flood risk, in that, they should be safe, resilient and not increase flood risk elsewhere. Paragraph 181 of the NPPF mirrors this advice and is clear that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.
- 11.137 Policy SCLP9.6 (Sustainable Drainage Systems) states that developments should use sustainable drainage systems to drain surface water. Runoff rates from new development must be restricted to greenfield runoff rates wherever possible. Similarly, paragraph 182 of the NPPF states that applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff and which are proportionate to the nature and scale of the proposal.
- 11.138 The application site is located entirely within Flood Zone 1 and experiences only some small pockets of surface water flood risk which are concentrated within the southern parcel of the site. An updated Flood Risk Assessment (LDE, May 2025) has been submitted with the application.
- 11.139 The development has been sequentially placed in Flood Zone 1. While there are some small pockets of surface water flood risk, the FRA states that the surface water drainage strategy would accommodate the surface water generated on site. Following the site's topography, the surface water run off would flow east towards the on-site water course and off-site field boundary ditches, to be eventually conveyed away from the site.
- 11.140 The submitted FRA outlines that the main ground impact comes from the poles which the solar panels sit on, the access track and the ancillary infrastructure (e.g. transformers, substation etc.). The solar panels themselves would not contribute to any ground impact as any rainfall which directly falls upon the panels would run off to reach the ground. The FRA details that the runoff would then flow underneath the next array of panels in the direction of the site's topography where it would then infiltrate to the ground. A swale is proposed along the eastern and southern perimeter fence to control any excess runoff generated from the development. The FRA demonstrates that the swales would offer a significantly greater amount of attenuation storage than what is required for the development alone. The bunds adjacent to the swales would prevent any excess flows

leaving the site boundary and are depicted within the FRA as having a height of between 15-16cm. Appendix G of the FRA details the location of the swales and demonstrates that they could be appropriately accommodated between the panels and the perimeter fencing.

11.141 The applicant's drainage consultant has stated that as only panels are proposed in the area affected by surface water flood risk and they would be raised from ground level, the development would not be affected by flooding in this area. The drainage consultant has also confirmed the "pit" within the south-east corner of the site would be maintained in its current form.

11.142 SCC as the Lead Local Flood Authority (LLFA) have reviewed the updated FRA and raised no objection to the scheme, subject to their recommended conditions being imposed. On this basis, the proposal is considered to accord with Policy SCLP9.5 and Policy SCLP9.6.

Water Quality

11.143 Paragraph 187(e) of the NPPF discusses that planning decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Development should, wherever possible, help to improve local environmental conditions such as water quality.

11.144 During the construction phase, there is a risk of accidental water pollution which could impact the ditch network. Any adverse impact from water pollution would be mitigated through the implementation of the Construction Surface Water Management Plan, which could be secured through condition. The buffer zone that has been created between the development and the ditch networks would further help to mitigate against water pollution.

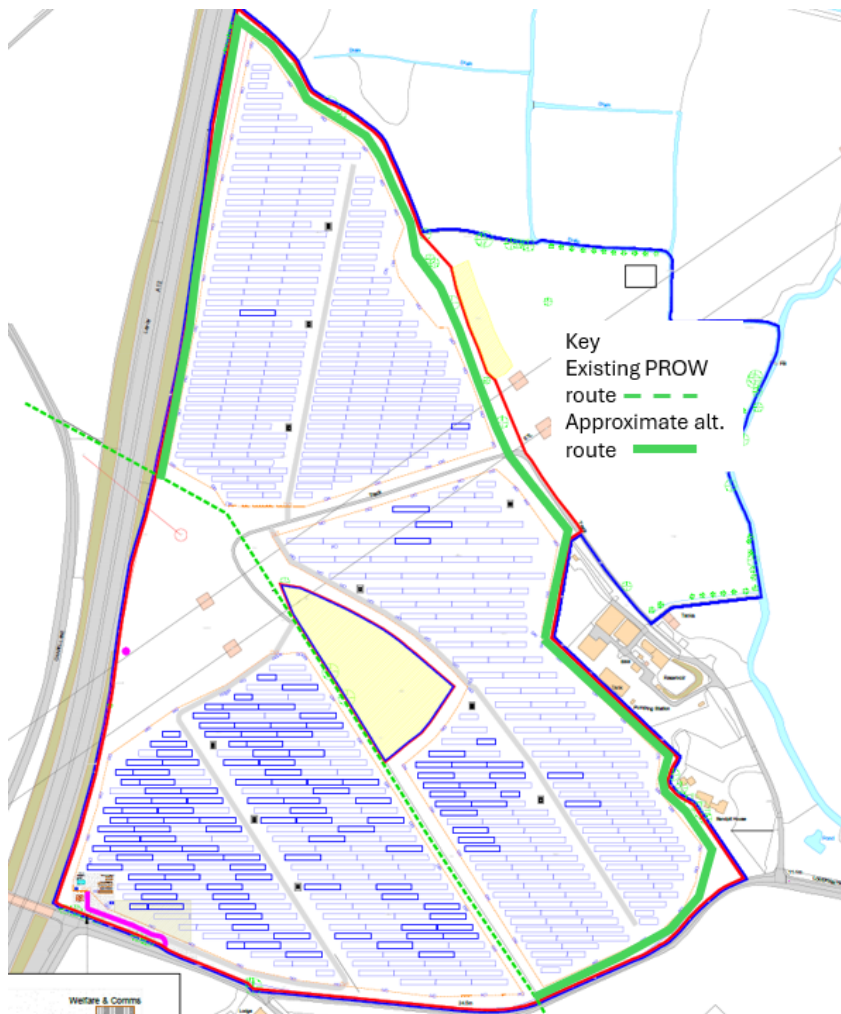
11.145 Subject to a condition requiring those mitigation measures being implemented, the development would not result in water pollution, in accordance with paragraph 187(e) of the NPPF.

Public Rights of Way

11.146 There is a public right of way (PROW) Pettistree Footpath 007 which transects diagonally through the site, from the western boundary to the southern boundary. The proposed site plan depicts that the PROW would be maintained through the creation of a hedge-lined corridor measuring 10m in width which has been depicted on the site layout plan.

11.147 SCC PROW officers initially raised an objection to the scheme as the PROW Management Plan did not reference the 10m wide corridor. It has been agreed that a condition should be imposed requiring the PROW Management Plan is updated to reference this corridor, as well as a section provided to show the relationship between the corridor and the PROW route according to the definitive map. Details of matters such as PROW signage and surfacing of the access track over the PROW should also be conditioned. Subject to these conditions being imposed, SCC and ESC PROW officers have confirmed the treatment of the PROW upon occupation would be acceptable.

11.148 However, concerns were also raised in relation to the temporary closure of the PROW during construction works. SCC PROW officers encouraged the applicant to provide a permissive alternative route to ensure continued access to the wider PROW network for users throughout the construction period. As a result, the applicant has proposed an alternative route which would extend along the north and southern boundaries of the site, the approximate route is depicted below.



11.149 This alternative route would add approx. 900m to the length of the footpath. The applicant has consulted with their construction team to ensure that adequate Health and Safety measures are afforded to PROW users, and with this in mind, the alternative route is considered to be the most suitable. SCC and ESC PROW officers have reviewed the proposed alternative route and based on the applicant's justification, considered it acceptable. However, a Temporary Traffic Regulation Order would be required from SCC prior to the diversion being undertaken and a condition should be imposed requiring this is obtained.

Highways

11.150 Policy SCLP7.1 (Sustainable Transport) states that development will be supported where amongst other matters, any significant impacts on the highways network are mitigated; it is well integrated into, protects and enhances the existing pedestrian routes and the public right of way network; it reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road

safety; and the cumulative impact of new development will not create severe impacts on the existing transport network.

11.151 Paragraph 116 of the NPPF is explicit that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

11.152 The site access would be obtained from Loudham Hall Road and the applicant has confirmed that some hedgerow works (discussed above) would be required to facilitate adequate visibility splays. The submitted Technical Note (July 2022) demonstrates that the site access could accommodate the predicted vehicles within the proposed geometry and traffic management measures, including the use of temporary traffic signals at the site access during construction hours. It has therefore been demonstrated that the site access could be used safely, and SCC as the local Highway Authority ('LHA') have raised no objection to its location.

11.153 A Transport Statement (February 2022) and additional Technical Note (July 2022) have been submitted to support the application. The previous officer report contains the assessment of these documents, and no evidence has been presented to indicate that their comments and findings would be outdated. After construction, the site would encounter low levels of traffic equivalent to around one van per week for regular maintenance purposes.

11.154 The LHA have raised no objection to the application subject to a number of conditions being imposed. Further to their consultation response, the LHA have confirmed that a Construction Traffic Management Plan should be secured through a condition.

Crime Prevention

11.155 Paragraph 96(b) of the NPPF states that planning decisions should aim to achieve healthy, inclusive and safe places. Paragraph 102(a) outlines that planning decisions should promote public safety and take into account wider security and defence requirements.

11.156 Suffolk Constabulary Designing Out Crime have been consulted on the application and have highlighted that the high value of component parts used in solar farms, has led to a marked rise in theft from such installations. In response to this consultation, the applicant has set out a number of security measures that they typically put in place which include:

- 2.1m post and wire mesh fencing around site boundaries;
- 2m heras fencing and gates for compounds;
- CCTV cameras mounted on 3.5m poles;
- Sold secure "gold" standard padlocks;
- Signage indicating the use of SmartWater® forensic marking technology;
- On site security personnel during construction.

11.157 The applicant is currently working with DeterTech to carry out detailed security assessments across their UK sites which combine physical site inspections with localised crime intelligence to identify potential vulnerabilities.

11.158 Suffolk Constabulary have reviewed the applicant's response and have noted that they are pleased with the measures proposed and confirm that they do not raise an objection to the application. On this basis, it is considered that the proposal would adhere to the NPPF in its attempts to reduce crime on the site.

Economic Development

11.159 Policy SCLP4.5 (Economic Development in Rural Areas) supports development proposals that grow and diversify the rural economy, particularly where this will secure employment locally, enable agricultural growth and diversification and other land based rural businesses.

11.160 The previous officer report noted that the proposal would result in the temporary loss of agricultural land but recognised clean energy is a key sector in the East Suffolk Growth Plan. It was noted that the proposal would align with the East Suffolk Growth Plan as it would provide additional energy infrastructure to support the growing energy supply chain.

11.161 The officer report also recognised that agriculture, food and drink form key sectors in East Suffolk. The current land use is agricultural, and it has been stated that currently no jobs are supported on this site. The proposed development would result in the creation of one job. This means the land would continue to provide significantly low job density but the proposed development in this location would not have a detrimental impact on the availability of direct employment and local employment opportunities. As such, it was concluded that the proposal furthers the objectives of the East Suffolk Growth Plan and there are no reasons presented which suggest that this would no longer be the case.

Other Material Considerations

11.162 A material consideration in the determination of planning proposals for renewable energy is the National Policy Statements ('NPS') for the delivery of major energy infrastructure. The NPS recognises that large scale energy generating projects will inevitably have impacts, particularly if sites are in rural areas.

11.163 NPS EN-1 and EN-3 identify the approach to delivering nationally strategic level energy schemes. EN-3 recognises that solar is to play a key part in the strategy for low-cost decarbonisation of the energy sector and will help deliver greater energy independence.

11.164 It is noted that the Climate Change Act 2008, as amended, sets a legally binding target to reduce net greenhouse gas emissions from their 1990 level to net zero by 2050 and reducing emissions by 78% compared with 1990 levels, by 2035. On 24th July 2019, East Suffolk Council declared a climate emergency and in doing so, the Council made the following pledges:

- To set up a Cross Party Task Group, to investigate ways to the cut the Council's carbon and harmful emissions, with an ambition to be carbon neutral by 2030;
- To work with Suffolk County Council and other partners across the country and region towards the aspiration of making the county of Suffolk carbon neutral by 2030; and

- To work with the Government to deliver its 25 year Environmental Plan, and increase the powers and resources available to local authorities in order to make the 2030 target easier to achieve.

11.165 The Council's current Strategic Plan 'Our Direction 2028' continues the commitment to meet net zero targets by 2030 through supporting, promoting and implementing green technology which contributes to local and national energy infrastructures.

11.166 The importance of solar in delivering energy security for the UK is clearly set out within Government policy. The Department for Energy Security and Net Zero (DESNZ) and National Energy System Operator (NESO) have set up the "Clean Power 2030"² pathway which looks to achieve 95% net-zero electricity generation by 2030. Within the UK, the current installed capacity for solar measures 16.6GW and to meet this target, an increase of 47GW of solar would be required by 2030. In addition, the Government Policy Paper "UK Infrastructure: a 10 year plan" includes a major focus on solar energy, with a goal of reaching up to 47GW of installed solar capacity by 2030.

11.167 In response to the Clean Power Action Plan, the Government's Solar Road Map (Policy Paper, 30th June 2025) introduced a strategic plan to increase solar development by up to 50GW by 2030. This road map looked to address the practical actions for industry and government to overcome the challenges of delivering this ambition in order to boost the UK's energy security.

11.168 The proposed development is estimated by the applicant to produce enough clean, renewable electricity to power 5,251 homes per year which would represent a saving of 4,651 tonnes of CO2 annually.

11.169 There are no physical constraints limiting early development of the application site and the development has a grid connection offer in place. The grid offer is reflective of NESO's Grid Connection Reform which focuses on projects which are "ready" and "needed" to meet the Government's clean power targets. Therefore, the solar farm would be able to make an early and significant contribution of achieving the statutory net target set of 50GW of solar by 2030. It would enable the delivery of clean and secure renewable energy to be realised. This carries significant overarching weight.

12.0 Conclusion

Development Plan

12.1 Section 70(2) of the Town and Country Planning Act 1990 states that in dealing with an application for planning permission the authority shall have regard to the provisions of the development plan, so far as material to the application and any other material considerations.

12.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.

² [Clean Power 2030 Action Plan: A new era of clean electricity – main report - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/101222/clean-power-2030-action-plan-main-report.pdf)

12.3 The proposed development would be compliant with Policy SCLP9.1 (Low Carbon and Renewable Energy), particularly in regard to the following areas:

- The applicant has demonstrated the power connections required for functional purposes;
- The proposal would not cause significant adverse impacts to residential amenity;
- The proposal would not cause significant adverse impacts to landscape and visual impact;
- The proposal would not cause significant adverse impacts to transport;
- The proposal would not cause significant adverse noise and air quality;
- A condition would be attached to the planning permission (if granted) which would require the site to be decommissioned and restored when energy generation use ceases or becomes non-functional for a period of 6 months or more, or after a 40 year period (whichever is sooner).

12.4 It has been argued by residents and the Parish Council that the proposal would be contrary to Policy SCLP10.4 (Landscape Character) on the basis that it would have a significant adverse impact on the rural river valley. However, officers do not concur with this view and find that the impacts are moderate overall; with most of this harm arising within the immediate environs of the site, rather to the wider landscape. It is considered that, provided the mitigation planting proposed is secured, the proposal would protect the landscape character of this area and comply with this policy.

12.5 Taking the above considerations into account, officers consider that the proposal would not conflict with the development plan when taken as a whole.

Other material considerations:

12.6 As set out in Paragraph 8 of the NPPF achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and needed to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- an economic objective (to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation, and improved productivity; and by identifying and coordinating the provision of infrastructure);
- a social objective (to support strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being); and
- an environmental objective (to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy).

12.7 The presumption in favour of development sits at the heart of the NPPF. In this case, the policies which are most important for determining the application are not deemed to be out-of-date. As a consequence, if the proposal accords with the development plan, Paragraph 11(c) of the NPPF directs approval without delay (subject to there being no material considerations which indicate otherwise).

12.8 In this case, taking into consideration the presumption in favour of sustainable development and finding no conflict with the NPPF as a whole, it is not considered there are any material considerations which indicate otherwise; and for the record the wider planning balance has been satisfied for the reasons set out below.

Planning balance

Heritage Impact

12.9 The proposed development would give rise to a moderate level of less than substantial harm to the setting of the Grade II* listed building, Loudham Hall, however, the public benefits would outweigh this harm and the heritage balance would be satisfied.

12.10 Officers note that enhanced hedgerow screening will be provided between the development and the curtilage of Loudham Hall (including the Gate House). Having considered how the agrarian setting currently contributes to the particular significance of Loudham Hall, and how development within its setting would cause an impact by loss of this agrarian setting, it is considered that this could be mitigated to a degree by this screening; because visually this conflict would be less apparent, however, it is acknowledged the development would still fundamentally persist to exist (for a 40-year period) and the undeveloped field would not. It is therefore considered that overall, this harm carries limited weight.

12.11 No more than minor harm would occur to the two non-designated heritage assets. Having regard to the scale of harm or loss and the significance of these assets, it is considered that this would attract very limited weight.

Landscape Impact

12.12 Irrespective of the proposed landscape mitigation, the proposal would have a moderate impact upon the landscape character and a moderate impact on visual amenity. This judgement has been reached when weighing the local impacts (major) versus the wider impacts (negligible). Officers consider that as the magnitude of landscape harm is relatively contained, it is therefore warranted moderate weight.

Temporary loss of Agricultural Land

12.13 The proposal would involve the loss of medium quality (Grade 3b) and poorer quality (Grade 4) agricultural land. The proposal would take the land out of agricultural food production even if for a limited (40 years) time. This would result in some limited harm.

Residential Amenity

12.14 The proposed development would result in some temporary impacts during the construction period to nearby residential properties. These impacts would predominantly be in the form of noise, highway traffic and potentially vibrations. However, the construction (and subsequently decommissioning) period would only be for a limited time and would be minimised to an acceptable degree, therefore this is only afforded limited weight.

Biodiversity and ecology

12.15 The proposal would result in some limited loss of hedgerows and trees but these would be compensated for by ecological enhancements and an overall significant Biodiversity Net Gain. The BNG exceeds the expectations set out within the NPPF and would be a benefit of the scheme, albeit as the application was submitted prior to the 2024 Regulations, it has not been held to the same level of scrutiny as applications determined under these Regulations would be. As such this is attributed limited weight.

Renewable Power Generation

12.16 Over the course of its lifetime, the proposal would make a valuable contribution to cutting greenhouse gas emissions and this would also contribute to energy security; this attracts significant weight.

Conclusion

12.17 Taking into account the above, it has been concluded that on balance, the collective benefits would outweigh the harms identified. It is acknowledged that this is a balanced decision and based on relative weights of the benefits against the harms. If the Planning Committee are minded to agree, a summary of the conditions recommended to be imposed are set out below.

Recommendation

APPROVE subject to conditions including those listed below.

Conditions:

1. Standard timeframe condition
2. Development to be carried out in accordance with approved plans

Operation

3. Development to occur for a 40 year period only
4. Decommission strategy to be agreed
5. Soil management plan to be submitted and agreed (prior to commencement)

Landscape and Arb

6. Details of a landscape scheme to be submitted to and agreed. Landscape scheme shall include details of additional planting along the southern boundary adjacent to the access with Loudham Hall. Management of the scheme to be provided including management of the planting adjacent to Sandpit Cottage

7. Detailed arboricultural method statement to be submitted and agreed (prior to commencement)
8. Tree protection to be carried out in accordance with section 6.0 of Arboricultural Planning Statement (May 2025) (prior to commencement)
9. Notwithstanding fence elevation plan, the fence is to be finished with plain wire. Details of the materials of the gates are to be submitted and agreed.

Ecology

10. Landscape and Ecological Management Plan to be submitted and agreed (pre commencement).
11. Development to be carried out in accordance with the ecology assessments
12. Construction Environment Management Plan (Biodiversity) to be submitted and agreed (prior to commencement)
13. No removal of hedgerows, trees or shrubs during bird breeding season
14. No lighting to be installed unless a lighting design strategy for biodiversity is submitted and agreed
15. Ecological Enhancement Strategy to be submitted and agreed (pre commencement)
16. Additional badger survey report to be submitted and agreed (prior to commencement)

Environmental Protection / Amenity

17. Construction Management Plan to be submitted and agreed
18. Ground survey to be submitted and agreed
19. Vibration on site to be controlled
20. Details of acoustic barriers to be submitted and agreed and development to be carried out in accordance with appendix 5 and section 8.1 of the Noise Assessment
21. Validation noise survey to be submitted and agreed
22. Operation hours to accord with those assessed by the Noise Assessment
23. CCTV camera locations and directions to be submitted and agreed

Flood Risk

24. Development to be carried out in accordance with surface water strategy and flood risk assessment, including appendix G
25. Construction Surface Water Management Plan to be submitted and agreed including the prevention of accidental water pollution
26. A surface water drainage verification report to be submitted and agreed

Archaeology

27. Written scheme of investigation to be submitted and agreed (prior to commencement)
28. Site investigation completed and agreed
29. Archaeological management plan to be submitted and agreed for the use of any no dig construction methods

Highways

30. Details of the proposed access to be submitted and agreed
31. Visibility splays to be provided prior to use of the access
32. Photographic condition survey of the highway to be submitted and agreed
33. Construction Traffic Management Plan to be submitted and agreed
34. PROW Management Plan updated
35. Temporary Traffic Regulation Order to be sought from SCC

Background information

See application reference DC/21/5550/FUL on [Public Access](#)