



Strategic Planning Committee

Committee Report – Monday 4 October 2021.

Application no: DC/21/1001/FUL

Location:

Land to the North And South Of New Road, East of Silverlace Green, Parham, Suffolk

Expiry date: 30 September 2021

Application type: Full Application

Applicant: Low Carbon Solar Park 3 Limited / AECOM

Parish: Parham

Proposal: Construction and operation of a solar farm together with all associated works, equipment and necessary infrastructure.

Case Officer: Grahame Stuteley
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1. Summary

- 1.1. The planning application is submitted as a full application, with the formal description of development as follows: Construction and operation of a solar farm together with all associated works, equipment, and necessary infrastructure. It is for the construction and operation of a solar farm together with all associated works, equipment, and necessary infrastructure. The proposed solar farm consists of ground mounted photovoltaic (PV) panels which cover six fields currently in agricultural use, having a land area of 73.95 hectares (Ha). The proposed solar farm will generate up to 49.9MW of electricity which equates to the power consumption of approximately 16,581 homes and a saving of approximately 11,210 tonnes CO2 per annum.
- 1.2. 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 must therefore be supported in line with planning policy requirements and local commitments. Appropriate weight has therefore been given to the positive contribution that this development would make towards meeting National and

Local carbon reduction targets as discussed in detail within the Planning Considerations section of this report.

- 1.3. When determining applications for planning permission, Paragraph 47 of the National Planning Policy Framework (NPPF 2021) states that they should be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing. For this application, a series of extensions of time were agreed with the Applicant to allow for the provision of species survey materials and surface water drainage evidence, being integral to the determination process. The requirements of Paragraph 47 have therefore been met in full by East Suffolk Council and appropriate weight has been given to all material planning matters in accordance with the development plan.
- 1.4. This application was discussed with the referral panel on 17th August 2021 and all members confirmed that they were happy with it proceeding to a Strategic Planning Committee meeting scheduled to be held on the morning of Monday 4th October 2021.
- 1.5. This application has come before members of the Strategic Planning Committee in line with the East Suffolk Council Constitution (Aug 2021), Section E, Appendix 1 – Register of Specific Officer Functions for the Head of Planning and Coastal Management. Item 1 has been invoked, stating that the Planning Application is, in the opinion of the Head of Planning and Coastal Management, of significant public interest.
- 1.6. The scale of this proposal (having a proposed land area of 73.95 hectares (Ha)) and its forecast electricity generation output (up to 49.9MW) places it just below the 50MW Nationally Significant Infrastructure Project (NSIP) threshold for an onshore generating station in England, as defined in Section 15 of the Planning Act 2008 (as amended).
- 1.7. Given the strategic nature of the proposal, the scale of the development proposed, and the importance of low carbon and renewable generating energy to East Suffolk, it was determined that the application should be considered and determined by the Strategic Planning Committee.
- 1.8. Timely determination is required by the Applicant to enable them to enter in to the BEIS Contracts for Difference (CfD) auction process which is being held in December 2021 (should planning permission be granted). The CfD scheme is the government's main mechanism for supporting low-carbon electricity generation. Renewable generators located in the UK that meet the eligibility requirements can apply for a CfD by submitting a 'sealed bid'. Successful developers enter into a private law contract with the Low Carbon Contracts Company (LCCC), a government-owned company, and they are paid a flat (indexed) rate for the electricity they produce over a 15-year period. This cycle only occurs every two years and plays a fundamental role in the proposal's business model.
- 1.9. All detailed matters have been satisfactorily resolved with support from statutory consultees. Any remaining matters outstanding have been given due consideration and have subsequently been discussed and agreed with statutory consultees and the Applicant to be covered by viable pre-commencement planning conditions. On this basis, no matters have been overlooked and approval is recommended subject to the agreed planning conditions

2. Site Description

- 2.1. The proposed development site covers six existing fields in the vicinity of the Parham Airfield Museum, extending to the north and south between Mill Green, Great Glemham and Silverlace Green. The southern half of the site is due to be located within the historic confines of the former RAF Framlingham Airfield.
- 2.2. The south-eastern boundary of the site is adjacent to a residential property and commercial buildings which are separated from the proposed development site by New Road. There is also farmland belonging to Runway Farm in this vicinity. The eastern boundary also neighbours land belonging to Church Farm and Paul's Grove Farm which extends east to further residential properties. Commercial buildings (including the Parham Museum) are located to the west of the site, with farmland belonging to Stone Farm to the north and the land to the south belonging to Common Farm.
- 2.3. There is an existing solar farm located on approximately 35 hectares of land adjacent to the proposed development site to the south and east of Runway Farm, Parham Airfield, Great Glemham (Ref: C/12/2067). This existing development lies to the east of the southern boundary / New Road and consists of a 15MW solar farm with substation building, an operations and maintenance kiosk, seven inverter kiosks, security fencing, cameras, poles, landscaping, cable route and access. This application was approved in April 2013 and covers agricultural land which also formed part of the historic airfield.
- 2.4. The proposed development site and its surroundings are predominately rural in character on land currently in arable agricultural use. The development site is mostly covered by Agricultural Land Class 3b (moderate quality land), with a lesser extent being covered by Class 3a (good quality land – best and most versatile). It is understood that there are no landscape designations covering the site.
- 2.5. The dominant landform of the proposed development site and its surrounding area is of generally flat, arable fields, characteristic of disused historic airfields in the East of England. The site is located approximately 1.5km to the east of the River Ore at its nearest point and the is located within a Flood Zone 1 area meaning it has a low risk of flooding.
- 2.6. There are three Public Rights of Way (PRoW) which run directly across or along the perimeter of the proposed development site, with a forth being located close to the site boundary. Footpath 8 (FP8) and Footpath 14 (FP14) cross directly through the centre of the site on a north-east/south-west alignment, dissecting it in two and linking Trust Farm/Simpers Drift in the east with Silverlace Green/Hall Road in the west. Both footpaths partially run along an existing access track which crosses through the site boundary. Footpath 10 (FP10) runs along the northern boundary of the site in a north-east/south-west alignment, it commences in the east on Simperts Drift and continues west along agricultural farmland boundaries for approximately 1km where it links with Footpath 12 at Paul's Grove, running west to Mill Green.
- 2.7. Two points of vehicular access will be provided to the site joining on to New Road, these will utilise existing junctions currently serving access tracks used by agricultural machinery.
- 2.8. All vehicular movements accessing and departing the site during the construction, operation and decommissioning phases of the proposed development will utilize the two access points linking on to New Road. Drivers due to arrive at the site will be instructed to

make use of A-roads such as the A12 whether travelling from the north or south, exiting the highway at The Lodge junction and joining Button's Road, before turning north onto New Road. Departing drivers will use the same route.

- 2.9. There are no designated heritage assets within the application site, however there are several assets whose setting could be affected by the proposed development.
- 2.10. A brief review of the site's recent planning history (last 10 years) suggests that there was a 74m tall wind turbine refused in 2011 due to landscape character impacts (Ref: C/11/0191). No other significant planning history has been identified within the defined development boundary of relevance to this application.

3. Proposal

- 3.1. The application has been submitted by Aecom (the agent) on behalf of Low Carbon Solar Park 3 Limited (the Applicant). The proposal comprises the construction and operation of a solar farm together with all associated works, equipment, and necessary infrastructure on land to the north and south of New Road, east of Silverlace Green, Parham, Suffolk. The proposed solar farm consists of ground mounted photovoltaic (PV) panels which cover six fields currently in agricultural use, having a land area of 73.95 hectares (Ha). The solar panels and associated infrastructure are collectively referred to as 'B-17 Solar Farm'.
- 3.2. The Cable Connection Route element of this application links the solar farm to the local electricity grid network and extends approximately 3km to the west of the site, linking with a substation to the south-west of Parham. The Applicant proposes that the electricity cable is buried within the local public highway network (including Hall Road, The Street and the B1116 in Parham) connecting generated electricity with the substation location.
- 3.3. The Applicant proposes two points of vehicular access joining New Road at existing access track junctions. Both junctions will be modified as part of the development in order to accommodate all anticipated vehicle turning manoeuvres to serve the development over its operational life. The Applicant also proposes hedgerow reinforcement to fill gaps in existing hedges where necessary in order to limit long views. Landscaping will include wildflower boundaries as well as a security fence set within existing field boundaries.
- 3.4. The proposed solar panel arrays will be aligned in rows running east to west (having a south facing aspect) and a maximum height of 3m above ground level and a horizontal inclination of between 10 and 35 degrees. The metal framework housing the solar panel modules will be supported at intervals by either single or double mounted posts approximately 5m apart. Support posts will be driven into the ground to a depth of 1.5m and cabling would be concealed in trenches.
- 3.5. There are 27 proposed inverters and transformers with each being contained in a shipping container measuring 2.9m high, 12.2m long and 2.5m wide. Each inverter converts direct current (DC) coming from the solar panels to alternating current (AC). The transformers (also contained within the inverter containers) convert the low voltage output from the inverters into high voltage current suitable for feeding into the local electricity distribution network. The containers will be located towards the centre of the development.
- 3.6. A substation compound will be provided at the site which will contain a Development Network Operator (DNO) substation measuring approximately 4.1m high, 8m long and 6m

wide. This will be accompanied by a customer substation measuring approximately 3m high, 10m long and 4m wide. Both structures will be located on a hardcore base.

- 3.7. The Cable Connection Route is due to link into the Parham Substation located approximately 3km to the south west of Parham village. The applicant is proposing that the cable route runs below ground in buried trenches exiting the site along the farm access track and extending across two fields before connecting with the lane joining Hall Road on the northern edge of Rachel's Wood. It then turns west where it will run along Hall Road into Parham, joining with The Street and passing through Parham village. The cable route then joins the B1116 heading south for approximately 1km before connecting with the substation on the southern side of Old Hall, located on the western side of the B1116 road.
- 3.8. A stock-proof fence with mesh and wooden posts to a height of approximately 2m will be installed along the outer edges of the proposed development site to restrict access. This would be located a minimum of 4m withing existing field boundaries/hedges/trees/vegetation to ensure visual screening and to allow for hedge maintenance. Gates will be installed at site access points and the perimeter of the site will utilise a system of CCTV cameras and/or infrared cameras to provide 24-hour surveillance. An intelligent sensor management system will be used to manage the cameras which will be situated on poles of approximately 2.3m in hight, spaced at 50m intervals. There would be no lighting within the site at night.
- 3.9. Construction will take approximately 16 weeks and facilities would be provided on site for construction works including a site office, welfare facilities and temporary parking. Construction working hours would be 8am to 6pm weekdays and 8am to 1pm on Saturdays. Once the solar farm is in operation, occasional maintenance of the panels and infrastructure would be required (i.e. cleaning). It is anticipated that no more than four two-way trips would be required each week by car or van. The applicant intends for the site to be maintained in agricultural use over its operational lifespan, utilizing grazing and/or planting of grassland meadows.
- 3.10. The operational life of the solar farm is currently anticipated to be approximately 40 years, after which the solar panels and other infrastructure would be removed and the site restored back to full agricultural use. The decommissioning process intends to restore the land to the same quality as it was prior to the development taking place and this would be secured via planning condition.
- 3.11. The proposed B-17 solar farm will generate up to 49.9MW of electricity which equates to the power consumption of approximately 16,581 homes and a saving of approximately 11,210 tonnes CO₂ per annum. This is only marginally below the 50MW Nationally Significant Infrastructure Project (NSIP) threshold for an onshore generating station in England, as defined in Section 15 of the Planning Act 2008. This application is therefore considered under the Town and Country Planning Act 1990 (as amended).
- 3.12. The proposed development includes the following key elements as set out in the Applicant's submission materials:
 - Rows of solar PV panels;
 - Approximately 27 inverters and transformers (within containerised units similar to shipping containers);

- Approximately 3km cable connection from the site to Parham Substation (the Cable Connection Route)
- DNO (Development Network Operator) substation;
- Customer substation/switchgear;
- Internal access tracks;
- Internal buried cabling;
- Perimeter fence and security gate;
- CCTV cameras.

3.13. The Applicant states that this is the minimum level of development required to ensure the site performs effectively in generating and storing electricity. There would also be provision of planting and landscaping to effectively assimilate the proposed development into the wider landscape

EIA Development

- 3.14. The proposals have been the subject of pre-application discussions with the Local Authority prior to the submission, with pre-application advice being provided to the applicant by the Council along with an Environmental Impact Assessment (EIA) Screening Opinion.
- 3.15. The EIA Screening Report response provided by East Suffolk Council on 17th December 2020 advised that the proposed development required an EIA as it exceeds the published EIA Regulation thresholds for solar energy development (under the Energy Industry category) as set out in Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- 3.16. The EIA Screening Report found that the proposed site area far exceeds the 0.5Ha threshold, and that the assessment needs to consider the potential significance of impacts relating to air emissions, visual impact, heritage impacts and the potential for underground archaeology due to large scale of site. It also found that there is potential for in-combination effects with other energy projects in the locality as there is an existing 15MW solar farm located adjacent to the proposed development site (Ref: C/12/2067) which may result in cumulative impacts such as vehicle movements. This application is therefore accompanied by an Environmental Statement.

4. Consultations / Comments

- 4.1 The proposed solar farm extends across three Parish Council boundaries, these being Parham, Great Glemham and Marlesford.

Parham Parish Council:

- 4.2 On 30th March 2021, Parham Parish Council confirmed their **support** for the application subject to further negotiations with Low Carbon, stating:

‘Parham Parish Council has now met and discussed this application. It supports the proposals subject to further negotiations with Low Carbon.

The Parish Council will be meeting to discuss possible community benefits of the scheme with Low Carbon in April.

The Parish Council is concerned about the proposed route of the cables and the extent of disruption and length of road closures the current route would lead to. Councillors would prefer for the cable to be taken across fields rather than next to the roads.'

Great Glemham Parish Council:

- 4.3 On 19th March 2021, the Clerk for Great Glemham Parish Council requested a two week extension to the consultation deadline as they were awaiting further information from Low Carbon who were unable to address some of the questions raised at the Parish's extraordinary meeting held earlier that week. In the interests of flexibility this request was approved, resulting in a revised consultation closing date of 15th April 2021. This allowed additional time for the applicant to provide the Parish Council with the requested information to assist them in their consideration of the application.
- 4.4 On 31st March 2021, Great Glemham Parish Council confirmed that they **object** to this application in its current form, stating:

'Summary:

The Parish Council has been supportive of renewable energy projects on Parham Airfield in the past, were open minded to this application and remain supportive of renewable energy at this location but have reservations relating to the process of community consultation, the detail and quality of the information provided during this process and also the overall scale of the proposal in relation to its impact on the wider landscape. We have tried to use Policy No. SCLP9.1 to guide our opinion as well as reflect concerns raised by Parishioners

SCLP9.1 States:

The Council will support Neighbourhood Plans in identifying suitable areas for renewable and low carbon energy development, particularly where they relate to developments that are community-led. In identifying suitable areas, consideration should be given to the criteria listed below:

- a) They can evidence a sustainable and, ideally, local source of fuel;
- b) They can facilitate the necessary infrastructure and 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 and fauna, noise and air quality, unless those impacts can be appropriately mitigated.

The Council will support low carbon and renewable energy developments, with the exception of wind energy schemes, where they are within an area identified as suitable for renewable or low carbon energy or satisfy the above criteria. Wind energy schemes must be located in an area identified as suitable for renewable or low carbon energy in a Neighbourhood Plan.

From the material presented to us to date over the consultation period by the Applicant we believe that adverse impacts relating to the wider and immediate landscape amenity have not been properly addressed as the criteria summarised in point c).

We have met with the Applicant twice, the first meeting in December 2020 during which they presented a power point report which was followed by a Q&A session. Due to the limited information provided we took a decision at that point to await the actual planning application before coming to any conclusions.

On receipt of the actual application notification, we had a further virtual meeting with the developer, but this resulted in very little new information to what had already been presented beforehand. Their representative was not able to answer any specific questions in regard to the detail, height of panels, spacing of rows and no visuals were available to determine the impact on the local countryside and neighbouring properties - particularly those Parishioners effected by the development but outside the consultation zone. The Parish Council felt that the developer had not taken the meeting seriously enough and was ill prepared.

As a result of this we submitted a request for an extension to the deadline for submitting comments to the planning department at 1541 hours on 19 March, pending further information from Low Carbon. To date we have not received a reply from your department.

From the information provided we remain concerned that the wider impact of this development has not been properly assessed by the applicants and have strong concerns in this respect due to the scale of the proposed site particularly in reference where it moves into the wider landscape outside the curtilage of the old airfield and the impact it will have over a large area of the surrounding countryside as a result.

In light of this we submitted a request for an extension to the deadline for submitting comments to the planning department at 1541 hours on 19 March, pending further information from Low Carbon offered at the end of the most recent meeting. To date we have not received a reply from your department.

Since that time we have received some selected viewpoint photomontages which appear of low quality and of limited use and have had a request to attend a meeting to discuss a community benefit scheme with other Parish Councils. Having been told by the applicant at pre-application that the proposed development model did not support a community benefit scheme we welcome this development but feel for clarity this should not be linked with the Application process. We have not had any further offer from the developer to review their proposal in detail with them.

As such we feel we are in no position but to object to this application in its current form.'

- 4.5 As a point of clarification, the Case Officer authorised a two-week consultation extension for Great Glemham Parish Council following the request received from the Parish Clerk on 19th March 2021. The revised consultation deadline for Great Glemham Parish Council was therefore extended to 15th April 2021.

Marlesford Parish Council:

- 4.6 On 29th March 2021, Marlesford Parish Council confirmed that they **do not support** this application, stating the following:

'The proposal for the development of a solar farm to cover the old WW2 airfield comes from Low Carbon, an investment platform specialising in renewable energy (www.lowcarbon.com).

While the company hopes for a good return for their investors, we fear the parish of Marlesford will pay the price. Recently, I met (on Zoom) with their Stakeholder Manager, xxxx, plus xxxx and xxxx.

My first point was that the solar farm would dramatically change our local rural scene for the worse. However, my point about the East Anglian concept of big skies was lost on them as they all live in Gloucestershire and had never visited the site.

The original information sent to Marlesford Parish Council included a very inferior map. My complaint on behalf of local residents to Low Carbon produced copies of larger clearer maps. However, the map still did not give any latitude or longitude, indicate North (an important feature for a solar farm), state the scale of the map or highlight the roads (especially important for access to the site). These deficiencies came as a surprise to the Low Carbon staff.

In the corner of the new version map is a larger scale inset showing Parham, Little Glemham, Wickham Market etc.. Marlesford, through which all the construction traffic from the A12 to site will pass, is not shown.

There is talk in the application of screening the site boundaries with hedging. As the solar cells will be 3m high, large hedges will be needed. The Marlesford housing overlooking the site is to the South. Instead of opening their bedroom curtains in the morning to view the seasonal rural scene, a sea of glittering silicon panels will be presented. To screen the houses effectively, trees will be needed but, as this is to the South of the site, unless spaced well away from the solar cells, the trees will shade them in the middle of the day. The area bounded by the Button's Avenue, the A12 and the Marlesford to Gt Glemham road forms part of important and sensitive landscape. Marlesford Parish Council would find the application more acceptable if the section of the solar farm to the East of New Road (Marlesford to Great Glemham) was removed from the proposal.

Because of the enormous increase in traffic flowing through Marlesford with the development of Sizewell C nuclear power station and EA1(N) and EA2 windfarms, the construction traffic for the proposed solar farm would place an intolerable burden on Marlesford.

Marlesford Parish Council does not support this application.'

Framlingham Town Council:

4.7 No response was received.

Easton Parish Council:

4.8 No response was received.

Hacheston Parish Council:

- 4.9 On 11th May 2021, the Hacheston Parish Clerk advised that the parish **does not object** and provided the following comments:

‘The following applications were presented to council at the meeting on May 10th. All had no objections.

DC/21/1001/FUL | Construction and operation of a solar farm together with all associated works, equipment and necessary infrastructure | Land To The North And South Of New Road East Of Silverlace Green Parham Suffolk - no objections’.

5. Statutory Consultees

- 5.1. Please note that the revised 2021 edition of the National Planning Policy Statement (NPPF) was published by the Ministry of Housing, Communities & Local Government in July 2021 during the determination period for this application. Some of the consultee’s responses therefore refer to the previous 2019 version of this document. All assessments undertaken in the determination of this application have cross referenced the 2019 / 2021 editions where required to account for any policy changes and referencing.

Natural England:

- 5.2. **On 26th March 2021, the Natural England Consultations Team provided the following comments confirming that they have no objection:**

‘Thank you for your consultation on the above dated 11 March 2021 which was received by Natural England on 11 March 2021. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND’S ADVICE - NO OBJECTION Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites. Natural England’s generic advice on other natural environment issues is set out at Annex A.

European sites

Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development. To meet the requirements of the Habitats Regulations, we advise you to record your decision that a likely significant effect can be ruled out.

Sites of Special Scientific Interest

Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development.

Protected Landscapes - Suffolk Coast and Heaths AONB

The proposed development is for a site within or close to a nationally designated landscape namely Suffolk Coast and Heaths AONB. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.

Your decision should be guided by paragraph 172 of the National Planning Policy Framework which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks. For major development proposals paragraph 172 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies. We also advise that you consult the relevant AONB Partnership or Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

The statutory purpose of the AONB is to conserve and enhance the area's natural beauty. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm that statutory purpose. Relevant to this is the duty on public bodies to 'have regard' for that statutory purpose in carrying out their functions (S85 of the Countryside and Rights of Way Act, 2000). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Protected Landscapes – Suffolk Heritage Coast

The proposed development is for a site within or close to a defined landscape namely Suffolk Heritage Coast. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.

Your decision should be guided by paragraph 173 of the National Planning Policy Framework. It states:

173. Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 172), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

The NPPF continues to state in a footnote (footnote 55) that "For the purposes of paragraph 172 and 173, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined."

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies.

Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

Sites of Special Scientific Interest - Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Suffolk County Council - Archaeological Service correspondence:

5.3. On 22nd April 2021, Suffolk County Council Archaeological Services provided their final response, stating (does not object subject to conditions):

'We would disagree with the view set forward by the applicant's archaeological contractor-archaeological results have been entirely obscured in certain parts of the site, for whatever reason. Historic mapping shows former field boundaries in these locations, some of which survive as substantial earthworks (as visible on LIDAR), and would have been expected to be picked up by geophysical survey if it had worked, given that they have successfully been detected in adjacent fields.

As these large features have not been able to be detected, other surviving archaeological remains which one would expect geophysics to have identified will also have not been able to be detected. Given that these fields contain recorded finds scatters, there is still high potential for settlement and other archaeological remains to survive within the proposed development area.

However, as a result of the specific nature of this development, we note the preservation in situ possibilities and flexibility retained in the design.

Although we would strongly advise that evaluation is undertaken at this stage, on this basis, we wouldn't object to trial trenched evaluation of the whole site being undertaken post consent as long as flexible options for mitigation remain, noting that the developer accepts the risk of this.

We would however advise that trial trenched evaluation is undertaken at the earliest opportunity so that mitigation requirements can be defined at an early stage.

In this instance, we would advise that in accordance with the National Planning Policy Framework (Paragraph 199), any permission granted should be the subject of planning conditions to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case we would advise that our standard two part condition would be appropriate:

1. No development shall take place within the area indicated [the whole site] until a programme of archaeological work has been secured and implemented, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
 - b. The programme for post investigation assessment
 - c. Provision to be made for analysis of the site investigation and recording
 - d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
 - e. Provision to be made for archive deposition of the analysis and records of the site investigation
 - f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
 - g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.
2. The solar farm shall not be brought into operation until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON:

To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Policy SCLP11.7 of Suffolk Coastal Local Plan (2020) and the National Planning Policy Framework (2019).

INFORMATIVE:

The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.

We would however, agree that the condition PC3 as suggested by the applicant would also be appropriate in this instance.

PC3. Detailed Site Plan including Archaeological Exclusion Zones, if required – Prior to Commencement

Following the approval and completion of the archaeological evaluation referred to in Condition 1 and prior to the commencement of development, a final detailed site layout plan with full details of the final locations, design and materials to be used for the panel arrays, inverters, customer switchgear, substations, CCTV cameras, fencing, foundations and cabling. Should the archaeological evaluation identify any significant archaeological deposits, the final detailed site layout plan will define archaeological exclusion zones within which below and above ground development will be excluded or provide sufficient design mitigation including but not limited to the use of above ground cables, concrete shoes or other means to avoid any impact on archaeological deposits if required. The final detailed site layout plan shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the County Council's Lead Archaeologist. Subsequently the development shall be carried out in accordance with the approved details.

We would also request that as part of this, that a management plan is also produced for any archaeological areas to be preserved in situ, setting out the methodology to secure the ongoing protection of these areas both during construction, operation and decommissioning of the solar farm.

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to East Suffolk Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation will be required to establish the potential of the site and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation.

Further details on our advisory services and charges can be found on our website: <http://www.suffolk.gov.uk/archaeology/>.

5.4. On 26th April 2021, the Applicant responded stating:

'I can confirm that we are happy with the conditions proposed in xxxxxx's email below dated 22nd April 2021.

With regard to the management plan, we request that the condition wording states that the management plan is only required if there are archaeological areas to be preserved in situ'.

Suffolk County Council – Lead Local Flood Authority:

5.5. On 12th August 2021, SCC LLFA Flood and Water Engineer responded confirming the following (recommend approval subject to conditions):

'I have now had a chance to read through the updated drainage strategy technical note. There are a few minor technical points that we would usually pick up on, but I'm content to use my engineering judgement in this instance.

For example:

1. The Source Control calculations simulate vertical sides. If this is a swale, this is not accurate nor acceptable and would underestimate potential land take. However, you could reasonably argue that rain gardens, with vertical sides, could be implemented instead. Please bear this in mind when developing your detailed design and liaise with us if you need any advice/clarification

2. The hydrobrake orifice size is less than our recommended minimum of 100mm. This could be acceptable depending on detailed design, but we would not want to see an orifice this small at surface level. It could however be acceptable if the swale/rain garden were to be underdrained, with a perforated pipe picking up the then filtered water and taking it to a downstream manhole with a small orifice hydrobrake. This would need to be considered with your gradients and the depth of the existing piped system, but I'm content for this to also be considered further at detailed design. Worst case scenario, we have scope to explore increasing the discharge rate and assessing any potential increase in downstream flood risk

I can't recall what XXXX or I have said previously RE infiltration testing for this site. Looking at the borehole records provided, I'm content for you not to undertake infiltration testing at all on this application. It's evident that Boulder Clay is present to a significant depth across the whole site.

Please accept this as a recommendation for approval, based on the attached document, but subject to the below conditions. If you need me to submit a response formally, please let me know.

Suggested conditions:

1. No development shall commence until details of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the local planning authority (LPA).

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained

2. No development shall commence until details of the implementation, maintenance and management of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the LPA. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

3. Within 28 days of practical completion, a surface water drainage verification report shall be submitted to the Local Planning Authority, detailing and verifying that the surface water drainage system has been inspected and has been built and functions in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks in an agreed form, for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

4. No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the LPA. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP shall include:

Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-

- i. Temporary drainage systems
- ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
- iii. Measures for managing any on or offsite flood risk associated with construction

Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-management-plan/>

Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board district catchment is subject to payment of a surface water developer contribution'.

5.6. On 12th August 2021, the Applicant responded to SCC LLFA acknowledging their provided comments and confirming that they will take these on board as the detailed design is developed post-determination.

Suffolk County Council - Highways Authority:

- 5.7. **On 24th May 2021, the Senior Transport Planning Engineer followed this up by providing the following comments and recommending planning condition wording to cover the requirements raised (no objection subject to conditions):**

'TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/21/1001/FUL

PROPOSAL: Construction and operation of a solar farm together with all associated works, equipment and necessary infrastructure

LOCATION: Land To The North And South Of New Road East Of , Silverlace Green, Parham

ROAD CLASS: Various

Notice is hereby given that the County Council as Highway Authority make the following comments:

Further to the comments submitted on 24th March 2021, it is accepted that the potential feasibility and highway licensing issues raised associated with the cable route are not sufficient to uphold an objection and/or not strictly planning matters. These concerns have been recorded should any issues regarding the feasibility of the proposed cable route occur post-planning.

Recommended conditions:

Condition: No part of the development shall be commenced until details of the improved accesses as indicatively shown on drawing numbers B17SF_SPPSA1, B17SF_SPPSA1R, B17SF_SPPSA2, and B17SF_SPPSA2R (including the position of any gates to be erected) have been submitted to and approved in writing by the Local Planning Authority. The approved accesses shall be laid out and constructed in their entirety prior to any other part of the development taking place. Thereafter the access shall be retained in its approved form unless agreed in writing by the Local Planning Authority.

Reason: To ensure that the accesses are designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

Condition: Before the development is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the highway.

Condition: Before the development is commenced details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be

carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles in accordance with Suffolk Guidance for Parking (2015) where on-street parking and manoeuvring would be detrimental to highway safety.

Condition: All HGV traffic movements to and from the site over the duration of the construction period shall be subject to a Deliveries Management Plan which shall be submitted to the planning authority for approval a minimum of 28 days before any deliveries of materials commence. No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan. The site operator shall maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

Reason: To reduce and / or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas.

Condition: Before the improved accesses are first used, visibility splays shall be provided as shown on Drawing Nos. B17SF_VSPSA1 and B17SF_VSPSA2 with an X dimension of 2.4m and a Y dimension of 160m and thereafter retained in the specified form, with the exception of the visibility splays for VSPSA1, that can be provided via temporary traffic signals, the details of which will have been previously approved in writing by the Planning Authority. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays

Reason: To ensure vehicles exiting the drive would have sufficient visibility to enter the public highway safely, and vehicles on the public highway would have sufficient warning of a vehicle emerging to take avoiding action.'

Note:

It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority. Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out. These works will need to be applied for and agreed with Suffolk County Council as the Local Highway Authority. Application form for minor works licence under Section 278 of the Highways Act 1980 can be found at the following webpage:
www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/

Suffolk County Council – Public Rights of Way and Access:

5.8. On 22nd March 2021, the Growth, Highways and Infrastructure's Public Rights of Way Team provided the following (no objection):

'The proposed site does contain public rights of way (PROW): Footpath 8 Great Glemham, Footpath 10 Great Glemham, and Footpath 14 Parham. The Definitive Maps for Great Glemham and Parham can be seen at <https://www.suffolk.gov.uk/assets/Roads-and->

transport/public-rights-of-way/Great-Glemham.pdf and <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Parham.pdf>. A more detailed plot of public rights of way can be provided. Please contact DefinitiveMaps@suffolk.gov.uk for more information. Note, there is a fee for this service.

We do not object to this proposal, however the Applicant MUST also take the following into account, particularly in relation to planting near to a PROW and ensuring that the PROW are unobstructed at all times:

1. PROW are divided into the following classifications:

Public Footpath – only for use on foot or with a mobility vehicle

Public Bridleway – use as per a public footpath, and on horseback or by bicycle

Restricted Byway – use as per a bridleway, and by a ‘non-motorised vehicle’, e.g. a horse and carriage

Byway Open to All Traffic (BOAT) – can be used by all vehicles, in addition to people on foot, mobility vehicle, horseback and bicycle

All currently recorded PROW are shown on the Definitive Map and described in the Definitive Statement (together forming the legal record of all currently recorded PROW). There may be other PROW that exist which have not been registered on the Definitive Map. These paths are either historical paths that were not claimed under the National Parks and Access to the Countryside Act 1949 or since, or paths that have been created by years of public use. To check for any unrecorded rights or anomalies, please contact DefinitiveMaps@suffolk.gov.uk.

2. PROW MUST remain open, unobstructed and safe for the public to use at all times, including throughout any construction period. If it is necessary to temporarily close or divert a PROW, the appropriate process must be followed as per point 4 below.

3. The applicant, and any future owners, residents etc, must have private rights to take motorised vehicles over a PROW other than a BOAT. To do so without lawful authority is an offence under the Road Traffic Act 1988. Any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy. We do not keep records of private rights and suggest that a solicitor is contacted.

4. The granting of planning permission IS SEPARATE to any consents that may be required in relation to PROW. It DOES NOT give authorisation for structures such as gates to be erected on a PROW, or the temporary or permanent closure or diversion of a PROW. Nothing may be done to close, alter the alignment, width, surface or condition of a PROW, or to create a structure such as a gate upon a PROW, without the due legal process being followed, and permission being granted from the Rights of Way & Access Team as appropriate. Permission may or may not be granted depending on all the circumstances. To apply for permission from Suffolk County Council (as the highway authority for Suffolk) please see below:

To apply for permission to carry out work on a PROW, or seek a temporary closure – <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/> or telephone 0345 606 6071. PLEASE NOTE that any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy.

To discuss applying for permission for structures such as gates to be constructed on a PROW – contact the relevant Area Rights of Way Team <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> or telephone 0345 606 6071.

5. To apply for permission for a PROW to be stopped up or diverted within a development site, the officer at the appropriate borough or district council should be contacted at as early an opportunity as possible to discuss the making of an order under s257 of the Town and Country Planning Act 1990 - <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> PLEASE NOTE that nothing may be done to stop up or divert the legal alignment of a PROW until the due legal process has been completed and the order has come into force.

6. Under Section 167 of the Highways Act 1980 any structural retaining wall within 3.66 metres of a PROW with a retained height in excess of 1.37 metres, must not be constructed without the prior written approval of drawings and specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Construction of any retaining wall or structure that supports a PROW or is likely to affect the stability of the PROW may also need prior approval at the discretion of Suffolk County Council. Applicants are strongly encouraged to discuss preliminary proposals at an early stage.

7. Any hedges adjacent to PROW must be planted a minimum of 1 metre from the edge of the path in order to allow for annual growth and cutting, and should not be allowed to obstruct the PROW. Some hedge types may need more space, and this should be taken into account by the applicant. In addition, any fencing should be positioned a minimum of 0.5 metres from the edge of the path in order to allow for cutting and maintenance of the path, and should not be allowed to obstruct the PROW.

In the experience of the County Council, early contact with the relevant PROW officer avoids problems later on, when they may be more time consuming and expensive for the applicant to address. More information about Public Rights of Way can be found at www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/

East Suffolk Council – Environmental Protection:

5.9. **On 29th April 2021, the ESC Environmental Protection Officer provided the following suggested condition wording (no objection subject to conditions):**

‘Thanks for your communication on this application. I think for the scale of development proposed, it is unfortunate that noise was not given due regard by the applicant. As a minimum, the applicant should have undertaken baseline sound level surveys, and noise should have been a chapter within the Environmental Statement. As a result, what has

been submitted is not adequate at this time to enable the local authority to determine the magnitude of any noise impacts that could result from the development, either alone, or in combination with the existing solar farm equipment. On that basis my holding memo dated 9th April 2021 was an objection to the proposed development.

I note that following my initial comments regarding the applicants' desktop only noise assessment report, they acknowledge that the predicted noise levels are indicative only as they do not yet know what equipment they might use. This is one factor leading to uncertainty in assessing potential noise impacts.

I don't agree with the applicants' initial rationale for establishing what they deem to be the LOAEL (which is important in establishing suitable target noise levels), however I note that they would define it differently had they surveyed and characterised the sound climate in the study area. The suggestion is that they would establish LOAEL equal to the typical existing background sound levels which I would be more inclined to agree with.

Without surveying the area, I do have some concerns/uncertainty as to whether the applicant can reasonably achieve acceptable target noise rating levels. The lack of survey also means we cannot easily at this stage understand whether cumulative noise levels and impacts are likely from a combination of the existing and proposed solar farms.

What has been presented to date could give rise to a complete change in nature of the sound in the gardens of receptor dwellings, with the introduction of a continuous man-made tonal noise throughout the day.

If the Local Planning Authority is minded to recommend approval of the development at this stage, then ultimately I consider that the scheme can most likely be suitably designed and mitigated as necessary to ensure that the numerous inverters and substation would not cause adverse noise impacts or detriment to residential amenity.

On that basis therefore noise could be dealt with by means of pre-commencement conditions to cover the operational and construction phases. The operational noise condition will require submission for approval of a much more detailed noise assessment.

I have taken your proposed conditions, and made some revisions. I prefer to separate the operational phase condition (as quite complex) from the construction noise condition which will make things clearer and better from an enforcement perspective. Though I have revised the proposed conditions from a technical noise perspective, I rely on you to ensure the final versions of the conditions meet the planning tests. Finally, I would advise that site layouts/plans are not approved at this stage. Part of the design and noise mitigation strategy for the proposed development may mean specific locations for the inverters and substation(s) to maximise distance from noise sensitive receptor locations, this could therefore impact upon the layout of the panel arrays themselves. Neither would I want the current acoustic report accepted as an approved document or endorsed.

Suggested Pre-commencement Conditions

Operational Noise:

1. Prior to commencement of development, a noise assessment shall be submitted to the East Suffolk Council for approval in writing to include all proposed plant and machinery and in accordance with BS4142:2014+A1:2019. A noise rating level (LAr,T) from the

scheme of at least 5dB below the typical background sound level (LA90,T) should be achieved at noise sensitive receptors, and include any cumulative impacts from the existing solar farm plant. Where the noise rating level cannot be achieved, the noise mitigation measures considered should be explained and the achievable noise rating level should be identified and justified. This full assessment should inform any noise mitigation that may be needed. The assessment shall include:

- a) Details of background sound level surveys at, or representative of noise sensitive receptors. This should include capturing the typical background sound levels at the end of the night-time between 05:00 and 07:00 hours. Ideally these surveys should take place on a number of days. The assessment report should include observations and descriptions of the sound climate during these surveys.
- b) Derivation of predicted noise rating levels at noise sensitive receptors to include for any acoustic character corrections such as tonality.
- c) Initial estimate of the noise impact by comparing the predicted noise rating level with typical background sound levels at noise sensitive receptors.

Reason – To be drafted

Construction Noise:

2. A Construction Management Plan (CMP) shall be submitted to East Suffolk Council for approval in writing prior to commencement. The CMP shall include details for the control and management of noise and dust during the construction phase, and with respect to noise shall have due consideration of the guidance within BS 5228:2009+A1:2014.

Reason - To mitigate noise and dust impacts in particular to receptor locations during the construction phase.

Please do not hesitate to discuss this further with me as required. Otherwise I will await your further updates on the determination that will be made by the local planning authority.'

5.10. On 12th May 2021, the Applicant provided the following response:

'The condition wording is fine with the exception of one query we have on the operational condition highlighted below. Can you confirm why reference is made to "include any cumulative impacts from the existing solar farm plant". As the solar farm is existing any noise from the solar farm plant will be included within the baseline background levels that will be carried out.'

5.11. On 12th May 2021, the ESC Environmental Protection Officer advised the following:

'If the applicant is going to accept the remainder of the condition and specifically the target rating level of 5 dB below the typical background sound level, then I am happy for the reference to cumulative impacts to be removed. Technically the new development would need to be 10 dB below the existing background level (were that dominated/dictated by the existing solar farm) to ensure the background sound level is not raised. The remainder of the wording however should remain as written. The applicant's survey will include the

existing solar farm as pointed out, and I would just advise that the consultants make subjective observations and report those alongside their physical measurements so I can review whether the existing solar farm is audible at noise sensitive receptors, and what contribution it may make.'

East Suffolk Council - Economic Development:

5.12. **No response was received.**

East Suffolk Council - Design and Conservation:

5.13. **On 8th April 2021, the East Suffolk Council Design and Conservation Officer advised the following (comments only):**

'The application is for the construction of a solar farm near Parham. There are no designated heritage assets within the application site, however there are several assets whose setting could be affected by the proposed development.

The Environmental Statement identifies several designated heritage assets within the surroundings of the application site:

- Paul's Grove Farmhouse – grade II listed;
- Church Farmhouse – grade II listed;
- The Willows – grade II listed;
- Common Farmhouse – grade II listed;
- Great Glemham Hall Registered Park and Garden [BH16] – grade II registered;

Stone Farmhouse (GII) and the Great Glemham Conservation Area are located further to the north-east and east of the application site, and have been discounted by the ES for being too far from the site to be impacted.

The ES concludes through its impact assessment that the magnitude of impact on the designated heritage assets would be 'very low', leading to a 'minor adverse' effect on their significance. In the terms of the NPPF, this would fall in the 'less than substantial harm' category. Based on the categories of adverse impact described in the ES, a minor adverse effect would likely be considered to fall on the very lower end of 'less than substantial', according to the ES.

I agree with the assessment of impact on Church Farmhouse, The Willows, Common Farmhouse, and Great Glemham Hall Park, however, I consider that the impact on Paul's Grove Farmhouse would be somewhat more significant than is stated in the ES. Paul's Grove Farmhouse is located approximately 260m from the boundary of the application site, with only its former outbuildings nearby. The historic farmstead is surrounded by agricultural land on all sides; this open agricultural setting makes an important contribution to the understanding of the function of the historic buildings, as well as to how it is experienced and viewed within its setting.

Paul's Grove Farmhouse is located in a dip in the landscape; the roofs of the buildings are visible in views from the PRow to the north and when travelling along the road, with the rolling landscape in the background. The edge of the solar farm would be located just on the crest of the hill which is the backdrop to the historic farmstead, thereby diminishing the agricultural character of its wider setting. Additionally, the treeline on the southern

boundary of the listed farmhouse is not impermeable, and the solar farm would still be visible from within its immediate setting. Taking into account the low height of the solar panels and the proposed landscaped boundary, I consider that the magnitude of impact would be low, rather than very low as assessed in the ES. This would still lead to a minor adverse effect in the terms of the ES. In the terms of the NPPF, this would be considered less than substantial harm, at the lower end of the scale.

The ES also identifies several historic buildings and buildings relating to the former RAF Framlingham as non-designated heritage assets. The methodology for their identification as NDHAs is unclear, however, using the council's published criteria for the identification of NDHAs, I would agree with the identification of Potash Cottage, Glebe Cottage/Trust Farm, Chantry Cottage and 2 Common Farm Cottages (for their historic interest and architectural interest). The Watch Office and T2 airfield hangar have historic and archaeological interest due to their association with the former RAF Framlingham and they are recorded in the HER.

The settings of Potash Farm, Chantry Cottage and Common Farm Cottages would be affected by the proposed development, which would be located relatively close to their grounds. The solar farm would be a notably alien development in the landscape, however, the proposed vegetation boundary would reduce the negative visual impact somewhat once established. I consider that the magnitude of impact on these NDHAs would be medium, leading to a minor adverse effect in the terms of the ES. In the terms of the NPPF, this would be considered at the lower end of 'less than substantial'.

The Watch Office and T2 airfield hangar would be located adjacent to the solar farm. Views from the Watch Office were an important part of its function, and therefore the proposed development would be a significant change to its current setting. However, the Watch Office and T2 hangar's historic/original setting has already experienced substantial change with the loss of the airfield, and the remaining landscape features relating to the airfield which still contribute to their significance (the perimeter road and outlines of the former runways) would stay unchanged. Overall, I therefore consider that the magnitude of impact on the Watch Office and T2 airfield hangar would be low, leading to a minor adverse effect in the terms of the ES. In the terms of the NPPF, this would be considered at the lower end of 'less than substantial'.

In conclusion, the proposed development would be considered to cause a very low to low level of less than substantial harm to the nearby designated and non-designated heritage assets, in the terms of the NPPF. This harm should be weighed up in the planning balance against public benefits, as per para. 196 of the NPPF.'

East Suffolk Drainage Board:

5.14. On 8th April 2021, the Sustainable Development Officer at Water Management Alliance advised the following (comments only):

'The site is near to the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board (IDB) and is within the Board's Watershed Catchment (meaning water from the site will eventually enter the IDD). Maps are available on the Board's webpages showing the Internal Drainage District (https://www.wlma.org.uk/uploads/ESIDB_Index_plan.pdf) as well as the wider watershed catchment (https://www.wlma.org.uk/uploads/ESIDB_Watershed.pdf).

I am pleased to see that initial testing shows that a drainage strategy reliant on infiltration is likely to be achievable on the proposed development. If for any reason a strategy wholly reliant on infiltration does not prove viable and a surface water discharge is proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.

The reason for our recommendation is to promote sustainable development within the Board's Watershed Catchment therefore ensuring that flood risk is not increased within the Internal Drainage District (required as per paragraph 163 of the National Planning Policy Framework). For further information regarding the Board's involvement in the planning process please see our Planning and Byelaw Strategy, available online.'

East Suffolk Council - Ecology:

5.15. On 11th August 2021, the Applicant's ecologist discussed the application with the ESC ecologist. The ESC ecologist subsequently provided the following feedback (comments with suggested conditions provided):

'Further to my comments of 1st April 2021, I have read the additional ecological information which has been submitted (Ornithological Survey Report, AECOM, August 2021; Bat Survey Report, AECOM, August 2021 and Ecology Surveys Technical Note, AECOM, August 2021) and am satisfied with the conclusions of the consultant. Based on the information provided, and subject to securing the required mitigation measures, the proposed development appears unlikely to result in a significant adverse impact on designated sites, protected species or UK Priority habitats or species (under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)).

Should permission be granted the following conditions should be included (for the LEMP I've worded it as a pre-commencement condition but am happy to consider an alternative post-commencement but pre-completion trigger if you think one would be better?):

1) Development must be undertaken in accordance with the ecological avoidance, mitigation, compensation and enhancement measures identified within the Preliminary Ecological Appraisal (PEA) (AECOM, February 2021); the Ornithological Survey Report (AECOM, August 2021); the Bat Survey Report (AECOM, August 2021) and the Ecology Surveys Technical Note (AECOM, August 2021) as submitted with the planning application and agreed in principle with the local planning authority prior to determination.

Reason: To ensure that ecological receptors are adequately protected and enhanced as part of the development.

2) No removal of hedgerows, trees or shrubs, or works to areas that may be used by breeding birds shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority.

Reason: To ensure that nesting birds are protected.

3) No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following:

- a. Risk assessment of potentially damaging construction activities.
- b. Identification of “biodiversity protection zones”.
- c. Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
- d. The location and timing of sensitive works to avoid harm to biodiversity features.
- e. The times during construction when specialist ecologists need to be present on site to oversee works.
- f. Responsible persons and lines of communication.
- g. The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h. Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Reason: To ensure that ecological receptors are adequately protected as part of the development.

4) A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior to the commencement of the development. The content of the LEMP shall include the following:

- a. Description and evaluation of features to be managed.
- b. Ecological trends and constraints on site that might influence management.
- c. Aims and objectives of management.
- d. Appropriate management options for achieving aims and objectives.
- e. Prescriptions for management actions.
- f. Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- g. Details of the body or organisation responsible for implementation of the plan.
- h. Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

Reason: To ensure that the long-term ecological value of the site is maintained and enhanced.

5) Prior to the any construction activity (including vegetation clearance or site preparation) within 50m of the River Ore, an Ecological Mitigation Method Statement will be submitted to and approved in writing by the Local Planning Authority. The Method Statement will be based upon suitably up to date ecological surveys undertaken by a suitably qualified ecologist. Mitigation measures described in the Statement will be implemented as approved unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that ecological receptors are adequately protected.'

East Suffolk Council - Arboriculture and Landscape:

5.16. On 1st April 2021, the East Suffolk Council Arboriculture and Landscape Manager responded stating the following (no reasons for refusal):

'I have reviewed the submitted information in respect of potential landscape and visual impacts and can advise that it has been carried out in accordance with professional guidelines (GLVIA 3). On 20th January 2021 I agreed viewpoints for the LVIA with the applicant's consultants and that agreement included some minor additions from me.

The assessment specifically and importantly includes a very localised site specific landscape character assessment as well as referring to published landscape character assessments at national, County and District levels. The assessment identifies that the site itself falls within the Glemham Estate Claylands landscape character area as defined by the Suffolk Coastal Landscape Character Assessment, an assessment that is in part based on County level landscape character types. The visual baseline has been assessed firstly on a bare land basis and then to include woodland and my own site assessment of 30th April 2021 largely confirms its findings, and also confirms the suitability of the agreed viewpoints.

The assessment rightly identifies at the outset that the proposal will result in a fundamental change from arable agricultural land use to extensive solar array over grassland. Whilst the development entails minimal loss of existing hedgerows, and the planting of 13.5km of new hedgerow, the new planting will not be effective in screening of the development and would not contribute to landscape character enhancement until it becomes well established (at least 5-7 years after planting). On that basis, the fundamental change in landscape character would be experienced across the site for at least the early years post installation.

Part of the site has been affected by the building of Parham airfield during WW2 and this has left the locality partially of reduced sensitivity in terms of defining landscape character features. Where the solar development extends beyond the airfield influence, the impact on landscape character will be very localised and contained within the receiving LCA. Similarly in respect of visual impacts, even at Year 1 post completion and with any mitigation planting being too small to have any benefit, the visual impact of the development remains very localised around the site perimeter out to around 500-600m. My site visit and assessment confirms this. It is really only VPs 4, 5, 9 and to a lesser extent 7 and 8. The assessment states that there would be no discernible change in visual amenity for the remaining viewpoints because of the distance from the viewer to the development, intervening vegetation and to some degree, topography, and my site visit confirms this.

The year 10 assessment indicates that these visual impacts will have been largely nullified assuming that the indicated boundary hedge planting has been effective and is well established and maturing. Full details of new planting can be required by Condition should consent be granted.

Solar array development of this type are considered to be temporary and reversible but over a medium to long term time period. Whilst this should be noted, their presence in the landscape will still be of some effect over the period of its duration. I consider that effects on local landscape character and local visual amenity will be notable in the immediate locality of the site, and certainly so whilst new planting matures, but such adverse effects are not of significance in EIA terms and can be suitably mitigated by appropriate planting. Such planting will be retained after the development has been de-commissioned and will continue to make a positive contribution to landscape character in the long term. This will contribute to restoring the adverse effects on landscape features left over from the airfield construction.

Overall, whilst there will be localised adverse landscape and visual effects arising from the development, I do not consider that they are sufficiently so to warrant reasons for refusal.'

Environment Agency:

5.17. On 9th July 2021, the Environment Agency provided the following written response (comments only):

‘CONSTRUCTION AND OPERATION OF A SOLAR FARM TOGETHER WITH ALL ASSOCIATED WORKS, EQUIPMENT AND NECESSARY INFRASTRUCTURE

LAND TO THE NORTH AND SOUTH OF NEW ROAD EAST OF SILVERLACE GREEN PARHAM SUFFOLK

Thank you for your consultation dated 7 July 2021. We have reviewed the application as submitted and can confirm there are no constraints within our remit. Therefore we have no comments to make.'

Cadent Gas (National Grid):

5.18. On 12th July 2021, Cadent Gas provided the following comments (comments only):

'Formal Planning Application - Your Ref: DC/21/1001/FUL (KS) Our Ref:
EA_GE4B_3NWP_030213

Thank you for your enquiry which was received on 07/07/2021.

Please refer to the attached documentation for Cadent and National Grid's response.

Planning,

Should you be minded to approve this application please can the following notes be included an informative note for the Applicant

****PLEASE NOTE – the below information is related to Low and Medium Pressure Assets. You may be contacted separately by our engineers regarding High/Intermediate Pressure Pipelines.****

Considerations in relation to gas pipeline/s identified on site:

Cadent have identified operational gas apparatus within the application site boundary. This may include a legal interest (easements or wayleaves) in the land which restricts activity in proximity to Cadent assets in private land. The Applicant must ensure that proposed works do not infringe on Cadent's legal rights and any details of such restrictions should be obtained from the landowner in the first instance.

If buildings or structures are proposed directly above the gas apparatus then development should only take place following a diversion of this apparatus. The Applicant should contact Cadent's Plant Protection Team at the earliest opportunity to discuss proposed diversions of apparatus to avoid any unnecessary delays.

If any construction traffic is likely to cross a Cadent pipeline then the Applicant must contact Cadent's Plant Protection Team to see if any protection measures are required.

All developers are required to contact Cadent's Plant Protection Team for approval before carrying out any works on site and ensuring requirements are adhered to.'

Historic England:

5.19. In a letter received on 26th July 2021, Historic England provided the following comments (no objection):

'T&CP (Development Management Procedure) (England) Order 2015

& Planning (Listed Buildings & Conservation Areas) Regulations 1990

Land To The North And South Of New Road East Of Silverlace Green Parham Suffolk

Application No. DC/21/1001/FUL

Thank you for your letter regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

Historic England considers that the change in land use in the proposed area would have a detrimental impact upon the rural and agrarian landscape surrounding the Grade I listed Church of St Mary at Parham and would have temporary effects upon its tranquillity while construction works are undertaken.

We consider that the scheme would lead to a negative effect upon the landscape that falls short of harm to the designated heritage assets, as identified in paragraph 202 of the NPPF. We therefore do not object to the scheme.

Historic England Advice

The site of the proposed facility lies to the north and the south of Silverlace Green. There is a further solar farm in the vicinity situated upon the former airfield. We have identified the following highly graded heritage assets that could be affected by the proposal;

Church Farm House, Parham – Grade II* Listed

Church of St Mary, Parham – Grade I Listed

The site of the solar farm itself would not impact directly upon the fabric, significance or setting of the Church of St Mary and Church Farm House. The rising land out of Parham towards the site, and the landscape of dense hedgerows mean the solar facility would be screened from the view.

The main impact upon the significance of the Church of St Mary, Parham comes from the provision of the cable route past the entrance of the grade I listed church. Historic England setting guidance is clear that harm to setting can be experienced through other measures and tranquillity is one of those factors. It is situated off of the main road in a small residential street of larger houses with the minimum of passing traffic. The cable would be run along Hall Road which would result in substantial temporary harm to the tranquillity and significance of the Listed Building. This has not been considered within the documentation.

Temporary harm will also be caused to the significance of the grade II* listed Church Farm House through the provision of the cable running through and past the house but this will disappear once the cable is laid.

The immediate setting of the buildings will not be affected by the development which will be screened from the buildings by established hedgerows and new boundary planting. While the wider agrarian landscape does have a positive impact upon the setting and significance of the buildings, the nature of the landscape in this area means that the land is parcelled into discreet areas defined by hedgerows. The change of use of this land to the 'rural industrial' would impact negatively upon the character of the landscape but, would not cause harm to the immediate setting of the grade I and II* listed buildings.

The landscape mitigation should ensure that new boundary planting is of mature native hedgerow species to make certain that the solar panels are appropriately screened from the heritage assets.

Some assurance should be sought by your local authority that the works to lay the cable through Parham Village would be done in the least impactful way and vibrations caused through mechanical tools will not cause damage to the historic buildings.

Policy Context.

Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the assets conservation (and the more important the asset, the greater that weight should be)

Paragraph 202 of the NPPF states that where a development 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 scheme.

Relevant Guidance

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 – 2nd edition, (2017)

Historic England Position

The change of the character of the land would have a negative impact upon the landscape character surrounding the villages of Great Glemham and Parnham While Historic England acknowledge this negative impact, our remit lies with the impact upon the highly graded heritage assets identified within the vicinity of the proposal. In this instance the grade I listed Church of St Mary at Parham and the grade II* Listed Church Farm House. The immediate setting of these grade I and II* listed buildings would not be altered by the proposal and mitigation in the form of mature native hedgerows could be considered to better assimilate the development into the existing landscape. This would then meet the requirements of paragraph 199 of the NPPF.

We therefore consider that this scheme would have some negative effects upon the character of the landscape which falls short of harm as identified within paragraph 202 of the NPPF.

Recommendation

Historic England does not object to this application on heritage grounds.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 199 and 202 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard

to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.'

6. Non-Statutory Consultees

Suffolk Coast and Heaths Area of Outstanding Natural Beauty:

6.1 On 20th April 2021, the AONB Planning Officer advised that following (comment only):

'The site lies approximately 7km from the boundary of the Nationally Designated Landscape. As such the AONB team does not wish to comment on the proposal'.

Suffolk Wildlife Trust:

6.2 On 24th August 2021, the Suffolk Wildlife Trust provided the following response:

'Thank you for sending us details of this application, we wish to withdraw our holding objection and make the following comments:

We have read the Ornithological Survey Report (AECOM, Aug 2021), the Report on Surveys for Bats (AECOM, Aug 2021) and the Further Ecology Surveys Technical Note (AECOM, Aug 2021) we are satisfied with most of the findings of the consultant. We request that the recommendations made within the reports are implemented in full, via a condition of planning consent, should permission be granted. This includes the requirement to complete further surveys for Otter and Water Vole should 'HDD methods underneath the watercourse' be needed for the cabling – as stated in the Further Ecology Surveys Technical Note (AECOM, Aug 2021).

We note the presence of an estimated 19 Skylark territories within the Ornithological Survey Report (AECOM, Aug 2021). Skylarks are a Red Listed Bird of Conservation Concern in the UK1 and listed under Section 41 of the Natural Environment and Rural Communities (NERC) act2. There is little proven evidence to suggest that Skylark will nest between solar arrays and along narrow field margins adjacent to hedgerows, as they are a species that require unbroken sightlines to breed and any breeding that does occur is likely to be in a reduced density. Therefore, we recommend that offsite mitigation is required, and this should be detailed within a Skylark Mitigation Strategy, with the approach agreed prior to the determining of the application.

We request that a Landscape and Ecological Management Plan (LEMP) be produced to include the following:

- Details of seed mixtures to be sown in 'cover crop' areas, we recommended sowing a Turtle Dove Conservation Seed Mix as recommended by Operation Turtle Dove on the areas neighbouring suitable nesting habitat. We also recommend the use of a wild bird seed mix to include small seed-bearing crops such as kale, linseed, quinoa and rape to provide food for birds such as Yellowhammer and Grey Partridge.

- Appropriate management of cover crops to include: sowing seed at a low rate to create a habitat with areas of bare ground for foraging and nesting birds; maintenance of the cover crops should include re-sowing the areas every 2 – 3 years throughout the lifespan of the solar farm; exclusion of livestock during establishment.
- If the grassland is to be grazed by sheep, stocking densities must be managed to ensure varied grass height – if stocking density is too high a uniform grassland will be created with less benefit to wildlife.
- Grassland margins as wide as possible (10m- 15m), to increase likelihood of providing nesting Skylark habitat.'

On 9th September 2021, the Applicant provided the following concluding comments:

'Following consultation with XXXX (LPA Ecologist) on 11th August 2021, regarding the proposed B-17 Solar Farm, we have now received comment from XXXX (Suffolk Wildlife Trust (SWT)). This letter, therefore, is in response to some of the points raised by SWT in their letter (dated 24th August 2021). The points raised by SWT are outlined below, together with our response.

"We request that the recommendations made within the reports are implemented in full, via a condition of planning consent, should permission be granted"

The recommendations for avoidance, mitigation and enhancement that were identified within the Preliminary Ecological Appraisal (PEA) (AECOM, February 2021); the Ornithological Survey Report (AECOM, August 2021); the Bat Survey Report (AECOM, August 2021) and the Further Ecological Surveys Technical Note (AECOM, August 2021) will be implemented to protect identified ecological receptors. Further surveys and pre-commencement checks will be undertaken as necessary.

"We note the presence of an estimated 19 Skylark territories within the Ornithological Survey Report (AECOM, Aug 2021).....Therefore, we recommend that offsite mitigation is required, and this should be detailed within a Skylark Mitigation Strategy, with the approach agreed prior to the determining of the application"

Skylark (*Alauda arvensis*) is a species of principal importance under the NERC Act 2006 and whilst 19 Skylark territories were recorded within the survey area (which included the cable corridor), only 16 territories were within the footprint of proposed solar arrays (hereafter referred to as the Site). Territories are calculated on the basis of the presence of singing males occupying an area and are not a measure of nesting or productivity of any nests. Sixteen territories represents a low density (approximately 1 territory per 5ha) of Skylark on Site and at a breeding population size of no more than local nature conservation importance.

Existing arable habitat, which is often of a temporary nature for its suitability to support nesting Skylark, will be converted into grassland habitat, which will be beneficial to invertebrates and species (such as Skylark) that prey on them. Grassland habitat within and around the solar arrays will provide permanent long-term opportunities for Skylark (and other ground-nesting species) to nest, undisturbed, throughout the duration of the breeding season and without the interference of agricultural practices. Whilst Skylark are unlikely to nest beneath the solar arrays, recent research papers[1][2][3] indicate that Skylark will incorporate solar farms into their territorial boundaries and nesting does occur between panels and within buffers. To support this, personal observations were made in

2021 of Skylark nesting within the solar arrays of an adjacent solar farm (AB, pers. comms). James Meyer also confirmed during our call that he has observed skylark behaving in this way. Furthermore, grassland margins (of up to 15m width) will be created and retained (where currently they exist) around the solar arrays and will also provide permanent long-term opportunities for ground-nesting species.

Whilst it is acknowledged that Skylark prefer an open landscape for nesting, grassland within the solar farm and buffers of up to 15m from hedgerows would be sufficient to support Skylark territories. Post-development areas of grassland will, therefore, provide permanent habitat for Skylark throughout the breeding season, which would potentially increase productivity of the existing population on Site.

The creation of areas of set-aside or 'cover crops' would also benefit a range of arable farmland passerines present within the survey area.

Therefore, the measures included on Site are appropriate to maintain succession of occupation and productivity of the local population of Skylark and no offsite mitigation is considered necessary.

"We request that a Landscape and Ecological Management Plan (LEMP) be produced to include the following...."

A LEMP will be produced prior to the commencement of development and will incorporate, where possible, recommendations made by SWT (August 2021).'

Suffolk Preservation Society:

6.3 On 22nd April 2021, the Suffolk Preservation Society provided the following comments (objection):

'I write on behalf of the Suffolk Preservation Society (SPS) regarding the proposal for a 49.9MW solar farm on a 74-hectare site, in the countryside including parts of the former Framlingham RAF airfield. The SPS recognises the importance of renewable energy production as a key contributor to achieving the Government's net zero targets and is fully aware that Suffolk councils have declared a climate emergency. Therefore, the SPS is supportive of the use of the former Parham airfield as previously developed land and recognises that the proposed solar farm offers genuine landscape benefits in a location that has suffered substantial loss and landscape degradation in the twentieth century. The proposal provides for the reinstatement of over 13km of hedgerow out of a total of 23km of hedgerow that was removed during the construction of the airfield, and this is welcomed.

However, as its former use as an airfield implies, the topography is flat and open and provides excellent visibility from all directions. Accordingly, the landscape and visual impacts require careful consideration and having carefully reviewed the ES and other supporting information, the SPS wishes to raise concerns specifically on the northern parcel of the scheme, identified in the submission as zone 1. This parcel of land is located between Low Road on the east and Mill Green on the west, with a footpath running along the northern boundary and bounded by a copse of woodland on its western boundary. It projects awkwardly into the countryside and while the small copse of trees on its western boundary does provide an important level of screening, its north and east boundaries are clearly visible, most notably from the public right of way which forms the northern boundary of the

site and provides a high level of receptors. Whilst it is acknowledged that hedgerow will be planted around all zones, it is also acknowledged in the ES and by the council's Landscape Manager, that it will be ineffective for possibly up to 10 years, which represents 25% of the life of the solar farm which is seeking consent for 40 years.

Secondly, zone 1 is the oldest surviving and most significant fragment of an historic landscape and therefore careful consideration should be given to its historic value. Fig. 7.3 of the ES, Historic Landscape Characteristics, identifies this parcel of land as Pre-18th century enclosure, with the central portion (zones 2, 3 and 4) as Post 1950 agricultural landscape and the southern portion (zones 1 and 2) as Post medieval military, (although a suspected drafting error has occurred, and it should more likely say 20th century military as it relates to the World War 2 airfield).

Zone 1 is therefore also a more historically significant part of the site, being of much earlier origin than the other five zones and a surviving example of an historic landscape that has retained its original form and boundaries. The Suffolk Historic Landscape Characterisation Version 3, 2012, specifies a set of 14 broad types of historic landscape character, with Pre-18th century enclosure described as the earliest, consisting of 8 sub types. The ES is silent on the classification it ascribes to this parcel of the site, but it is suggested that Zone 1 is most likely to be sub-type 1.1 – random fields, which are defined as “Landscapes made up of fields that have an irregular pattern (ie without any dominant axis). Many were in existence by the medieval period, but could be earlier. Boundaries usually take the form of species-rich hedges (normally coppiced not laid with associated ditches and banks. Areas of this field pattern are probably some of our earliest farming landscapes.” (my emphasis)

Furthermore, the closest designated heritage asset is Paul's Grove Farmhouse which is located immediately to the east of this parcel, but close to its southern boundary. Paul's Grove Farmhouse is approximately 260m from the boundary of the application site and the historic farmstead is surrounded by agricultural land on all sides which makes an important contribution to its setting and therefore contributes to its significance as a designated heritage asset. The heritage officer's assessment of the impacts of the scheme upon the historic environment states that in her view “that the impact of Paul's Grove Farmhouse would be somewhat more significant than is stated in the ES” and continues that “Paul's Grove Farmhouse is located in a dip in the landscape; the roof of the building are visible from the PROW to the north and when travelling along the road, with the rolling landscape in the background. The edge of the solar farm would be located just on the crest of the hill which is the backdrop to the historic farmstead, thereby diminishing the agricultural character of its wider setting. Additionally, the tree line on the southern boundary of the listed farmhouse is not impermeable, and the solar farm would still be visible from within its immediate setting.”

She concludes that the harm would be low in ES terms and at the lower end of the scale of less than substantial harm in the terms of the NPPF and correctly refers to para. 196 of the Framework which requires this harm to be weighed against the public benefits. However, it is also important to consider para. 193 which requires decision makers, when considering the impact of a proposed development on the significance of a designated heritage asset, that 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.

Therefore, the SPS considers that both in terms of landscape character as well as setting of a designated heritage asset, zone 1 should be removed from the scheme. It is also recommended that the landscape mitigation on the north and east boundaries of zone 2 are enlarged to address the harm identified to the setting of Paul's Grove Farmhouse.

We therefore object to the scheme on this basis and suggest that the removal of zone 1 is clearly justified on these grounds.

We trust that you find these comments helpful in the consideration of this case and request that we are consulted on any future amendments to the scheme'.

Third Party Representations

6.4 Six letters/emails were received from third party representatives. Three were objecting to the proposal, one was supportive of the proposal, and two provided questions or comments only and did not specify either support or objection.

6.5 The following topics of concern were raised:

- Significant visual impact to an existing rural landscape / loss of rural views;
- Significant degradation of the value of former WW2 Parham Airfield / museum as an asset of important cultural heritage and significance;
- A major loss of some 74 ha of highly productive agricultural land;
- Planning application contains numerous errors and distortions;
- Downplaying the adverse impacts;
- Makes false claims about visual impact;
- Industrial scale power station proposed in rural landscape;
- Height of proposed solar panels;
- Assessment of local asset value is distorted and down-graded;
- Assessment of cultural heritage is distorted and down-graded;
- Incorrectly describes land as being of low ecological value;
- Visual shielding;
- Vehicular access;
- Construction / traffic / highways impacts;
- Design of proposed development;
- Scale / extent of proposed development on rural landscape, being dominating and overbearing;
- Drainage;
- Loss of views;
- Objection to the proposed cable route through the village;

6.6 The following topics of support were raised:

- Any disruption caused by the cable route is worth it.

7. Publicity

7.1. **The application has been the subject of the following press advertisement and notices:**

Category	Published	Expiry	Publication
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Major Application

11th March 2021

n/a

East Anglian Daily Times

General Site Notice

Reason for site notice: Major Development, In the vicinity of a Public Footpath

Date posted: 26 March 2021.

Expiry date: 15 working days after Date Posted.

8 Planning Policy

8.1 National Planning Policy and Guidance

8.2 **Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that the planning application is to be determined in accordance with the development plan unless material consideration indicates otherwise.**

8.3 **The National Planning Policy Framework 2021 (NPPF, or 'Framework') sets out the three overarching objectives for the achievement of sustainable development, these being economic, social, and environmental objectives. The Framework is a material consideration and should be taken as a whole for the determination of planning applications made under the Town and Country Planning Act 1990 (as amended), however the following Chapters and Paragraphs are of particular relevance for the determination of renewable energy projects.**

- **Chapter 2 – Achieving sustainable development**

- **Para. 11** states that 'Plans and decisions should apply a presumption in favour of sustainable development – for decision-taking this means:

c. approving development proposals that accord with an up-to-date development plan without delay; or

d. where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole';

- **Chapter 14 – Meeting the challenge of climate change, flooding and coastal change**

- **Para. 152 (formerly 148)** refers to the planning system supporting the transition to a low carbon future, stating ‘The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure’.
- **Para. 155 (formerly 151)** seeks to encourage the use and supply of renewable and low carbon energy, stating: ‘To help increase the use and supply of renewable and low carbon energy and heat, plans should:
 - a. provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);
 - b. consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and
 - c. identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers’.
- **Para. 158 (formerly 154)** refers to the determination of planning applications for renewable energy development, stating ‘When determining planning applications for renewable and low carbon development, local planning authorities should:
 - a. 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; and
 - b. approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas’.

- **Chapter 15 – Conserving and enhancing the natural environment**

- **Para. 174 (formerly 170)** refers to the enhancement of the natural and local environment, stating ‘Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - a. protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - b. 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, and of trees and woodland;
 - c. maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - d. minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
 - e. preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
 - f. remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate’.

8.4 **The National Planning Practice Guidance** (NPPG or ‘PPG’) provides also guidance supporting to help local councils in developing policies for renewable and low carbon energy and identifies the planning considerations. Section ‘Renewable and low carbon energy’ sets out the planning considerations that relate to large scale ground-mounted solar photovoltaic farms.

8.5 **Paragraph: 013 Reference ID: 5-013-20150327** states ‘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.

Particular factors a local planning authority will need to consider include:

- 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 encourages biodiversity improvements around arrays. See also a speech by the Minister for Energy and Climate Change, the Rt Hon Gregory Barker MP, to the solar PV industry on 25 April 2013 and written ministerial statement on solar energy: protecting the local and global environment made on 25 March 2015.
- 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 (see guidance on landscape assessment) 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.

The approach to assessing cumulative landscape and visual impact of large scale solar farms is likely to be the same as assessing the impact of wind turbines. However, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography the area of a zone of visual influence could be zero'.

8.6 Local Planning Policy and Guidance

- 8.7 East Suffolk Council adopted the Suffolk Coastal Local Plan on 23 September 2020. The Local Plan sets out the level of growth which needs to be planned for in the former Suffolk Coastal area and identifies where this should be located and how it should be delivered.

The Plan sets out the strategic and non-strategic planning policies which the Council will use to determine planning applications across Suffolk Coastal, along with policies in made Neighbourhood Plans. This Local Plan covers the period 2018-2036.

8.8 The following policies are relevant to this application:

- **Policy SCLP3.2 Settlement Hierarchy** – this policy identifies Parham as Countryside;
- **Policy SCLP3.4 Proposals for Major Energy Infrastructure Projects** – this policy considers the nature, scale, extent and potential impact of proposals for Major Energy Infrastructure Projects, including cumulative impacts throughout their lifetime, including decommissioning of existing plant and facilities. It also seeks to ensure that the impacts of Major Energy Infrastructure Projects are adequately mitigated;
- **Policy SCLP4.5 Economic Development in Rural Areas** – this policy recommends that proposals which grow and diversify the rural economy, particularly where this will secure employment locally, enable agricultural growth and diversification and other land based rural businesses, should be supported. It also notes that proposals will be expected to provide additional community, cultural or tourism benefits where opportunities exist.
- **Policy SCLP4.7 – Farm Diversification** – this policy states that proposals for farm diversification schemes to support the continued viability of the farm will be supported where farming activities remain the predominate use on the site and the proposal avoids, or adequately mitigates, any adverse impact on the character of the surrounding area and landscape, the AONB and its setting or the natural or historic environment. This policy is relevant as the site is currently in arable agricultural use and the proposed development would change this use by diversifying the land use over its operational lifetime through the introduction of livestock grazing, and/or the planting of grassland/wildflower meadow where the arable crop was previously located. The development would also support the financial viability of the farm via a new revenue stream.
- **Policy SCLP7.1 Sustainable Transport** – this policy notes that development will be supported where any significant impacts on the highways network are mitigated, it is proportionate in scale to the existing transport network and the cumulative impact of new development will not create severe impacts on the existing transport network.
- **Policy SCLP9.1 Low Carbon and Renewable Energy** – this policy states that the Council will support low carbon and renewable energy developments, where they can evidence a sustainable and, ideally, local source of fuel, can facilitate the necessary infrastructure and power connections required for functional purposes, and 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 and fauna, noise and air quality, unless those impacts can be appropriately mitigated.

When the technology is no longer operational there is a requirement to decommission, remove the facility and complete a restoration of the site to its original condition.

The explanatory text states that The New Anglia Local Enterprise Partnership intends to maximise the energy opportunities in this area. This is an intention that the Council will endeavour to support, where possible. The former Suffolk Coastal area can contribute towards the generation of renewable energy, most notably through biomass and anaerobic digestion schemes, solar panel schemes and wind power... adding that solar panel schemes will generally be supported and that careful consideration will be given to the visual impact in sensitive locations including through design, siting and, where possible, natural screening.

- **Policy SCLP9.5 Flood Risk** - notes that proposals for new development will not be permitted in areas at high risk of flooding (Flood Zones 2 and 3) unless the applicant satisfies the safety requirements set out in the Flood Risk National Planning Policy Guidance, these include the 'sequential test'; where needed the 'exception test' and also a site specific flood risk assessment that addresses the characteristics of flooding and has tested an appropriate range of flood event scenarios (taking climate change into consideration). Developments should exhibit the three main principles of flood risk, in that, they should be safe, resilient and should not increase flood risk elsewhere.
- **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, such as wildlife corridors and habitat 'stepping stones'. All development should follow a hierarchy of seeking firstly to avoid impacts, mitigate for impacts so as to make them insignificant for biodiversity, or as a last resort compensate for losses that cannot be avoided or mitigated for. Adherence to the hierarchy should be demonstrated.

In addition, 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.

- **Policy SCLP10.3 Environmental Quality** - states that development proposals will be expected to protect the quality of the environment and to minimise and, where possible, reduce all forms of pollution and contamination. Development proposals will be considered in relation to impacts on:
 - a) Air quality, and the impact on receptors in Air Quality Management Areas;
 - b) Soils and the loss of agricultural land;
 - c) Land contamination and its effects on sensitive land uses;
 - d) Water quality and the achievement of Water Framework Directive objectives;
 - e) Light pollution; and
 - f) Noise pollution.

Proposals should seek to secure improvements in relation to the above where possible. The cumulative effect of development, in this regard, will be considered.

- **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:
 - a) The special qualities and features of the area;
 - b) The visual relationship and environment around settlements and their landscape settings;
 - c) Distinctive landscape elements including but not limited to watercourses, commons, woodland trees, hedgerows and field boundaries, and their function as ecological corridors;
 - d) Visually sensitive skylines, seascapes, river valleys and significant views towards key landscapes and cultural features; and
 - e) The growing network of green infrastructure supporting health, wellbeing and social interaction.

Proposals should include measures that enable a scheme to be well integrated into the landscape and enhance connectivity to the surrounding green infrastructure and Public Rights of Way network.

- **Policy SCLP11.3 Historic Environment** – states that the Council will work with partners, developers and the community to conserve and enhance the historic environment and to ensure that where possible development makes a positive contribution to the historic environment. The policies of the National Planning Policy Framework will be applied in respect of designated and non-designated heritage assets.

All development proposals which have the potential to impact on heritage assets or their settings should be supported by a Heritage Impact Assessment and/or an Archaeological Assessment prepared by an individual with relevant expertise. 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.

- **Policy SCLP11.4 Listed Buildings** - notes that developments affecting the setting of a listed building will be supported where they 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.
- **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.

It is noted that the parishes of Parham, Great Glemham and Marlesford do not have any made neighbourhood plans to be considered as part of the Local Plan.

Other Material Considerations

- 8.9 The following energy legislation and policy is also material to the consideration of the proposed solar farm development.
- 8.10 **The Climate Change Act 2008** - in 2008 the UK government set to reduce greenhouse gas emissions by 80% of 1990 levels by 2050. However, in June 2019, secondary legislation was passed where the government set a revised legally binding target of achieving net zero greenhouse emissions by 2050 relative to 1990 levels. Net zero refers to achieving a balance between the amount of greenhouse gasses produced and the amount removed from the atmosphere.
- 8.11 **East Suffolk Council declared a climate emergency** - at the Full Council meeting on Wednesday 24 July 2019, East Suffolk Council voted unanimously to step up its positive work on environmental issues to help fight climate change. It has joined other local authorities in recognising the fact that there is a climate emergency and committed itself to doing more to reduce its own carbon emissions and to encourage communities to help fight climate change.

The council pledges to:

- declare a climate emergency;
- set up a Cross Party Task Group, commencing by October 2019, to investigate ways to cut East Suffolk Council's carbon and harmful emissions on a spend to save basis, with ambition to make East Suffolk Council (including all buildings and services) carbon neutral by 2030. The Cross Party Task Group will report on their progress on a quarterly basis;
- work with Suffolk County Council and other partners across the county and region, including the Local Enterprise Partnership (LEP) and the public sector leaders, towards the aspiration of making the county of Suffolk carbon neutral by 2030;
- To work with Government to a) deliver its 25 year Environmental Plan and b) increase the powers and resources available to local authorities in order to make the 2030 target easier to achieve.

9 Planning Considerations

Principle of Development

- 9.1 This Application is for the construction and operation of a solar farm together with all associated works, equipment, and necessary infrastructure. The proposed solar farm consists of ground mounted photovoltaic (PV) panels which cover six fields currently in agricultural use, having a land area of 73.95 hectares (Ha). The proposed solar farm will generate up to 49.9MW of electricity which equates to the power consumption of

approximately 16,581 homes and a saving of approximately 11,210 tonnes CO2 per annum.

- 9.2 In June 2019, the UK Government became the first major economy in the world to pass laws to end its contribution to global warming. The legislation introduced a legally binding commitment to realise an ambitious target of net-zero carbon emissions by 2050 relative to the 1990 baseline level. The UK's 2050 net zero target is set out in the Climate Change Act 2008 (as amended), being recommended by the Committee on Climate Change (CCC) which is the UK's independent climate advisory body to the UK Government.
- 9.3 More recently, the UK Government introduced fresh targets to reduce emissions by 78% by 2035 relative to the 1990 baseline levels, being an intermediate target on route to reaching net zero by 2050. This new target is set to become law June 2021.
- 9.4 To achieve these ambitious carbon reduction targets, it is important that major investment in proven low carbon technologies (including ground-mounted solar farms) is supported where possible, along with a diverse mix of other renewable and low carbon energy generation technologies. Vast growth in this sector will be needed if the UK Government's legally binding targets are to be met, however, such proposals should only be brought forward where they are sustainable and are supported by planning policy requirements at a National and Local level.
- 9.5 At the Full Council meeting held on Wednesday 24 July 2019, East Suffolk Council voted unanimously to step up its positive work on environmental issues in order to help fight climate change. It has joined with other local authorities by declaring a climate emergency and has committed to doing more to reduce its own carbon emissions and to encourage communities to help fight climate change.
- 9.6 It is acknowledged that the proposed development would contribute towards meeting these targets and initiatives, both locally and nationally, noting that the overarching principle for the development of low carbon and renewable technologies is already well established in both National and Local planning policy, as stated within the Planning Policy of this report. Notably, Paragraph 158 (formerly 154) of the NPPF states that Local Planning Authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy when determining planning applications, approving such applications where impacts are (or can be) made acceptable.
- 9.7 This principle is echoed in Local Plan Policy SCLP9.1 'Low Carbon and Renewable Energy' which states that the Council will support low carbon and renewable energy developments where evidence is presented demonstrating a sustainable development can be delivered which can facilitate the necessary infrastructure and power connections required for functional purposes, whilst being complementary to the existing environment without causing any significant adverse impacts (unless those impacts can be appropriately mitigated). Local Plan Policy SCLP3.4 'Proposals for Major Energy Infrastructure Projects' also seeks to ensure that the impacts of Major Energy Infrastructure Projects are adequately mitigated, and considerable effort has been made for this Application to ensure that any potential impacts are (or will be) sufficiently assessed and/or mitigated before any development commences at the site. A lot of mediation has taken place working closely with the Applicant and stakeholders to ensure any potential impacts are identified and resolved to the satisfaction of stakeholders, consultees, and East Suffolk Council.

- 9.8 Additionally, the New Anglia Local Enterprise Partnership intends to maximise the energy opportunities in this area, noting the Council's commitment to its contribution towards making the County of Suffolk carbon neutral by 2030. The former Suffolk Coastal area can contribute towards the generation of renewable energy, with solar panel schemes being supported where it can be demonstrated that visual impact in sensitive locations is made sufficiently acceptable through design, siting and, where possible, natural screening.
- 9.9 This proposal would not be a permanent structure on the landscape, having an operational life of 40 years. Local Plan Policy SCLP9.1 'Low Carbon & Renewable Energy' requires that post decommissioning, the facility is removed, and the site is restored to its original condition and this will form the basis of a suitably worded planning condition.
- 9.10 The scale of this proposal and its forecast electricity generation output (up to 49.9MW) places it just below the 50MW Nationally Significant Infrastructure Project (NSIP) threshold for an onshore generating station in England, as defined in Section 15 of the Planning Act 2008 (as amended). This Application has been made for a development of up to 49.9MW, meaning that this cannot be exceeded, and this Council can lawfully determine the application pursuant to our powers under the Town and Country Planning Act 1990 (as amended).
- 9.11 The principle of low carbon and renewable energy development within East Suffolk must therefore be supported in line with policy requirements and local commitments. Appropriate weight has been given to the positive contribution this development would make towards meeting local and national carbon reduction targets.

Public Consultation and Design Evolution

- 9.12 The submitted Statement of Community Involvement (SCI) sets out the methods used by the Applicant to engage with the local community, local businesses, and key consultees in order to seek feedback on the proposed development. The views of local people and other interested parties have then been used to inform the site design process. It is clear from the submission materials that a significant effort has been made by the Applicant to engage with the local community, which was complicated by the global pandemic and national lockdown requirements.
- 9.13 Pre-application consultation was carried out between Monday 30th November 2020 and Monday 21st December 2020 using both physical and digital channels (such as Commonplace's bespoke digital engagement platform). The Applicant used a variety of methods to maximise participation from relevant stakeholders and the local community.
- 9.14 The SCI provides a record of all correspondence with stakeholders and includes details of how the feedback received has influenced site design. The Applicant advises that the overall response to the project was primarily positive, with the majority of comments received being in relation to local ecology and bird life, visual impacts, traffic and construction, tourism and recreation and archaeology and heritage (SCI Fig 9).
- 9.15 The SCI advises that the feedback received during the public consultation has been carefully considered and, where possible, addressed through the planning application and supporting documentation.

- 9.16 The Applicant claims that the following design considerations were directly attributed to the feedback received:
- The removal of solar panels adjacent to a residential property to the north east of the site;
 - A proposal to plant a one-metre hedgerow and three-metre scattered trees offsite to provide additional screening for residential property (to be secured by planning condition);
 - The removal of panels from a western part of the site in the vicinity of Parham Airfield Museum to limit visual impacts from the viewing tower;
 - Removed shared access with Parham Airfield Museum and the provision of an alternative access to the site to reduce the impact of traffic during construction.
- 9.17 Having reviewed the 'Resident Letter and Leaflet' contained in Appendix A to the SCI, it is understood that this formed the basis of the consultation held between November and December 2020 as referred to above. However, it is apparent that the site redline depicted in this correspondence matches that of the final submission materials for this Application. I therefore do not see how the feedback received during this consultation exercise directly led to the removal of the areas of solar panels listed above. It appears that this was predetermined and only later attributed to the feedback received.
- 9.18 However, it is generally accepted that the Applicant's engagement activities and outcomes follow the Council's principles for community engagement, with early, effective and meaningful engagement with the community being of primary importance as set out in the East Suffolk Council's Statement of Community Involvement (April 2021) guidelines.
- 9.19 In addition to the Applicant's pre-application activities, East Suffolk Council has carried out its own public consultation including direct letter notification, posting several site notices in close proximity to the site, and publishing a newspaper advertisement.
- 9.20 The Applicant is committed to ongoing engagement with the local community, advising that the consultation website will be updated with any news of progress on the planning application, including the ways in which the local community and stakeholders can continue to engage.

Site Selection

- 9.21 The Applicant states in Section 5.8 of the Planning, Design and Access Statement that a total of 19 landowners were approached in the area and that only three responded expressing any interest in hosting such a development on their land. The site selection justification presented states that of the three landowner respondents, one could not offer a sufficient land area to accommodate the 'required' output of 49.9MW.
- 9.22 Solar farms are typically designed and optimised for the land area available once a preferred site has been identified as part of the site selection process. It is noted that 49.9MW represents a very large development, far larger than many other operational solar farms including the neighbouring development at only 15MW. A site which can accommodate a 49.9MW solar farm is large in size and does not therefore represent the minimum scale required to be viable as stated by the Applicant in the submission materials.

- 9.23 The scale of this development is only 0.1MW below that of a Nationally Significant Infrastructure Project (NSIP), having a threshold of 50MW as defined in the Planning Act 2008 (as amended). The Applicant's reference to a 'required' output of 49.9MW therefore suggests that the site selection process was completed retrospectively and that the 'required' 49.9MW was only ever intended for the preferred application site as this had sufficient land area (73.95Ha) to accommodate this large-scale solar farm.
- 9.24 ES Volume 1, Chapter 4 provides details of design evolution along with the alternatives considered. The Applicant has considered alternative sites for the Proposed Development, utilising an iterative site selection process to ensure the site represents the most suitable and deliverable land for the Proposed Development. Factors including proximity to grid connection points and grid capacity, land availability and land constraints were considered as part of this process. A total of 19 landowners were approached regarding the land required for the Proposed Development. This process resulted in the final site being selected as being the most suitable.

Cumulative and Combined Effects

- 9.25 Marlesford Parish Council raised concerns regarding potential cumulative impacts of traffic movements / construction traffic due to Sizewell C and the EA1N and EA2 offshore wind farms. To recap, construction traffic effects have been assessed as low for the proposed development as already discussed in this report, being conducted over a relatively short time period of 4 months (16 weeks). Additionally, the Development Consent Order applications for these projects have not yet been determined by the Secretary of State. Even if approval is granted for these projects, the construction periods are not expected to overlap for more than 16 weeks, assuming they are under construction at the same time, which is unlikely. In addition, construction traffic movements for Sizewell C, EA1N and EA2 will not be focussed on the village of Marlesford. The likelihood of any cumulative impacts from construction traffic arising across projects has therefore not been considered a significant issue for this application.
- 9.26 Additionally, the Applicant's submitted Environmental Statement Non-technical Summary advises in Section 3.4.4 that the potential for cumulative effects with other more local developments in the area (within a 2km radius) has been considered from a landscape, visual and cultural heritage perspective and concludes that no significant effects will exist. Section 3.4.5 also states that combined effects, which can arise when several direct or indirect effects arising from the proposed development affect a single receptor, have also been assessed. It is concluded that there is no potential for significant combined effects from the proposed development.

Land Use

- 9.27 Sections 8.7 to 8.9 of the Applicant's Planning, Design and Access Statement states that an Agricultural Land Classification Report is submitted with the planning application which finds that the site comprises mostly Grade 3b, moderate quality agricultural land, with a small section (approximately 5Ha) of Grade 3a good quality agricultural land. Based on this assessment, the submission materials refer to the site as being farmed as a unit of Grade 3b land, advising the entire site has been classed as such for the purposes of this planning application. However, if a 5Ha area of land is Graded as 3a, then it can only be farmed as

Grade 3a and not as Grade 3b. This site therefore contains 5ha of Grade 3a land which falls within the categorisation of 'best and most versatile land'.

- 9.28 The Applicant states in Section 6.10 of the Planning, Design and Access Statement that it is intended that the site would retain its agricultural use whilst the proposed development is operational. However, the site currently consists of both Grade 3a and 3b agricultural land used for crop production. This would not remain a viable use during solar farm operation due to the presence of the solar panels and associated infrastructure. Instead, it is suggested by the Applicant that the land use would change to that of grazing sheep, grassland or wildflower meadow. It is therefore clear that 73.95Ha of crop producing land will be removed over the operational life of the development (circa 40 years as indicated by the Applicant). It can therefore not be claimed that the existing use (crop production) would be retained during operation.

Site Design

- 9.29 The Applicant states in Section 6.4 of the Planning, Design and Access Statement that all infrastructure required for the proposed development has been situated in such a way as to avoid environmentally sensitive areas, and mitigation has been included to reduce other impacts. However, as discussed in more detail within the Noise section of this report, the applicant only submitted a desk-based noise assessment and has not completed a site survey which accounts for the actual baseline noise impact at identified receptors. As discussed in the Noise section of this report, it has been agreed between the Applicant and East Suffolk Council's Environmental Protection Team that noise assessment will be undertaken as a pre-commencement planning condition. The precise type of inverter equipment has yet to be fixed by the Applicant and the magnitude of noise impact has not yet been modelled and measured. Therefore, appropriate levels of mitigation will be identified at the time of further noise assessment being undertaken under planning condition for approval by the Local Planning Authority.
- 9.30 The Applicant states in Section 6.6 of the Planning, Design and Access Statement that the initial design was assessed by planning and environmental specialists covering topic areas including landscape and visual, cultural heritage, ecology, hydrology and traffic considerations with each specialist visiting the site to identify the presence or absence of potential environmental constraints and opportunities. This is also mentioned in Section 6.14. Section 6.15 states that the incorporation of environmental mitigation measures were central in the preparation of the layout. However, as discussed in the Ecology section of this report, various species surveys identified in the Preliminary Environmental Appraisal (PEA) had not been undertaken prior to the submission of this application.
- 9.31 The Applicant also states in Section 6.6 that plans were produced to show potential environmental constraints in respect of landscape and visual impact, and in 6.7 states that the protection of existing landscape features and valuable habitat including hedgerows and trees have been central considerations in the preparation of the layout. Section 6.8 states that the Applicant proposes to plant a 1m high hedgerow and 3m high scattered trees off-site to provide additional screening for a neighbouring residential property to the north-east, however planting details of this are not clearly defined. A planning condition has therefore been recommended to provide full details of proposed planting

specifications, landscaping and biodiversity net gain areas through a full Landscape and Biodiversity Management Plan.

- 9.32 As set out in paragraphs 6.17 to 6.21 within the submitted Planning, Design and Access Statement, it has not been possible for the Applicant to fix all of the design details, so the proposal therefore incorporates sufficient design flexibility. This relates to the dimensions and layout of structures forming part of the proposed development, including the precise layout of the site. In order to ensure a robust assessment of the likely significant environmental effects of the proposed development, the EIA has been undertaken adopting the principles of the 'Rochdale Envelope'. This approach involved defining development zones rather than having a defined layout, allowing the future contractor to optimise the layout of the solar farm up to the maximum parameters defined within the assessment as part of the planning application. Following any grant of planning permission, rather than being bound to a precise layout, the Rochdale Envelope principle provides a sufficient means of flexibility in allowing changes to the final design post-planning consent to allow for a range of procurement and detailed technical design issues.
- 9.33 Development zones are illustrated in the Development Zones Plan (Reference: LCS040-DZ-01 Rev 13). The zones define where the solar farm infrastructure could be located within the site, but there is flexibility in terms of the layout within each zone. The infrastructure that is permitted to only be located within each zone is as follows:
- Development Zone 1: solar panels and inverters;
 - Development Zone 2: solar panels and inverters;
 - Development Zone 3: solar panels and inverters;
 - Development Zone 4: solar panels;
 - Development Zone 5: solar panels, inverters, DNO Substation and Customer Substation; and
 - Development Zone 6: solar panels and inverters.
- 9.34 The Indicative Site Layout Plan (Reference: LCS040-PL-01 Rev 10) provides an indication as to how the site could be laid out, however, the detailed design and fixing of the site layout could vary within the parameters of the development zones as outlined above and the final precise siting of the panels and infrastructure within the site will be for subsequent approval as part of a planning condition. However, the indicative site layout and the parameters defining the development zones, being based on the Rochdale Envelope approach, is considered acceptable subject to conditions. The final site layout will be fixed and approved by East Suffolk Council once pre-commencement studies have been completed enabling the refinement of site layout to be undertaken giving greater flexibility.

Designated Sites

- 9.35 Section 6 within the Environmental Statement Volume 1 states in 6.4.9 that the proposed development site is not subject to any local, national, or international landscape designations, nor is it a Registered Park and Garden. Beyond the site boundary, the Preliminary Ecological Appraisal (PES) identified the Great Glemham Nature Reserve (County Wildlife Site (CWS)) which is located immediately adjacent to the proposed south-eastern site boundary, and Silverlace Green CWS, which is located immediately adjacent to the cable corridor. However, it was concluded that neither will be impacted upon by the Proposed Development.

- 9.36 Natural England confirmed that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites, and that they have no objection to the proposed development.
- 9.37 Paragraph 176 (formerly 172) of the National Planning Policy Framework gives the highest status of protection for the 'landscape and scenic beauty' of Areas of Outstanding Natural Beauty (AONBs) and National Parks. The Suffolk Coasts and Heaths AONB Planning Officer advised that the site lies approximately 7km from the boundary of the Nationally Designated Landscape and as such the AONB team does not wish to comment on the proposal.
- 9.38 Natural England considers that the proposed development will not have likely significant effects on European Sites and to meet the requirements of the Habitats Regulations, it should be recorded that a likely significant effect can be ruled out. They also confirmed that the proposed development will not have likely significant effects on Sites of Special Scientific Interest (SSSIs), noting the nearest to the proposed development site is Cransford Meadow located 1.77km north of the proposed development site boundary.

Trees and Hedges

- 9.39 The submitted Arboricultural Impact Assessment states in Section 5.2 that part of one low quality tree group is required to be removed to facilitate the proposed development. However, it's loss will not detract significantly from the overall extent of the group feature. This relates to tree group 'G37' which are Category C trees (i.e. trees of low quality, minimum of 10+ years remaining contribution). The trees are due to be removed to provide an access route into part of the site. These are located on the southern field boundary for the northern most development zone. All of the remaining trees within and adjacent to the proposed development site will be protected.
- 9.40 Section 5.4 identifies that there is also a single Category C tree (Reference: T4) located at the western extent of Rachel's New Covert / Woodland by the road running between Mill Green and Silverlace Green. This will require some incursion into its construction exclusion zone to allow for the cable route forming part the proposed development. The cable route trench will be 1m wide and 1m deep and this has been micro-sited as far as possible to avoid retained tree root protection areas (RPAs). However, the RPA for T4 will incur a slight incursion, and the trench will therefore be hand dug in this area with any roots <25mm in diameter being preserved and worked around. This limited excavation will not impact on the health or amenity value of this tree or those to the west of the road and is considered reasonable.
- 9.41 The development entails minimal loss of existing hedgerows and proposes the planting of 13.5km of new hedgerow. The detailed landscaping and planting specification will be secured via planning condition. This will ensure that the proposed vegetation contributes to the agricultural character of the wider area and successfully screens any solar farm infrastructure in views.
- 9.42 However, Section 4.1 of the submitted Transport Assessment (TA) undertakes a visibility splay assessment for the two proposed vehicular access locations on New Road. Section 4.1.6 of this document states for the north-western access (Reference: PSA1) that in order to achieve the northern visibility splay of 2.4m x 160m, significant mature vegetation clearance to the north of the site access junction would need to be undertaken.

- 9.43 Similarly, Section 4.1.8 of the TA states for the south-eastern access (Reference: PSA2) that based on the observed speed data for New Road, it is considered that visibility splays of 2.4mx 160m to the north and south are appropriate and to facilitate the safe movements of vehicles at PSA2, vegetation clearance to the north of the site access junction will be required in order to achieve this visibility splay. A review of google street view suggests this vegetation is located on the opposite side of New Road (outside of the redline boundary) and this requirement was not identified as part of the submitted Arboricultural Impact Assessment, with Tree Constraint Plan Sheet 012 of 12 illustrating this hedge (Reference: G6, Category C) as being retained.
- 9.44 The requirement to remove identified vegetation within visibility splays for PAS1 has however been subsequently deleted from the highway access planning condition through agreement with SCC Highways due to traffic management being adopted throughout the construction period, managing road safety at this junction, and negating the need to remove the vegetation.

Ecology and Biodiversity

- 9.45 Suffolk Wildlife Trust initially submitted a holding objection for this application in light of the need for further surveys of hedgerows, great crested newts, breeding birds, non-breeding birds and bats being required as set out within the Preliminary Ecological Appraisal. This sentiment was echoed by the East Suffolk Council Ecologist who advised that this information is required to inform a full assessment of the potential biodiversity impacts of the proposal.
- 9.46 At the time of the application being submitted there was a lack of information on the species composition of the hedgerows which was a primary concern given that sections of hedgerow were proposed for removal resulting in insufficient information being available to determine whether the proposals will result in a negative impact upon a Priority habitat. In addition, the submitted Planning, Design and Access Statement proposes that areas of hedgerow would be planted although no landscape plan was supplied, resulting in the need for a planning condition covering detailed landscaping and planting specifications as it is currently unclear what species will be used for any replacement planting with no indication of the composition and range of species.
- 9.47 Suffolk Wildlife Trust and ESC also highlighted a requirement for a Landscape and Ecological Management Plan to be produced to detail how the habitats and open spaces on site are to be appropriately managed for biodiversity. This will also be covered by planning condition.
- 9.48 The submitted Preliminary Ecological Appraisal identifies the need for further eDNA surveys of three nearby waterbodies for great crested newts between April and June and these were requested to be completed before this application is determined.
- 9.49 The Arboricultural Impact Assessment identifies trees to be removed to facilitate part of the development, yet no bat roost appraisal had been undertaken prior to submission. The Applicant was therefore informed that the roost assessments on these trees should be carried out prior to the determination of this application. The Preliminary Ecological Appraisal also identifies the need for further bat activity surveys, and these were also requested prior to determination in order to determine the use of the site by foraging and commuting bats.

9.50 The Applicant was advised that the required further surveys for breeding birds should include targeted surveys for barn owl and also include an assessment of the number of skylark territories due to be lost by the proposals and whether a skylark offsite mitigation strategy is required. The Applicant was also asked to prepare a Biodiversity Enhancement Strategy detailing how the recommendations and enhancements made as a result of the completed surveys are to be incorporated within the development, including their locations. Pre-construction surveys are also proposed as part of the CEMP, to be secured as a condition to be imposed on any planning permission.

9.51 In August 2021, the Applicant submitted the ornithological survey report, the bat survey report and a technical note covering the Extended Phase 1 Habitat survey of the cable corridor and Great Crested Newt eDNA survey of two ponds. A synopsis of the findings is summarised below:

- **Hedgerows, breeding birds and non-breeding birds (wintering)** - no counts of any bird species recorded across the survey area during the breeding or non-breeding (wintering) season approaches the 1% level of national population estimates as detailed in Woodward et al. (2020) or form a significant proportion (i.e. 1% or more) of the county population. Therefore, species' populations across the survey area are considered to be of no more than local importance.

The development entails minimal loss of existing hedgerows and proposes the planting of 13.5km of new hedgerows (some of which will reinstate those originally removed during the construction of the airfield).

- **Barn owl** – these are listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) and were recorded during the breeding season but were not breeding on site.
- **Skylark territories and offsite mitigation** - nineteen Skylark territories were recorded within the survey area, of which two were located outside of the site (overlapping with the survey area) and one territory was recorded within the cable corridor. Therefore, this species is occurring on site (within the proposed solar array areas) at a low density (approximately 1 territory per 5ha) and at a breeding population size of no more than local nature conservation importance. Whilst existing arable habitat within the Proposed Development will be lost, arable habitat between the solar arrays will be converted to grassland habitat, which will be beneficial to invertebrates and species, such as Skylark, that prey on them. Grassland habitat will also provide long-term opportunities for Skylark (and other ground-nesting species) to nest.

9.52 Without mitigation, the construction of the proposed development has the potential to affect the assemblages of birds recorded within the site boundary. These potential effects include habitat loss and fragmentation as well as displacement and/ or loss of breeding or wintering populations. The Proposed Development will therefore retain as much of the existing boundary habitat as is practicable, such as hedgerows and scrub, along with all mature broadleaved trees.

9.53 Grassland habitat will also provide long-term opportunities for Skylark (and other ground-nesting species) to nest. Furthermore, grassland margins (of 5m-15m width) will be retained to provide additional nesting habitat for ground-nesting species. The creation of

areas of set-aside or 'cover crops' would also benefit a range of arable farmland passerines present within the survey area, including Yellowhammer and Skylark.

- 9.54 New hedgerow planting, to provide additional habitat used by species of conservation concern such as Turtle Dove, Dunnock and Yellowhammer, will include a mix of native species including Hawthorn *Crataegus monogyna* and Blackthorn *Prunus spinosa*. These habitats will provide foraging, roosting and breeding habitat for birds in the summer months, along with foraging and roosting habitat for birds in the winter months.
- 9.55 Consideration will be given to providing artificial nest boxes on retained trees and within woodland for species of conservation concern such as Stock Dove and Barn Owl.
- 9.56 It is presumed that the construction of the proposed development will be undertaken in a phased approach over many weeks, vegetation or ground clearance works will therefore be timed outside of the bird breeding season (i.e. between September and February) to avoid any additional constraints associated with this activity.
- **Bat roosts and bat activity surveys** - the survey identified two trees and two woodland blocks within the survey area that have medium to high potential to support roosting bats. Some of these features, most notably the woodlands with high suitability, are likely to contain roosting bats (with likely roosting confirmed during the transect surveys in Paul's Grove), however none of the features identified will be directly or indirectly impacted by the proposed development due to retention of these features and buffers around them.
- 9.57 In spring there was high activity of Common Pipistrelle using the site, with moderate activity of Soprano Pipistrelle along a woodland edge, with low activity of Noctule and Myotis species and very low activity of Brown Long-eared bats. However, these species were predominantly recorded using boundary features of the site, which will be retained.
- 9.58 In summer there was moderate activity of Common Pipistrelle and Soprano Pipistrelle using the site and very low activity of Barbastelle, Noctule, Brown Long-eared bat and Myotis species (1 pass). As with spring surveys, these species were predominantly recorded using boundary features of the site, which will be retained.
- 9.59 Overall, the time of the first bats recorded after sunset indicate possible nearby roosts of Common and Soprano Pipistrelle, Brown long-eared and Barbastelle bats in the adjacent woodland. The woodlands and hedges are likely to be important in maintaining the local bat populations and the proposed development avoids these features, noting that newly created habitats (from intensive agriculture to grassland) may be beneficial.
- 9.60 Whilst two activity surveys (spring and summer) falls below the recommended three surveys (with a third survey in Autumn), this is unlikely to provide any additional relevant information for the assessment of potential impacts on bats using the site.
- **Great crested newts** - the results of the eDNA survey, undertaken in May 2021, identified that Great Crested Newt is absent from ponds 8 and T7. However, this species is present in a pond (pond 6) c.120m away. Furthermore, pond 3 was not surveyed due to access restrictions. Ponds 3 and 6 are separated from the Scheme by intensively managed arable farmland with limited connectivity that would allow for Great Crested Newt dispersal onto the Site. It is highly unlikely that Great Crested Newt occurs on site and impacts to Great Crested

Newt will be avoided, through avoidance of suitable terrestrial habitat (such as grassland) and no loss of aquatic habitat. As such a licence for this species is unlikely to be required and construction work would be undertaken under a precautionary working method statement.

- **Phase 1 habitat survey of the cable corridor** - a buffer of at least 15m will be provided between the woodland the cable corridor to retain grassland/woodland edge habitats, and suitably buffer the woodland from disturbance and impacts. Grassland verges should be avoided, particularly at T2 where the flora is less improved and has a diverse range of species.

- 9.61 A method for the river crossing needs to be provided to assess the impacts on riparian habitats and riparian mammals. It is understood that the cabling will either be through existing ducting within the bridge, or HDD methods underneath the watercourse. If direct and indirect impacts to this watercourse during construction of the cable route cannot be adequately avoided, then further surveys for Water Vole and Otter, along with the potential for Mink Neovison vison, will be required. If the bridge requires work during construction to facilitate construction of the cable route then an assessment of the bridge will be required for bats. All surveys will identify whether mitigation is required and the surveys will be secured via condition once the river crossing method has been confirmed at detailed design stage. Precautionary measures for all species will be adopted during construction of the cable corridor as recommended in the PEA report.
- 9.62 The ESC ecologist advised that he was satisfied with the conclusions set out above, and subject to securing the required mitigation measures, the proposed development appears unlikely to result in a significant adverse impact on designated sites, protected species or UK Priority habitats or species (under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)). He also provided details of recommended planning conditions requiring the development to be undertaken in accordance with the ecological avoidance, mitigation, compensation and enhancement measures identified within the Preliminary Ecological Appraisal (PEA) and subsequent studies to ensure that ecological receptors are adequately protected and enhanced as part of the development. Vegetation removal or works to areas potentially used by breeding birds shall only take place between 1st March and 31st August inclusive. No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted and approved to ensure that ecological receptors are adequately protected as part of the development. A landscape and ecological management plan (LEMP) shall also be submitted and approved prior to the commencement of the development to ensure that the long-term ecological value of the site is maintained and enhanced. Finally, prior to the any construction activity (including vegetation clearance or site preparation) within 50m of the River Ore, an Ecological Mitigation Method Statement will be submitted and approved to ensure that ecological receptors are adequately protected.
- 9.63 Following the Applicant's submission of species survey data and planning conditions being agreed to maintain a precautionary approach throughout all phases of the development, the Suffolk Wildlife Trust and ESC ecologist have withdrawn their holding objections subject to the agreed ecological conditions. The proposals are therefore considered compliant with the requirements set out in Local Plan Policy SCLP10.1 'Biodiversity and Geodiversity' as they seek to maintain and enhance flora and fauna species at all opportunities, making a positive contribution towards the baseline biodiversity through

the creation of new habitats such as grassland and wildflower areas between and surrounding the solar panel arrays. This will benefit local insect and bird species, having a knock-on effect on the wider food chain, noting that the baseline environment across the site focusses on intensive arable farming which is not synonymous with a high level of biodiversity.

Landscape Visual Impact and Biodiversity Net Gain

- 9.64 The East Suffolk Council Arboriculture and Landscape Manager advised that whilst there will be localised adverse landscape and visual effects arising from the development, the effects are not sufficient to warrant reasons for refusal. The site itself falls within the Glemham Estate Claylands landscape character area as defined by the Suffolk Coastal Landscape Character Assessment. A site-specific landscape character assessment was submitted by the Applicant and the findings of this study have been confirmed by a separate site survey undertaken by the Officer on 30th April 2021.
- 9.65 The development entails minimal loss of existing hedgerows and proposes the planting of 13.5km of new hedgerows (some of which will reinstate those originally removed during the construction of the airfield), however the new planting will not be effective in screening of the development and would not contribute to landscape character enhancement until it becomes well established (at least 5-7 years after planting). On that basis, the fundamental change in landscape character would be experienced across the site for at least the early years post installation. However, the visual impact of the development remains very localised around the site perimeter out to around 500-600m.
- 9.66 The Officer's site visit confirmed that there would be no discernible change in visual amenity for the remaining viewpoints because of the distance from the viewer to the development as well as intervening vegetation and topography.
- 9.67 The year 10 assessment indicates that these visual impacts will have been largely nullified assuming that the indicated boundary hedge planting has been effective and is well established and maturing. Solar array developments of this type are considered to be temporary and reversible but over a medium to long term time period.
- 9.68 Effects on local landscape character and visual amenity will be notable in the immediate locality of the site, and certainly so whilst new planting matures, but such adverse effects are not of significance in EIA terms and can be suitably mitigated by appropriate planting. Such planting will be retained after the development has been de-commissioned and will continue to make a positive contribution to landscape character in the long term. This will contribute to restoring the adverse effects on landscape features left over from the original airfield construction some years ago. Over the longer term this would result in a net benefit in landscape terms.
- 9.69 The Applicant states in Section 6.32 of the Planning, Design and Access Statement that corridors of approximately 10m width will be provided to include hedgerow planting to screen the site where appropriate, plus sowing wildflower margins beyond the route of Public Rights or Way up to any hedgerows.
- 9.70 The Applicant summarises the proposed landscaping and biodiversity benefits of the proposal in Sections 6.34 to 6.39 of the Planning, Design and Access Statement. This commits to the retention of existing trees and hedgerows with existing gaps in boundary

planting being strengthened where necessary as well as the provision of new areas of hedgerow. This would enhance the existing hedgerow habitat areas, which together with areas of wildflower planting, would contribute towards a biodiversity net gain at the site. Section 4 'Responses to Feedback' within the Applicant's submitted Statement of Community Involvement echoes this sentiment, noting that solar farms can provide vital space for improving biodiversity. The Applicant advises that barn owl boxes, bird nesting boxes, beehives, log piles, restoration of traditional field boundaries and other hibernacula areas for reptiles, amphibians and insects will be provided across the site.

- 9.71 The NPPF and Local Plan Policy SCLP10.1 state 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. 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.
- 9.72 A planning condition has been recommended to provide full details of proposed planting specifications, landscaping and biodiversity net gain areas through a full Landscape and Biodiversity Management Plan as well as a Construction Environmental Management Plan. This will ensure that the proposed vegetation contributes to the agricultural character of the wider area and successfully screens any solar farm infrastructure in views.
- 9.73 The Suffolk Coasts and Heaths AONB Planning Manager was consulted and has advised that the proposed development site will be located approximately 7km from the boundary of the Nationally Designated Landscape and as such the AONB team does not wish to comment on the proposal. No concerns were therefore presented in relation to the AONB.
- 9.74 To summarise, Policy SCLP9.1 Low Carbon and Renewable Energy states that the Council will support renewable energy schemes when they are complementary to the existing environment without causing significant adverse landscape and visual impacts unless it can be appropriately mitigated. It is clear that the Applicant has incorporated several measures into the design of this proposal to meet this requirement. The proposal will be contained within existing established field boundaries and requires no or very minimal vegetation removal. Visual impacts will be localised, and mitigation measures would provide additional screening of the development and any visual impacts from construction would be short lived at only 16 weeks. It is therefore concluded that the proposal is in accordance with development plan policy requirements, having no significant effects on landscape character or visual amenity.

Heritage and Conservation

- 9.75 Historic England does not object to this application on heritage grounds. Whilst they acknowledge that the change in land use in the proposed area would have a detrimental impact upon the rural landscape character surrounding the Grade 1 listed Church of St Mary at Parham, as well as temporary effects on tranquillity during construction, they confirm that any negative effects observed fall short of 'harm' as defined in paragraph 202 of the NPPF. (Note that the revised NPPF 2021 now covers this requirement in paragraph 208).
- 9.76 The main impact upon the significance of the Church of St Mary, Parham comes from the provision of the cable route past the entrance of the Grade I listed Church as well as

temporary harm to the significance of the Grade II* listed Church Farm House. As discussed in the Highways and Viability sections of this report, highway matters do not fall within the remit of East Suffolk Council and will be approved separately by Suffolk County Council. However, assurances are sought by East Suffolk Council that the works to lay the cable through Parham Village would be done in the least impactful way and vibrations caused through mechanical tools will not cause damage to the historic buildings. The Applicant has acknowledged these requests.

- 9.77 The East Suffolk Council Design and Conservation Officer has confirmed that there are no designated heritage assets within the application site, however there are several assets nearby whose setting could be affected by the proposed development. It has however been concluded that any potential impacts will only result in very low levels of 'less than substantial harm' in terms of the NPPF.
- 9.78 The Officer agrees with the assessment of impact on Church Farmhouse, The Willows, Common Farmhouse, and Great Glemham Hall Park, however, considers that the impact on Paul's Grove Farmhouse would be low, rather than very low as assessed in the ES. However, despite this, the potential impacts would still lead to a minor adverse effect in the terms of the ES and would be considered less than substantial harm, at the lower end of the scale, in terms of the NPPF.
- 9.79 The Officer also advised that the magnitude of impact on Non-Designated Heritage Assets (Potash Farm, Chantry Cottage and Common Farm Cottages) would be medium, leading to a minor adverse effect in the terms of the ES. In the terms of the NPPF, this would be considered at the lower end of 'less than substantial'. The magnitude of impact on the Watch Office and T2 airfield hangar would be low, leading to a minor adverse effect in the terms of the ES. In the terms of the NPPF, this would be considered at the lower end of 'less than substantial'.
- 9.80 It is also noted that new vegetation is proposed along the eastern boundary of the site, as illustrated on drawing LCS040 PLE-01 Rev 10. The landscaping and planting specification will be detailed and secured via condition, ensuring that solar farm infrastructure is sufficiently screened in views from Paul's Grove Farmhouse.
- 9.81 The Suffolk Preservation Society expressed concerns over the potential impacts on Paul's Grove Farmhouse in reference to Paragraph 199 (formerly 193) of the NPPF which states 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.' This has been given due weight in the overall balance, noting that Paul's Grove Farmhouse is Grade II listed (i.e. it is not Grade II* or Grade I listed). Historic England's online guidance for listings states that Grade II listed buildings make up 91.7% of all listed buildings in England (with an estimated total of 500,000 assets on the register). The magnitude of potential impact on this heritage asset has been assessed as low and any residual views will be mitigated through appropriate landscape planting as set out above.
- 9.82 Marlesford Parish Council expressed concern stating that the proposed development represents inappropriate development within a conservation area. However, the Great Glemham Conservation Area is located approximately 700m to the north-east of the

proposed site's boundary and will not be visible due to landscape screening (natural topography) and by a number of woodland copses and hedges located between the northern section of the former airfield's perimeter road and Church Road. The Applicant's Environmental Statement Volume II (Technical Appendices) Appendix 7A: Cultural Heritage Desk Based Assessment states that the site is sufficiently distant from the conservation area and that development on it will not affect the conservation area's setting on the approach along Church Road from the west. East Suffolk Council agree with this assessment as there will be no impact on the conservation area or any designated buildings (including the Grade I listed Church of All Saints) or non-designated buildings within it because of the scheme.

- 9.83 In summary, there are no significant effects identified in relation to the setting of designated and non-designated heritage assets (including no significant residual effects). The proposed development would only introduce a very low level of less than substantial harm to nearby designated and non-designated heritage assets, in the terms of the NPPF. This has been weighed up in the planning balance against public benefits, as per the requirements of Paragraph 202 (formerly 196) of the NPPF. The proposed development therefore seeks to preserve the existing historic environment and is in accordance with both national policy and Local Plan Policies SCLP11.3, SCLP11.4.

Archaeology

- 9.84 The Suffolk County Council Archaeological Unit initially raised concerns for this application stating that it proposes a large site situated within an area of archaeological potential. They highlighted that this site has never been the subject of systematic archaeological investigation and there is a high potential for previously unidentified archaeological remains to be present. They advised that the proposed development would cause ground disturbance that has the potential to damage or destroy any below ground heritage assets that exist, and the Applicant is therefore requested to provide an archaeological evaluation of the site prior to the determination period expiring in order that the findings can be used to make a decision on the timing and extent of the required trial trenched evaluation at this site. A detailed strategy for the further investigation and appropriate mitigation was also required to be provided by Applicant.
- 9.85 The Applicant subsequently submitted a geophysical survey for the site, however the Archaeological Unit advised that the survey provided had not worked in fields 1 and 5, noting that the site is split in to 6 separate development zones (as illustrated on submitted drawing LCS040-DZ-01 Rev 13). The Archaeological Unit highlighted that the survey may therefore have failed to detect further anomalies of archaeological interest in these fields, where Roman and medieval find scatters have been previously recorded. The original concerns raised therefore remained relevant, noting that trial trenched evaluation is necessary in fields 1 and 5 in order to ground truth the geophysics results. The Archaeological Unit did however confirm that they have no objection to further evaluation being undertaken for the remainder of the site (and any subsequent mitigation) being undertaken via planning conditions should consent be granted.
- 9.86 The Applicant's archaeology consultants accepted that the surveys undertaken in fields 1 and 5 had not been as successful as they had hoped and that the area is more disturbed than originally thought, however they reaffirmed their position that the evidence currently suggests a lack of archaeological activity regardless of the spot finds.

- 9.87 With regard to the requirement for trial trench evaluation, the Applicant is fully committed to undertaking this work, however requested that this is wholly undertaken prior to the commencement of development as opposed to pre-determination. The reason for this is that the Proposed Development is based on the principles of the Rochdale Envelope and has sufficient flexibility to exclude development if anything of significance is found during trenching.
- 9.88 The Archaeological Unit advised that historical mapping shows former field boundaries in fields 1 and 5, some of which survive as substantial earth works. However, they note the preservation in situ possibilities and flexibility retained in the design and confirmed that they would not object to trial trenched evaluation of the whole site being undertaken post consent at the earliest opportunity as long a flexible options for mitigation remain (with any mitigation requirements being established at an early stage).
- 9.89 The Applicant's submitted Indicative Site Layout Plan (ref. LCS040-PLE-01 Rev 10) provides an indication as to how the site could be laid out; however, they have confirmed that the detailed design and fixing of the site layout could vary within the parameters of the Development Zones as outlined and within the confines of the parameters i.e. cabling techniques which avoid the need for invasive works. There is also potential to embrace new and emerging technologies in the UK, notably string inverters, which would be affixed to the back of the panels thereby removing the need for foundations (whereas the current approach uses inverters within shipping containers or similar structures with foundations). Furthermore, whole areas can be removed from the scheme and left as exclusion areas if required following site investigation works being completed.
- 9.90 The Applicant advised that subsequent approval as part of a planning condition would provide a Detailed Site Plan, including Archaeological Exclusion Zones. It was also confirmed that should anything of significant archaeological value be discovered following trial trench evaluation at the site, then a number of options can be implemented and secured by pre-commencement conditions for approval by East Suffolk Council and Suffolk County Council to ensure any features would be preserved in situ and not harmed by the proposed development. Site options include archaeological exclusion zones which would be established specifically excluding any below or above ground development from taking place within these areas and/or design mitigation in the form of above ground cables to limit ground disturbance.
- 9.91 The Archaeological Unit advised that in accordance with the National Planning Policy Framework Paragraph 205 (formerly 199), any permission granted should be the subject of planning conditions to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed. All parties have now agreed to elements of further site investigation and reporting to be covered by suitable pre-commencement planning conditions, these will cover approval of an Archaeological Written Scheme of Investigation (WSI), Archaeological Evaluation in accordance with the WSI following its approval, and the provision of a detailed site plan including archaeological exclusion zones. A management plan will also be produced for any archaeological areas to be preserved in situ, setting out the methodology to secure the ongoing protection of these areas both during construction, operation and decommissioning of the solar farm, however this will only be required if there are archaeological areas to be preserved in situ.
- 9.92 The Applicant has confirmed that any significant archaeology found at the site will be completely protected and secured by robust and enforceable planning conditions.

Following post-determination trial trenching, in the unlikely event that widespread archaeology of national significance is discovered in the majority of the site to the extent that the proposed solar farm simply cannot be delivered in any form because of archaeological exclusion, then Low Carbon would be left with an unimplementable planning permission and the site would not be developed for a solar farm. This is a risk the Applicant is willing to take but only at the post-determination stage.

- 9.93 In summary, the proposal meets the requirements set out in both national and local planning policy, including Local Plan Policy SCLP11.7.

Drainage and Flooding

- 9.94 The detailed design and layout of the proposed solar farm is not fixed at this stage, and in order to ensure a robust assessment of the impacts of the proposals within the planning application, the drainage strategy / FRA were undertaken using the Rochdale Envelope approach which involves using maximum parameters for elements where flexibility is required.
- 9.95 As such, the calculated total impermeable areas (e.g. equipment platforms) represent a worst case scenario and may reduce further (e.g. through the use of string invertors). It is also noted that these impermeable areas are relatively small in the context of the overall site and a technical solution. The final layout will be subject to agreement with the Council through a planning condition as will the detailed drainage design.
- 9.96 Suffolk County Council are the lead local flood authority covering the proposed development site and they initially submitted a holding objection due to further information being required regarding surface water management at the site as detailed earlier in Statutory Consultation (SCC LLFA) section of this report.
- 9.97 The SCC LLFA highlighted the following justification for their initial holding objection:
- no infiltration testing has been undertaken in full accordance with BRE 356 methodology;
 - boreholes need to be taken across each of the development zones to determine shallow infiltration, deep infiltration and groundwater levels;
 - it is suggested that there are no existing watercourses within the proximity of the site however evidence from Environmental Agency LIDAR would suggest that there are watercourses within sections of the red line boundary;
 - the proposed strategy relies on the sites topography to convey runoff over-land into strategically positioned attenuation swales, however this presents concerns of silt/debris congregation within the swales;
 - a climate change allowance of 20% has been used for design, however 40% should be applied.
- 9.98 The Applicant requested that all of the surface water drainage requirements highlighted by SCC are covered by pre-commencement conditions. SCC subsequently confirmed that they do not consider the area associated with the solar panels themselves to contribute to the net impermeable area as the ground below will remain unchanged and will therefore accommodate the surface water runoff, replicating the greenfield scenario. However, there will be some impermeable area through development with associated equipment and infrastructure, particularly the access road.

- 9.99 SCC have agreed that details of surface water management can be conditioned to be submitted at a later date, however they would require some evidence to provide confidence that there is sufficient room to provide SuDS. Their initial response outlined the requirement for infiltration testing and an assessment of the nearby watercourses, noting that one of these options will work for site drainage. Evidence was therefore required to demonstrate a viable strategy and sufficient space for surface water management, with infiltration testing and further assessment of nearby existing watercourses being undertaken later. SCC requested that infiltration evidence should provide details of the attenuation basin to accommodate the requirements of proposed impermeable areas, using a conservative 10mm/hr infiltration rate. Evidence to support discharge to a watercourse should calculate QBAR discharge rate in line with the proposed impermeable areas.
- 9.100 The Applicant advised that the proposed drainage strategy incorporates a number of swales, with the site being broken down into parcels to reflect topography and swales serving each individual parcel. They confirmed that it is not possible to provide a single basin to cover the whole site given the site's topography. Additionally, the infiltration rate used within the submitted Flood Risk Assessment (on page 22) is 0.0036m/hour, which converts to 3.6mm/hr. This is a more conservative infiltration rate than the value proposed by SCC meaning the water is held on the site for longer than requested by the LLFA. However, the Applicant did not accept that any watercourses exist within the site or adjacent to the site.
- 9.101 The Applicant submitted a drainage strategy technical note on 24th June 2021 to address the SCC LLFA concerns, this detailed the proposed drainage strategy across the development site and originally proposed dealing with surface water by infiltration and swales using an infiltration rate of 3.6mm/hr based on the current information available on the ground conditions. However, this led to lengthy dialogue with the SCC LLFA resulting in a revised technical note being issued. This was required as the LLFA were uncomfortable with such a slow infiltration rate, mainly because it could increase flood risk in a follow-up rainfall event. The LLFA requested that the technical note's calculations incorporated a rate of 10mm/hr to meet their standards.
- 9.102 The revised technical note was submitted on 4th August 2021, and this demonstrated that the proposed swales are adequately sized at that rate, however neither the Applicant's drainage team, nor the LLFA considered this to be realistic as it is anticipated that the ground conditions would not allow for such an infiltration rate (noting that Boulder Clay is present to a significant depth across the whole site). Therefore, the LLFA required an alternative strategy to be agreed to dispose of surface water.
- 9.103 The Applicant then engaged in further discussions with the landowner which resulted in the details being obtained for an existing operational piped drainage network running through the site (Reference: drawing SKM_C364e20092314230). The landowner is agreeable to Low Carbon connecting into this and this provides a feasible alternative option for managing surface water. However, the capacity and condition of this network would need to be subject to further survey (e.g. CCTV) and this could reasonably be undertaken post-determination to inform the detailed drainage design. The existing piped drainage network can be utilised as an alternative option to infiltration, making the surface water drainage strategy far more flexible and robust. The Applicant has agreed to repair / upgrade the piped network, as necessary, to ensure it can accommodate a drainage

solution which the LLFA is comfortable with and giving the control and assurance they require.

- 9.104 Four planning conditions have therefore been agreed with the SCC LLFA and the Applicant in relation to the implementation and management of surface water at the development site, no development shall commence until details of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the local planning authority, no development shall commence until details of the implementation, maintenance and management of the strategy for the disposal of surface water on the site have been submitted to and approved in writing, no development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing, and within 28 days of practical completion, a surface water drainage verification report shall be submitted to the Local Planning Authority.
- 9.105 Further drainage modelling / calculations associated with connecting to and utilising the piped network will therefore form part of these requirements at the post-determination stage once the final locations and areas of impermeable hardstanding are known, which are yet to be confirmed through the detailed design layout process as well an understanding being gained for the condition / capacity of the existing piped network following surveys, and what flows this network needs to accommodate.
- 9.106 It is agreed that to go into that level of detail pre-determination would be disproportionate given that the detailed layout is not fixed (being based on the Rochdale Envelope) and noting the very limited additional run-off which needs to be accommodated given that the vast majority of the site retains a greenfield runoff rate which has been acknowledged by the SCC LLFA.
- 9.107 The SCC LLFA advised that having reviewed the borehole records provided, they are content that no infiltration testing needs to be undertaken at all on this application as it is evident that Boulder Clay is present to a significant depth across the whole site. No such planning condition is therefore necessary.
- 9.108 On 12th August 2021, the SCC LLFA confirmed that their position is now a recommendation for approval, based on the Applicant's submitted and updated drainage strategy technical note, subject to the agreed conditions.
- 9.109 The East Suffolk Drainage Board provided comments noting that a drainage strategy is achievable at the proposed development site.
- 9.110 In summary, the proposal accords with the requirements set out within Suffolk Coastal Local Plan Policy SCLP9.5 on Flood Risk, i.e. developments should exhibit the three main principles of flood risk, in that, they should be safe, resilient and should not increase flood risk elsewhere. The assessments submitted, reviewed and discussed to date together with the agreed planning conditions, demonstrate that the site is safe from all types of flooding. The Applicant has worked very closely with the SCC LLFA in order to understand and overcome their initial concerns raised, resulting in their initial holding objection being lifted.

Highways

- 9.111 Suffolk County Council Highways Authority initially raised concerns about the construction of the proposal, specifically the provision of the cable route to the point of connection. The grounds for objection were due to SCC not being notified whether the Applicant is a statutory undertaker with a right to place utility infrastructure within the highway. The Highways Authority advised that if this is not the case, a New Roads and Street Works Act (NRSWA) Section 50 licence will be required to allow a non-statutory undertaker the right to place, retain and remove apparatus in a highway. It is noted that a planning permission does not give the Applicant such a right in reference to the installation of a cable in the highway.
- 9.112 The Applicant subsequently advised that UK Power Networks (UKPN) are the relevant Distribution Network Operator (DNO) and will own and maintain the cable between the DNO Substation and Parham Substation. UKPN are a statutory body and can exercise their rights to lay the cable within the highway if needed. However, at this stage, the decision on who will lay the cable has not yet been made, whether this will be UKPN or a suitably accredited contractor appointed by Low Carbon. Low Carbon understands both options for the cable connection, and if required will address this under the Section 50 licence.
- 9.113 Additional comments provided by the Highways Authority advised that they would not want the cable to be installed longitudinally in the highway, preferring its installation across fields as far as possible (a view shared by Parham Parish Council), noting that the Applicant needs to ensure that an agreed cable connection route is feasible prior to determination.
- 9.114 Several specific issues were also identified in relation to restricted working hours for highway works, narrow verges in parts of Parham potentially resulting in the cable running down the carriageway, the location of cable jointing boxes in the highway, how the cable would cross the River Ore, cable route proximity to listed buildings and existing stability problems on the B1116 between Parham and the Garden Centre.
- 9.115 It is important to stress however that not all matters raised by the Highways Authority fall within the remit of ESC. The Section 50 licence concern raised is not a planning matter for ESC and any works to the highway would be covered by a S278 Agreement under the Highways Act, being negotiated directly with SCC following the grant of planning permission. If the Applicant has permitted development rights this would also be a matter they need to address directly with SCC.
- 9.116 The Highways Authority subsequently accept that the potential feasibility and highway licensing issues raised in relation to the proposed cable route are not sufficient to uphold a planning objection and confirmed that they are not strictly planning matters for this determination. The Senior Development Management Engineer advised that these concerns have been recorded should any issues regarding the feasibility of the proposed cable route occur post-planning when the highway works are being arranged.
- 9.117 Despite this, the Applicant responded to the Highways Authority Network Assurance Team's comments, noting that restricted working hours requirements, known highway stability concerns and narrow verge widths will all be taken into account during the detailed design stage in cooperation with the Highways Authority. The Applicant also advised that prior to installation, Low Carbon will undertake detailed design works to provide a technical solution for the cable jointing positions. Any jointing positions will be

located underground with full reinstatement and there is no requirement for jointing boxes or pits for high voltage cabling.

- 9.118 In response to the River Ore crossing question, the Applicant confirmed that prior to installation, Low Carbon will undertake detailed design to provide a technical solution to the bridge crossing. Similarly, the proposed cable route's proximity to listed buildings will be considered during the construction phase of the development to ensure there are no unacceptable adverse impacts. It should also be noted that the East Suffolk Council Conservation officer did not raise any concerns in this regard at the time of consultation.
- 9.119 If the Applicant can't deliver the scheme for whatever reason relating to the proposed cable connection route after this application has been determined, then they will be required to come back to ESC with a different proposal for determination.
- 9.120 A range of conditions covering planning requirements have been proposed by the Highways Authority and agreed by the Applicant. Those of a more general nature relate to the discharge of surface water from the development onto the highway and details of the areas to be provided for the loading, unloading, manoeuvring and parking of vehicles to ensure the provision and long-term maintenance of adequate on-site space for the parking and manoeuvring of vehicles in accordance with Suffolk Guidance for Parking (2015) where on-street parking and manoeuvring would be detrimental to highway safety.
- 9.121 In summary, Local Plan Policy SCLP7.1 notes that development will be supported where any significant impacts on the highways network are mitigated. The highways arrangements discussed above for the proposal are therefore considered acceptable and in accordance with planning policy.

Site Access

- 9.122 The existing site access is split for the north-western and south-eastern land parcels. The submitted Transport Assessment states that the north-western land parcels are currently accessed via three routes:
- an existing access track located on the north-western side of New Road, located approximately 1km north of the T-junction with Button's Road;
 - an existing access track located on the north-western side of New Road, located approximately 1.6km north of the T-junction with Button's Road;
 - an existing priority T-junction located on the northern side of Hall Road, located approximately 1.3km west of the Hall Road/ New Road junction.
- 9.123 The south-eastern land parcel is currently accessed via an existing priority Y-junction, located on the south-eastern side of New Road, approximately 1km north of the T-junction with Button's Road. This is an existing access junction comprising hardstanding and is typically used by large agricultural farm vehicles.
- 9.124 New Road is a single-carriageway road measuring on average 5.5m in width, that provides a north/south route between Great Glemham in the north and Marlesford in the south. New Road is derestricted (60mph) in the vicinity of the site access junction and is not street lit. Button's Road forms the minor arm of a priority T-junction with New Road, to the south of the site. Button's Road is a single-carriageway road measuring on average 5.5m in width, that provides an east/ west route between the A12 in the east and New Road in the west. Button's Road is also derestricted (60mph) along its length and is not street lit.

- 9.125 The Applicant proposes two points of vehicular access to the site joining on to New Road. These will utilize existing junctions currently serving access tracks and all vehicular movements accessing and departing the site during the construction, operation and decommissioning phases of the proposed development will be via the two access points. The Applicant states in Section 5.12 of the Planning, Design and Access Statement that the historic airfield site enables the use of existing infrastructure such as concrete runways for access routes. A closer review of historic maps for RAF Framlingham confirms this.
- 9.126 Section 4.1.1 within the submitted Transport Statement advises that the proposed site access for the north-western land parcels (PSA1) will utilise the junction of New Road and an existing access track located on the north-western side of New Road, approximately 1.6km north of the New Road / Buttons Lane junction and 1.2km south of Great Glemham. Modifications to the junction, to provide a 6m kerb radii on the southern kerb-line will be required to facilitate all anticipated vehicle movements.
- 9.127 Similarly, Section 4.1.7 advises that the proposed site access for the south-eastern land parcel (PSA2) will be located on the south-eastern side of New Road. PSA2 will be located along the north-western boundary of the south-eastern land parcel, approximately 1km north of the New Road / Buttons Lane junction and 1.8km south of Great Glemham, at the existing field access. Modifications to the junction, to provide a priority T-junction, rather than the current informal Y-junction, will be required to facilitate all anticipated vehicles.
- 9.128 The submitted Transport Assessment undertakes a visibility splay assessment for the two proposed access locations on New Road. This states for the north-western Access (PSA1) that in order to achieve the northern visibility splay of 2.4m x 160m, significant mature vegetation clearance to the north of the site access junction would need to be undertaken. As a result, it is proposed that temporary traffic signals are provided at the PSA1 site access for the entirety of the 16-week construction phase, in association with the access being continually marshalled during working (construction) hours. Concerns over the removal of this vegetation have been discussed in the Trees and Hedges section of this report and have subsequently been echoed by the Applicant in correspondence with the Highways Authority. The Applicant subsequently requested that the required removal of this vegetation (both north and south of the junction) is omitted from the proposed site access planning condition due to the use of traffic signals at the PSA1 site access/ New Road junction for the entirety of the 16-week construction phase, in association with the access being continually marshalled during working (construction) hours. The Highways Authority agreed to this request and a revised condition wording has been set out and agreed which includes details of the temporary traffic signal layout to be submitted and approved prior to construction operations commencing.
- 9.129 The need to omit this requirement from the site access planning condition was justified by the Applicant, stating that the vegetation required to be removed is on land outside of the submitted red line boundary, acknowledging that the removal of the vegetation would have a significant impact on trees, ecology and the character of the road. The Applicant has stated that the removal of 160m of mature vegetation would have been disproportionate to the volumes of vehicular movements at this access location (vehicle movements are discussed in more detail in the following section of this report). The Applicant believes that temporary traffic signal measures are suitable to address the construction traffic impacts rather than to remove the vegetation. With regard to operation, the Applicant highlights that the proposed vehicle movements using this access location will be lower than the existing farm machinery currently using the access point to enter and exit the parcels of

land. In addition, the operational vehicles will be cars, small vans or small-scale mowing equipment, much smaller in scale than the current farm machinery using the existing junction.

- 9.130 The south-eastern access (PSA2) also requires visibility splays of 2.4m x 160m to the north and south based on the observed speed data, however, to facilitate the safe movements of vehicles at PSA2, vegetation clearance to the north of the site access junction will also be required. This concern was also discussed earlier in the Trees and Hedges section of this report. Details of this will need to be approved as part of the access condition at the appropriate time post determination.
- 9.131 The proposed point of connection located to the south-west of Parham will utilise the existing substation access junction on the western side of Main Road. No amendments to this junction are required to facilitate vehicle movement in association with the development proposals.
- 9.132 The Highways Authority have proposed planning conditions in relation to access proposals, these require no part of the development to be commenced until details of the improved accesses have been submitted to and approved in writing by the Local Planning Authority. In addition, before the improved accesses are first used, visibility splays shall be provided as required, noting the omission of this requirement at PSA1 due to the use of temporary traffic signals as mentioned above.
- 9.133 In summary, Local Plan Policy SCLP7.1 states that development will be supported where any significant impacts on the highways network are mitigated, it is proportionate in scale to the existing transport network and the cumulative impact of new development will not create severe impacts on the existing transport network. With appropriate planning conditions being agreed to secure site access arrangements, the site access proposal is considered to meet policy requirements.

Traffic Generation

- 9.134 The submitted Transport Assessment states that during the construction phase, associated vehicle movements will be expected to occur throughout a 16-week construction period. The components which are required to construct the solar farm will arrive in containers of up to 12m in length. Approximately 600 deliveries by HGVs associated with the delivery of the solar panel components will be required, with a further 50 deliveries anticipated in association with the other materials and access tracks that are required to build the solar farm.
- 9.135 Construction traffic will operate 08:00-18:00 weekdays, and 08:00-13:00 Saturdays over the 16-week period, equating to approximately 8 HGV deliveries (16 two-way vehicle movements) per day. There will also be a maximum of 20 staff vehicles arriving at site each day (40 two-way vehicle movements). This equates to a forecast total 28 arrivals and 28 departures to/from the site each day (56 two-way vehicle movements). Assuming a 50/50 split between both site access junctions, this would equate to a maximum of 14 arrivals and 14 departures at each site access every working day, which would be spread across 10 hours, thus averaging 1.4 vehicle movements per hour at each access.

- 9.136 The Transport Statement finds in Section 5.1.7 that this forecast quantum of vehicular trips will have a nominal impact on traffic levels on the strategic and local road networks in the vicinity of the site.
- 9.137 During the operational phase of the proposed development (which is anticipated to last for 40 years), vehicle movements are anticipated to be low, with a maximum of four vehicle trips (8 two-way vehicle trips) per week. This will average less than one site attendance per day at each of the proposed site accesses. This will be significantly lower than the current use of the access by vehicles associated with the agricultural land use.
- 9.138 Vehicle movements to the site will be associated with maintenance activities only and will involve a technician/ supervisor attending the development. Therefore, it is anticipated that during the operational phase of the development only cars, small vans or small-scale mowing equipment will be required to access the site.
- 9.139 After the 40-year life of the development, the Transport Statement anticipates that decommissioning activities will involve a similar profile of vehicles as the construction phase, with processes predominantly in reverse of those initially undertaken during the construction phase.
- 9.140 The Transport Statement states that it is anticipated that the vehicle routing for the construction, operational and decommissioning phases will be the same, with all vehicles being advised to take the most direct route to the site using 'higher' order roads, such as A and B classified roads. From the northeast, routing to site will be via the A12, with a right turn onto Button's Road (westbound) followed by a right turn onto New Road (northbound) whereby direct access to both site accesses is provided. From the south, the site will be accessed via the A12, with a left turn onto Button's Road (westbound), following the same route. The Highways Authority have also advised that the route from the A12 is the current signposted HGV route to the airfield.
- 9.141 Section 4 of submitted Statement of Community Involvement (SCI) advises that the preferred construction traffic route would be agreed as a planning condition, being presented in the Construction Traffic Management Plan (CTMP). This will be shared with the local community and the agreed route will be subject to approval by the Highways Authority.
- 9.142 During construction, all site access junctions will be marshalled by suitably qualified banksmen appointed by the contractor, such that all vehicle arrivals and departures are safely controlled. Furthermore, temporary traffic management (TTM) providing warning of the site access junctions will be provided on approach to the proposed site access junctions where determined necessary by the appointed contractor. Finally, a collision review of the highway network was undertaken and there was no evidence to suggest any existing road safety concerns that could be exacerbated by the proposed development.
- 9.143 The Highways Authority conclude that access proposals to the site during the construction phase can be managed via suitable delivery and construction management plans and temporary traffic management secured by planning condition. Permanent improvements to site accesses can also be secured by planning conditions. The Applicant accepted this recommendation. All HGV traffic movements to and from the site over the duration of the construction period shall be subject to a Deliveries Management Plan which shall be submitted to the planning authority for approval a minimum of 28 days before any

deliveries of materials commence. No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan. The site operator shall maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

- 9.144 It is acknowledged that concerns have been raised by third party representatives (Marlesford Parish Council) in relation to construction traffic. However, it is concluded that the proposed development will generate a relatively low daily level of vehicular activity during both the construction and operational phases. It is also noted that the construction phase is expected to only last for 4 months in total (16 weeks) which does not represent a long-term impact.
- 9.145 Given the low number of forecast daily vehicle trips during both the construction and operational phases of the proposed development, it is concluded that the solar farm will not have a material impact on the surrounding highway network and accords with Local Plan Policy SCLP7.1 that notes that development will be supported where any significant impacts on the highways network are mitigated.

Public Rights of Way (PRoW)

- 9.146 The Applicant proposes to provide corridors of approximately 10m width with hedgerow planting to screen the site where appropriate, plus sowing wildflower margins beyond the route of the footpath up to any hedgerows.
- 9.147 The submitted Transport Statement states that the existing PRoWs that run along the boundary and / or through the site will not be diverted as part of the development, instead, they will be managed with exclusion zones and crossings, where necessary. These measures will remain in place throughout the construction and operational phases of the development. As a result, it is anticipated that there will be no adverse / severance impacts upon the PRoWs within the vicinity of the site and they shall remain accessible at all times.
- 9.148 The Suffolk County Council PRoW Team do not object to this proposal and set out standard best practice guidance which the Applicant should take into account, particularly in relation to planting near to a PRoW and ensuring that the PRoW remain unobstructed at all times and safe for the public to use, including throughout any construction period. The Applicant has accepted all of the PRoW requirements, stating that all of the comments have been noted and will be addressed as necessary to facilitate the proposed development.

Noise

- 9.149 The Applicant states in Section 6.24 of the Planning, Design and Access Statement that the noise generated from the development is expected to be minimal, noting that the inverters have a sound level of 75 dB (a) at a distance of 1m (with inverters only being operational during daylight hours) and that inverter noise levels will not result in any adverse effects such as sleep disturbance. The Applicant concludes that due to the location of the inverters at the centre of the development zones, and the existing background noise of the adjacent solar farm, that there would be no adverse noise impact on any neighbouring receptors.
- 9.150 Based on the submitted desk-based noise assessment, the Applicant adds that all sensitive receptors are predicted to experience noise levels below or equal to the Lowest Observed

Adverse Effect Level (LOAEL) being the level above which adverse effects on health and quality of life can be detected. The Applicant notes in Section 6.25 that inverter noise levels will not result in any adverse effects such as sleep disturbance when operational during early morning and late evening periods during the summer months. Consequently, the Applicant concludes that noise effects are not considered to be significant, and no mitigation measures are required.

- 9.151 East Suffolk Council's Environmental Protection Officer initially recommended refusal of this application, advising that the noise information and assessment submitted by the Applicant is far from adequate for a development of this scale and they are therefore not satisfied with several fundamental elements of the assessment that has been presented, in particular the absence of any background sound surveys (at noise sensitive receptor locations), and then the assessment criteria used to determine impacts.
- 9.152 The Officer added that the Applicant scoped out noise impacts from the submitted Environmental Statement, and pre-application guidance does not appear to have been followed but rather a desk-top study only has been submitted with alternative noise assessment criteria established.
- 9.153 There is an existing (smaller) solar farm in the study area, and it is understood that the electrical inverters for that project were conditioned by planning consent after being fully assessed in accordance with the BS 4142 methodology at the time and adhering to local noise criteria. This assessment included survey work carried out at sensitive time periods. However, the Applicant has not measured / nor characterised the sound climate at receptor locations.
- 9.154 The Officer was not satisfied with the derivation of the LOAEL in this document or the Applicant's target noise level. The applicant did not generate any predicted rating noise levels prior to submission and has not considered whether any acoustic character corrections should apply at receptor locations. Concerns were raised that the proposal could introduce continuous man-made noise (including tonal noise) to receptor locations that would considerably exceed the existing background sound levels. This is of particular concern in the early hours between 05:00 to 07:00 hours in the summer months with the early sunrise, and with residents likely having their windows open.
- 9.155 It was therefore very clear that the Applicant's submitted acoustic report cannot be accepted as an approved document, highlighting that further work was required to fully assess noise impacts in accordance with the BS 4142:2014+A1:2019 methodology. This full assessment should be used to inform any noise mitigation that may be needed, be that relocation of inverters, or noise source mitigation.
- 9.156 The Applicant subsequently advised that they would accept a condition requiring the submission of a Noise Impact Assessment that demonstrates that the operational rating noise levels (including character corrections as per BS4142 guidance) from the proposed solar farm plant installations would not exceed typical background sound levels for the relevant times of operation at nearby residential properties. This would be completed once all plant and equipment has been chosen.
- 9.157 The Environmental Protection Officer agreed that noise could be dealt with by means of pre-commencement conditions to cover the operational and construction phases. The operational noise condition will require submission for approval of a much more detailed

noise assessment. However, the Officer felt that the scheme can most likely be suitably designed and mitigated as necessary to ensure that the numerous inverters and substation compound would not cause adverse noise impacts or detriment to residential amenity.

- 9.158 The proposed pre-commencement planning condition covering noise assessment will be split in to two parts covering operational noise and construction noise. The Applicant accepted the proposed condition wording, however asked why the proposed operational condition includes reference to cumulative impacts from the existing solar farm plant, noting that the solar farm is already in operation and any noise from the solar farm plant will be included within the baseline background levels that will be carried out as part of the noise assessment survey. This query was put to the Environmental Protection Officer who advised that as the applicant accepts the remainder of the condition and specifically the target rating level of 5 dB below the typical background sound level, then the reference to cumulative impacts can be removed. It was also suggested that a Construction Management Plan will be required as a condition of any planning consent granted in order to mitigate noise and dust impacts in particular to receptor locations during the construction phase.
- 9.159 Finally, the Officer advised that site layouts/plans should not be approved at this stage as part of the design as noise mitigation strategy for the proposed development could mean specific locations for the inverters and substation(s) may change to maximise distance from noise sensitive receptor locations, this could therefore impact upon the layout of the panel arrays themselves. However, it is noted from the Applicant's submission materials that the plans submitted are indicative of how the site could be set out, being based on the Rochdale Envelope approach, but noting that flexibility has been included within development zones for this precise reason.
- 9.160 In summary, whilst concerns have been raised due to the absence of background noise survey data being submitted, it has been agreed that these requirements will be secured by pre-commencement planning conditions. The potential for noise impact on local receptors (including cumulative impacts from the adjacent solar farm which forms part of the existing background noise environment) will therefore be fully assessed once the site layout has been fixed, requiring approval pre-commencement. On this basis it is considered that the proposal meets the requirements set out in Local Plan Policy SCLP10.3.

Residential Amenity

- 9.161 The proposal is not expected to have any overshadowing or loss of privacy impacts due to its low built form on the landscape and the passive nature of development.
- 9.162 The proposed solar farm and associated infrastructure has the potential to generate background noise at local receptors, and as discussed in the Noise section of this report, the desk-based noise impact assessment submitted with this application is not acceptable in its current form. However, the Applicant has agreed to pre-commencement planning conditions which require stringent assessment of potential impacts to be submitted and approved by East Suffolk Council prior to commencement of the development. This will determine if any impacts are possible at local receptors, and if so, will ensure appropriate mitigation is put in place to overcome these impacts. The site design has maintained a flexible approach using the Rochdale Envelope, meaning that whilst a site plan has been submitted with this application setting out the proposed site layout, in reality this is based on development zones allowing items such as noise emitting invertors to be moved in

order to minimise any foreseeable impacts. This is considered to be an acceptable approach.

- 9.163 Consideration has been given to construction traffic operations as discussed earlier in the Traffic Generation section of this report. It has been concluded that the daily levels of construction and operation traffic will not significantly disrupt the local highway network, with any associated noise, dust or vibrations being of low impact on local receptors.
- 9.164 No concerns relating to air quality and other forms of pollution have been raised for this application. Potential construction dust and air quality measures will be implemented and managed through the Construction and Environmental Management Plan which will be secured via planning condition.
- 9.165 The proposed development includes 24-hour surveillance at strategic locations around its perimeter fence, this is considered sufficient in terms of site safety and security. There are no residential properties directly adjacent to the site boundary, with only one property close to the eastern boundary being separated from the site by New Road. This property is set back from the roadside and benefits from mixed hedgerow shielding. No privacy concerns have been raised in relation to CCTV coverage.
- 9.166 The Landscape section of this report discusses the likelihood of visual impacts at local receptors. It has been acknowledged that in the early years of the development, new planting intended to shield the development from view will not have reached its full effectiveness. The vast majority of existing trees and hedgerows on or around the site would be retained and additional planting would be provided where necessary to fill gaps in the existing boundary planting, and to retain field enclosures. The Applicant advises that structures on site would be appropriately coloured or clad to minimise any visual impact and comply as far as practicable with the local vernacular. The ESC Landscape Officer advised that any site visibility at nearby receptors will be localised and is not considered a significant detrimental visual impact in landscape terms. In respect of visual impacts, even at Year 1 post completion and with any mitigation planting being too small to have any benefit, the visual impact of the development remains very localised around the site perimeter out to around 500-600m. View Points 4, 5, 9 and to a lesser extent 7 and 8 may have some visibility, but there would be no discernible change in visual amenity for the remaining viewpoints because of the distance from the viewer to the development, intervening vegetation and to some degree, topography. The year 10 assessment indicates that these visual impacts will have been largely nullified. The design of the proposed development has embedded a number of mitigation measures to reduce visual effects including substantial planting and no significant effects are predicted on landscape character or visual amenity.
- 9.167 The applicant states in Section 6.27 of the Planning, Design and Access Statement that the solar panels are static and designed to absorb sunlight therefore there would be no significant issues associated with solar glint and glare. Whilst this assumption cannot be made conclusively without supporting evidence by the Applicant, the topography of the proposed site is relatively flat and open in nature, with detrimental impacts being considered unlikely, noting that most solar panel reflections are skywards throughout the majority of the day. This resulted in glint and glare assessment not being requested at the pre-application stage.
- 9.168 In summary, no significant impacts in relation to residential amenity have been identified.

Employment and Economic Development

- 9.169 No loss of employment is anticipated due to the proposed development. The construction, operation and decommissioning of the proposal will provide work for a skilled labour force during the separate phases of the development.
- 9.170 Local Plan Policy SCLP12.38: Land at Silverlace Green (former airfield) Parham is located in close proximity to the south and west of the proposed development site, being separated by fields. This has an employment allocated use comprising of 2.24 hectares of employment land (containing lawful uses within Use Classes B1 and B2). No part of the proposed development is due to be within this policy area and no impacts are expected.

Community Benefits

- 9.171 The Great Glemham Parish Council response advises that the Applicant stated that the proposed development model did not support a community benefit scheme. However, it is understood that the Applicant has been corresponding with Parish Councils directly regarding potential negotiations, as confirmed by Parham Parish Council in their response to this application. Precise details of proposed community benefits have not been provided by the Applicant; however, this is not a material planning consideration.
- 9.172 As set out in Section 4 of the submitted Statement of Community Involvement, the project will deliver significant benefits for the local community. This includes enhancing local biodiversity, including wildflower planting and the potential addition of beehives to the site. Another key benefit identified by the Applicant could be climate change education, being eager to help educate local communities so they are aware of climate change and how solar energy projects can assist in reducing the UK's reliance on fossil fuels.
- 9.173 The SCI also advised that the Applicant is considering the opportunities, in due course, for organising site tours for local schools and / or members of the community and supplying education packs to local schools. The Applicant is currently consulting with local parish councils in relation to financial contributions towards community projects. In addition, the project will deliver wide-reaching benefits for the environment. This includes a carbon saving equivalent to 11,210 tonnes of CO₂ every year, which is similar to taking 5,175 cars off the road.

Viability

- 9.174 The proposed Cable Connection Route element of this application links the solar farm to the local electricity grid network and extends approximately 3km to the west of the site, linking with a substation to the south-west of Parham. The Applicant proposes that the electricity cable is buried within the local public highway network (including Hall Road, The Street and the B1116 in Parham) connecting the electricity generated by the solar farm with the substation location. Following consultation with the Applicant and Suffolk County Council Highways Authority, it is expected that a suitable solution for the proposed Cable Connection Route will be reached, however it is noted that highway matters do not fall within the remit of East Suffolk Council.
- 9.175 The Applicant's ability to secure a suitable connection links directly to the overall viability of the proposal. However, the cable route has not been proven to be unviable and the development as a whole is considered deliverable. As discussed earlier in the Highways

section of this report, if the Applicant can't deliver the scheme for whatever reason relating to the proposed Cable Connection Route after this application has been determined, then they will be required to submit a new proposal for determination.

CIL Liability

9.176 The Community Infrastructure Levy (CIL) relates to residential and convenience retail development. The proposed solar farm development is therefore not CIL Liable development.

Non-material Considerations

9.177 Material planning considerations are matters that should be taken into account in deciding a planning application. At the time of consultation, concerns were raised by third party representatives in relation to the loss of views from residential properties. However, issues such as the loss of a view is not a material planning consideration.

10 Conclusion

- 10.1 This Application is for the construction and operation of a solar farm together with all associated works, equipment, and necessary infrastructure. The proposed solar farm consists of ground mounted photovoltaic (PV) panels which cover six fields currently in agricultural use, having a land area of 73.95 hectares (Ha). The proposed solar farm will generate up to 49.9MW of electricity which equates to the power consumption of approximately 16,581 homes and a saving of approximately 11,210 tonnes CO2 per annum.
- 10.2 The proposal would make a significant contribution towards meeting the UK Government's ambitious carbon reduction commitments, notably the legally binding commitment to realise net-zero carbon emissions by 2050 relative to the 1990 baseline level as set out in the Climate Change Act 2008 (as amended). The UK Government are also seeking to achieve a 78% reduction by 2035 relative to the 1990 baseline levels, being an intermediate target on route to reaching net zero by 2050.
- 10.3 To achieve these ambitious carbon reduction targets, it is important that major investment in proven low carbon technologies (including ground-mounted solar farms) is supported where possible, along with a diverse mix of other renewable and low carbon energy generation technologies. Vast growth in this sector will be needed if the UK Government's legally binding targets are to be met, however, such proposals should only be brought forward where they are sustainable and are supported by planning policy requirements at a National and Local level.
- 10.4 East Suffolk Council have made a committed to help fight climate change and has joined with other local authorities by declaring a climate emergency, pledging to do more to reduce its own carbon emissions and to encourage communities to help fight climate change. Additionally, the New Anglia Local Enterprise Partnership intends to maximise the energy opportunities in this area, noting the Council's commitment to its contribution towards making the County of Suffolk carbon neutral by 2030.
- 10.5 It is acknowledged that the proposed development would contribute towards meeting these targets and initiatives, both locally and nationally, noting that the overarching principle for the development of low carbon and renewable technologies is already well

established in both National and Local planning policy, as stated within the Planning Policy of this report. Notably, Paragraph 158 (formerly 154) of the NPPF states that Local Planning Authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy when determining planning applications, approving such applications where impacts are (or can be) made acceptable.

- 10.6 This principle is echoed in Local Plan Policy SCLP9.1 'Low Carbon and Renewable Energy' which states that the Council will support low carbon and renewable energy developments where evidence is presented demonstrating a sustainable development can be delivered which can facilitate the necessary infrastructure and power connections required for functional purposes, whilst being complementary to the existing environment without causing any significant adverse impacts (unless those impacts can be appropriately mitigated). Local Plan Policy SCLP3.4 'Proposals for Major Energy Infrastructure Projects' also seeks to ensure that the impacts of Major Energy Infrastructure Projects are adequately mitigated, and considerable effort has been made for this Application to ensure that any potential impacts are (or will be) sufficiently assessed and/or mitigated before any development commences at the site. A lot of mediation has taken place working closely with the Applicant and stakeholders to ensure any potential impacts are identified and resolved to the satisfaction of stakeholders, consultees, and East Suffolk Council.
- 10.7 This proposal would not be a permanent structure on the landscape, having an operational life of 40 years. Local Plan Policy SCLP9.1 'Low Carbon & Renewable Energy' requires that post decommissioning, the facility is removed, and the site is restored to its original condition.
- 10.8 The proposal has been designed and submitted using the 'Rochdale Envelope approach' which involves using maximum parameters for elements where flexibility is required. This includes the Indicative Site Layout Plan (ref. LCS040-PLE-01 Rev 10) submitted which provides an indication as to how the site could be laid out, however the detailed design and fixing of the site layout could vary within the agreed parameters of the Development Zones. Furthermore, whole areas can be removed from the scheme and left as exclusion areas if required following further site investigation works being completed. This allows for greater flexibility in terms of the layout within each zone and a worst case has been assessed.
- 10.9 The principle of low carbon and renewable energy development within East Suffolk must therefore be supported in line with policy requirements and local commitments. Appropriate weight has been given to the positive contribution this development would make towards meeting local and national carbon reduction targets. It has been demonstrated that the Proposed Development complies with planning policy and that impacts of the proposal have been shown to be acceptable and, where necessary, mitigation measures have been set out and agreed prior to determination to adequately mitigate potential impacts.
- 10.10 The proposal accords with the relevant policies contained in both National and Local Planning Policy and Guidance and would deliver significant benefits with any potential impacts having been avoided through careful site design, and/or will be assessed and mitigated through agreed planning conditions post-determination.
- 10.11 This application requires an Environmental Impact Assessment (EIA). The Applicants submitted an Environmental Statement (ES) with the application. The ES has appropriately

considered the likely significant environmental impacts of the development project. This report has been produced taking the environmental information into account. Members must take into account the ES when considering this application and this recommendation that likely significant effects without proposed mitigation have not been identified.

- 10.12 This accords with NPPF Para. 11 and ESC should apply a presumption in favour of sustainable development, approving development proposals that accord with an up-to-date development plan without delay. The planning balance has not found any adverse impacts which significantly and demonstrably outweigh the benefits and it is therefore considered acceptable in planning terms.

11 Recommendation

APPROVE subject to the inclusion of appropriate conditions as detailed below:

1. The development to which this permission relates shall be begun no later than three years from the date of this planning permission.

Reason: To comply with Section 92 of the Town and Country Planning Act 1990.

2. The development hereby permitted shall be completed in all respects in accordance with the submitted drawings ref: SP-01 Rev 06 - Site Location Plan; SD-17 Rev 01 - Panel Arrangement; SD-16 Rev 01 - Inverter Floor Plan; SD-15 Rev 01 - Customer Substation Floor Plan; SD-08 Rev 02 - Inverter Elevations and Dimensions Plan; SD-04 Rev 02 - Security Fence and CCTV; SD-03 Rev 01 - Indicative CCTV Post; SD-02 Rev 02 - Customer Substation Elevations and Dimensions Plan; SD-01 Rev 02 - DNO Substation Elevations and Dimension Plan; SD-01 Rev 01 - DNO Substation Floor Plan; PLE-02 Rev 03 - Layout Plan External; PLE-01 Rev 10 - Layout Plan External; DZ-01 Rev 13 - Development Zone Plan, noting that the precise layout is not yet fixed and will be agreed post-development by condition, being governed by the agreed parameters within each development zone/parcel.

Reason - To secure a properly planned development based on development parcels/zones which allow for flexibility in the precise layout within the agreed parameters for each development parcel.

3. The planning permission is for a period from the date of this permission until the date occurring 40 years after the date of commissioning of the development. Written confirmation of the date of commissioning of the development shall be provided to the Local Planning Authority no later than 1 calendar month after that event.

Reason: To ensure this permission is a temporary development on the landscape, having an operational life of 40 years.

4. If the solar farm hereby permitted ceases to operate for a continuous period of 6 months, then unless otherwise agreed in writing by the Local Planning Authority, a scheme for the decommissioning and removal of the panels and any other ancillary equipment, shall be submitted to and agreed in writing by the Planning Authority within 3 months of the end of the cessation period. The scheme shall include details for

the restoration of the site. The scheme shall be implemented within 12 months of the date of its agreement by the Local Planning Authority.

Reason: To remove the non-operational development from the landscape.

5. At the end of the operational lifespan (40 years), the solar panels and other infrastructure will be removed, and the site restored back to full agricultural use.

Reason: The decommissioning and restoration process intends to restore the land to the same quality as it was prior to the development taking place.

Archaeology Conditions

6. **Part 1** - No development shall take place within the area indicated [the whole site] until a programme of archaeological work has been secured and implemented, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording;
- b. The programme for post investigation assessment;
- c. Provision to be made for analysis of the site investigation and recording;
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation;
- e. Provision to be made for archive deposition of the analysis and records of the site investigation;
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation;
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

Part 2 - The solar farm shall not be brought into operation until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Part 1 of this condition, and the provision made for analysis, publication and dissemination of results and archive deposition.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Policy SCLP11.7 of Suffolk Coastal Local Plan (2020) and the National Planning Policy Framework (2019).

INFORMATIVE: The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.

7. **Part 1** – Prior to any development on site commencing, a detailed site plan including Archaeological Exclusion Zones will be submitted to and approved by the Local Planning Authority. Following the approval and completion of the archaeological evaluation referred to in Condition 6, and prior to the commencement of development, a final detailed site layout plan with full details of the final locations, design and materials to be used for the panel arrays, inverters, customer switchgear, substations, CCTV cameras, fencing, foundations and cabling will be submitted for approval.

Should the archaeological evaluation identify any significant archaeological deposits, the final detailed site layout plan will define archaeological exclusion zones within which below and above ground development will be excluded or provide sufficient design mitigation including but not limited to the use of above ground cables, concrete shoes or other means to avoid any impact on archaeological deposits if required.

The final detailed site layout plan shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the County Council's Lead Archaeologist. Subsequently the development shall be carried out in accordance with the approved details.

Part 2 - If there are archaeological areas to be preserved in situ, a management plan will be produced for any archaeological areas to be preserved in situ, setting out the methodology to secure the ongoing protection of these areas both during construction, operation and decommissioning of the solar farm.

Reason: To ensure that trial trenched evaluation is undertaken at the earliest opportunity post consent to establish the archaeological potential of the site in order that any mitigation requirements can be defined at an early stage.

INFORMATIVE: This condition is in accordance with the National Planning Policy Framework Paragraph 205 (formerly 199), any permission granted should be the subject of planning conditions to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

Highways Conditions

8. No part of the development shall be commenced until details of the improved accesses as indicatively shown on drawing numbers B17SF_SPPSA1, B17SF_SPPSA1R, B17SF_SPPSA2, and B17SF_SPPSA2R (including the position of any gates to be erected) have been submitted to and approved in writing by the Local Planning Authority. The approved accesses shall be laid out and constructed in their entirety prior to any other part of the development taking place. Thereafter the access shall be retained in its approved form unless agreed in writing by the Local Planning Authority.

Reason: To ensure that the accesses are designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

9. Before the development is commenced, details shall be submitted to and approved in writing by the Local Planning Authority showing the interim means to prevent the

discharge of surface water from the development onto the highway during the construction process. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form. The longer term drainage solution will be approved and implemented in accordance with details submitted, agreed and implemented for condition 18.

Reason: To prevent hazards caused by flowing water or ice on the highway.

10. Before the development is commenced, details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long-term maintenance of adequate on-site space for the parking and manoeuvring of vehicles in accordance with Suffolk Guidance for Parking (2015) where on-street parking and manoeuvring would be detrimental to highway safety.

11. All HGV traffic movements to and from the site over the duration of the construction period shall be subject to a Deliveries Management Plan which shall be submitted to the planning authority for approval a minimum of 28 days before any deliveries of materials commence. No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan. The site operator shall maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

Reason: To reduce and / or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas.

12. Before the improved accesses are first used, visibility splays shall be provided as shown on Drawing Nos. B17SF_VSPSA1 and B17SF_VSPSA2 with an X dimension of 2.4m and a Y dimension of 160m and thereafter retained in the specified form, with the exception of the visibility splays for VSPSA1, that can be provided via temporary traffic signals, the details of which will have been previously approved in writing by the Planning Authority. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Reason: To ensure vehicles exiting the drive would have sufficient visibility to enter the public highway safely, and vehicles on the public highway would have sufficient warning of a vehicle emerging to take avoiding action.'

Noise Conditions

13. Operational Noise: Prior to commencement of development, a noise assessment shall be submitted to the East Suffolk Council for approval in writing to include all proposed

plant and machinery and in accordance with BS4142:2014+A1:2019. A noise rating level (L_A,T) from the scheme of at least 5dB below the typical background sound level (L_{A90},T) should be achieved at noise sensitive receptors. Where the noise rating level cannot be achieved, the noise mitigation measures considered should be explained and the achievable noise rating level should be identified and justified. This full assessment should inform any noise mitigation that may be needed.

The assessment shall include:

- a. Details of background sound level surveys at, or representative of noise sensitive receptors. This should include capturing the typical background sound levels at the end of the night-time between 05:00 and 07:00 hours. Ideally these surveys should take place on a number of days. The assessment report should include observations and descriptions of the sound climate during these surveys;
- b. Derivation of predicted noise rating levels at noise sensitive receptors to include for any acoustic character corrections such as tonality;
- c. Initial estimate of the noise impact by comparing the predicted noise rating level with typical background sound levels at noise sensitive receptors.

Reason: Once the proposed plant has been chosen, the submission of a Noise Impact Assessment that demonstrates that the operational rating noise levels (including character corrections as per BS4142 guidance) from the proposed solar farm plant installations would not exceed typical background sound levels for the relevant times of operation at nearby residential properties. This full assessment should be used to inform any noise mitigation that may be needed.

Surface Water Drainage Conditions

14. No development shall commence until details of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the local planning authority (LPA).

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained

15. No development shall commence until details of the implementation, maintenance and management of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the LPA. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

16. Within 28 days of practical completion, a surface water drainage verification report shall be submitted to the Local Planning Authority, detailing and verifying that the surface water drainage system has been inspected and has been built and functions in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks in an agreed form, for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk
<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

17. No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the LPA. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction.

The approved CSWMP shall include Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-

- i. Temporary drainage systems;
- ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses ;
- iii. Measures for managing any on or offsite flood risk associated with construction;

Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater
<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-management-plan/>

INFORMATIVE: Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991. Any discharge of surface water to a watercourse that drains into an Internal Drainage Board district catchment is subject to payment of a surface water developer contribution.

Ecological and Landscape Conditions

18. Development must be undertaken in accordance with the ecological avoidance, mitigation, compensation and enhancement measures identified within the Preliminary Ecological Appraisal (PEA) (AECOM, February 2021); the Ornithological Survey Report (AECOM, August 2021); the Bat Survey Report (AECOM, August 2021) and the Ecology Surveys Technical Note (AECOM, August 2021) as submitted with the planning application and agreed in principle with the local planning authority prior to determination. Further surveys for Otter and Water Vole as set out in the Further Ecology Surveys Technical Note (AECOM, Aug 2021) must be undertaken if 'HDD methods underneath the watercourse' are required for the cabling route between the development site and point of connection.

Reason: To ensure that ecological receptors are adequately protected and enhanced as part of the development.

19. No removal of hedgerows, trees or shrubs, or works to areas that may be used by breeding birds shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority.

Reason: To ensure that nesting birds are protected.

20. No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP) has been submitted to and approved in writing by the local planning authority. The CEMP shall include details for the control and management of noise and dust during the construction phase, and with respect to noise shall have due consideration of the guidance within BS 5228:2009+A1:2014. The CEMP will be adhered to by the contractor throughout the construction process, as outlined in the Environmental Statement Volume II (Technical Appendices) Appendix 3B: Draft Outline Construction Environmental Management Plan.

The CEMP shall include the following:

- a. Risk assessment of potentially damaging construction activities;
- b. Identification of "biodiversity protection zones";
- c. Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements);
- d. The location and timing of sensitive works to avoid harm to biodiversity features;
- e. The times during construction when specialist ecologists need to be present on site to oversee works;
- f. Responsible persons and lines of communication;
- g. The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person;
- h. Use of protective fences, exclusion barriers and warning signs;
- i. Details for the control and management of noise and dust during the construction phase;
- j. Shall have due consideration of noise guidance contained within BS 5228:2009+A1:2014.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Reason: To ensure that ecological receptors are adequately protected as part of the development. To also mitigate noise and dust impacts in particular to receptor locations during the construction phase.

21. A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior to the commencement of the development. The content of the LEMP shall include the following:

- a. Description and evaluation of features to be managed;
- b. Ecological trends and constraints on site that might influence management;
- c. Aims and objectives of management;
- d. Appropriate management options for achieving aims and objectives;
- e. Prescriptions for management actions;
- f. Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period);
- g. Details of the body or organisation responsible for implementation of the plan;
- h. Ongoing monitoring and remedial measures;
- i. Details of seed mixtures to be sown in 'cover crop' areas;
- j. Details of appropriate management of cover crops to include;
- k. Details of stocking densities (if sheep are to be used to manage grassland areas);
- l. Details of maximised grassland margins to increase likelihood of providing nesting Skylark habitat;
- m. Details of proposed planting specifications;
- n. Details of landscaping and biodiversity net gain areas;
- o. Details of who will manage and maintain these areas once operational.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

Reason: To ensure that the long-term ecological value of the site is maintained and enhanced and to ensure that the proposed vegetation contributes to the agricultural character of the wider area and successfully screens solar farm infrastructure in views.

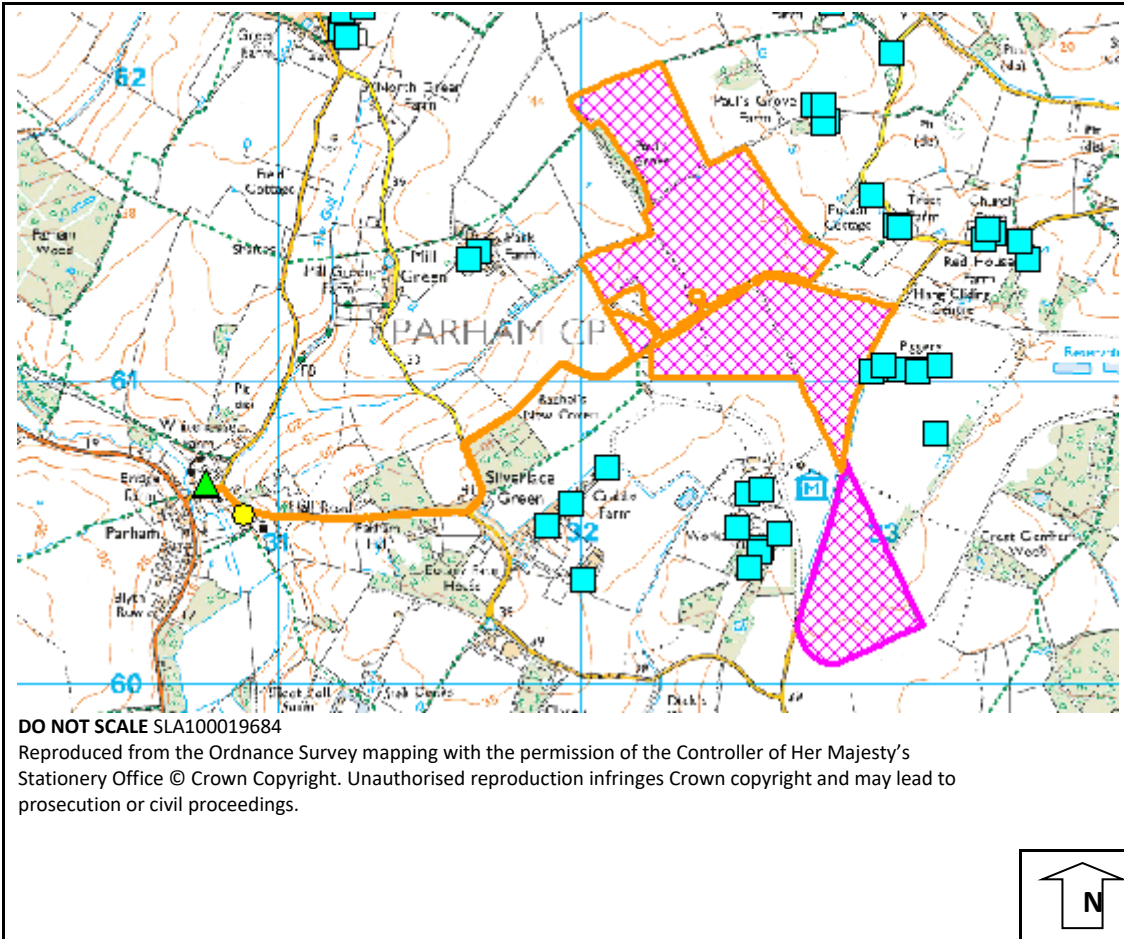
22. Prior to the any construction activity (including vegetation clearance or site preparation) within 50m of the River Ore, an Ecological Mitigation Method Statement will be submitted to and approved in writing by the Local Planning Authority. The Method Statement will be based upon suitably up to date ecological surveys undertaken by a suitably qualified ecologist. Mitigation measures described in the Statement will be implemented as approved unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that ecological receptors are adequately protected.





Background information

See application reference DC/21/1001/FUL on [Public Access](#)

Map



Key

-  Notified, no comments received
-  Objection
-  Representation
-  Support