Suffolk County Council

EcoPower Suffolk

Non-Statutory Consultation

10 March – 22 April 2025

Comments of Suffolk County Council

Contents

Introduction

1.1 These comments of Suffolk County Council ("SCC") are in response to the non-statutory consultation held between 10 March and 22 April 2025 by EcoPower Suffolk Ltd ("the promoter") in respect of the proposed EcoPower Suffolk solar farm project.

1.2 This response includes an introductory section, including SCC's Energy and Climate Adaptive Infrastructure Policy, followed by some general comments on EcoPower Suffolk Ltd's proposals, then identifies key issues in overview. Detailed topic-based comments are provided in Appendix A.

1.3 The proposed project would allow for the generation of approximately 250 megawatts ("MW") of renewable energy and is therefore considered a Nationally Significant Infrastructure Project ("NSIP").

1.4 The proposed development comprises the development of solar panels, a Battery Energy Storage System ("BESS") and related infrastructure, including underground cables connecting the solar arrays to one another and the Grid, areas proposed for environmental mitigation, environment and biodiversity enhancement areas, and recreational areas or corridors.

1.5 A map of the current order limits of the proposed development showing the local context is provided in Appendix B.

1.6 The total site area is around 600 hectares, comprising five separate land parcels (listed below) around the proposed Point of Connection (the existing National Grid 400 kV Yaxley substation):

- Land parcel 1 – Land south of Stuston
- Land parcel 2 – Land north of Eye
- Land parcel 3 – Land north of Gislingham
- Land parcel 4 – Land north of Occold
- Land Parcel 5 – Land south of Thrandeston and north of Mellis

1.7 Appendix C provides a map, along with the promoter's labelling of the five separate land parcels and the Point of Connection. Suffolk County Council has split some of these land parcels up further, and Suffolk County Council's labelling can also be seen in Appendix C. Some comments will make reference to this labelling, as appropriate.

1.8 The whole site is located within the parishes of Occold, Eye, Brome and Oakley, Stuston, Thrandeston, Mellis, Burgate, Thornham Parva, Gislingham and Yaxley, all of which are within the administrative boundaries of Mid Suffolk District Council and Suffolk County Council.

1.9 The SCC electoral divisions directly affected are as follows:

- Hartismere
- Hoxne & Eye
- Upper Gipping

SCC Energy and Climate Adaptive Infrastructure Policy

1.10 SCC adopted its Energy and Climate Adaptive Infrastructure Policy in May 2023, setting out its overall stance on projects required to deliver the UK's Net Zero ambitions. The policy is relevant for the Council's position on the EcoPower Suffolk proposals, and states:

1.11 "Suffolk County Council has declared a Climate Emergency and is therefore predisposed to supporting projects that are necessary to deliver Net-Zero carbon and climate adaptation for the UK. However, projects will not be supported unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately recognised, assessed, appropriately mitigated, and, if necessary, compensated for."[1]

1.12 The Council will follow this approach in this response, and throughout the subsequent Development Consent Order ("DCO") process.

1.13 The Council considers it essential that effective Planning Performance Agreements ("PPAs") are agreed with the promoter. Its Energy and Climate Adaptive Infrastructure Policy states:

1.14 "The Council will expect developers to engage in effective pre-application discussion with the Council. The Council expects that the costs of its engagement throughout the consenting process will be covered under the terms of a Planning Performance Agreement. This will be on a full cost recovery basis, to ensure that local services, and local taxpayers, are not disadvantaged financially by the Council's engagement with project promoters."

1.15 Further details on the position SCC adopts in relation to PPAs can be found in its published guidance for project promoters.[2]

1.16 The Council continues to be willing to work with EcoPower Suffolk Ltd through the issues, towards improvement of the proposals and required mitigations, and looks forward to further engagement over the coming months.

1.17 SCC has also published a Supplementary Guidance Document for its Energy and Climate Adaptive Infrastructure Policy which gives specific guidance for developers of solar farms, following SCC's experience with such NSIPs, which the promoter is encouraged to consult (see Appendix D). The document contains guidance on the roles of the developer and authorities, how they should interact and how SCC expects solar-specific issues to be handled by the promoter.

[1] See SCC Energy and Climate Adaptive Infrastructure Policy: https://www.suffolk.gov.uk/asset-library/energy-and-climate-adaptive-infrastructure-policy.pdf

[2] See Suffolk County Council's expectations for Planning Performance Agreements (PPAs) for Nationally Significant Infrastructure Projects (NSIPs) – Guidance for project promoters: https://www.suffolk.gov.uk/asset-library/planning-performance-agreements-for-nationally-significant-infrastructure-projects.pdf

Overview of SCC's position on the specific proposals

2.1 SCC objects to the EcoPower Suffolk proposals as currently formulated. Whilst SCC acknowledges the need for low carbon energy to combat climate change, this cannot be at any cost to local communities and the environment. SCC therefore expects the promoter to establish a comprehensive suite of mitigation measures, whilst proactively engaging with the local community.

2.2 Parts of Land Parcels 1, 2, 4 and 5 proposed by the promoter to site solar infrastructure are located over Grade 2 agricultural land. SCC's stated policy position is that solar farms should not remove Suffolk's best quality farmland from food production:

For solar schemes, brownfield, rooftop, and around built infrastructure, such as warehousing, are our preferred sites. Where schemes are proposed for agricultural land, developers should commission, via the County Council, independent land quality assessments to inform our response. The Council will oppose any scheme that removes grade 1 and 2 land from food production.

2.3 SCC acknowledges that these proposals are at a formative stage and the identified areas will need to be reduced to take account of the proximity of local communities and other environmental constraints.

2.4 Generally, SCC considers that land parcel 3, north of Gislingham, would cause significant adverse visual impacts to Mellis Conservation Area (Mellis Green), and thus significant reductions to the northern section of this land parcel would be required. Parts of this land parcel also have high archaeological sensitivity, with some preservation in situ required. SCC also considers the proximity of the southern part of this land parcel to the village of Gislingham is unacceptable.

2.5 Views of solar infrastructure within land parcel 4 would be far-reaching due to the open and undulating landscape, and there are scheduled ancient monuments meaning that setting is a key issue for this land parcel. Significant reductions to the areas within land parcel 2 would also be required to ensure that there are appropriate buffers provided for visual mitigation, including from residential properties, Public Rights of Way, and Listed Buildings.

2.6 With regard to the cable corridor areas of search, any works in proximity to River Dove at Eye/Brome/Occold have particular potential for high archaeological sensitivity, for example the proposed double crossing of the River Dove to join land parcels 2B and 2C. Where cable routes cross watercourses and areas of floodplain, there is potential for well-preserved stratified sites, as well as palaeo-environmental remains and survival of important and rare organic remains.

2.7 SCC is particularly concerned about the cable corridor area linking land parcel 4A to land parcel 2B, and land parcel 3 and Yaxley substation, as this is likely to irreversibly change the landscape character of the valley meadows. The cable corridor within Mellis Conservation Area (Mellis Green), linking land parcels 5C and 5A to 3C is also considered unacceptable.

2.8 With regard to siting of the BESS, the detailed comments provided by Suffolk Fire and Rescue Service (SFRS) in Appendix A highlight key considerations, including access for emergency responders, separation distances, and water supply for fire suppression.

2.9 SCC sets out its recommendation for the promoter to publish an interim design report in the following paragraphs, and then sets out key issues with the proposals in their current form. Detailed technical comments are provided in Appendix A.

Need for interim design report

2.10 SCC strongly recommends that the promoter publishes an interim design report in order to provide refined plans in light of further assessment work conducted and the responses it receives to this non-statutory consultation.

2.11 Not only will this assist in providing reassurance and clarity regarding the proposals to the local community, but given the extensiveness of the indicative cable corridor areas presented, the narrowing down of these areas will be essential to assess impacts.

2.12 SCC considers that such a report should be produced by the end of June 2025, providing the promoter with sufficient time for detailed consideration of consultation responses, whilst also allowing statutory consultees and the local community sufficient time to digest the report prior to statutory consultation scheduled for Autumn 2025.

2.13 The promoter may also see publication of this report as a suitable opportunity to announce its plans for, and to promote, the statutory consultation, helping to ensure a transparent approach to the pre-application stage is adopted.

Key Issues

2.14 This section highlights some of the key issues that arise out of the non-statutory consultation. This section must be read in conjunction with Appendix A which provides the full responses from internal consultees.

Cumulative Effects

2.15 The Council is conscious that a significant number of renewable energy and other large scale infrastructure projects are under construction or being proposed in Suffolk, or in nearby areas, resulting in impacts on Suffolk. This includes those within the general vicinity of the location of the proposed EcoPower Suffolk project.

2.16 The Council is aware of several other projects in the area which may surface during the determination of this application and create effects that combine or interact with the EcoPower Suffolk proposals. The Council considers it essential that the promoter's assessment of cumulative impacts includes all reasonably foreseeable projects, as per the Norfolk Vanguard judgement.

2.17 A map of both consented and proposed NSIPs affecting Suffolk is provided in Appendix E.

SCC Archaeology Service (SCCAS)

2.18 All five of the proposed solar farm areas, alongside the Yaxley substation site and all connection corridor route options, have very high archaeological potential.

2.19 An Historic Environment Record (HER) search must be obtained at the earliest opportunity (as part of a wider Desk Based Assessment) so that the promoter has a comprehensive understanding of the current baseline archaeological record for the application area. Non-exhaustive lists of known archaeology recorded in the County HER within each of the proposed sites are provided in the detailed comments of SCCAS in Appendix A.

2.20 Aside from the Yaxley substation site itself, the five solar farm areas and all connection corridor route options have, for the most part, not been subject to systematic archaeological investigation and, therefore, the character, extent and significance of surviving above and below ground heritage assets across these areas has yet to be defined.

2.21 Archaeological surveys recently undertaken for other major infrastructure projects, in similar landscape locations and with equivalent initial archaeological baseline data, have identified a significant number of additional archaeological sites. This indicates that there is high potential for additional, and as yet unknown, heritage assets of archaeological significance to survive across large parts of all areas of this scheme.

2.22 Archaeological fieldwork is essential in order to enable the nature, significance and extent of archaeological remains across all parts of the scheme to be understood, and thereby the archaeological impacts of proposals to be properly assessed, to facilitate informed planning decisions.

2.23 Some as yet unknown sites may be of national significance and worthy of preservation in situ. As such, without further archaeological assessment to fully characterise the heritage resource, the impacts of the development upon above and below ground heritage assets cannot be fully understood.

2.24 Completing archaeological assessment work in a timely manner will allow a suitable archaeological mitigation strategy to be developed, alongside enabling informed design and routing decisions to be made.

2.25 It is important that areas of flood alleviation, ecological compensation and biodiversity net gain are identified at the earliest opportunity. Such areas will need archaeological assessment as most methods of habitat creation have significant archaeological impact.

2.26 It is important to note that there exists a potential conflict for some parcels of land with another large NSIP, Norwich to Tilbury. This particularly relates to the areas north of Gislingham. These conflicts may impact flexibility of design and timescales, both for construction and for the necessary archaeological assessments, therefore, it is vital that robust and effective channels of communication are established between the two projects.

2.27 All phases of archaeological evaluation and mitigation must be led by a brief produced by SCCAS and subject to detailed Written Scheme of Investigations, which must be agreed with SCCAS.

2.28 A detailed Historic Environment Management Plan (HEMP) to secure the appropriate management of areas where archaeological remains have been preserved in situ will be required.

2.29 As numerous other large development projects are currently being undertaken in the county at present, this may put pressure on available archaeological work forces.

SCC Ecology

2.30 SCC Ecology expect the promoter to make clear and deliverable promises regarding the biodiversity that already exists in and around the areas in question. SCC's Energy and Climate Adaptive Infrastructure Policy Large Solar Schemes Supplementary Guidance document, which can be found in Appendix D, specifies SCC's expectations, including the application of the mitigation hierarchy, early consideration of ecology and biodiversity, post-construction monitoring, and a dynamic and adaptive approach to aftercare and management.

2.31 To help achieve these outcomes, SCC Ecology consider that an extensive desk-top survey and a full suite of species surveys across affected habitats should be conducted. SCC Ecology would expect there to be appropriate levels of survey effort to describe very clearly the biodiversity interest of the affected sites and the part they play in the wider ecological network. A suitably experienced Ecological Clerk of Works should also be appointed.

2.32 SCC Ecology expect management plans, including the landscape and ecological management plan, to be submitted in outline form with the Development Consent Order application, then discharged in detail post-consent.

2.33 An Ecology Working Group should be established as early as possible including, as appropriate, representatives of District and County Council, Natural England, Environment Agency and Suffolk Wildlife Trust. In SCC's experience with other NSIPs, the Ecology Working Group has proved an invaluable asset to all parties.

2.34 The detailed comments of SCC Ecology in Appendix A identify County Wildlife Sites and species within each of the five land parcels and the Yaxley substation site that could potentially be affected by the proposals.

2.35 Measures to ensure County Wildlife Sites are not damaged by proposals will be required, and the promoter may wish to use these sites for enhancement and Biodiversity Net Gain (BNG), informed by the Lawton Principles of more, bigger, better and more joined-up.

2.36 A well-designed, constructed and managed solar farm should deliver benefits for wildlife and habitats but it is critical that, prior to design and construction, the fullest understanding of the biodiversity interest of the sites is obtained to inform the design and construction, and that on-

going monitoring and management is in place to ensure such delivery of the essential biodiversity net gain.

SCC Economic Development, Tourism and Skills

2.37 The promoter is expected to undertake a comprehensive and policy-aligned socio-economic assessment, agree on the assessment methodology with SCC prior to formal scoping or Preliminary Environmental Information Report (PEIR) submission, and set out how community, business, and training partnerships will be formed

2.38 The promoter should begin with a robust baseline assessment of the local labour market characteristics, local supply chain capabilities, local educational and training infrastructure, and demographics, social profile, and economic resilience of communities within the zone of influence

2.39 The project promoter must quantify workforce requirements by skill levels, and trade for each phase and assess whether workforce needs can be met locally or regionally, or will require inward migration.

2.40 The readiness and potential of the local supply chain to scale should be assessed through active dialogue with business groups and chambers of commerce.

2.41 The promoter is expected to align with SCC's Regional Skills Coordination Function for assessment, planning, governance and delivery.

2.42 The promoter must assess the project both alone and in combination with other Nationally Significant Infrastructure Projects, including but not limited to Sizewell C, National Grid reinforcement projects, and offshore transmission connections.

2.43 The promoter must consider worker accommodation strategies, transport links between labour sources and the site, impacts on local housing demand and availability, including tourism accommodation, and pressures on local services.

2.44 Governance mechanisms should be proposed to track and secure employment, skills, and supply chain outcomes.

2.45 SCC consider it essential that works don't adversely affect traffic on the A140, as this could impact economic activity across a number of sectors.

SCC Floods

2.46 The promoter should undertake site-specific flood risk assessments for each area of proposed development in accordance with the national guidance.

2.47 The promoter should also produce a strategy for the disposal of surface water in accordance with the national policy and guidance, and LLFA's latest SuDS Guidance and Standing Advice – Solar Panels (PV) and Solar Farms - https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk.

2.48 This area of Suffolk has poor drainage to agricultural land and is water scarce (Hartismere Water Resources Zone). Therefore, any measures to retain and re-use water for local use/firefighting should be explored.

SCC Highways

2.49 There is the potential for two cable crossings of the A140, and SCC, as Local Highway Authority, has a strong preference for horizontal directional drilling (HDD) to minimise disruption to this part of the Major Road Network.

2.50 No detail of access routes, site accesses or haul road crossing has been presented. An understanding of their location and quantum of use is essential to assess impacts.

2.51 Given the multiple sites and the nature of the network, it is anticipated that the project is likely to encounter significant difficulties in facilitating construction access. Some of the largest sites, for example Mellis, appear likely to experience significant difficulties in terms of construction access, and there appears to be a significant risk of adverse impacts during construction.

2.52 Cumulative transport impacts require consideration due to the number of projects that may be delivered concurrently with this project.

2.53 The transport impacts of pre-commencement survey work also require consideration.

2.54 The Yaxley Substation is very poorly served in terms of highway access. Temporary haul roads from the A140 would not be an acceptable permanent solution as there will be no practical access for emergency vehicle or occasional HGVs or abnormal indivisible loads (AILs) during the operational phase.

2.55 There are restrictions for abnormal load access on the A140 north and south of the site. Temporary overbridging has been used on the A140 at Brockford Street, but regular overbridging is not acceptable due to the significant traffic disruption this would cause.

SCC Landscape

2.56 SCC would welcome information with regards to the extent of the area that is envisaged to be be utilised for solar infrastructure, environmental and landscape mitigation, and biodiversity net gain in each parcel.

2.57 A Landscape and Visual Impact Assessment (LVIA) will be required as part of this application, to assess the landscape and visual effects of the proposals.

2.58 The LVIA shall be carried out in accordance with the GLVIA 3rd Edition. The LVIA should clearly assess the proposal, including identifying residual impacts in both visual and landscape terms, potential intra- and inter- cumulative impacts, and sequential effects, and presenting possible measures to avoid, minimise, and/or mitigate adverse impacts.

2.59 All details of the methodology, viewpoint locations and the scope of the assessment should be agreed in writing with the relevant local authorities **before** the LVIA is undertaken.

2.60 Design principles should be agreed with stakeholders and should include application of the Mitigation Hierarchy, striving to achieve above 10% Biodiversity Net Gain for each land parcel/cable corridor area, providing appropriate buffers to PRoW and roads/lanes, and avoiding vegetation loss for temporary components.

2.61 SCC is very concerned about envisaged access routes to the various sites, as beyond the A140 the road network consists mainly of small lanes which are often single track and can be vegetated, including tree lined.

2.62 SCC (Landscape) have provided detailed comments by land parcel and cable corridor area in Table 1 of Appendix A. However, SCC (Landscape) would like to highlight the following points:

- There is concern regarding the visual effects of Land Parcel 3 on Mellis Conservation Area, and the proximity of this land parcel to the village of Gislingham.
- Land Parcel 4 is within an open and undulating landscape, creating far-reaching views of the solar infrastructure.
- SCC considers that significant reductions are required to parts of Land Parcel 2 to provide sufficient buffers to roads, residential properties and listed buildings, particularly with regard to the proximity of Land Parcel 2A to The Avenue on its eastern boundary.
- SCC considers that the southern cable corridor linking Land Parcel 3 to Land Parcel 4A across the River Dove would have a detrimental impact on the landscape character of the valley meadows.

SCC Public Health

2.63 SCC Public Health would recommend a Glint and Glare Impact Assessment is conducted and, where necessary, appropriate mitigation measures, such as screening, employed to avoid harmful impacts.

2.64 An assessment of community impacts on tourism, recreation, employment, opportunities and benefits to the local economy should be conducted, and mitigation measures proposed where necessary.

2.65 The promoter should refer to SCC's Energy and Climate Adaptive Infrastructure Policy Community Engagement and Wellbeing Supplementary Guidance document, which can be found in Appendix F. Effective community engagement through developing a community engagement plan at an early stage will be essential to build trust and confidence through the process. An assessment of the impacts of proposals on mental health and community wellbeing will also be required, and mitigation measures implemented as appropriate.

2.66 An assessment of the cumulative impacts and opportunities arising from the scheme due to multiple changes in wider determinants of health should be conducted.

2.67 Air quality and noise impacts should also be assessed.

SCC Public Rights of Way (PROW)

2.68 SCC PROW requests that all items which impact upon the PROW are addressed and mitigated in a PROW Management Plan and also PROW are referred to in their own sections in any applications.

2.69 All routes affected by the proposal should be plotted according to the definitive map. This information should be sought from SCC and then accurately plotted on the maps.

2.70 Labelling of PRoW should be consistent and standard across all documents and follow the same convention as depicted on the Definitive Map, the legal record for PRoW.

2.71 Whilst the mapping supplied indicates PROW routes, it does not include promoted routes, both circular and linear. A significant linear route (shown in SCC PROW's detailed technical comments in Appendix A) runs through the proposal and will be impacted upon.

2.72 Prior to any proposed closures and/or diversions, surveys of routes should be undertaken to assess the conditions and usage.

2.73 An understanding of the location of the haul roads and any associated activities such as compounds and their quantum of use is vital to assess impacts on the PROW.

2.74 Cumulative PRoW impacts require consideration due to the number of projects that may be delivered concurrently with this project.

Suffolk Fire and Rescue Service (SFRS)

2.75 The promoter should produce a risk reduction strategy. SFRS would expect that safety measures and risk mitigation is developed in collaboration with the SFRS to ensure emergency responders are not placed at risk and appropriate access and facilities are provided. The strategy should cover the construction, operational and decommissioning phases of the project.

2.76 SFRS will want to view the transport strategy to minimise the impact of the increased number of daily vehicle movements in the local area during construction, prevent an increase in the number of road traffic incidents, and prevent negative impacts of the project on SFRS' ability to respond to an incident in the local area.

2.77 The promoter must ensure the risk of fire and other emergencies is minimised, for example by procuring components and using techniques that comply with relevant legislation, using fire-resistant materials to restrict the spread of fire, and ensuring there are appropriate water supplies on-site for fire-fighting. A more detailed list of measures is provided in the detailed technical comments of SFRS in Appendix A.

2.78 As the proposals include a BESS, SFRS advise that additional considerations are required in respect of BESS design, details of which are provided in SFRS' detailed comments in Appendix A.

Appendix A – Detailed Technical Comments

Introduction

1.1 This appendix provides detailed technical comments from internal consultees at SCC, and should be read in conjunction with the Key Issues set out in the main body of the response.

SCC Archaeology Service (SCCAS)

1.2 All five of the proposed solar farm areas, alongside the Yaxley substation site and all connection corridor route options, have very high archaeological potential.

1.3 Data held by the Historic Environment Record (HER) is not currently included on the Cultural Heritage Map and so an HER search must be obtained at the earliest opportunity (as part of a wider Desk Based Assessment) so that the promoter has a comprehensive understanding of the current baseline archaeological record for the application area.

1.4 However, the vast majority of the areas being consulted upon as part of the proposed scheme have not yet been subject to systematic archaeological investigation. As such, the potential for additional extensive and as yet unknown archaeological remains to survive across large parts of all areas of the scheme must be recognised, alongside the need for full archaeological field assessment at the earliest opportunity.

1.5 Archaeological fieldwork is essential in order to enable the nature, significance and extent of archaeological remains across all parts of the scheme to be understood, and thereby the archaeological impacts of proposals to be properly assessed, to facilitate informed planning decisions.

1.6 SCCAS therefore advise that the proposed solar development cannot be assessed or have permission granted until a full programme of archaeological evaluation has been undertaken; this is in accordance with NPS EN-1 (5.9.9 – 5.9.15) and EN-3 (3.10.105).

1.7 Completing archaeological assessment work in a timely manner will allow a suitable archaeological mitigation strategy to be developed, alongside enabling informed design and routing decisions to be made and will also be essential for effective risk management, project management, programme scheduling and budget management.

Baseline data

1.8 Aside from the Yaxley substation site itself, the five solar farm areas and all connection corridor route options have, for the most part, not been subject to systematic archaeological investigation and, therefore, the character, extent and significance of surviving above and below ground heritage assets across these areas has yet to be defined.

1.9 Below is a brief summary of known archaeology which is currently recorded in the County HER within the different areas of the proposed scheme. This list is not exhaustive and does not negate the need for a full HER search and desk-based assessment and there should not be an assumption that data within the Historic Environment Record is of local

significance. The Historic Environment Record includes non-designated assets of national importance and regionally significant assets, applicable to a number of sites listed below.

1.10 *Site 1: Land south of Stuston*

- BRM 011 Route of a known Roman road (Area 1D)
- Multiperiod finds scatters recorded across and in the immediate vicinity of all site parcels indicative of below ground archaeological remains

1.11 *Site 2: Land north of Eye*

- OKY 030 Hengiform prehistoric monument- potential to be worthy of Scheduling (Area 2C)
- Large multi-period finds scatter indicative of occupation and funerary activity (potentially of at least regional significance) recorded across and in the immediate vicinity of all site
- Roman sites recorded during recent archaeological works in the vicinity e.g. EYE 142

1.12 *Site 3: Land north of Gislingham*

- MLS 011 Mellis Green- potential for green edge medieval settlement
- BUR 048 recorded Burgate market site
- GSG 001 Medieval moated site and associated fishponds- needs preserving in situ as a surviving earthwork site
- GSG 005: Possible medieval moated hall site associated with kilns
- Saxon settlement site recorded during recent archaeological work at Gislingham indicating a potential for further Saxon occupation remains and also funerary activity in the area
- Multiperiod finds scatters recorded across and in the immediate vicinity of the site, indicative of below ground archaeological remains

1.13 *Site 4: Land north of Occold*

- EYE 011/012 SAM moated sites – setting a key issue here (Area 4A)
- EYE 068 Potential Anglo-Saxon cemetery site (could be of regional if not national significance) (Area 4B)
- EYE 253 Route of historic road (Areas 4A and 4B)
- Multiperiod finds scatters recorded across and in the immediate vicinity of all site parcels, indicative of below ground archaeological remains

1.14 *Site 5: Land south of Thrandeston and north of Mellis*

- Multiperiod finds scatters recorded across and in the immediate vicinity of all site parcels, indicative of below ground archaeological remains

1.15 *Yaxley substation*

- The current substation location has already been subject to archaeological assessment, but it is situated within an area of high archaeological sensitivity, which has the potential to have significant implications with regards to any expansion of the substation site itself and the cable corridor route and connection in this area e.g. YAX 029 metalwork scatter indicative of a site of Roman and medieval settlement activity and YAX 017/YAX 018 metal finds indicative of possibly two Anglo Saxon cemeteries (potentially of at least regional significance) are recorded immediately adjacent to the substation site.

1.16 *Cable connection corridor*

- All potential routes have high archaeological potential – avoidance of known HER sites and appropriate early assessment before final route determined is key.
- Any works in proximity to River Dove at Eye/Brome/Occold have particularly potential for high sensitivity e.g. known SAMs/Anglo Saxon cemetery sites/high potential for archaeological remains from all periods as indicated by extensive multi-period finds scatters.
- Where cable routes cross watercourses and areas of floodplain, there is potential for well-preserved stratified sites, as well as palaeo-environmental remains and survival of important and rare organic remains. Valley sides, overlooking watercourses have high archaeological potential, and sites can be stratified and well-preserved in colluvial sediments.

1.17 As well as the known archaeological record, there is high potential for additional, and as yet unknown, heritage assets of archaeological significance to survive across large parts of all areas of the scheme. This is demonstrated by archaeological surveys recently undertaken for other major infrastructure projects, in similar landscape locations and with equivalent initial archaeological baseline data, which have identified a significant number of additional archaeological sites which were not previously recorded on the County HER, or where recorded, were previously only areas of undefined potential based upon finds scatter or cropmark evidence.

1.18 Some as yet unknown sites may be of national significance and worthy of preservation in situ. As such, without further archaeological assessment to fully characterise the heritage resource, the impacts of the development upon above and below ground heritage assets cannot be fully understood.

Further assessment required

1.19 To inform the final scheme design and routing of the cable corridor, a thorough desk-based assessment and field evaluation is needed. This

should be undertaken at the earliest opportunity, to allow the archaeological potential of the different parts of the study area to be fully assessed and therefore the likely impacts of the proposed development on designated and non-designated heritage assets and sites of archaeological potential to be defined. Evaluation will provide sufficient baseline information to enable design decisions to be made and to inform planning decisions.

1.20 A desk-based assessment would be appropriate in the first instance. This should include a full and up-to-date HER search, historic map regression, a study of aerial photography (including historical imagery and aerial photographs held by The Historic England Archive and Library at Swindon), an assessment of LIDAR data, and predictive modelling of potential based upon topographic and geological evidence. Datasets held by the County Records office and other archive sources may also need to be consulted where features merit more detailed research.

1.21 A settings impact assessment for above ground heritage assets should be undertaken and the impact of the proposals upon historic hedgerows, boundaries and other historic landscape elements should also be considered through the use of historic mapping and Historic Landscape Characterisation data.

1.22 Landscape should be considered for assessment as an aspect of the historic environment. Interrelationships between archaeology, the historic landscape and the built environment should be addressed in the assessment. The lack of a holistic approach to assessing the impact on landscape has given rise to omissions in other recent DCO applications.

1.23 All areas which will be impacted by the different elements of the scheme should be subject to archaeological field assessment at this stage (including preferred cable corridor routes) to allow for preservation in situ where appropriate of any sites of importance that might be defined (and which are currently unknown).

1.24 Geophysical survey should form a first phase of field evaluation. The results of this survey should be used to inform a programme of trial trenched evaluation, combined with metal detecting in order to ground truth the geophysics results, alongside palaeo-environmental assessment in river valley areas as appropriate.

1.25 SCCAS advise that all sites which will be impacted on by any element of the scheme should be subject to a full suite of archaeological assessment (desk-based, geophysical and trial trenched evaluation) prior to/at Environmental Impact Assessment (EIA) stage, with the results of these investigations used to inform final site design/routing. Undertaking full archaeological evaluation at this stage will enable the results of the surveys to be used to assist with project programming and to contribute to risk management. Upfront work will ensure all options can be properly considered and the scope of mitigation defined (including giving proper thought to preservation in situ and alternative construction solutions), thereby avoiding unexpected costs and delays post-consent. Evaluation at this stage will test the suitability of different site areas for development. This is particularly important given the reduced flexibility for mitigation

through design once locations for fixed elements of the scheme have been determined and for aspects of the scheme where removing ground disturbance is not possible.

1.26 Any unevaluated areas of the scheme will represent a high degree of risk for the development. Failure to adequately evaluate the site at an early stage could lead to unnecessary destruction of heritage assets, potential programme delays and excessive cost increases that could otherwise be avoided and which have the potential to leave a scheme which is undeliverable. Any areas that are not subject to trenched archaeological evaluation prior to the determination of this application would carry a high level of risk which will need to be accommodated by incorporating substantial flexibility in the design, work schedule and budget. Therefore, it is strongly recommended that sufficient trenched archaeological evaluation is undertaken across the full redline area to provide essential baseline information on the archaeological resource, in order to inform and design an appropriate mitigation strategy. Any parts of the proposal area which are scheme critical, or where limited design flexibility will be possible, are a particular priority for early assessment.

1.27 Furthermore, it is important that areas of flood alleviation, ecological compensation and biodiversity net gain are identified at the earliest opportunity. Such areas will need archaeological assessment as most methods of habitat creation have significant archaeological impact. Such areas cannot be altered or removed post-consent, and this may represent a conflict in delivery of Order Requirements if significant archaeological remains are present within land earmarked for these purposes.

1.28 It is important to note that there exists a potential conflict for some parcels of land with another large NSIP, Norwich to Tilbury. This particularly relates to the areas north of Gislingham. These conflicts may impact flexibility of design and timescales, both for construction and for the necessary archaeological assessments, therefore, it is vital that robust and effective channels of communication are established between the two projects.

1.29 The combined results of the above assessments should be used to develop a comprehensive mitigation strategy. Some archaeological remains (including those as yet unidentified) may require localised preservation in situ, either because their significance warrants this or to avoid alternative mitigation. For below ground archaeological heritage assets, where (1) development impacts are proposed that will damage or destroy those remains and (2) where mitigation through investigation and recording is considered acceptable, and is preferred to the use of design solutions to achieve preservation in situ, the mitigation identified should include proposals to record and advance understanding of the significance of heritage assets before they are damaged or destroyed. Appropriate mitigation techniques, such as excavation prior to development, will be based upon the results of the suite of evaluation and assessment work undertaken.

1.30 All phases of archaeological evaluation and mitigation must be led by a brief produced by SCCAS and subject to detailed Written Scheme of Investigations, which must be agreed with SCCAS. All stages of the work

will be monitored by SCCAS on behalf of the Local Planning Authority and Planning Inspectorate to ensure the written schemes are satisfactorily fulfilled.

1.31 Archaeological remains that have been preserved in situ as part of archaeological mitigation strategies must be protected from damage during site operation and decommissioning. If any areas of archaeology are to be preserved in situ, then a strategy for ongoing protection of these remains throughout construction, operation and in perpetuity must be agreed and included within the mitigation strategy for the development, and provision must be made for a detailed Historic Environment Management Plan (HEMP) to secure the appropriate management of these areas within the development going forward.

1.32 As has been shown by other Nationally Significant Infrastructure Projects in the region, time will be a critical factor. Archaeological and heritage assessments and resultant archaeological mitigation phases should be programmed into the project at the earliest opportunity. Sufficient time must be allowed to enable evaluations to be undertaken, taking into account agricultural cycles and time required for landowner negotiations (which should commence at the earliest opportunity) and also all fieldwork to be completed prior to the start of construction works, so as to avoid any delays to the development schedule. SCCAS would advise that an archaeological consultant is bought on board early on, and an archaeological clerk of works (ACoW) employed to manage interactions between the archaeological, ecological, and engineering teams.

1.33 As numerous other large development projects are currently being undertaken in the county at present, this may put pressure on available archaeological work forces which is something to be aware of.

SCC Ecology

1.34 SCC Ecology have seen various documents provided by the promoter which support the Stage One consultation, most especially a series of annotated plans.

1.35 Initially, SCC Ecology welcomes various statements made by the promoter in those documents including:

- *"The proposed design layout of the Project will be informed by ecological surveys, environmental assessments…"*
- *"The land used for the Project would include… areas for environmental mitigation, environment and biodiversity enhancement areas…"*

1.36 In the Chapter "*Protecting and Enhancing the Environment*":

- *"The environment is a key consideration informing how we design the Project."*
- *"We have a long-term vision for EcoPower Suffolk where we endeavour to provide a meaningful contribution to decarbonisation, a range of biodiversity and habitat improvements to support local wildlife…"*

- *"We are exploring opportunities to protect, retain and manage existing areas and features of environmental significance within the site."*
- *"We will deliver Biodiversity Net Gain (BNG) through the Project."*

1.37 These statements and aims are welcome but, of course, definite obligations rather than just endeavours would be preferred. As the consultation progresses, SCC Ecology expect the promoter to make clear and deliverable promises regarding the biodiversity that already exists in and around the areas in question from pre-construction, during the construction and post-construction for the entire lifetime of the project.

1.38 At this stage it would be appropriate to refer to Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy - Large scale solar schemes (v1.0 04/2024), which can be found in Appendix D, in which certain expected outcomes are required. Relevant paragraphs are set out below as an aide memoire:

- *Ecology, Landscape, Heritage, Amenity and Access*
- *As set out in the National Policy Statement EN-1 (November 2023) the County Council expects that project promoters will ensure the effective application of the mitigation hierarchy, including, were required, compensation measures.*
- *Early consideration of the natural environment, its ecology and biodiversity, the character and visual sensitivity of the landscape, Cultural Heritage (including Archaeology), public amenity and access to the countryside, as well as vehicular access opportunities and constraints, should shape the development of the scheme, including during land assembly.*
- *In order to mitigate, maintain, and where possible enhance, the quality of access and public amenity, the Council considers that land option agreements should retain the right to set up additional Rights of Way, as at least binding permissive routes, for the operational lifetime of the project.*
- *The post construction monitoring of the effectiveness of all landscape and ecological mitigation and enhancements, including Biodiversity Net Gain, requires a robust mechanism, secured through the terms of the Development Consent Order, and relevant control documents. This will ensure that the agreed mitigation and enhancement goals are achieved.*
- *A dynamic and adaptive approach should be applied to aftercare and long-term management of mitigation measures, which is focused on achieving these goals. This may result in extended periods of higher-intensity aftercare, and replacement planting, in areas where milestones are not met. It is always preferable that landscape and ecological mitigation and enhancements, once effective, should be retained beyond the lifetime of the scheme, and this should be secured through the terms of the*

development consent order, or by private treaty with the relevant landowners.

1.39 SCC Ecology consider that measures that the promoter could take to achieve these outcomes include the following:

- An extensive desk-top survey (not just limited to Magic Maps) including seeking records from Suffolk Biodiversity Information Service (SBIS). SCC Ecology note that the maps prepared by ARUP show some information, but enquiries should be made of SBIS regarding the Ancient Woodland Inventory and County Wildlife Sites (including Roadside Nature Reserves).
- The full suite of species surveys across the affected habitats – including the identification of features likely to be used by foraging and commuting animals (such as Bats and Birds). SCC Ecology would expect there to be appropriate levels of survey effort to describe very clearly the biodiversity interest of the affected sites and the part they play in the wider ecological network.
- Please note that Badger will be present and are, as the promoter will be well aware, highly mobile.
- Invasive Non-Native Species must also be recorded and, for example in the case on non-native species such as Muntjac, management plans will be anticipated.
- Apart from the obvious “hot spots” such as semi-natural Ancient Woodland, the ditches, drains and verges are highly likely to have considerable biodiversity interest and these should not be neglected in survey effort.
- SCC Ecology expect all ecological surveys and reports to meet CIEEM Guidelines.
- SCC Ecology expect that all data recorded will be forwarded to SBIS.
- SCC Ecology expect that an Ecological Clerk of Works will be appointed to assist in the delivery of the best outcomes and to be on site to give advice to the construction crews throughout the clearance, construction and enhancement phases.

1.40 The Suffolk County Council’s Energy and Climate Adaptive Infrastructure Policy - Large scale solar schemes (v1.0 04/2024) (Appendix D) continues:

- *Post consent Discharge of Requirements*
- *Management plans including, but not limited to, the landscape and ecological management plan, should be submitted in outline form with the Development Consent Order, and subsequently agreed through the discharge of relevant requirements under the Development Consent Order.*

1.41 Further, it states:

- *Landscape design should respond effectively to the character and sensitivities of the site and the receiving landscape:*
    - *By effectively incorporating water management, ecological, archaeological, and public access requirements.*
    - *By ensuring that lighting is, wherever possible, eliminated, or minimised. Where lighting is necessary, light spill and sky glow should be effectively controlled.*
    - *By ensuring that ecological impacts that cannot be mitigated within the red line area of the development will require effective mitigation elsewhere, as close as possible to the site.*

1.42 The comments of SCC Landscape (paras 1.136-1.159) respond to much of the above, but SCC Ecology do expect any additional lighting proposed is in accordance with the Institute of Lighting Professionals and Bat Conservation Trust Guidelines.

1.43 The SCC Guidance continues:

- *Detailed scheme design:*
    - *Should deliver substantive environmental, ecological, access and other benefits.*
    - *Should design the project mitigation and Biodiversity Net Gain measures, to contribute positively to the site following decommissioning.*
    - *Should, during both the construction and operational phase, not add to local surface water or fluvial flood risk; or should provide an opportunity to eliminate such additional risks as may be created.*
    - *Should achieve acceptable operational site access, and where required temporary construction access that can be reasonably remediated following commencement of site operation.*
    - *Should identify any elements that are capable, in principle, of design treatment.*
    - *Should, where possible, be designed to provide additional climate resilience, including but not limited to, management of fluvial and surface water flows during high rainfall events.*
    - *Should facilitate multifunctional land use, including appropriate crop and livestock production. Mitigation proposals, and biodiversity and environmental net gain measures.*
    - *Should be climate resilient, and, or, capable of adaptation to current and emerging climate change impacts.*
    - *Should include adaptive aftercare, and long-term management should be outcome-led, rather than focused*

on time-limited aftercare-periods. This is particularly important, because successful mitigation is the essential basis on which the additionality of Biodiversity Net Gain is achieved.

1.44 SCC Ecology would be pleased to meet, discuss and otherwise assist the promoter to meet these aims. An Ecology Working Group should be established as early as possible including, as appropriate, representatives of District and County Council, Natural England, Environment Agency and Suffolk Wildlife Trust. The RSPB may also wish to make representations to such a group. In SCC's experience with other NSIPs, the Ecology Working Group has proved an invaluable asset to all parties.

1.45 The SCC Guidance continues:

- *Given the temporary nature of haul routes, construction access, and laydown areas:*
  - *Should eliminate permanent or significant adverse effects on, trees, hedgerows, woodland, and other landscape features, historic landscape character and wildlife. Permanent tree loss from these temporary features should be avoided.*
  - *Should be located and designed in such a way that they are capable of effective restoration.*
  - *Should be located to eliminate or minimise temporary adverse impacts on public and private amenity in respect of noise, dust, availability of rights of way, and other disturbance.*

1.46 SCC Ecology consider it essential to ensure that any existing ecological connectivity is identified, and appropriate protection measures are put in place before access points, haul routes, compounds and the like associated with construction, use and maintenance are proposed.

1.47 The existing ecological and landscape features (identified by appropriate surveys) must inform the design, not be compromised afterwards.

Monitoring, Maintenance and Management:

1.48 It is an essential requirement that a workable, practical and pragmatic – and on-going – method of establishing monitoring, maintenance and management of ecological and landscape interest.

1.49 The establishment of an Ecology Working Group will be a critical tool for this along with the appointment of a suitable experienced Ecological Clerk of Works.

Site Specific Comments:

1.50 *Site 1: Land south of Stuston*

1.51 SCC Ecology expect that the promoter will be aware of Broome Field County Wildlife Site (No. 197) designated for species rich grassland. Measures must be put in place to ensure that this site does not suffer any

damage or degradation, and the promoter may see it as an influence on the direction of local enhancement measures.

1.52 No doubt the appropriate records will be sought from SBIS but SCC Ecology expect the appropriate survey effort and the implementation of measures to mitigate harm and disturbance on farmland bird assemblages as there are records for Yellowhammer, Skylark, Fieldfare and Song Thrush (amongst many other species) in the vicinity.

1.53 SCC Ecology also have records for Hedgehog and the design of the Solar Farms should take into account these and other mammals in terms of boundary access.

1.54 SCC Ecology did not encounter a record for Brown Hare in the vicinity but it is very highly likely that they will be present and it is anticipated that mitigation measures will have this species in mind as well as those that there are records for.

1.55 *Site 2: Land north of Eye*

1.56 SCC Ecology expect that the promoter will be aware of Redingfield Wood County Wildlife Site (No. 153) designated for probable Ancient Woodland interest. Measures must be put in place to ensure that this site does not suffer any damage or degradation and the promoter may see it as an influence on the direction of local enhancement measures.

1.57 There are records for Bat (Common Pipistrelle) in the vicinity and this must ensure that those features that have the potential to provide navigation, commuting and foraging areas are not only protected from damage and disturbance but are targets for reinforcement planting and management.

1.58 Not surprisingly, there are records for farmland bird assemblages including Fieldfare, Skylark, Tawny Owl, Swift and Yellowhammer.

1.59 Hare should also be taken into consideration.

1.60 *Site 3: Land north of Gislingham*

1.61 Again, SCC Ecology have records of valuable farmland bird assemblages including Yellowhammer, Skylark and Fieldfare as well as Swift and Barn Owl. Personal communication confirms the presence of Brown Hare.

1.62 As with the sites above, mitigation and enhancement measures should be directed at these species.

1.63 *Site 4: Land north of Occold*

1.64 SCC Ecology expect that the promoter will be aware of Clint Farm Woodland County Wildlife Site (No. 59) designated for probable Ancient Woodland interest. Measures must be put in place to ensure that this site does not suffer any damage or degradation and the promoter may see it as an influence on the direction of local enhancement measures.

1.65 Again, there are records for farmland bird assemblages including Skylark and Yellowhammer and mitigation and enhancement measures should be directed at these species.

1.66 *Site 5: Land south of Thrandeston and north of Mellis*

1.67 SCC Ecology expect that the promoter will be aware of the following:

- Railway Meadows CWs (No. 125) designated for species-rich grassland.
- Thrandeston Marsh CWS (No. 124) designated for wet species-rich grassland.

1.68 As above, measures will be expected to be put in place to ensure that these sites do not suffer any damage or degradation and the promoter may see them as an influence on the direction of local enhancement measures.

1.69 Once more, SCC Ecology have records for farmland bird assemblages including Yellowhammer and Fieldfare as well as Barn Owl, Tawny Owl and Turtle Dove. Mitigation and enhancement measures should be directed at these species.

1.70 *Yaxley POC*

1.71 Again, there are records for farmland bird assemblages including Yellowhammer and Lapwing and mitigation and enhancement measures should be directed at these species.

General Comments:

1.72 Birds such as Skylark are already singing over breeding territories and SCC Ecology strongly recommend that the farmland bird surveys start without any delay. The promoter should give thought to where compensatory Skylark plots can be established in the locality.

1.73 The promoter's Ecology Report should give consideration to the following points:

- Impacts on over-wintering birds (which may include, but are not limited to, Lapwing and Golden Plover).
- Impacts on Brown Hare. Please give details of research on how this species interacts with the both the construction and operating phase of the proposal.
- Badgers are found all over Suffolk now. Please ensure that the Ecology Report gives consideration to this species and advises how conflicts will be avoided during the construction and operational phases.
- Existing tree lines, hedgerows and watercourses must be given suitable stand-off protection when considering construction routes and so on.
- Deer are found in large numbers all over Suffolk. The promoter will need to provide details of their Deer Management Plan (particularly in relation to protecting new planting delivered as part of the enhancement and BNG).
- Invasive Non-Native Species: Please give details of what steps will be taken by the promoter should any INNS be encountered within or close by the Red Line Boundary.

- European Protected Species: Please ensure that these are dealt with in appropriate detail within the Ecology Report (SCC Ecology expect Bats, watercourses should be scoped for Otter signs but Dormouse are not anticipated – but would like the promoter's Ecologist to clarify why, if scoping them out).
- Be aware of and consult regularly the Suffolk RNR map: https://www.suffolk.gov.uk/planning-waste-and-environment/suffolks-countryside-and-wildlife/landscape-and-wildlife/suffolks-roadside-nature-reserves-interactive-map as this is updated regularly.

Enhancements/BNG:

1.74 SCC Ecology have indicated above that the locally designated sites (County Wildlife Sites) may assist in the direction of enhancements and delivering BNG but, in broad terms, it is expected that existing habitats of biodiversity interest will be suitably buffered and ecological networks and corridors appropriately reinforced.

1.75 This will require the identification and survey of all features of interest including hedgerows, copses, veteran (and other trees), all watercourses (including drains and ditches) and ponds.

1.76 Achieving the Lawton Principles of more, bigger, better and more joined up must inform the enhancement and BNG.

1.77 SCC Ecology (in conjunction with Landscape and Arboriculture colleagues, both at County and District level) will be very interested and keen to assist the promoter when it comes to agreeing seed and planting mixes. This is another area where an Ecology (and Landscape) Working Group will be of real assistance to the promoter.

In conclusion:

1.78 A well-designed, constructed and managed solar farm should deliver benefits for wildlife and habitats but it is critical that, prior to design and construction, the fullest understanding of the biodiversity interest of the sites is obtained to inform the design and construction, and that on-going monitoring and management is in place to ensure such delivery of the essential biodiversity net gain.

SCC Economic Development, Tourism and Skills

1.79 SCC Economic Development consider it essential that works don't adversely affect traffic on the A140, as this could impact economic activity across a number of sectors. The area is, apart from anything else, a key gateway/corridor.

1.80 The proposals, including the solar farm and any associated groundworks/infrastructure, should not have an adverse visual or environmental impact which may affect the cultural/ tourism offer in that area. Any long-lasting impacts should be sympathetic to the natural environment.

1.81 The comments of SCC Skills are set out in the following paragraphs.

1.82 Introduction

1.83 This response sets out SCC's expectations regarding the assessment of socio-economic impacts linked to employment, skills, and supply chain impacts in relation to the EcoPower Suffolk project.

1.84 At this Stage 1 consultation, the project promoter has not yet undertaken or published a socio-economic assessment.

1.85 Therefore, SCC is taking this opportunity to establish the recommended methodology and core expectations, drawing on our Solar Guidance (see Appendix D), and Energy and Climate Adaptive Infrastructure Policy Socio-Economic Effects Supplementary Guidance (see Appendix G).

1.86 Expectations for Assessment Methodology

1.87 The promoter should begin with a robust baseline assessment of the local labour market characteristics, including employment rates, skills availability, and sectoral employment trends.

1.88 The baseline should include an analysis of local supply chain capabilities within the East of England, particularly Suffolk, as well as the local educational and training infrastructure, and demographics, social profile, and economic resilience of communities within the zone of influence.

1.89 This assessment must use publicly available datasets and involve stakeholder engagement with SCC and partners.

1.90 Labour Market and Skills Analysis

1.91 The project promoter must quantify workforce requirements by skill levels, and trade for each phase i.e. site operation, construction, operation, and decommissioning.

1.92 The assessment should evaluate whether workforce needs can be met locally or regionally, or will require inward migration.

1.93 Low, medium, and high scenarios for local employment (home-based and non-homebased) engagement must be modelled, in line with SCC guidance.

1.94 The geographic labour catchment areas should be identified using realistic commute time scenarios based on workforce availability, such as thirty minutes for unskilled workers and thirty to ninety minutes for skilled workers.

1.95 Supply Chain Potential

1.96 The assessment should consider both direct and indirect economic impacts, including Gross Value Added, using a scenario-based approach for regional supply chain engagement.

1.97 A realistic mapping of Tier 1 and Tier 2 supplier opportunities must be undertaken.

1.98 The readiness and potential of the local supply chain to scale should be assessed through active dialogue with business groups and chambers of commerce.

1.99 Education, Training and Legacy

1.100 The promoter is expected to align with SCC's Regional Skills Coordination Function for assessment, planning, governance and delivery.

1.101 There should be support for existing and emerging local initiatives and promotion of inclusive access to training.

1.102 The promoter must differentiate between civil, mechanical, and electrical engineering roles to identify distinct legacy opportunities.

1.103 Cumulative Impact Consideration

1.104 The promoter must assess the project both alone and in combination with other Nationally Significant Infrastructure Projects, including but not limited to Sizewell C, National Grid reinforcement projects, and offshore transmission connections.

1.105 Suffolk County Council considers cumulative impacts on skills and its relationship to housing, transport, and service pressure to be a critical area for analysis.

1.106 Housing, Accommodation and Services

1.107 The promoter must consider worker accommodation strategies, transport links between labour sources and the site, and impacts on local housing demand and availability.

1.108 The assessment should include effects on tourism accommodation and pressures on local services such as healthcare and public protection.

1.109 These impacts must be modelled proportionally to the anticipated workforce size and duration, and cross-referenced with the project's transport assessment.

1.110 Engagement and Governance

1.111 Suffolk County Council expects early agreement on the assessment methodology.

1.112 Governance mechanisms should be proposed to track and secure employment, skills, and supply chain outcomes.

1.113 A clear statement of social value delivery should be included, for example referencing the HMG Social Value Model and SCC's approach.

1.114 Next steps

1.115 The EcoPower Suffolk project presents potential for regional benefit, contingent upon the appropriate assessment, mitigation, and proactive securing of opportunities.

1.116 Suffolk County Council is committed to working collaboratively with the promoter.

1.117 The promoter is expected to undertake a comprehensive and policy-aligned socio-economic assessment, agree on the assessment methodology with SCC prior to formal scoping or PEIR submission, and set out how community, business, and training partnerships will be formed.

SCC Emergency Planning

1.118 SCC Emergency Planning have no comments or concerns regarding the proposals. The main concern relating to this type of facility is the fire risk related to the Battery Energy Storage Systems (BESS), which is a matter raised by Suffolk Fire and Rescue Service below.

SCC Floods

1.119 SCC, as the Lead Local Flood Authority (LLFA), provide the following comments for the EcoPower Suffolk non-statutory consultation:

1.120 The LLFA advise that the promoter should undertake site-specific flood risk assessments for each area of proposed development in accordance with the national guidance. The promoter shall also produce a strategy for the disposal of surface water in accordance with the national policy and guidance, LLFA latest SuDS Guidance and Standing Advice – Solar Panels (PV) and Solar Farms: https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk.

1.121 This area of Suffolk has poor drainage to agricultural land and is water scarce (Hartismere Water Resources Zone). Therefore, any measures to retain and re-use water for local use/firefighting should be explored.

1.122 The promoter should take note of Babergh & Mid Suffolk Joint Local Plan, Policy LP27 – Flood risk and vulnerability.

SCC Highways

1.123 SCC, as the Local Highway Authority (LHA), provides the following comments:

1.124 Cable crossings of Public Highways

1.125 Other than maps showing generic cable routes, no details are provided. There are potentially two crossings of the A140. As LHA, SCC has a strong preference for horizontal directional drilling (HDD) to avoid disruption to part of the Major Road Network.

1.126 Construction access

1.127 No consideration of access routes, site accesses or haul road crossing has been presented. An understanding of the location of these and quantum of use is vital to assess impacts. Many of the local roads away from the A140 are not suitable for heavy goods vehicle (HGV) access (note HGV restrictions in Eye and recent controversy). It is noted that this project may be delivered at the same time as other energy projects so cumulative transport impacts will need to be considered.

1.128 Pre-commencement access

1.129 It is likely that, due to the large, combined area of the sites, significant survey work will be required before commencement. The transport impacts of this, such as vehicle movement and safe access, must be considered within the application.

1.130 Grid Connection Site (Yaxley Sub Station)

1.131 The Yaxley Substation is very poorly served in terms of highway access. Leys Lane is a narrow rural lane unsuitable for anything other than occasional light traffic. Recent projects have accessed this site via temporary haul roads from the A140. This is not an acceptable permanent solution as there will be no practical access for emergency vehicle or even occasional HGVs or abnormal indivisible loads (AILs) during the operational phase.

1.132 Workers Access

1.133 With such a rural dispersed site, it will be difficult to provide sustainable access for workers and the additional vehicle movements this generates should be reflected in any assessment.

1.134 Abnormal Load Access

1.135 SCC is aware of restrictions on the A140 north and south of the site. Whilst temporary overbridging has been used on the A140 at Brockford Street, this causes significant disruption to traffic and will not be considered acceptable if temporary bridging needs to be installed on a regular basis.

SCC Landscape

1.136 Based on the information presented to date and site visits carried out on 20, 21 and 28 March 2025, SCC (Landscape) offer the following comments without prejudice to any further comments SCC (Landscape) or other SCC officers may wish to make with regards to any proposals for this site at a later date, when further information is available.

General comments

1.137 SCC would welcome information with regards to the site selection process as well as the rationale for the connecting corridors.

1.138 SCC would welcome information with regards to the extent of the area that will be utilised for solar infrastructure in each parcel and what area percentage is envisaged for environmental and landscape mitigation and biodiversity net gain.

1.139 SCC notes that detailed ecological surveys will need to be carried out, as well as detailed tree, woodland and hedgerow surveys, and that some of these will need to be carried out at certain time in the year.

1.140 SCC would welcome if the promoter would share the result of any geo-technical work and borehole samples that the promoter may have carried out to date. Alternatively, SCC would welcome if the promoter would be able to provide a timeline for when such information may be forthcoming.

1.141 SCC would welcome information with regards to the anticipated voltages of the cables connecting to the substation at Yaxley and the resulting required width of the cable corridors. SCC would welcome typical cross-sections for 11kV and 33kV cables; SCC is currently assuming that no 132kV cables will be required, but if they are (or cannot be excluded), would welcome cross-section of these also.

1.142 SCC considers that the southern cable corridor, linking sites 3 and 4A across the River Dove would have a detrimental impact on the landscape

features of the river meadows and hedgerows of the river valley. Similar issues apply to the cable corridor search are between sites 4A and 2B.

1.143 SCC is very concerned about envisaged access routes to the various sites, as beyond the A140 the road network consists mainly of small lanes which are often single track and can be vegetated, including tree lined.

Landscape and Visual Impact Assessment

1.144 A Landscape and Visual Impact Assessment (LVIA) will be required as part of this application, to assess the landscape and visual effects of the proposals.

1.145 GLVIA 3rd Edition states in para. 1.9 (p.6): *"…, LVIA deals with both effects on landscape itself and effects on the visual amenity of people, as well as with possible interrelationships of these with other related topics."* Such topics could be Noise, Air Quality, Biodiversity etc.

The promoter should note:

1.146 All details of the methodology, viewpoint locations and the scope of the assessment should be agreed in writing between the appointed Landscape Consultants and the relevant local authorities **before** the Landscape and Visual Impact Assessment (LVIA) is undertaken.

Methodology

1.147 The LVIA shall be carried out in accordance with the GLVIA 3rd Edition. The LVIA should clearly assess the proposal, identifying residual impacts in both visual and landscape terms. The detailed methodology to be used for the assessment and the presentation of any visual material should be agreed with the relevant local authorities in writing in advance. This should include:

- Study area, viewpoints, and
- All viewpoint locations
- The locations for photomontage/photowire/annotated photographs (types of visual representation) and the rationale for visualisation types
- All visual representations should be prepared in accordance with the Landscape Institute's Technical Guidance Note (TGN) 06/19: Visual Representation of development proposals (Sept. 2019). Samples sheets of visual presentation should be provided by the promoter.

Scope of the assessment

1.148 **Study area, ZTV and Viewpoints**: The study area and location and number of viewpoints shall be informed by a ZTV (Zone of Theoretical Visibility), based on the theoretical visibility of the proposals within the surrounding landscape (due to maximum height of site structures, stockpiles, and machinery; topography). The study area should be agreed with the relevant local authorities in writing, before any works is carried out for the LVIA.

1.149 **Landscape effects**: The LVIA shall include an assessment of potential impacts on locally characteristic physical landscape features (such as boundary vegetation, trees, water courses) as well as on the local landscape character, including potential impacts on tranquillity and perceptive qualities.

1.150 **Visual effects**: The LVIA shall include an assessment of potential visual impacts on the wider landscape, Public Rights of Way and residential visual amenity. The relevant local authorities will need to be satisfied that there is no likelihood of significant adverse impacts on residential receptors, including allocated sites and consented but unbuilt dwellings.

1.151 **Residential Visual Amenity Assessment (RVAA)**: For any uninvolved residential properties within 500m (where the landform is relatively flat) or further (where land is undulating) from the project, a separate, standalone Residential Visual Amenity Assessment should be prepared and appropriate buffers provided, between any residential properties and any solar infrastructure, according to potential visual impact.

1.152 **Sequential effects**: The LVIA shall include an assessment of sequential impacts and effects (such as prolonged exposure to views of the solar infrastructure along PRoW), intra-cumulative impacts and effects (for example where more than one parcel can be perceived) and inter-cumulative impacts and effects with other developments (such as Norwich to Tilbury by National Grid and other energy infrastructure projects which are reasonably foreseeable)

1.153 **Cumulative effects**: The LVIA shall include potential intra- as well as inter- cumulative impacts resulting from the proposals, including cumulative impacts in connection with the existing, operational part of the site and other facilities in the surrounding area, including those that have been consented, but where work has not yet commenced.

1.154 **Stages of development**: Assessment of night-time impacts and the impacts of the construction phase should be included within the scope of the LVIA to enable the relevant local authorities to properly and reasonably understand the effects of the proposal as a whole.

1.155 **Glint and Glare**: The ES will need to include an assessment of Glint and Glare with regards to residential properties, users (pedestrians and equestrians) of PRoW, road users and aviation.

1.156 **Potential Opportunities**: The LVIA shall include measures to avoid, minimise and/or mitigate the adverse impacts of the proposal and integrate it into the character of the wider landscape, which shall be implemented at the earliest opportunity.

<u>Baseline Data</u>

1.157 SCC expects the promoter to include the following data sets to inform assessment and design of the proposed solar infrastructure:

- Information of revised ancient and semi-natural woodlands and on hedgerows and canopy cover from Suffolk Biodiversity Information Service (SBIS) (to refine desktop studies on vegetation, prior to ground truthing in the field)

- Suffolk Landscape Character Assessment
- Local Landscape Character/ Valued Landscape and Key Views Assessments
- Neighbourhood Plans
- Historic late 19th and early 20th century OS Maps to inform landscape and visual mitigation proposals (landscape restoration)
- Suffolk Historic Landscape Character Assessment https://heritage.suffolk.gov.uk/hlc#Character_Types

Design Principles

1.158 SCC considers that design principles should be agreed with stakeholders. This should include (but not be limited to):

- Applying the Mitigation Hierarchy in full, including compensation, for residual impacts that cannot be mitigated.
- Striving to achieve above 10% Biodiversity Net Gain (BNG) for each parcel and corridor area.
- Retaining all existing woodlands and copses and leaving a minimum of 25m buffer around them.
- Retaining all ancient and veteran trees and mature trees, and Important Hedgerows (Hedgerow Regulations 1997) as far as possible.
- Avoiding vegetation losses for temporary components, such as temporary compounds, accesses and haul road. For temporary access, temporary traffic management should be the default to minimise vegetation losses to visibility splay requirements.
- Providing a minimum buffer of no less than 10m between any PRoW and any solar infrastructure.
- Providing appropriate buffers of any solar infrastructure from any lane or road, no less than 20m, but more if required for visual mitigation.
- Avoiding adverse impacts on the setting of Listed Buildings and Scheduled and Schedulable Monuments.
- Reducing the cable corridor width to the absolute minimum, when crossing hedge lines and if crossing valley meadows.
- Considering horizontal directional drilling (HDD) under important hedgerows and veteran trees and features that are of cultural significance.
- Designing the solar infrastructure to maximise environmental benefits (for example, see Solar farms managed for nature can boost bird numbers and biodiversity).
- Improving the connectivity of PRoW through the creation of additional routes through the development.

- Improving connectivity of landscape features, such as woodlands and hedgerows.
- Exploring, and designing in, potential for grazing.
- Minimising external lighting.
- Securing reinstatement planting, mitigative planting for landscape and visual purpose and planting for BNG through a robust aftercare management scheme, anchored in two-stage control documents, including an adaptive approach to aftercare and long-term management within the parcels and BNG areas.

1.159 SCC (Landscape) has provided further detailed comments by land parcel and cable corridor area in Table 1 below. Reference to Appendix C, a map showing the labelling of the land parcels used by SCC, is recommended.

Table 1: Further detailed comments by parcel.

Parcel	Location	Suffolk Landscape Character type	Description	SCC (Landscape) Concerns	Opportunities
1A	West of Stuston, south of Old Bury Road, west of reservoirs	Rolling Valley Claylands	The field stretches south from Old Bury Road. There is some roadside vegetation. However, the current field entrance is directly opposite a residential property which therefore has long-reaching views across the field. The field is bounded by hedges almost on all sides except on the eastern side, north of the reservoirs.	Although the existing vegetation provides some screening, the field can be glimpsed from the road to the west, between Old Bury Road and New Road (due to undulating landform/ field lying slightly lower).	An appropriate buffer should be provided at the northern side of the Parcel 1A, and within this a tree shelter belt should be provided. It should be possible to largely screen the solar panels within this field, by strengthening the boundary vegetation. This would also improve habitat connectivity.
Corridor	1A-1B	Rolling Valley Claylands			Any cable connections through the southern boundary of Parcel A1 should be micro-sited to avoid any damage to the existing hedgerow trees.
1B	South of Stuston, west of B1077 and Prow (Grove Lane?)	Rolling Valley Claylands and Rolling Valley Farmlands & Furze (nearest B-road)	Parcel 1B consist of four large fields. The PRoW is tree lined, however there would likely be views along the expanse of the panels looking north and then west. The views westwards from B1077	There is concern about the remaining field pattern which is well defined by hedgerows and hedgerow trees. Both the field boundaries and the vegetation would need to be retained and	There is an opportunity to strengthen the remaining field boundary system, to achieve greater connectivity for wildlife corridors. With appropriate buffers it may be possible to minimise the adverse effects on public amenity.

Parcel	Location	Suffolk Landscape Character type	Description	SCC (Landscape) Concerns	Opportunities
			are largely open. Some areas appear (from the aerial) to be no longer used for arable crops and may have a higher ecological value.	safeguarded. The public amenity of the PRoW needs to be safeguarded.	
Corridors	1B-1C	Rolling Valley Claylands	The exact location of the western corridor option is unclear as the corridor straddles Abbey Close, which is lined on both side with hedgerow and intermittent mature trees. The eastern corridor option cuts across the corner of one field, in which a cluster of mature trees is located.	There are concerns with regards to the existing mature trees in relation to the required corridor width.	It should be explored, if one cable connection between Parcels 1B and 1C would be sufficient, and which one would be the preferred option, i.e. minimise vegetation loss and loss in public amenity.
1C	Brome and Thrandeston, between A140 in the east and beyond Home Fram to the west, between two PRoW north and south	Rolling Valley Claylands	The fields, although large in size, are largely bounded by hedgerows with hedgerow trees.	There is concern about vegetation loss.	There are opportunities to retain existing vegetation including mature trees, to achieve greater habitat connectivity and visual screening. There should be appropriate buffers from residential properties.
Corridors	1C-1D	Rolling Valley Claylands and Rolling Valley Farmlands & Furze	The northern corridor option would exit Parcel 1C through a group of mature oaks and would need to cross the B1077, before also needing to	In landscape and visual terms, the greatest concern is the loss of mature trees to the cable routes, where trees also could not be replaced.	The ‘southern’ corridor between Parcels 1C and 1D is also the ‘western’ corridor between Parcels 1D and 2A, which may be the less impactful route (with regards to mature trees)

Parcel	Location	Suffolk Landscape Character type	Description	SCC (Landscape) Concerns	Opportunities
			cross the A140, which also has roadside hedgerows. The southern corridor option would only cross the A140 but would likely affect the junction with the B1077. Directly around this junction are gaps in the roadside vegegation.	The concern is both with regards to the further erosion of the legibility of the remaining historic field pattern as it is of the visual amenity in the public realm. The two corridor options would need to be carefully assessed.	compared with the 'eastern' corridor between Parcels 1D and 2A. A holistic assessment will be required to establish which corridor would be least harmful, not only in landscape and visual terms but also with regards to other disciplines (such as ecology, archaeology and Rights of Way).
1D	Adjacent east of A140	Predominantly in Rolling Valley Farmlands and Furze	This field is located adjacent east of the A140, south of the B1118 adjacent to the northern and eastern boundary are PRoW. The existing powerline is visible in the background in views across the parcel from the south-east.	The solar infrastructure in this field would be visible from the PRoW connecting The Street, Brome with the B1118. There is an existing hedgerow with trees along the south-eastern boundary of the parcel, which would potentially filter some of the views. However, it is expected that at least some of the this hedge would need to be removed to allow for the connecting cable corridor. There are concerns about vegetation loss and about the proximity of the proposed solar	SCC considers that the hedgerows around this field should be strengthened and the existing hedgerow to the west of the PRoW continued south along the eastern Parcel Boundary. There should be an appropriate buffer from the residential receptors to the south-west of the parcel.

Parcel	Location	Suffolk Landscape Character type	Description	SCC (Landscape) Concerns	Opportunities
				infrastructure to residential receptors at the south-western end of the field.	
Corridors	From Parcel 1D to 2A	Rolling Valley Farmlands and Furze (north) and Rolling Valley Claylands (south)	There are two search areas for a cable corridor to connect Parcel 1D with Parcel 2A.	SCC is very concerned about the potential landscape and visual impacts and effects of the eastern corridor. Where this corridor crosses The Street, there are several (approximately 8Nos.) mature roadside oak trees, which would be at risk, if this corridor was chosen. Additionally, the corridor would affect the PRoW and its vegetation and the potential for successful visual mitigation.	It would appear that crossing Rectory Road, further west, may incur the loss of fewer mature trees, although there would likely be adverse impacts and effects on a different PRoW (which is, however, at a greater distance to the development) and two mature hedge lines which also contain mature trees. These pros and cons of the corridors would need to be assessed in detail and the options carefully weighed up.
2A	South of The Street, Brome	Rolling Valley Claylands	Parcel 2A stretches from The Avenue to Brome Hall and Brome Hall Lane in the east towards the chicken units and beyond to Nick's Lane and the Mink Farm in the West. To the south, it is adjacent north of Parcel 2B.	SCC is concerned about the proximity of the parcel earmarked for solar infrastructure adjacent to The Avenue. There is also concern with regards to the setting of Grade II* Listed Church of St Mary and	SCC considers that the parcel earmarked for solar infrastructure adjacent to The Avenue is not suitable and that a minimum buffer to the western edge Gooderham's Plantation is required (approx. 200m). The area for solar panels should also be reduced in the south. A buffer of approx. 100m from the southern hedge would alleviate

Parcel	Location	Suffolk Landscape Character type	Description	SCC (Landscape) Concerns	Opportunities
			Three PRoW follow the outline of the parcel, one PRoW crosses the parcel along an existing hedgerow from south-east to north-west to Nick's Lane.	the nearby Scheduled Monument.	some of the visual effects experienced from Brome Park Farm and from Brome Avenue PRoW to the south).
Corridor	From Parcel 2A to Parcel 2C	Rolling Valley Claylands	This corridor stretches from the eastern edge of Parcel 2A to the western edge of Parcel 2C.	The corridor includes the Avenue which provides the access to Brome Hall and is treelined on either side.	If a connection from the parcel needs to be laid crossing The Avenue, this would need to be done with HDD to avoid tree losses at this location. The cable corridor search area appears quite roughly drawn and should not cross The Street to avoid roadside vegetation losses. There should also be appropriate buffers form any other vegetation and any residential properties.
2B	Parcel 2B is located east of the B1077, both north-west and south-east of Brome Avenue (PRoW)	Rolling Valley Claylands	Parcel 2B divides into two obvious parts: the part north-west of Brome Avenue, and the part south-east of Brome Avenue.	SCC is concerned about the proximity of the parcel earmarked for solar infrastructure to residential properties, including several Listed Buildings.	SCC would welcome if the extent of Solar Panels could be reduced, and appropriate buffers created. In the northern part, from Brome Park Farm (approx. 150m to the west) with planting for visual mitigation. This could be along a former field boundary. Further west SCC considers that an appropriate buffer needs to be created from Conifer Cottage and Mustardpot Barn and other nearby residential properties. SCC would

Parcel	Location	Suffolk Landscape Character type	Description	SCC (Landscape) Concerns	Opportunities
					welcome if the area proposed for solar panels and other solar infrastructure could be set back appropriately from Brome Avenue (northern side). South of Brome Avenue, SCC considers a appropriate set back from Brome Avenue would be required. Brome Avenue is largely a treelined lane, except for a short stretch between Brome Park Farm and Brome Lodge. SCC would welcome it, if, as part of mitigation and landscape restoration, trees could be provided along this stretch (cable connections permitting). SCC considers that the north-eastern boundary of the southern part of the parcel should be strengthened with additional vegetation. Appropriate buffers need to be created from Brome Lodge.
2C	East of Upper Oakley	Rolling Valley Claylands and Wooded Valley	This is one on the more remote parcels, east of Upper Oakley. However, the Mid Suffolk Path runs	SCC is concerned with regards to the Listed Buildings along Upper Oakley.	SCC considers that Parcel 2C should be slightly reduced at the northern end, so that it does not extend further north than the

Parcel	Location	Suffolk Landscape Character type	Description	SCC (Landscape) Concerns	Opportunities
		Meadowlands and Fens	along its northern boundary. The parcel is partly sheltered by woodland blocks to the north and east, but more open to the west and south.	There is concern with regard to the cable corridor linking Parcel 2C with Parcel 2B.	woodland at its eastern edge. This would create a suitable buffer from the Mid Suffolk Way and also preserve some of the views from residential properties to the west. Additional boundary mitigative vegetation should also be considered. SCC would welcome if the two woodland blocks to the north and east of this parcel could be linked with a new tree belt, within the parcel, in its north-eastern corner.
Corridor	Southeast boundary of Parcel 2C, crossing the River Dove twice to connect to the eastern side of Parcel 2B	Wooded Valley Meadowlands and Fens and Rolling Valley Claylands		There is concern about the double crossing of the River Dove. This area may be of archaeological importance.	South of Parcel 2C there appears to be a gap in the wooded vegetation which is typical for this river valley floor. SCC would welcome it, if the Applicant would consider crossing the River Dove in this location, if possible/necessary, in order to avoid vegetation losses.
3A	North and East of Gislingham from railway line to Burgate Road, from village edge to Green Lane/Mellis Road	Plateau Claylands close to Gislingham, then Ancient Plateau Claylands	SCC (Landscape) has subdivided parcel 3 and considers the southern quarter as Section 3A, with the green lane, Mellis Road and Broad	SCC (Landscape) considers that the current outline boundary is too close to the village of Gislingham and too close to Thornham Road.	SCC (Landscape) considers that solar infrastructure, including panels, should begin north of the River Dove, and the existing woodland to provide an acceptable buffer from the village and the eastern approach to it.

Parcel	Location	Suffolk Landscape Character type	Description	SCC (Landscape) Concerns	Opportunities
			Dock Woodland to be the division line to the north. The current plans provided by the Applicant shows a potential area for solar panels and associated infrastructure which stretches form Burgate Road in the West to the railway line in the east. In the south the proposal outline follows the settlement boundary and then Throndon Road/Major Lane.	The change from rural/ agricultural views, when approaching Gislingham from the east to solar energy infrastructure would be detrimental to the visual amenity for both residents and visitors to the village. The inclusion of a small parcel of land adjacent north of residential visual receptors of Columbine Way, east of Mellis Road would also detrimental. SCC is further concerned about the cumulative effects with the Norwich to Tilbury Powerline proposals by National Grid and considers that these would need to be fully assessed. At Greens Farm the proposed development would envelop the residential property on all sides.	SCC would further suggest leading the cable corridor through the field adjacent to the river, on the southern side, as these seem largely void of any vegetation. The location of crossing back over the river to reach Parcel 2B should be carefully selected to avoid vegetation losses; there appears to be a potential area between two wooded areas. SCC (Landscape) considers that there is an opportunity for restoration works around the River Dove and considers that the area south of the River Dove would be appropriate as an area that delivers Environmental and Biodiversity Net Gain while retaining visual amenity for residents and visitors to Gislingham approaching from the east. SCC (Landscape) considers that the Green Lane connecting Burgate Road and Mellis Road should be retained and strengthened. SCC considers that Broad Dock Woodland should be connected to the triangular woodland to the

Parcel	Location	Suffolk Landscape Character type	Description	SCC (Landscape) Concerns	Opportunities
					south-east of Greens Farm with a new tree belt on the eastern side of the track with a minimum depth of 15m. There should be an appropriate set back of solar infrastructure from Mellis Road.
3B	East of Burgate Road, as far north as Moatyard Plantation	Ancient Plateau Calylands	The area proposed for solar energy infrastructure stretches from Burgate Road in the West to Mellis Road in the East, form the Green Lane and Mellis Road in the south to the Moatyard Plantation in the north. This section also includes Collyer's Wood and other smaller treed areas.	SCC is concerned about the impacts and effects of the proposed infrastructure development on Collyer's Wood and Moatyard Plantation, the effects on the local landscape character and the visual amenity along Burgate Road, which is not only used by cars but also as a recreational route by walkers.	SCC considers that Collyer's Wood, The Moatyard Plantation and other existing vegetation should be retained and strengthened and provided with an appropriate buffer. Opportunities for greater connectivity should be explored. There should also be an appropriate buffer form Burgate Road.
Corridor	Parcel 3A and 3B to Yaxley substation	Ancient Plateau Claylands	This corridor needs to be fully assessed in due course. It should be noted, however, that south-east of the railway line, the byway (Park Lane) is tree lined on both sides.	There is concern with regards to the loss of mature trees and hedgerows.	Special constructions methods may need to be considered. There is potential for landscape restoration within the corridor.
3C	Between Burgate Road and Mellis Road, up to Big	Ancient Plateau Claylands	The proposed solar infrastructure continues northwards to Big Wood	SCC is concerned about the proximity of the proposed solar	SCC considers that the triangular field north of Mellis Common should not form part of the solar

Parcel	Location	Suffolk Landscape Character type	Description	SCC (Landscape) Concerns	Opportunities
	Wood and further east to Stonebridge Plantation/Whitmore Wood and Windeye		and, in places bounds to Mellis Conservation Area (Mellis Common, which is Registered Common Land). Further solar infrastructure is proposed north of Mellis Common between Big Wood and Stonebridge Plantation continuing north of Big Wood to Church View, south of Furze Way (Registered Common Land).	infrastructure boundary line to existing vegetation and Listed Buildings west of Mellis Road. However, the biggest concern with regards to the proposals is their proximity to Mellis Common. The visual change would be severe from a wide area and expected to result in unacceptable visual effects.	infrastructure proposals, as the adverse visual effects on the Common are expected to be severe to be acceptable. It is considered that this field may be suitable as cable corridor (subject to full assessment). Likewise, the field south of Big Wood should be removed from proposals for solar infrastructure, as the visual effects on Mellis Common would be detrimental. Again, this field may be suitable as a cable corridor (subject to full assessment).
Corridor	From Parcel 3C to Parcel 5C and 5A	Ancient Plateau Claylands		SCC considers the location of the cable corridor within Mellis Conservation Area and Mellis Common unacceptable.	SCC considers that the cable corridor can be routed outside of Mellis Conservation Area and Mellis Common (see comments for Parcel 3C)
3D	Field west of Burgate Road	Ancient Plateau Claylands	The field is located west of Burgate Road and south-east of Stubbing's Green (Registered Common Land). A PRoW crosses the field from Burgate Road westwards approximately at half point. The field is agricultural, but there are some trees and other	SCC is concerned about the further loss of vegetation and the cumulative effects with the Norwich to Tilbury powerline proposals in this area, as there is a potential for a CSE compound east of Burgate Road and the powerlines crossing	The land in this area is relatively flat and falls slightly away from Burgate Road to the west. With appropriate buffers and robust boundary planting in addition the existing vegetation, SCC considers that the adverse effects on the local landscape character may be sufficiently reduced. This area provides an opportunity to link up a number of PRoW and

Parcel	Location	Suffolk Landscape Character type	Description	SCC (Landscape) Concerns	Opportunities
			vegetated areas dotted along its boundaries.	Burgate Road twice. The effects on views from the PRoW network to the west would need to be fully addressed.	to create additional routes towards Gislingham.
4A	East of B1077, south of Cranley Hall	Plateau Claylands and Rolling Valley Claylands	Parcel 4A consists of 3 arable fields with some boundary vegetation. The Cranley Hall complex, just to the north of this parcel comprises Grade II and Grade II* Listed buildings and a scheduled monument (moated site). A PRoW, which follows a watercourse follows the parcel boundary for a short section.	This undulating landscape affords wide reaching views. The roadside vegetation along the eastern side of the B1077 is intermittent at best. Parcel 4A would also be visible from Redlingfield Road, on the rising valleyside beyond Parcel 4B.	This is an area, where landscape and biodiversity enhancements could be achieved through the creation of proportionate, landscape scale buffers linked by wildlife corridors. The existing vegetation and trees, for example along the southern boundary of the middle field should be retained and enhanced. Appropriate buffers will be required from Cranley Hall and Moated Site, the B1077 and the PRoW to the south.
4B	East of B1077, south of Parcel 4A a far as Bridleway and a residential curtilage in the south	Plateau Claylands and Rolling Valley Claylands	Parcel 4B consists of several large arable fields. Along the B1077, there is intermittent roadside vegetation including mature trees, but views into the fields are available. Further south , there is no roadside vegetation and the views into the fields are wide open. The proposed solar	There is concern with regards to the openness of this landscape and the far-reaching views afforded by the undulating landform. There is concern with regards to the proximity of the potential solar arrays to the residential property in the south, the PRoW and the B1077.	This is an area, where landscape and biodiversity enhancements could be achieved through the creation of proportionate, landscape scale buffers linked by wildlife corridors. The existing vegetation and trees, for example along the northern stretch of the B1077 should be retained and enhanced. Appropriate buffers will be required from the residential property, the B1077 and the

Parcel	Location	Suffolk Landscape Character type	Description	SCC (Landscape) Concerns	Opportunities
			array area is adjacent to a residential curtilage at its southern end. A Bridleway marks the southern boundary on the eastern side; a PRoW crosses the Parcel roughly in the middle from north-west to south.		PRoW adjacent to and within the site.
Corridor	Parcel 4A to Parcel 3 and Yaxley substation	Rolling Valley Claylands, Wooded Valley Meadow & Fens, Plateau Clayland	This corridor proposes to connect Parcel 4A with the Yaxley substation crossing the intricate system of wooded valley meadows. In this area the historic field pattern and vegetation pattern are largely intact. Other areas of the corridor are yet to be visited.	There is great concern with regards to the crossing of the valley meadows, as this is expected to irreversibly change the landscape character of this sensitive landscape.	SCC (Landscape) considers that the location indicated here to cross the Dove River is inappropriate.
Corridor	Corridors from Parcel 4A to Parcel 2B	Ancient Plateau Clayland (around Yaxley), Rolling Valley Claylands, Wooded Valley Meadow & Fens, Plateau Clayland (near Occold)	This corridor proposes to connect Parcel 4A with the Parcel 2B crossing the intricate system of wooded valley meadows to the south-east and east of Eye. In this area the historic field pattern and vegetation pattern are largely intact. Other areas of the corridor are yet to be visited.	There is great concern with regards to the crossing of the valley meadows, as this is expected to irreversibly change the landscape character of this sensitive landscape.	This corridor may be slightly less problematic than the one proposed to link Parcel 4A with Yaxley substation, because the cable route would follow the river and then crosses into arable fields. It is expected that the woodland south-east of Parcel 2B would be outside of the corridor. There may overall be less vegetation and fewer trees

Parcel	Location	Suffolk Landscape Character type	Description	SCC (Landscape) Concerns	Opportunities
					affected here, but this would need to be carefully assessed. There is the opportunity of landscape and ecological enhancement in this area.
Corridor	Corridor from Parcel 4A to Parcel 2C	Rolling Valley Claylands, Wooded Valley Meadow & Fens, Plateau Clayland	This corridor also crosses the Dove River, which is vegetated in this area. Not all areas of this corridor have been visited.	There is concern about vegetation loss and irreversible change to the local landscape character.	There appears to be a gap between the plantations along the Dove River to the south of Parcel 2C, which might be able to support a cable route. Nevertheless, this is a sensitive landscape which is likely to require appropriate constructions techniques as well as landscape and ecological enhancement.
5A	East of railway line, west of Thrandeston and west and north of Mellis Road	Rolling Valley Farmlands and Furze (north-west), then Ancient Plateau Claylands	The northern end of Parcel 5A is fairly sheltered from public viewpoints, except for the PRoW which crosses the parcel near it northern tip. Further south there are open views from Mellis Road across the parcel to the railway line, which is clearly visible in this location and constitutes a detracting element in the landscape. Mellis Road is tree lined here.	It appears that the extent of the parcel is adjacent to the private curtilages of properties in Thrandeston. There is also concern about access to the proposed solar plant, in particular during construction, as Mellis Road is a narrow, predominantly single-track road.	SCC considers that solar infrastructure should begin south of the footpath and provide an appropriate buffer from the private curtilages. SCC considers that there needs to be an appropriate buffer between Mellis Road and the solar infrastructure. There is an opportunity to plant additional trees along Mellis Road as part of visual mitigation and landscape restoration.

Parcel	Location	Suffolk Landscape Character type	Description	SCC (Landscape) Concerns	Opportunities
5B	South and east of Mellis Road, west of Green Lane (Judas Lane), as far south as to two small ponds	Ancient Plateau Claylands		Judas Lane is, except for a short stretch at the southern end, a highly vegetated green corridor and unsuitable as an access route.	SCC considers that there needs to be an appropriate buffer between Mellis Road in the west and Judas Lane in the east and the solar infrastructure. SCC considers that the area earmarked for solar infrastructure would need to be set back by sufficiently from Mellis Road (north and west) and Judas Lane (east). There is an opportunity to plant additional trees along Mellis Road as part of visual mitigation and landscape restoration.
5C	East of railway line, west of Mellis Road, south of a woodland, and enveloping a woodland to the south, which is part of Mellis Conservation Area	Ancient Plateau Claylands	Parcel 5C begins just south of a woodland and follows the existing field boundary to Mellis Road in the east. Looking west from Mellis road in this area the railway line is well screened and not very conspicuous. There are few detracting elements in the view	SCC is concerned about the visual effects of the proposed solar infrastructure in this area. SCC does not consider it acceptable to place solar infrastructure adjacent west, north and east of the woodland block to the south of this parcel, which is part of Mellis Conservation Area.	SCC considers that the area between the woodland and Mellis Road should be reserved for environmental measures. Further there should be a buffer of no less than 100m to the north and 25m to the west. An appropriate buffer will also be required north of the Grade II listed Barn of Elm Tree Farm.
Corridor	From parcels 5B and 5C Yaxley substation	Ancient Plateau Claylands	The search area for the wider cable corridor is rather large and will require refinement.	SCC is concerned that from Parcel 5A Mellis Road will need to be crossed, where it is currently tree lined. Further it would appear	These locations need to be considered for HDD, in order to maintain the connectivity of wildlife corridors and visual amenity.

Parcel	Location	Suffolk Landscape Character type	Description	SCC (Landscape) Concerns	Opportunities
				that from Parcel 5B the corridor would need to cross the highly vegetated Green Corridor of Judas Lane.	There is an opportunity to extend the wildlife corridor to where Judas Lane meets Mellis road again in the south.

SCC Public Health

1.160 **Document Library:** There is no mention or section on Health and impacts. Recommendation: To add a specific chapter on Human Health to understand impacts of this solar farm NSIP on human health and wellbeing and to assess their cumulative effects. This chapter should cover potential impacts beyond technical assessments.

1.161 **Glint and Glare:** Recommend a Glint and Glare Impact Assessment. Glint and glare assessments should consider the reflective capacity of all the materials used including panels, frames and supports, to avoid glint and glare. Where necessary, appropriate mitigation measures, such as screening, should be employed to ensure that harmful impacts are avoided.

1.162 **Socio-economics community impacts:** Recommend assessment of community impacts on tourism, recreation, employment, opportunities and benefits to the local economy, and any required mitigation. Opportunities could include providing jobs to local people both during construction and operation, and promotion of active travel including walking; cycling; equestrian routes through the site, which can benefit and support local community activities.

1.163 **Community engagement:** Key to build trust and confidence through the process. Community engagement good practice should include:

- Develop a community engagement plan from the outset and begin community engagement as early as possible in the process, recognising there are differences and local needs through different engagement methods.

1.164 **Cumulative impacts & effects:** Recommend an assessment to consider:

- Cumulative impacts and opportunities arising from the scheme combining multiple changes in wider determinants of health eg with traffic and transport, visual impacts, loss of agricultural land, demand on local services or accommodation throughout the construction and after construction.

1.165 **AQ:** Recommend an EIA to assess impact from construction; combustion, demolition, noise and impact on Air Quality.

1.166 **Battery Energy:** Recommend using the guidance on grid-scale BESS by the National Fire Chiefs Council, which is provided in Appendix H.

1.167 **Land Use and Visual Impact:** Recommend mitigation to:

- Reduce any impact to biodiversity, visual appearance, landscape character and protect access to land for active travel.
- Increase opportunities to access to PROWs and ensure good access to green spaces.

1.168 **Mental Health and Community Wellbeing:** Recommend an Impact assessment of mental health and community wellbeing to ensure mitigation measures are put in place to reduce any community stress or anxiety is minimised. The promoter should refer to SCC's Energy and

Climate Adaptive Infrastructure Policy Community Engagement and Wellbeing Supplementary Guidance document.

SCC Planning Authority

1.169 SCC is the planning authority for minerals and waste planning matters within Suffolk, as well for its own development which includes schools and some highways developments.

1.170 The Development Plan for the area directly affected by the scheme includes the Suffolk Minerals & Waste Local Plan, Part 1 of Babergh & Mid Suffolk District Councils' Joint Local Plan, and several Neighbourhood Plans (see Table 2 below).

1.171 The main concern in terms of minerals and waste development is the safeguarding of minerals resources and development and the safeguarding of waste development.

1.172 The relevant Suffolk Minerals & Waste Local Plan policies are MP10 for minerals and WP18 for waste.

1.173 Policy MP10 titled "Minerals consultation and safeguarding areas" seeks to safeguard:

a) those Minerals Safeguarding Areas located within the Minerals Consultation Areas identified on the Proposals Map from proposed development in excess of five Ha, and;

b) areas falling within 250m of an existing, planned or potential site allocated in the Plan for sand and gravel extraction.

1.174 Policy WP18 titled "Safeguarding of waste management sites" seeks to safeguard:

a) existing sites and sites proposed for waste management use as shown on the Proposals & Safeguarding Maps.

1.175 The full text of these policies, along with the corresponding supporting text for each can be found in Appendix I.

1.176 SCC notes that Eye Power Station is located to the east of Yaxley substation, and to the west of Land Parcel 2, although it is acknowledged that the safeguarded site is not within any of the proposed land parcels, nor within the indicative cable corridor areas of search.

1.177 The proposal is also indicated as laying within areas of the County that are mapped as being covered by spreads of underlying sand and gravel resources. The significance of these resources is at most of regional importance. The proposed development would also not cause the irreversible loss of these resources, albeit they would not be accessible for a considerable period of time. They are also not identified in the Suffolk Minerals and Waste Local Plan as extensions to existing extraction sites or as new areas of proposed extraction either. Therefore, the County Council as Minerals Planning Authority does not raise an objection on minerals safeguarding grounds.

1.178 SCC will defer to Mid Suffolk District Council and Parish Councils to make comments in respect of their own development plans.

Table 2: Adopted Development Plans

Item	Area	Subject	Comment
1	Suffolk	Suffolk Minerals and Waste Local Plan https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme	Adopted July 2020
2	MSDC	Joint Local Plan (Part 1) https://www.midsuffolk.gov.uk/documents/d/asset-library-54706/babergh-and-mid-suffolk-joint-local-plan-part-1-nov-2023	Adopted November 2023
3	Eye PC	Eye Neighbourhood Plan https://www.midsuffolk.gov.uk/w/eye-neighbourhood-plan	Adopted May 2021
4	Diss & District	Diss and District Neighbourhood Plan https://www.southnorfolkandbroadland.gov.uk/planning/future-development/neighbourhood-plans/adopted-neighbourhood-plans-south-norfolk/diss-district-neighbourhood-plan	Adopted October 2023

SCC Property

1.179 SCC believe that Hoxne Home Farm, an SCC property, is potentially affected by the EcoPower Suffolk proposals.

1.180 The impact and necessary mitigation to these sites can only be established when there is greater detail.

SCC Public Rights of Way (PROW)

1.181 SCC PROW's comments on the EcoPower Suffolk proposals can be found in the following paragraphs. Appendix J provides SCC's position in relation to PROW and solar farms in Suffolk.

1.182 For further information and advice about public rights of way please contact: Rights of Way & Access Team, Growth, Highways and Infrastructure, Suffolk County Council, Phoenix House, 3 Goddard Road, Ipswich IP1 5NP. PROWplanning@suffolk.gov.uk

1.183 The information provided by the promoter only mentions PROW with regards to "*Maintain existing Public Rights of Way (PRoW), minimise disruption to PRoWs during all phases and identify opportunities to improve local walking routes and paths where possible."* (taken from the EcoPower Suffolk Non-Statutory Consultation Event Boards).

1.184 Also supplied by the promoter is a PROW map titled '*A3 EcoPower Suffolk – Public Rights of Way'*. This map shows the indicative locations of the Public Rights of Way in the vicinity.

Minimum Buffers

1.185 SCC expects a minimum buffer of no less than 10m between any PRoW should be a design principle for the project. The connectivity of PRoW should also be improved through the creation of additional routes through the development.

Public Rights of Way (PROW) Management plan

1.186 SCC PROW requests that all items which impact upon the PROW are addressed and mitigated in a PROW Management Plan and also PROW are referred to in their own sections in any applications. Public rights of way (PROW) are an important part of Suffolk's landscape and are legally protected. Early contact and discussion with the Green Access Team is essential to allow for best practice to be followed in developing new sites.

PROW mapping

1.187 All routes affected by the proposal should be plotted according to the definitive map. This information should be sought from SCC and then accurately plotted on the maps, and walked routes should not be relied upon for the definitive route. More information for this can be found here: https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/view-definitive-maps-of-public-rights-of-way

1.188 Labelling of PRoW should be consistent and standard across all documents and follow the same convention as depicted on the Definitive Map, the legal record for PRoW. PRoW are identified by the parish (which has a code) and the path number, for example **E – 354/007/A** is East/parish code (Knodishall=354)/path number =7A, ie Knodishall 7A.

PROW promoted routes

1.189 Whilst the mapping supplied indicates PROW routes, it does not include promoted routes, both circular and linear. A significant linear route runs through the proposal and will be impacted upon. More information can be found here: https://www.discoversuffolk.org.uk/ for example:

Surveys of PROW

1.190 Prior to any proposed closures and/or diversions (temporary or permanent) surveys of routes should be undertaken to assess the conditions and usage. The parameters of the surveys should be agreed with SCC PROW prior to being undertaken.

Construction access and associated activities

1.191 Understanding of the location of the haul roads and any associated activities such as compounds and their quantum of use is vital to assess impacts on the PROW. Many of the PROWS are not suitable for HGV access and may impact on PROW user safety. It is noted that this project may be delivered at the same time as other energy projects so cumulative transport impacts will need to be considered.

Suffolk Fire and Rescue Service

1.192 Suffolk Fire and Rescue Service ("SFRS") will work and engage with the developer as this project develops to ensure it complies with the statutory responsibilities that SFRS enforce.

1.193 The developer should produce a risk reduction strategy as the Responsible Person for the scheme as stated in the Regulatory Reform (Fire Safety) Order 2005 (as amended).

1.194 SFRS would also expect that safety measures and risk mitigation is developed in collaboration with the SFRS to ensure emergency responders are not placed at risk and appropriate access and facilities are provided. The strategy should cover the construction, operational and decommissioning phases of the project.

1.195 During the construction phase the number of daily vehicle movements in the local area will significantly increase. SFRS will want to view the transport strategy to minimise this impact and prevent an increase in the number of road traffic incidents. Any development should not negatively impact on the Service's ability to respond to an incident in the local area.

1.196 **The developer must ensure the risk of fire and other emergencies is minimised. This may be by way of any or all of the following measures:**

- Procuring components and using construction techniques which comply with all relevant legislation, supported with appropriate test evidence and certification.
- Designing the development to contain and restrict the spread of fire through the use of fire-resistant materials, and adequate separation between elements.
- The design should be undertaken in accordance with the IET PV Code of Practice and MCS requirements, or equivalent technical requirements, provided UK regulations are still met.
- Appropriate automatic fire detection should be installed in all areas inside buildings in which electrical control equipment (inverters, isolators, and distribution boards) is located. This should be monitored to give the earliest possible warning of fire.
- Consideration should be given to the fire safety management implications of a PV system that will operate at a fully or partially unattended location.
- The installation of appropriate automatic fire suppression systems is highly beneficial for the mitigation of risk in the event of fire and for protection of property and should be considered for areas inside buildings where equipment associated with PV systems is installed.
- Appropriate water supplies for fire-fighting purposes.
- Developing an emergency response plan with SFRS to minimise the impact of an incident during construction, operation and decommissioning of the facility. The emergency response plan should include:
  i. details of the hazards associated with PV panels and associated equipment
  ii. isolation of electrical sources to enable firefighting activities
  iii. minimise the environmental impact of an incident
  iv. containment of fire water run-off. The emergency response plan should be maintained and regularly reviewed by the occupier and any material changes notified to SFRS
- Environmental impact should include the prevention of ground contamination, water course pollution, and the release of toxic gases.

1.197 If the comments above are not considered or inappropriate access and facilities for the FRS provided, SFRS will ensure its SSRI record is amended accordingly, and operational crews will adopt an informed risk based defensive approach on arrival. Depending on the nature of the incident and the information ascertained, defensive tactics may be

deployed for some time, to maximise our response while maintaining crew safety.

1.198 It is acknowledged the information provided includes the presence of battery energy storage systems (BESS) as part of the proposed development. As well as all of the above, SFRS requests that the promoter takes note of the following additional comments.

1.199 **The BESS facilities should be designed considering the following principles:**

- Effective identification and management of hazards and risks specific to the siting, infrastructure, layout, and operations at the facility.
- Siting of renewable energy infrastructure so as to eliminate or reduce hazards to emergency responders.
- Safe access for emergency responders in and around the facility, including to renewable energy and firefighting infrastructure.
- Provision of adequate water supply and firefighting infrastructure to allow safe and effective emergency response. This could include the provision of water to allow for defensive firefighting to protect surrounding infrastructure.
- Vegetation sited and managed so as to avoid increased bushfire and grassfire risk.
- Prevention of fire ignition on-site.
- Prevention of fire spread between site infrastructure (solar panel banks, wind turbines, battery containers/enclosures).
- Prevention of external fire impacting and igniting site infrastructure.
- Provision of accurate and current information for emergency responders during emergencies.
- Effective emergency planning and management, specific to the site, infrastructure and operations.

1.200 Suffolk Fire and Rescue Service will seek to obtain as much information as possible at the earliest opportunity from the applicant/developer/designer/manufacturer etc., to allow an initial appraisal of the BESS to be made. It is the responsibility of those above to provide this information, with appropriate evidence provided to support any claims made on performance and with appropriate standards cited for installation. Areas for discussion that SFRS may wish to clarify include those listed in Table 3:

Table 3: Examples of areas for discussion and associated clarification questions that may be used by SFRS to allow an initial appraisal of the proposed Battery Energy Storage System (BESS).

Areas for discussion	Clarification questions
Thermal event / deflagration	• How will the proposed BESS perform in the event of a thermal event / deflagration and what proactive / reactive systems are proposed to mitigate this? • How will the thermal event be contained to the BESS of origin without the radiant heat to others? • How has the performance of the BESS in a thermal runaway event influenced site design?
Site plans	• What are the assumptions about active firefighting, within the emergency response plan and what measures are in place to reduce the scale of an incident? • Are the incident assumptions realistic? What is the role of the FRS at an incident? Are they realistic? What is the expectation of the FRS in terms of the fire strategy at a thermal event? • What is the provision for firefighting access to, around and within the site?
Water supply / suppression systems	• What is the type, purpose and effect of any fire suppression system installed? • What is the purpose of the water supply provision on site? Boundary cooling/defensive firefighting or active suppression?
BESS design	• What is the size, quantity and capacity of each BESS unit? • Is the BESS design appropriate for the weather at the proposed location i.e. prevention of water ingress and impact of temperature range on cooling systems? • Does the applicant/developer have relevant competence and experience in the field of BESS design and deployment on the scale of the proposed development? • What are the arrangements for ongoing monitoring of the BESS and what is the response time for onsite technical assistance in the event of an incident?
Annunciation	• What remote annunciation panels are available for monitoring an event from the site? • What data is available from these remote annunciation panels?

Suffolk County Council

EcoPower Suffolk Non-Statutory Consultation

Response of Suffolk County Council

Appendix B: Map showing the local context of the proposals

ECOPOWER SUFFOLK LOCAL CONTEXT MAP

KEY

- Order Limits
- National Grid Substation
- White Elm Solar Farm Order Limits
- Norwich to Tilbury Order Limits
- Progress Power Order Limits
- Conservation Area
- Site of Special Scientific Interest
- Special Area of Conservation
- Minerals and Waste Safeguard Area
- Development Allocation: Employment
- Development Allocation: Residential

1:100,000

0 0.75 1.5 3 mi

0 1.25 2.5 5 km

Suffolk County Council

Growth, Highways & Infrastructure
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

ECOPOWER SUFFOLK NON-STATUTORY CONSULTATION APPENDIX B

Map showing the local context of the proposals

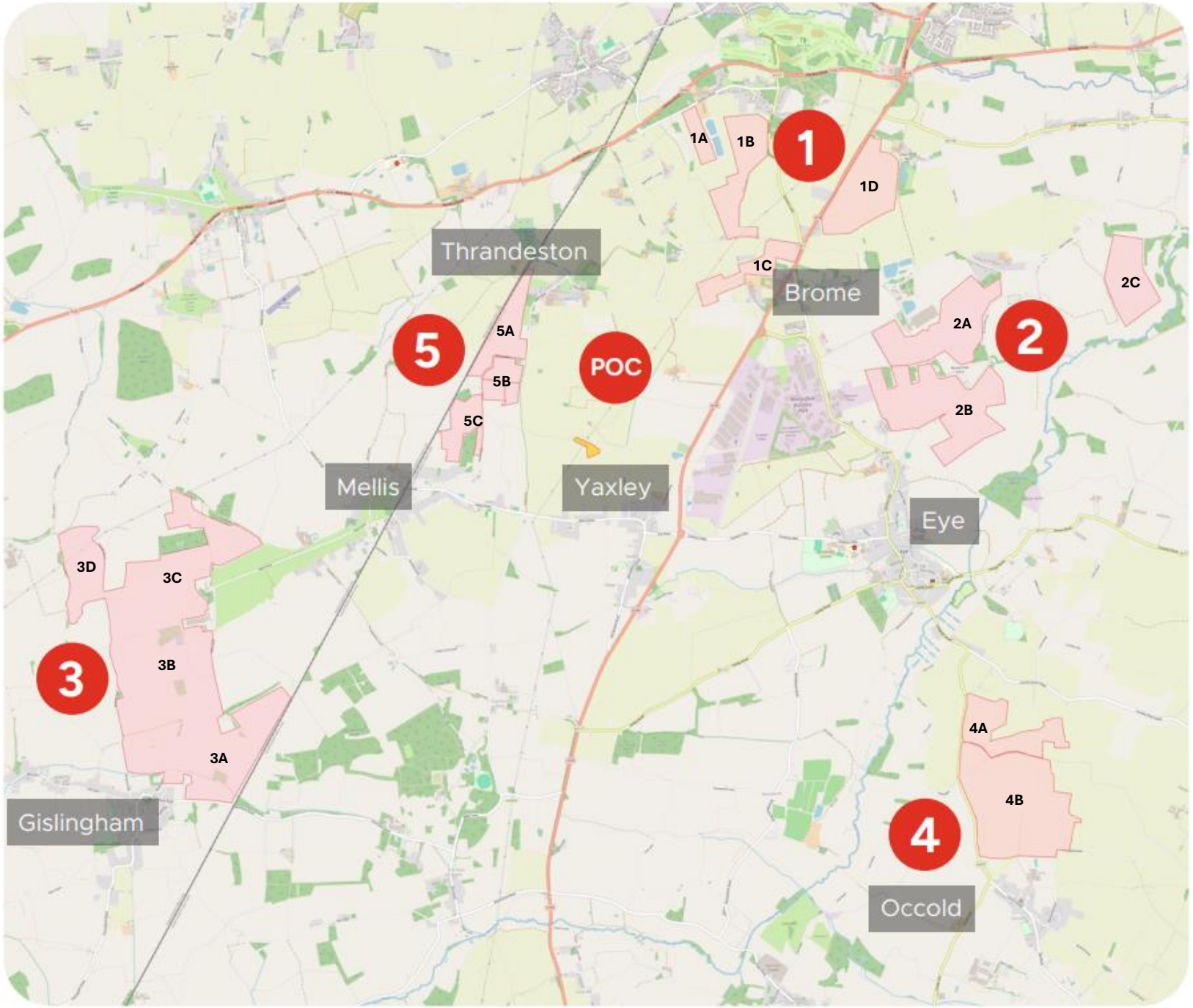
Suffolk County Council

EcoPower Suffolk

Non-Statutory Consultation

Comments of Suffolk County Council

Appendix C: Map showing land parcel labelling


1
1A
1B
1D
Thrandeston
1C
Brome
2C
2A
2
5
5A
POC
5B
5C
2B
Mellis
Yaxley
Eye
3D
3C
3
3B
3A
4A
4B
4
Gislingham
Occold

Suffolk County Council

EcoPower Suffolk Non-Statutory Consultation

Response of Suffolk County Council

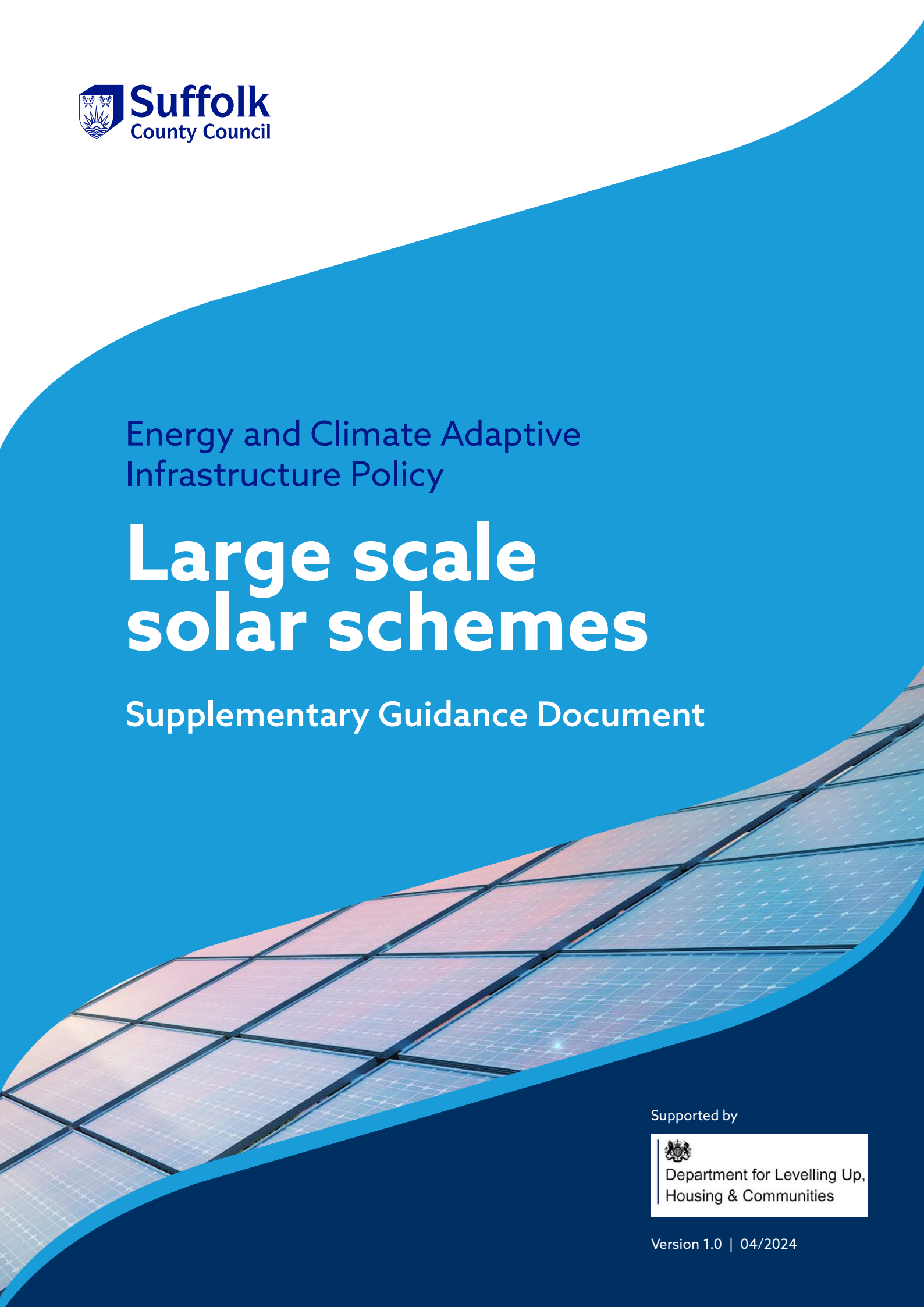
Appendix D: Energy and Climate Adaptive Infrastructure Policy Supplementary Guidance Document – Large scale solar schemes

Suffolk County Council

Energy and Climate Adaptive Infrastructure Policy

Large scale solar schemes

Supplementary Guidance Document



Supported by

Department for Levelling Up, Housing & Communities

Version 1.0 | 04/2024

This is a supplementary guidance document, to support the Energy and Climate Adaptive Infrastructure Policy[1], which was adopted by Suffolk County Council's Cabinet, on the 16th of May 2023.

Scope and purpose of this Supplementary Guidance Document

The County Council recognises that solar project locations are dependent on the location and availability of transmission and distribution network connections, and that the ambition is to deliver 70GW of solar by 2035[2].

While the Council considers that the priority should be to deliver solar generation as part of multifunctional land use on buildings, and around areas of built infrastructure, such warehousing and employment sites. It is recognised however, that utility scale ground mounted solar will also be required to reach this target.

Suffolk has natural and geographic advantages that make it attractive for locating specific low-carbon technologies, including solar power. This, therefore, creates significant challenges for the economy, environment, and communities of Suffolk.

Therefore, the highest standards of design, delivery, and mitigation, are required to deliver acceptable solar schemes.

The purpose of this Supplementary Guidance Document is to outline how, in principle, the Council will:

- Seek to engage with project promoters of these schemes, to ensure that the adverse impacts of these projects are properly understood, minimised, mitigated, and compensated for.
- Seek to ensure the best possible outcomes through the design of projects, that deliver improved biodiversity, access, landscape fabric, water management, and where appropriate, retain compatible agricultural production.
- Seek to ensure that communities hosting new NSIP-scale solar projects are treated fairly by project promoters, in that they should have a genuine opportunity to engage with the promoter, to shape the emerging project effectively and demonstrably, from the earliest possible stage of its development.
- Seek to maximise the benefits of economic growth, skills, and STEM (Science, Technology, Engineering and Maths) educational inspiration, that can be secured from NSIP-scale solar projects.

1 https://www.suffolk.gov.uk/asset-library/energy-and-climate-adaptive-infrastructure-policy.pdf

2 https://www.gov.uk/government/groups/solar-taskforce

The role of the County Council

Suffolk County Council is not the decision-maker for Nationally Significant Infrastructure Projects (NSIP). However, the County Council is a key statutory consultee, and its view carries significant weight with the Examining Authority (ExA) and, by extension, the Secretary of State (SoS). Particularly because it has responsibility for a wide range of interlocking issues across the whole county, which affect decision-making, and has a key role in representing, developing, and supporting, its local communities and protecting their environment.

The role of the County Council is set out in more detail in the Energy and Climate Adaptive Infrastructure Policy.

The role of project promoters

As responsible corporate entities, promoters of solar projects will be interested in achieving positive outcomes for the community, environment, and economy. Promoters should be seeking to deliver inclusive growth in renewable generation, through working with partners, such as Suffolk County Council.

To make a project more acceptable, Suffolk County Council expects any large solar promoter to propose schemes that will deliver social, environmental, and economic objectives, including those necessary to mitigate impact. It is critically important for the promoter to work with Suffolk County Council and the relevant district/borough council, not just on the mitigation of impacts, but also on the integration of their projects into the community and landscape. This should begin at the earliest stages of consultation, that is, as soon as possible after the project is in the public domain.

Promoters should approach communities with a clear rationale for delivering on a range of wider local objectives as part of their project. By exploring the full extent of potential partnerships at an early stage, promoters will significantly reduce the risks around managing potentially competing demands, and any resultant obligations will be full and active commitments, clearly supported by both the promoter and the other parties.

Engagement with the County Council

Robust and effective Planning Performance Agreements (PPA) will be essential to ensure effective collaboration and engagement with Suffolk County Council. As set out in the Energy and Climate Adaptive Infrastructure Policy, the Council expects that

the costs of its engagement with the project promoter throughout the consenting process, will be covered under the terms of a Planning Performance Agreement. This will be on a full cost recovery basis, to ensure that local services and local taxpayers are not disadvantaged financially by the Council's engagement with the project promoters. A detailed explanation of the Council's position on Planning Performance Agreements can be found in our guidance for project promoters[3].

The Council considers that effective engagement and co-design with statutory consultees from the earliest stage, (including during site finding and land assembly) is necessary to facilitate an effective response to the constraints imposed, and opportunities offered, by the natural and historic environment of Suffolk, and the likely community and environmental issues that arise from large scale solar projects.

Engagement with communities

Solar projects consented under the NSIP process are capable of reshaping place. As a result, Suffolk County Council considers, that over and above effective consultative engagement, there is a need to involve and collaborate with communities. Therefore, the co-designing of projects with the host communities, is essential.

Given the dispersed pattern of settlement, which is generally found in Suffolk, these proposals will have significant, widespread, and lasting impacts, on the character of the places in which people live. The scale of solar projects consented through the Planning Act 2008 is such that NSIP scale solar projects, are not just an object in the landscape, they are, in fact, likely to change the landscape, across a wide area.

Therefore, genuine, and effective dialogue between the project promoter and representatives of the affected localities is critical, to allow those communities, directly impacted by the scheme, to shape its design and delivery. Likewise, it is essential for project promoters to engage effectively with host communities during the construction of the project.

Project promoters should work effectively with community leaders, with a particular focus on engagement with Parish Councils and their representatives.

Engagement with other project promoters

As set out in the Climate Adaptive and Energy Infrastructure Policy, the harm to the environment and communities of Suffolk will arise both from the construction and operation of the promoter's project itself, and from its in combination, and cumulative effects, with overlapping and consecutive projects. The Council will expect promoters to develop a demonstrable understanding of the wider

3 https://www.suffolk.gov.uk/asset-library/planning-performance-agreements-for-nationally-significant-infrastructure-projects.pdf

development environment for their project, and to work with the Council and other promoters, to manage and mitigate these impacts.

The Council expects that project promoters will collaborate to minimise the construction impacts of their projects, coordinate development, and share infrastructure, to minimise the adverse cumulative and in combination effects of developments, on communities and the environment.

Ecology, Landscape, Heritage, Amenity and Access

As set out in the National Policy Statement EN-1 (November 2023) the County Council expects that project promoters will ensure the effective application of the mitigation hierarchy, including, were required, compensation measures[4].

Early consideration of; the natural environment, its ecology and biodiversity, the character and visual sensitivity of the landscape, Cultural Heritage (including Archaeology), public amenity and access to the countryside, as well as vehicular access opportunities and constraints, should shape the development of the scheme, including during land assembly. In order to mitigate, maintain, and where possible enhance, the quality of access and public amenity, the Council considers that land option agreements should retain the right to set up additional Rights of Way, as at least binding permissive routes, for the operational lifetime of the project.

The post construction monitoring of the effectiveness of all landscape and ecological mitigation and enhancements, including Biodiversity Net Gain, requires a robust mechanism, secured through the terms of the Development Consent Order, and relevant control documents. This will ensure that the agreed mitigation and enhancement goals are achieved.

A dynamic and adaptive approach should be applied to aftercare and long-term management of mitigation measures, which is focused on achieving these goals. This may result in extended periods of higher-intensity aftercare, and replacement planting, in areas where milestones are not met. It is always preferable that landscape and ecological mitigation and enhancements, once effective, should be retained beyond the lifetime of the scheme, and this should be secured through the terms of the development consent order, or by private treaty with the relevant landowners.

4 EN1 para 4.2.10-4.2.13 and as defined on p173 - https://assets.publishing.service.gov.uk/media/65a7864e96a5ec0013731a93/overarching-nps-for-energy-en1.pdf

Nationally Designated landscapes and their settings

The Levelling up and Regeneration Act (s245) places a duty on public authorities such as the County Council, and the Secretary of State, to "further the purposes" of a designated landscape when exercising their function. Therefore, the project promoter will need to consider this duty that is on the decision maker, and the statutory consultees, when promoting and designing a solar project. Furthermore, even if all of a project is outside one of Suffolk's three nationally designated landscapes, that is; The Broads, the Suffolk Coast & Heaths National Landscape, and the Dedham Vale National Landscape, the applicant will need to also have due regard for:

- the setting of those landscapes.
- potential impacts on their character and special qualities.
- potential impacts on their reasons for designation.

Tourism and the visitor economy

Tourism, and the visitor economy, makes a very significant contribution to economic activity in rural Suffolk. Therefore, the Council will expect project promoters to identify tourism and visitor businesses that maybe adversely impacted, by both the operation and construction of their projects.

Impacts are likely to consist of loss of recreational opportunities, in and around visitor attractions, and impacts on the accessibility of tourism and recreational businesses, as a result of the construction of energy projects.

Furthermore, it should be recognised, that the presence of construction activity is likely to have an adverse impact on the inclination and propensity of potential customers, to visit affected localities and businesses, and that the day visitor economy is particularly sensitive in this regard.

Therefore, an effective and comprehensive approach to the assessment of these impacts, effective engagement with the relevant businesses, and a comprehensive scheme of mitigation, is essential.

Labour force management and skills development

Securing and managing the labour force during construction of a large-scale solar project presents significant challenges in Suffolk's rural areas, both for the project alone, and from the combination of energy projects. Effective management of construction workers, and mitigation of the impacts of, their travel to site, their accommodation, and their requirements for healthcare and other local services, will be essential, to minimise or eliminate adverse impacts.

The Council's objective is to create a talent pool, that can take advantage of the opportunities presented by a succession of energy generation projects. Therefore, it is expected that project promoters will contribute to delivery of these goals, going beyond the minimum measures necessary to mitigate the clearly defined impact of their project.

Agricultural Land Classification

Suffolk and the wider East of England is a very significant contributor to food production in England, relative to other areas, as set out in official statistics[5].

Consequently, the assessment of agricultural land classification in relation to solar projects can be a highly contentious matter in Suffolk. Therefore, the County Council considers that the assessment of agricultural land classification should be undertaken by an independent third party, commissioned by the County Council, using funding provided under the terms of a Planning Performance Agreement. The findings of this assessment can then be submitted to the examining authority and can inform the decision of the Secretary of State.

Post consent Discharge of Requirements

Management plans including, but not limited to, the landscape and ecological management plan, should be submitted in outline form with the Development Consent Order, and subsequently agreed through the discharge of relevant requirements under the Development Consent Order.

5 https://www.gov.uk/government/statistics/agricultural-facts-england-regional-profiles/agricultural-facts-east-of-england-region

Transition from consenting to construction

The project promoter should work with the County Council and its Local Authority partners, to ensure an effective transition between their consenting and construction teams. The project promoter should ensure that robust measures for engagement with hosting communities and the Local Authorities are in place during the construction period.

Community benefits

Given the extent, and duration, of the impacts of solar projects of this scale on communities, in addition to the full and effective application of the mitigation hierarchy, the Council considers that robust and effective schemes of community benefit are required for NSIP scale solar projects. The Council would, in addition, also encourage promoters to explore the possibilities for shared ownership of the project with communities. The Council's position on community benefits is set out in more detail in Appendix A.

Interim design principles for large scale solar projects

Design approach

The Council considers that very large-scale solar projects consented under the NSIP regime are likely to reshape place, in that, unlike other developments, they have this potential because they are so extensive as to be much more than objects in a landscape.

Therefore, given the transformational nature of these developments, the Council considers it is essential for project promoters to take an exemplary approach to the design and construction and maintenance of these schemes. Projects should not only eliminate or minimise adverse impacts, but also deliver substantive environmental, ecological, access and other benefits.

Promoters should work in close and effective collaboration, in the development of the details of the scheme, with both the relevant statutory consultees and, the local communities, who will host the project.

Therefore, the Council considers that the applicant should engage with the relevant local authorities as early as possible, including during site finding and land assembly, as this will provide an opportunity to understand constraints, such as archaeology or historic landfill sites, which may limit, or curtail, scheme layout.

Likewise, the Council will expect project promoters to design and deliver a genuinely effective and collaborative master planning process, by which host communities can shape the design of the proposals.

The Council expects the developer to apply the mitigation hierarchy in full, as set out in NPS EN-1. This includes, after avoidance, minimisation, and mitigation, compensation of residual adverse effects, which are harmful in their own right, or become significant in accumulation.

Site layout of solar array parcels, cable corridors, substations, and battery storage, should be:

- Located to minimise or eliminate permanent adverse impacts on the fabric of the landscape, historic features and landscape character, or ecological features such as trees, hedges, woodlands, wetlands etc.
- Set out in such a way, as to reasonably accommodate the future growth of retained trees and allow for the effective management of hedgerows.
- Identify and avoid impacts within Root Protection Areas (BS5837) from both the construction process and operational layout.
- Located to minimise or eliminate permanent adverse impacts on visual amenity and the setting of historic assets. Harm to built heritage assets and their setting should be minimised, substantial harm should be avoided.

- Located to protect residential amenity. It must not have, in line with the Lavender Test, an overbearing or oppressive impact on residential amenity.

Landscape design should respond effectively to the character and sensitivities of the site and the receiving landscape:

- By effectively incorporating water management, ecological, archaeological, and public access requirements.
- By ensuring that lighting is, wherever possible, eliminated, or minimised. Where lighting is necessary, light spill and sky glow should be effectively controlled.
- By ensuring that ecological impacts that cannot be mitigated within the red line area of the development will require effective mitigation elsewhere, as close as possible to the site.

Detailed scheme design:

- Should deliver substantive environmental, ecological, access and other benefits.
- Should design the project mitigation and Biodiversity Net Gain measures, to contribute positively to the site following decommissioning.
- Should, during both the construction and operational phase, not add to local surface water or fluvial flood risk; or should provide an opportunity to eliminate such additional risks as may be created.
- Should achieve acceptable operational site access, and where required temporary construction access that can be reasonably remediated following commencement of site operation.
- Should identify any elements that are capable, in principle, of design treatment.
- Should, where possible, be designed to provide additional climate resilience, including but not limited to, management of fluvial and surface water flows during high rainfall events.
- Should facilitate multifunctional land use, including appropriate crop and livestock production.

Mitigation proposals, and biodiversity and environmental net gain measures:

- Should be climate resilient, and, or, capable of adaptation to current and emerging climate change impacts.
- Should include adaptive aftercare, and long-term management should be outcome-led, rather than focused on time-limited aftercare-periods. This is particularly important, because successful mitigation is the essential basis on which the additionality of Biodiversity Net Gain is achieved.

Given the temporary nature of haul routes, construction access, and laydown areas:

- Should eliminate permanent or significant adverse effects on, trees, hedgerows, woodland, and other landscape features, historic landscape character and wildlife. Permanent tree loss from these temporary features should be avoided.
- Should be located and designed in such a way that they are capable of effective restoration.
- Should be located to eliminate or minimise temporary adverse impacts on public and private amenity in respect of noise, dust, availability of rights of way, and other disturbance.

Battery storage risk management

Proposals that include a Battery Energy Storage System, ("BESS") should provide a Battery Fire Safety Management Plan, to which adherence is secured by a requirement of the DCO. Where final details of the BESS system are unknown at the examination stage, an outline management plan should be provided with details to be approved subject to a DCO requirement.

A Battery Fire Safety Management Plan should include:

- A description of the BESS proposals, including the proposed technology and location.
- A brief overview of applicable safety standards and the non-planning regulation/s that apply.
- A risk assessment of the manufacturing, installation, and operational stages of the BESS.
- The mitigation and control measures which will be applied to maintain an acceptable level of safety.
- Any proposals for, or agreements that have been achieved, for enhanced cooperation with Fire and Rescue Services.

Additionally, as part of the Environmental Statement, applicants should submit an assessment of unplanned atmospheric emissions from BESS[7], to inform the location of BESS within the project site. The aim of this is to ensure that potentially toxic fumes from a battery fire are a safe distance away from sensitive receptors.

---

6 https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010106/EN010106-005560-7.6%20Outline%20Battery%20Fire%20Safety%20Management%20Plan_%5bCLEAN%5d.pdf

7 https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010106/EN010106-004259-6.2%20Appendix%2016D%20Unplanned%20Atmospheric%20Emissions%20from%20BESS.pdf

Appendix 1

Community Benefits Position Statement

Scope and purpose of this Appendix

The purpose of this supplementary guidance appendix is to assist with the negotiation of Community Benefit Agreements (CBA), related to large-scale solar schemes. This guidance also encompasses community benefits that should be expected from Battery Energy Storage Systems (BESS).

It will be used to illustrate to local communities hosting large-scale solar schemes, the scale of monetary value that may be secured, and that will be distributed in their locality.

It is expected that project promoters will engage effectively with communities, to ensure that benefits are tailored to the unique qualities of the affected areas, and that the County Council, and District/Borough Councils, play an active role in recognising and maximising the synergies between community benefit schemes, within, and across, their administrative boundaries.

Where community benefits are provided in the form of a Community Benefits Fund (CBF), as these funds will be derived from renewable and low carbon energy, and given the Council's commitment to delivering net zero, the proposal is, that funds; in addition to supporting the local communities' aspirations, will also provide financial support to deliver decarbonisation and fuel poverty reduction initiatives in the eligible communities.

Where community benefits are provided in the form of Community Ownership, in the absence of a current framework in England, the Council proposes that the Welsh Government's approach to "local and shared ownership of energy projects in Wales", as published in June 2022 and the Scottish Government's "good practice principles for shared ownership"[1], as published in April 2020 are robust models to follow[2].

For the avoidance of doubt, the negotiations and decision to enter into a CBA is not indicative of any support for a project, rather it is a means by which to secure benefits if the project receives planning consent. A CBA will be supplemental to any section 106 agreement required to mitigate the adverse impacts of a proposed development.

Policy Context

SCC declared a Climate Emergency on 21 March 2019, committing to delivering the Government's 25 Year Environment Plan, and working with partners across the county and region towards making Suffolk carbon neutral by 2030.

Suffolk's Climate Emergency Plan 2023 and the accompanying technical report outlines the approach, and methodology, to delivering Suffolk's transition to net zero.

The Department for Levelling Up, Housing and Communities (DLUHC), published, in February 2023, the NSIP Action Plan which stated that, "Local Authorities are key to representing community interests and helping negotiate community benefits with infrastructure developers". This was in recognition of community benefits as dependent on strategic negotiation, and whether infrastructure developers are willing to engage at an early stage.

The National Infrastructure Commission's (NIC) April 2023 Report, on the NSIP Action Plan, set out key principles of community benefits and engagement. Most significantly, it suggested that benefits should provide an amount that reflects the national benefits of the scheme being delivered.

The Government's November 2023 response, to the Community Benefits for Electricity Transmission Network Infrastructure consultation, notably, proposed both direct, and wider benefits. Setting out proposed rates of wider benefits for overhead lines, underground cabling systems, and substations. This has established a precedent for a rate of benefit per type of infrastructure, building upon the previous precedents of onshore wind CBAs.

---

1 Scottish Government Good Practice Principles for Shared Ownership of Onshore Renewable Energy Developments

2 Guidance for developers, local communities & decision-makers Local and shared ownership of energy projects in Wales

Key Operational Principles

Early engagement on a CBA will be expected to take account of the following core requirements, depending on the nature of the proposals, and seek to agree heads of terms and a relevant timescale for the delivery of community benefits.

The Council expects that community benefits should be community-led, and that projects should engage with the eligible communities, to ensure that a range of voices have made contributions to a meaningful suite of benefits, targeted and tailored to their locality.

Resourcing, to facilitate the funds, should be provided outside of the funds, this may require a project officer, working with communities, to ensure effective administration and distribution of benefits.

Considerable and demonstrable efforts must be made to ensure that people are aware of the community benefits that they will be eligible for, and consideration should be given to opportunities, where they exist, for combining or synergising CBAs to maximise benefits for each community.

Core Requirements

Community Benefits will either be Community Benefit Funds or Community Ownership.

Where community benefits are provided in the form of community ownership, SCC would also welcome local or shared ownership. The definition of community ownership shall be: "a project owned, partially or in whole, by more than one legal entity with at least one of those whose principal headquarters are located in East Anglia; or a project wholly owned by a social enterprise whose assets and profits are committed to the delivery of social and/or environmental objectives."

Where community benefits are provided in the form of a CBF, the rate to be applied for large-scale solar schemes will be £500 per MW per year (index-linked) for the operational lifetime of the scheme.

A rate of additionality should be applied, where a BESS is being constructed as associated development; this rate shall be 50% of the £500 per MW per year (index-linked), for the operational lifetime of the scheme.

The rate will be index-linked to the Consumer Price Index, with a base rate calculated from 1 April 2024.

Project promoters are expected to fund this figure, or a greater figure, unless there are compelling reasons to support an alternative figure, to be agreed on a case-by-case basis.

No provisions will be agreed to repay any unspent funds, rather, such funds will remain available for use in support of the communities' local initiatives, and/or projects, and rolled over into subsequent financial years.

Distribution of the Funding

The funds from a CBF will be managed in the interest of the local communities. It is anticipated that project promoters contributing funds will wish to remain engaged with the programming and distribution of funds. The projects and initiatives funded will be supported with ongoing engagement by the project promoters, and result in legacy benefits from the delivery of the schemes.

It is anticipated that a Special Purpose Vehicle, or Community Investment Company, or an existing organisation (such as the Suffolk Community Foundation or similar), would be an appropriate means to manage the funds from a CBF.

Funds from a CBF should be distributed in the following geographical prioritisation:

1. Within the boundaries of parish councils which intersect with the scheme's Order Limits; or,
2. Within the boundaries of any other parish councils which are partially or wholly within the 'zone of visual influence' of the scheme, to be defined on a case-by-case basis with a base expectation of a 5km buffer of the scheme's Order Limits; or,
3. Within the administrative boundaries of the District or Borough Councils which are hosting the scheme.

There shall be three strands of opportunities to distribute funds in a CBF: environmental; heritage and access; and social value.

The range of local initiatives and/or projects that a CBF could incorporate include:

Environmental

- Support home retrofits that improve climate resilience (alongside other Government retrofit funds);
- Support community renewable energy schemes;
- Provide grant funding to support the transition of households to renewable energy sources (i.e., eliminating reliance on fossil fuels);
- Invest in projects and engagement with schools to embed net zero;
- Invest in decarbonisation initiatives;
- Assist the delivery of the Local Nature Recovery Strategy;
- Assist the delivery of Biodiversity Net Gain;
- Assist other biodiversity initiatives;
- Enable volunteering activities for communities, such as offsite hedgerow and tree planting;
- Improvements to the management of potential flood risk and low air quality;

Heritage and Access

- Invest in the restoration of community infrastructure and assets with heritage value;
- Support sensitive energy efficiency measures in historic buildings;
- Support community engagement in the archaeological background of their locality;
- Help delivery of rights of way improvements;
- Improve footpath surfaces and waymarking;
- Improve accessibility of green and blue spaces to enable walking, cycling, wheelchair and mobility-scooter access to the environment;
- Assist in delivering active travel schemes, to facilitate recreational activities and sustainable commuting;

Social Value

- Invest in the improvement of existing community infrastructure;
- Maximise the development of STEM skills, resources, and subjects in local schools via educational grant funding;
- Support the Skills and Employment Strategy; and,
- Support community engagement to promote renewable energy apprenticeships and careers.

Version 1.0 | 04/2024

Suffolk County Council

EcoPower Suffolk Non-Statutory Consultation

Response of Suffolk County Council

Appendix E: Map showing the proposed and consented NSIPs affecting Suffolk

ECOPOWER SUFFOLK CUMULATIVE IMPACT MAP

East Pye Solar

Gull Wing

LionLink

EA3

EA1N

EA1

Sizewell C

Progress Power

EcoPower Suffolk

Sunnica Energy Farm

White Elm Solar Farm

Bramford to Twinstead

Ipswich Rail Chord

Norwich to Tilbury

EA2

Galloper

Five Estuaries

Sea Link

North Falls

KEY

- West Suffolk District
- Babergh District
- Mid Suffolk District
- East Suffolk District
- Ipswich Borough
- Suffolk County

1:750,000

0 5 10 20 mi

0 10 20 40 km

Suffolk County Council

Growth, Highways & Infrastructure
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

ECOPOWER SUFFOLK NON-STATUTORY CONSULTATION APPENDIX E

Map showing the proposed and consented NSIPs facing Suffolk

N W E S

Suffolk County Council

EcoPower Suffolk Non-Statutory Consultation

Response of Suffolk County Council

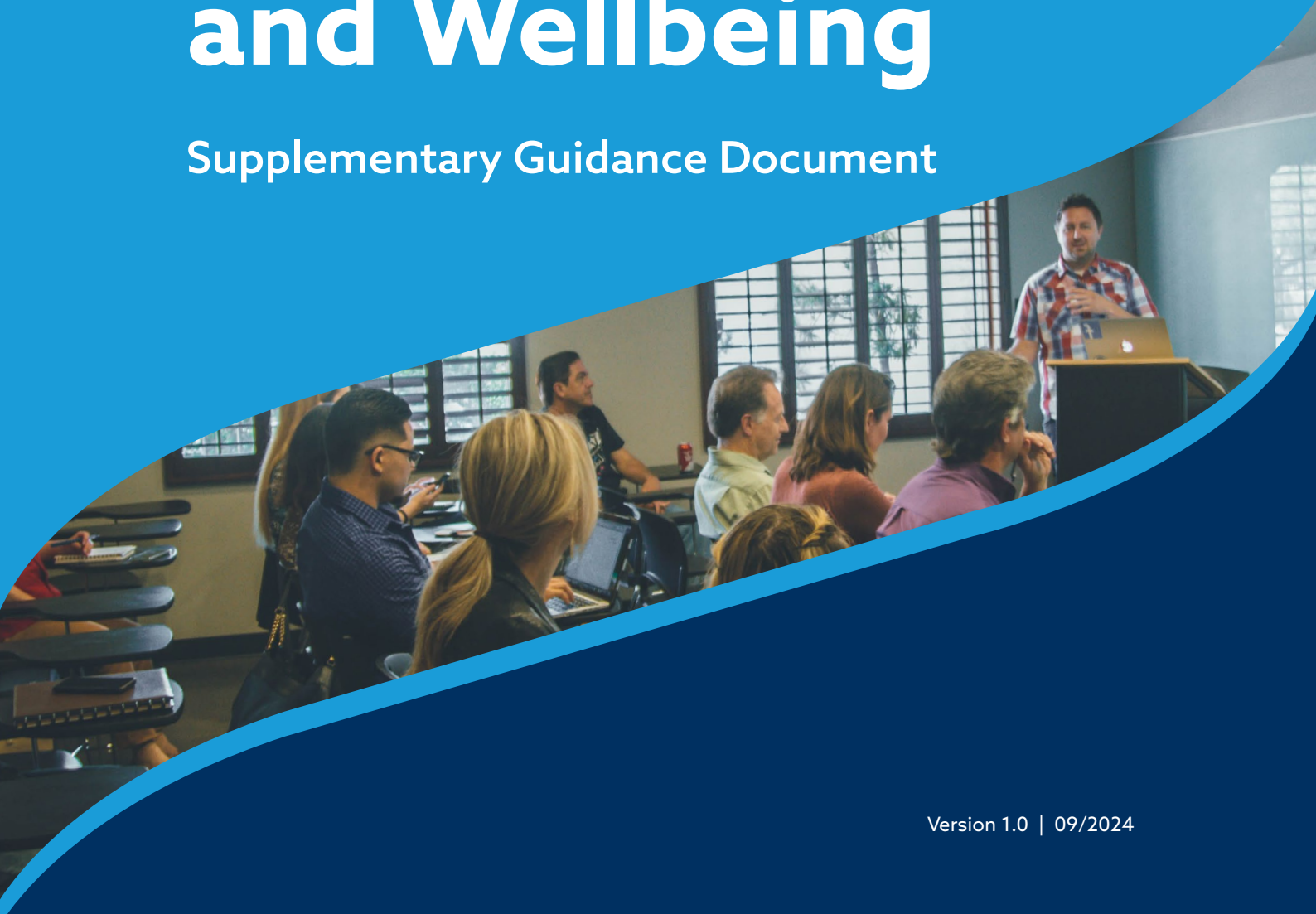
Appendix F: Energy and Climate Adaptive Infrastructure Policy Supplementary Guidance Document – Community Engagement and Wellbeing

Suffolk County Council

Energy and Climate Adaptive Infrastructure Policy

Community Engagement and Wellbeing

Supplementary Guidance Document



Version 1.0 | 09/2024

This is a supplementary guidance document, to support the Energy and Climate Adaptive Infrastructure Policy, which was adopted by Suffolk County Council's cabinet, on the 16th of May 2023.

The scope and purpose of this Supplementary Guidance Document

Suffolk has natural and geographic advantages that make it attractive to project promoters for locating low-carbon technologies, and the consequent supporting infrastructure. This, therefore, creates significant challenges for the local economy, environment, and communities of Suffolk.

The Council considers that it is essential for project promoters to engage effectively and collaboratively with communities. Project promoters must have consideration for the impacts of their project on community wellbeing, both alone and in combination with other proposals, during all phases of the project, from the earliest stages of the pre-application period, through consenting, and during construction. In doing so, project promoters should recognise that:

- Individual energy and climate adaptive projects are part of a substantial, significant, widespread, and ongoing succession of infrastructure developments in this region, that are necessary to mitigate the impacts of, and adapt to the changing climate.
- Public understanding of the amount, extent, and speed of this requirement for new infrastructure is generally low, or at best, inconsistent.
- The technical processes of the national infrastructure consenting regime are neither appropriate, nor sufficient by themselves, to ensure that communities have an effective understanding of, and engagement with, the processes and delivery of change.
- The Nationally Significant Infrastructure Planning (NSIP) process is perceived by the public as exclusive and exclusory, being the province of experts, bureaucrats, and non-departmental public bodies. This characterisation of public perception is backed up by research[1] [2], as well as the Council's experience of previous projects.
- The consenting process results in significant adverse impacts on community wellbeing, particularly where multiple projects are being consulted on and consented across the same communities.
- Distributional fairness, such as community benefits, or shared community ownership, are a necessary addition to, rather than a substitute for, procedural fairness[3], which must be created through effective dialogue with the affected communities.

1 https://www.sciencedirect.com/science/article/pii/S0301421517308212

2 https://www.liverpooluniversitypress.co.uk/doi/full/10.3828/tpr.2019.10

3 Understanding Social Licence - https://www.sciencedirect.com/science/article/abs/pii/S030626192031237X

Project promoters have critical obligations to ensure procedural fairness, as defined by the Gunning Principles[4], given the inherent imbalance of power between the project promoter and communities. This is essential to ensure a fair process, secure trust in the process, and as a result, safeguard community wellbeing. This is likely to require the project promoter to go beyond the regulatory or legislative minimum, throughout project design, consenting, and construction. As such, it is critical for the project promoter, to:

- Provide communities with a genuine opportunity to engage in collaborative dialogue with the promoter, allowing communities to shape the emerging project effectively and demonstrably, from the earliest possible stage of its design and development.
- Ensure that effective engagement methods and approaches with host communities, as well as appropriate community mitigation, are established for the construction, and where appropriate, the operational or decommissioning phases of the project.

The purpose of this Supplementary Guidance Document is to outline in principle how the Council expects project promoters to:

1. **Secure effective dialogue with communities about change**, through their engagement with those who are expected to host NSIP proposals, to ensure a fair process and to protect community wellbeing.
2. **Ensure assessment of community wellbeing**, as part of the Environmental Impact Assessment.
3. **Secure and safeguard community wellbeing**, through effective and robust mitigation measures, that minimise or eliminate the adverse impacts of pre-application engagement, consenting, and construction.

The Council recognises that community wellbeing, and the adverse impacts on it of infrastructure projects, is a relatively new and developing field of interest, therefore, the Council will continue to review and update this guidance appropriately.

---

4 https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf

The need for the consideration of community wellbeing impacts

Through discussion with communities in Suffolk, that are experiencing the impacts of multiple NSIP schemes, the Council has identified that these communities feel that project promoters have, in forming and promoting their proposals, overlooked the adverse impact this has on community wellbeing.

Feelings of fear, mistrust, anger, and frustration are all reported, along with impacted sleep, and inability to plan for the future, due to the uncertainty created by the proposed development.

These concerns echo feedback received by the Suffolk Emotional Needs Audit, carried out by Suffolk Mind in 2022[5]. The audit showed that for people living in the Saxmundham, Leiston, and Aldeburgh area, (that in addition to Sizewell C, hosts multiple energy projects) the least met needs were Community, Security, and Control, and when asked what could improve wellbeing locally, responses included:

- Having more say when it comes to local development
- Places where people can talk about their emotional wellbeing
- More community events and activities

In addition to the impacts on the whole community, community leaders, i.e. parish councillors, also report increased levels of emotional distress, because of the demands of the role they play, in supporting the community to navigate the NSIP process.

Parish councillors report feeling overwhelmed, both by technical information that is challenging to understand and interpret, and by the amount of time that needs to be invested in the process. Therefore, the burden of responsibility weighs heavily on a small number of people.

Alongside their duty to represent the views of the community in the consultation process, parish councils also take their responsibility to support the wellbeing of their parish very seriously. However, they report that they receive no signposting, training, or guidance to assist them in this role.

The cumulative effect of these issues has resulted in considerable impacts on the wellbeing of individuals, the overall wellbeing of the community, and has also led to an apparent loss of identity.

One member of the public described how the association with the energy projects has, *"created a perception that the nature of our village and parish.....has been completely altered, and is now one to be defined by the presence of large industrial complexes, rather than what it actually is, a rural community.....It remains a small rural village, with living breathing people, who strive to protect its unique quality."*

5 Suffolk Mind Emotional Needs Audit Reports and Accounts - Suffolk Mind

Roles and responsibilities

Suffolk County Council

The Role of the County Council

Suffolk County Council is not the decision-maker for Nationally Significant Infrastructure Projects (NSIP). However, the County Council, routinely in collaboration with the relevant district or borough council, is a key statutory consultee, and its view carries significant weight with the Examining Authority (ExA) and, by extension, the Secretary of State (SoS). The role of the County Council is set out in more detail in the Energy and Climate Adaptive Infrastructure Policy[1].

The wellbeing of Suffolk's communities is a corporate priority for the County Council[6], therefore the health and wellbeing impacts of the consenting, construction, and operation of NSIP projects is a significant concern for the Council.

In addition to representing and supporting its communities, the Council also has a role, with partners, in providing support to town and parish councils to enable them to engage effectively with the NSIP process, and to that end, has published guidance[7] specifically designed to support them.

Engagement with the County Council

A robust and effective Planning Performance Agreement (PPA) will be essential to ensure effective collaboration and engagement with Suffolk County Council. The Council's expectations on PPAs are set out in its published guidance[8]. The Council also expects early engagement with project promoters on the Statement of Community Consultation[9] (SoCC).

The Council expects, from the earliest stage, effective engagement to enable co-design of the project, between the promoter and statutory consultees, including the Council. Project promoters should ensure that the SoCC for the project is effective; in order that it not only meets the test of adequacy as defined in s55(5) of the Planning Act 2008, but also, that the quality and process of engagement, rather than just the extent, reach, and duration of consultation, facilitates co-design with communities and protects community wellbeing.

In its role as the Public Health Authority, the Council also expects engagement with its Public Health Directorate, alongside the Council's planning team, to discuss and agree the scope of mental health and wider human health impact assessments, within the Environmental Impact Assessment, and any required avoidance and mitigation measures.

---

6 https://www.suffolk.gov.uk/asset-library/imported/master-corp-strategy-report-2022-26.pdf

7 https://www.suffolk.gov.uk/asset-library/getting-to-grips-with-nsips.pdf

8 https://www.suffolk.gov.uk/asset-library/planning-performance-agreements-for-nationally-significant-infrastructure-projects.pdf

9 Before a SoCC is finalised and published, an applicant must consult on its content with each local authority in whose area the Proposed Development is situated. The local authority's aim in responding to consultation about a SoCC should be to ensure that the people affected by a proposal can take part in a thorough, accessible and effective consultation exercise about a Proposed Development s47 FAQs 2017

Town and Parish Councils

Role and status of town and parish councils

Town and parish councils are specifically identified in the relevant regulations as a statutory party[10] in all cases, when it is expected they will host all, or any part, of an NSIP development.

The role and function of town and parish councils and parish meetings is set out in section 9 of the Local Government Act 1972[11]. Project promoters should therefore recognise that these are properly constituted and democratically accountable bodies, and that they are subject to the same or similar constitutional arrangements and codes of conduct as principal councils, that is, county, district, or unitary authorities.

In recognition of the limited capacity and resources of parish councils, the County Council encourages project promoters to consider providing financial support, to facilitate the engagement of town and parish councils with the NSIP process.

Engagement with town and parish councils

The project promoter should recognise that the scale of projects consented through the Planning Act 2008 is likely to have significant and widespread impacts on a locality, such as to reshape place, during construction and operation. Therefore, promoters should work effectively with town and parish councils, both the members and appointed representatives.

It is also likely that the host communities are not accustomed to significant and rapid change in their environment, or the character of place. Therefore, effective engagement with communities, that supports them through the process of change, and over which they can have meaningful and effective dialogue and influence, without prejudice to any in principle objections they may have, is essential.

Therefore, genuine, and effective dialogue between the project promoter, and representatives of the affected localities is critical, to allow those communities directly impacted by the scheme, to shape its design and delivery. Likewise, it is essential for project promoters to engage effectively with host communities during the construction of the project.

---

10 The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 Schedule 1 with Note: "relevant", in relation to a body, shall mean the body which has responsibility for the location where the proposals may or will be sited or has responsibility for an area which neighbours that location.

11 https://www.legislation.gov.uk/ukpga/1972/70/part/I/crossheading/parishes

Guidance

Part 1: Securing effective dialogue with communities about change

The case for a new approach to promoter's engagement with communities

The objectives of the promoter's engagement with communities should be strategic as well as tactical.

The default approach to engagement to date has had a tactical focus, on consulting communities by informing them about the emerging and evolving details of the project. Whilst this is necessary, it is not sufficient.

Engagement with communities must also seek to build effective functional relationships of trust, confidence, and understanding, between the community and the project promoter.

The Council considers that consultation should principally be focused, especially in the early stages, on building and maintaining trust, by creating an effective framework for dialogue, conflict resolution, and management. This will create a space into which informing the community about a project, and discussing issues and options around it, can then be placed.

To summarise: the objective of engagement should be to create a framework of trust, fairness, and mutual confidence in process, into which the detail of the project proposal, is then inserted. The Council considers that such an approach will not only significantly improve the quality and effectiveness of engagement but will also help to safeguard community wellbeing.

The Council recognises that this approach requires communities to engage and participate in the development of a framework for effective engagement, notwithstanding any objections that they may have, to either the principle, or details, of the emerging project.

The proposed approach to collaboration

To date, engagement undertaken by NSIP promoters with host communities has usually been focused on informing and consulting the target audience, therefore, covering only the basic levels of public engagement (see Figure 1[12]).

Figure 1: Spectrum of public participation: Increasing levels of public participation

IAP2 Spectrum of Public Participation

IAP2's Spectrum of Public Participation was designed to assist with the selection of the level of participation that defines the public's role in any public participation process. The Spectrum is used internationally, and it is found in public participation plans around the world.

INCREASING IMPACT ON THE DECISION

	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

Reproduced by kind permission of International Association for Public Participation

12 International Association for Public Participation Spectrum of Public Participation – https://www.iap2.org/page/resources

The Council considers that this basic approach to engagement is insufficient; given both the complexity and level of impact on a community created by an NSIP, and the public awareness and anxiety around the scale, and pace of change, of the energy generation and transmission system.

Project promoters should therefore, in accordance with the spectrum of public participation, seek to **involve** and **collaborate** with host communities in the design and delivery of their projects.

The National Infrastructure Commission's Project **Level Design Principles Handbook**[13] should underpin not only the approach to project design, but also the approach to engaging on design and placemaking with local communities. This is because, as Part 2, Why does Infrastructure Design Matter, states:

"Public acceptance of such rapid and extensive change can best be supported by processes that are designed to achieve highest quality outcomes. And public acceptance will become easier to achieve if efforts are made to engage, and collaborate with, those directly affected by change. We know that transformative change is essential, therefore transformative thinking is also required. And that, ultimately, is why infrastructure design matters."

Therefore, project promoters should focus on working with the representatives of town and parish councils as the properly constituted local body.

Based on good practice[14], the Council considers that a good way for a project promoter to achieve community collaboration is for the project promoter to create a panel of people from the hosting parishes or towns. This should be one of various techniques utilised in developing relationships with local communities and actively seeking dialogue and community engagement throughout the approvals process and beyond.

---

13 https://nic.org.uk/app/uploads/NIC-Design-Principles-Handbook-Digital-PDF.pdf

14 Case Study 2 in https://nipa-uk.org/wp-content/uploads/2023/08/Clifford_and_Morphet_-_NIPA_II_Project_A_extension_project_report_-_Final_1.pdf

The purpose of this panel should be as follows:

- To establish a panel made up of a group of engaged individuals, who have the confidence of the communities they represent, and who can engage and work with the promoter, without prejudice to any objections they may have to the scheme.
- To ensure that the project promoter can have a genuine, open, and ongoing dialogue with community representatives, in order to understand the character of place and community, local concerns and opportunities, and how to achieve the best possible outcomes for those who are likely to be most impacted by the construction and operation of the project.
- To work with the promoter by engaging with emerging details of the project, that are fit for the public domain, regarding how the project will be built, designed, and mitigated. This will ensure that the panel can participate actively in place making, regarding those aspects of the development around which there is flexibility. This will also ensure the panel can understand those aspects of the design that are fixed by constraints, and critically, the nature of those constraints.
- To understand the multiple design options, or multiple potential outcomes. These options or outcomes will be explained to the panel, interrogated by the panel, and the panel will provide feedback to the project promoter.
- To recognise that prior to determination of the Development Consent Order and the appointment of lead contractors, design outcomes will remain provisional. Therefore, development of the detailed designs used for the Discharge of Requirements will need to be finalised, in discussion with the panel, before submission to the discharging Local Authority.
- Lengthy or detailed discussion of the need for, or alternatives to, the project, are not for discussion at meetings of the panel, but are for other fora.

It is anticipated that the relevant county and district councillors would be part of the panel throughout, in addition to parish representatives. Furthermore, relevant Local Authority Officers would also be present, to observe proceedings, support participants in their consideration of issues, and to assist the project promoter in the facilitation of effective discussions.

Where a project requires associated development, that is in the hands of a third party, such as the electricity transmission or distribution operator, it is expected that this party would also participate in the panel engagement process.

It is expected that meetings of the panel are likely to require a neutral chair.

Part 2: Assessment of impacts on mental health and community wellbeing

Rationale

It has been recognised that the consenting and construction of major infrastructure projects can have an adverse impact on the mental health and wellbeing of communities[15].

Furthermore, NPS EN-1 requires applicants to assess adverse health impacts of their project. It is also noted that the World Health Organization (WHO) defines health as, "a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity." [16]

It should be noted that many of the processes that are most likely to result in mental wellbeing impacts, take place outside the temporal scope of the Environmental Impact Assessment (EIA). This largely eliminates the opportunity to identify and mitigate these impacts through the EIA. Therefore, identification of potential harm and appropriate mitigation measures must be integrated into the pre-application consultation process.

Approach

The Council expects that the mental health and wellbeing impacts of the project will be assessed in the Environmental Impact Assessment, alongside other human health aspects. The Institute of Environmental Management and Assessment (IEMA)'s Guides to "Effective Scoping of Human Health in Environmental Impact Assessment" and "Determining Significance for Human Health in Environmental Impact Assessment"[17] provide general good practice guidance on assessing human health and should be used by project promoters as guidance.

15 https://www.parliament.uk/globalassets/documents/commons-committees/hs2-phase-2a/written-evidence/043-Report-from-HS2---Mental-Health-Assessment-Scoping-Report---requested-by-Select-Committee-July-2018.pdf

16 https://cdn.who.int/media/docs/default-source/documents/publications/basic-documents-constitution-of-who179f0d3d-a613-4760-8801-811dfce250af.pdf?sfvrsn=e8fb384f_1&download=true

17 Both guides are available at Human Health in Environmental Impact Assessment – November 2022 (iema.net)

There should be parity between mental and physical health in the assessments.

The mental health assessment should also consider the outlook of individuals in the community, i.e.

"People's understanding or views of the project can be highly influential to their psychological and even physiological response to project changes. Such views may change through the project and depend on trust in the developer and regulators. Where there are strong and persistent concerns, sensitivity, particularly to mental health effects, is higher. Consider if there are people with strong views (or high degrees of uncertainty) about the project who may anticipate risks to their health and wellbeing and thus be affected by not only actual changes but also by the possibility of change." [18]

18 IEMA guidance - Human Health in Environmental Impact Assessment – November 2022 (iema.net)

Part 3: Safeguarding and supporting community wellbeing

Rationale

"Potentially affected individuals and communities may feel disenfranchised by transformative infrastructure change 'over their heads'. Missed opportunities to achieve benefits of well-executed community engagement not only lead to feelings of disempowerment and frustration among stakeholders but can potentially negatively impact on individual and community health and wellbeing. Health impact assessments that effectively assess planning and engagement processes can play a role in mitigating these impacts."

The health impacts of transformative infrastructure change: Process matters as much as outcomes - Environmental Impact Assessment Review - Vol 85 November 2020[19]

The Council considers that project promoters have a duty to take effective and robust measures to minimise and mitigate adverse impacts on community wellbeing, during the pre-application, consenting, construction, and decommissioning phases of their project. Given the spatial and temporal overlaps between projects, project promoters are expected to work collaboratively to minimise and mitigate these effects on community wellbeing.

The Council considers that community leaders, be they formally or informally appointed to such a role, have a duty to protect community wellbeing by supporting efforts of the project promoter and others, to build and maintain trust, cooperation, and effective dialogue, notwithstanding their in-principal objection to a proposal.

Principles for good continuous engagement

Early and continuous engagement with communities will not only improve community understanding of the project but will, as set out in the Guide to Effective Scoping of Human Health in Environmental Impact Assessment; *"actively alleviate particular impacts upon mental health, by providing a sense of control, inclusion and participation. Such engagement activities could be considered primary mitigation."* [20]

19 https://www.sciencedirect.com/science/article/abs/pii/S019592551930513X
20 Human Health in Environmental Impact Assessment – November 2022 (iema.net)

Therefore, good community engagement should give participants confidence that their words and ideas count. This requires an honest approach, that openly recognises the scale of impacts, and the fact that the project may remake and radically change a place. Likewise, there should be a recognition that there will be non-tangible residual impacts on the community, including on the wellbeing of the community.

The key principles for good engagement, based on recognised best practice and the UK context[21], include:

- Comprehensive and honest engagement, from the earliest stages of development.
- A clear explanation of the process and related timelines.
- Demonstrable and ongoing appreciation of, and responsiveness to, the impacts of multiple projects in the area, and the consequent impacts on the communities' wellbeing, and capacity to engage with a specific project.
- Clarity, around the purpose and scope of any specific engagement with communities, at different times during the formation of project proposals and around what the community is being 'asked' to contribute, or how they may influence any aspect of the proposal. For example, being clear when engagement is about one, or a combination of:
    - The specifics of the proposal
    - The principle of the proposal
    - The potential alternatives to the proposal
- Early signposting of any emerging proposals in principle, for community benefit or shared ownership schemes.
- Careful consideration of the timing of consultations. Considerations should include avoiding main holiday periods, unless holiday visitors are to be targeted in the consultation.
- Practical support, including phone helpline and drop-in events.
- A clear and effective feedback mechanism to address any comment, concern, or complaint.
- A regular in-person presence.
- A clear and comprehensive complaints and grievance mechanism.
- Where necessary and appropriate, a scheme for ongoing community engagement during the operation of the project.

By listening to local views and following up on these by making changes to the project, greater trust and confidence in the process will be engendered, which will contribute to the safeguarding of community wellbeing.

21 See also IEMA suggestions on what this means in the UK context here: https://www.iema.net/resources/blog/2023/02/08/ia-outlook-journal-volume-15-public-participation-stakeholder-engagement-and-impact-assessment

Mitigation measures to minimise adverse impacts on community wellbeing

There are simple measures that can be taken to mitigate against the adverse impacts of the engagement and consenting process.

Good quality, timely, and accessible information

This should include the project promoter:

- Providing access to easily understood summary material, concise, and "plain-English" summary documents.
- Delivering information regarding the proposed infrastructure programmes to community leaders, should be supported by face-to-face conversations to ensure that community leaders can ask questions, and get responses, in a timely manner.
- Providing a clear and early explanation of how, or if, the proposal would result in compulsory purchase and related processes, or if there may be significant impact on individuals, which would need to be compensated for.
- Proactively distributing information regarding compulsory purchase, and discretionary purchase schemes, or, in the absence of such a formal scheme, the mechanisms to deal with situations where there is extreme financial hardship, and/or a pressing need to sell.
- Ensuring that access to compensation schemes does not generate an undue administrative burden on, and consequent anxiety for, an individual or community.
- Maintaining proactive, regular, in person contact with communities, via attendance at parish council meetings. Acknowledging the concerns of the community and working with them to develop a supportive and collaborative dialogue.

Project promoters should consider how parish councils will be supported to understand the technical and complex nature of these projects. Support should be provided from the outset of any proposals and should be consistent throughout the process. Such guidance should be complementary to that published by Suffolk County Council and the Suffolk Association of Local Councils[22] (SALC), as well as any guidance provided by the relevant borough or district council.

Relationship management

Consideration should be given to the employment of an independent third party to act as a "relationship manager" between the developers, local authorities, and the impacted communities, to ensure conversations remain positive and helpful.

22 https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects-including-nsips/nsip-information-for-town-and-parish-councils

Through discussions with people in affected communities it has been found that their strong feeling is that regular, good quality community conversations with project promoters and local authorities are highly valued, having a significantly positive impact on the wellbeing of the community.

The creation of a "relationship manager" role would provide a consistent, impartial, single point of contact for a community. This would foster greater trust and improved relationships between the community and the other parties involved, thereby reducing the negative impacts of the project, and both preserving the wellbeing of the community and assisting in the development of the project proposals.

Preservation and development of community assets

Project promoters should not only seek to understand the environmental and biophysical characteristics of a place, but also its societal and cultural characteristics: understanding what is important to people, what they love about where they live, and what they think would support their community to continue to thrive. Through engagement with the local community, project promoters should establish how these societal and cultural characteristics may be impacted by the project proposals.

Project promoters should invest in the development of community assets, as mitigation and enhancement. The identification of relevant assets should be undertaken in close collaboration with the community, and may include for example, proactively investing in supporting local community events, the enhancement of community buildings such as village halls or places of worship, or public spaces and community organisations, so supporting communities to continue to foster a sense of pride, allyship and belonging.

This will help not only to ensure better working relationships between communities and the project promoters, but ultimately result in better outcomes for local people.

Some measures to mitigate community wellbeing impacts are likely to be interlinked with other mitigation areas, for example Public Rights of Way. Therefore, the value to communities from such interrelated issues and opportunities, should be fully explored.

Promotion of good emotional health and wellbeing

Alongside effective communication about the proposed changes, communities should also be proactively helped to maintain their own wellbeing throughout the process, through provision of good quality information and support. This could be provided through the following means:

- East Suffolk Council has developed a WellMinds resource which, supported by Suffolk County Council, will be available to all parishes across the county. These resources should be proactively distributed in a range of formats, to communities affected by large scale development[23].
- Parish council representatives should be provided with suitable training and support to carry out their duties. Provision of funded Mental Health First Aid training for members of the community should be considered, along with networking opportunities, for people adopting this role, to liaise with others for support and supervision. In addition, training for the community in how to have supportive conversations about difficult subjects, such as suicidal ideation and self-harm, should be provided[24].
- Consideration should be given to the funding of local mental health organisations, to enable them to mentor those who volunteer to undertake wellbeing support roles. This would ensure that volunteers receive appropriate training, support, and guidance, and would also reduce the feelings of isolation and overwhelm often described by community leaders in these roles.
- It should be noted that volunteers should not be expected to provide specific mental health support to individuals. Where this is necessary, people should be supported to access professional interventions from the Suffolk Wellbeing Service,[25] or their local GP surgery.

Monitoring

Suffolk's Emotional Needs Audit 2022 provides baseline wellbeing scores for communities across the county. It may be beneficial for further audits to be carried out, in areas impacted by large scale development. However, to do so would require funding.

There is a potentially instrumental role for community members to play in monitoring and evaluation, in a way that builds community pride and ownership. Examples are emerging globally of how this may be done in the energy transition, and this approach is advocated in this guidance. The Council considers that all parties should explore the scope for collaborative and empowering levels of engagement, including:

- Follow-up activities and feedback
- Independent verification
- Two-way communication
- Partnerships
- Participatory monitoring
- Involvement in adaptive management[26]

Provisional Key performance Indicators for the monitoring and evaluation of engagement and community wellbeing set out in the Appendix.

---

23 Well Minds East Suffolk https://www.paperturn-view.com/?pid=ODc8797953

24 https://www.zerosuicidealliance.com/suicide-aw5areness-gateway-training

25 https://www.wellbeingnands.co.uk/suffolk/

26 Morrison-Saunders, A. et al (2023) Distilling best practice principles for public participation in impact assessment follow up - Impact Assessment and Project Appraisal 41(1) https://research-portal.uea.ac.uk/en/publications/distilling-best-practice-principles-for-public-participation-in-i

Appendix
Provisional Key Performance Indicators for community engagement and the safeguarding of community wellbeing

Outcome reference	Indicator	Objective	Frequency	Measurement	Source of measurement data / method	Baseline (optional)	Volume and trajectory over years (Performance Targets - %, number, timescales etc. - or TBD*)								Comments
							Year 1				Year 2				
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
Informing communities															
IN01	Provide good quality, timely, and accessible information to the community and its representatives.	Providing access to easily understood summary material that is concise and written in "plain-English".	Quarterly	% of survey respondents reporting 'good' access to concise and plain English information about the project from initial engagement through to follow-up via surveys.	Data collected from feedback surveys or community satisfaction surveys	N/A									Evaluate quarterly results of feedback surveys or community satisfaction surveys to track and inform improvements required.
IN02		Provide clear and early explanation of how, or if the proposal would result in compulsory purchase and related processes, or if there may be significant impact on individuals, which would need to be compensated for.	Quarterly	% of relevant survey respondents reporting clear and early explanation of how or if the proposals would result in compulsory purchase or if there may be significant impact on individuals through follow up surveys.	Data collected from feedback surveys or community satisfaction surveys										Evaluate quarterly results of feedback surveys or community satisfaction surveys to track and inform improvements required.
IN03		Proactively distribute information regarding discretionary purchase schemes or, in the absence of such a formal scheme, the mechanisms to deal with situations where there is extreme financial hardship, and/or a pressing need to sell.	Quarterly	% of relevant survey respondents reporting receiving access to information regarding discretionary purchase schemes and/or the mechanisms to deal with situations where there is extreme financial hardship, and/or a pressing need to sell through follow up surveys.	Data collected from feedback surveys or community satisfaction surveys										Evaluate quarterly results of feedback surveys or community satisfaction surveys to track and inform improvements required.
IN04		Ensure that access to compensation schemes does not generate an undue administrative burden on, and consequent anxiety for, an individual or community.	Quarterly	Overall decrease in % of relevant survey respondents reporting sentiment of undue administrative burden and consequent anxiety through follow up surveys.	Data collected from feedback surveys or community satisfaction surveys										Evaluate quarterly results of feedback surveys or community satisfaction surveys to track and inform improvements required.

Outcome reference	Indicator	Objective	Frequency	Measurement	Source of measurement data / method	Baseline (optional)	Volume and trajectory over years (Performance Targets - %, number, timescales etc. - or TBD*)								Comments
							Year 1				Year 2				
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
IN05		Maintain proactive, regular, in person contact with communities, via attendance at parish council meetings. Acknowledging the concerns of the community and working with them to develop a supportive and collaborative dialogue.	Quarterly	% of relevant parish council survey respondents reporting, in person contact with project promoter, via attendance at parish council meetings; that acknowledgement of community concerns is made, and the promoter is working with the parish council to develop a supportive and collaborative dialogue.	Data collected from feedback surveys or community satisfaction surveys	N/A									Evaluate quarterly results of feedback surveys or community satisfaction surveys to track and inform improvements required.
Involving communities															
IV01	Build effective functional relationships of trust, confidence, and understanding with the community and its representatives.	During pre-application engagement, co-design and publish a framework for dialogue, conflict resolution and management with representatives of the host community, town and parish councils. Updating as necessary based upon user and community feedback.	Quarterly	Overall increase in % of survey satisfaction levels.	Data collected from feedback surveys	TBD									Evaluate results of feedback survey to enhance the framework as required.
IV02		Employment of an independent third party to act as a "relationship manager" between the developers, local authorities, and the impacted communities, to ensure conversations remain positive and helpful.	Quarterly	Overall increase in number and % of trust, confidence and understanding of the project from the community and its representatives from initial engagement with Relationship Manager to follow up surveys.	Follow up surveys	TBD									This measure will assess the effectiveness of the Relationship Managers approach to increasing trust, confidence and understanding of the project within the host community and its representatives.

Outcome reference	Indicator	Objective	Frequency	Measurement	Source of measurement data / method	Baseline (optional)	Volume and trajectory over years (Performance Targets - %, number, timescales etc. - or TBD*)								Comments
							Year 1				Year 2				
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
Collaborating with communities															
CO01	Create a panel of people from the hosting parishes or towns to establish community collaboration.	Create a panel of people from the hosting parishes or towns comprising engaged individuals, who have the confidence of the communities they represent, and who can engage and work with the promoter, without prejudice to any objections they may have to the scheme. Panel members could include relevant county and district councillors, parish representatives and local authority officers.	Quarterly	Number and percentage of key representatives (TBD) at town and parish councils and privately engaged individuals taking membership in the panel (and maintained).	Data collection	TBD									Regularly review participation rates and adjust strategies to maintain or increase engagement levels as needed.
CO02		Provide the panel with emerging details of the project, that are fit for the public domain, regarding how the project will be built, designed, and mitigated. Engage with the panel to facilitate understanding of those aspects of the design that are fixed by constraints, and critically, the nature of those constraints.	Quarterly	Increase in % of panel understanding in aspects of constraints and their nature from initial engagement to follow-up survey.	Follow up surveys	TBD									Evaluate results of feedback survey and where necessary identify alternative means of collaborating with the panel to increase understanding as required.
CO03		Support the panel to understand the multiple design options, or multiple potential outcomes. These options or outcomes will be explained to the panel, interrogated by the panel, and the panel will provide feedback to the project promoter.	Quarterly	% increase of panel confidence in the feedback they have provided to the project promoter on the proposed multiple design options or multiple potential outcomes based on their understanding of the relevant process and outcomes via follow up survey.	Follow up surveys	TBD									Evaluate results of feedback survey and where necessary identify improvements to the approach in order that panel have sufficient understanding to inform their feedback to multiple design options or multiple potential outcomes.

Outcome reference	Indicator	Objective	Frequency	Measurement	Source of measurement data / method	Baseline (optional)	Volume and trajectory over years (Performance Targets - %, number, timescales etc. - or TBD*)								Comments
							Year 1				Year 2				
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
CO04		Development of the detailed designs used for the Discharge of Requirements to be finalised in discussion with the panel, before submission to the discharging Local Authority.	Once	Panel consulted in a collaborative capacity in the designs proposed before they are finalised and submitted to the discharging Local Authority.	Confirmation from panel	N/A									Measure to ensure the Panel are consulted.
CO05	Community collaboration.	Provide communities with genuine and meaningful opportunity to engage in collaborative dialogue with the promoter, allowing communities to shape the emerging project effectively and demonstrably, from the earliest possible stage of its design and development.	Quarterly	Number of genuine and meaningful opportunities provided to host communities to engage collaboratively with the project promoter measured by % of community attendees reporting high satisfaction levels via follow up surveys.	Follow up surveys	N/A									This measure will assess the quality of the opportunities offered to the host community to genuinely collaborate in a meaningful way.
CO06		After providing any significant new information about the project, offer face-to-face conversations with community leaders, allowing Q&A.	Adhoc	% of face-to-face sessions offered to community leaders measured against the number of releases of significant new information about the project.	Data collection from project promoter	N/A									Evaluate the opportunities given to consult with community leaders in recognition of new information about the project.
CO07		Provide effective engagement methods and approaches with host communities, as well as appropriate community mitigation, for the construction, and where appropriate, the operational phases of the project.	Quarterly	Number of engagements facilitated to host communities that include community mitigation measured by % of community attendees reporting high satisfaction levels via follow-up surveys.	Follow up surveys	N/A									This measure will assess quality of the engagements facilitated to the host community that include community mitigation.
CO08		In close collaboration with the host community, identify relevant community assets in the community and invest in their development as mitigation and enhancement.	Quarterly	Number and % of community assets receiving investment (as mitigation and enhancement) in their development as a result of collaboration with host community and/or their representatives.	Data collected from project promoter	N/A									Evaluate the number of community assets developed through collaboration with the host community.

Outcome reference	Indicator	Objective	Frequency	Measurement	Source of measurement data / method	Baseline (optional)	Volume and trajectory over years (Performance Targets - %, number, timescales etc. - or TBD*)								Comments
							Year 1				Year 2				
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
Empower communities															
EM01	Improve the communities ability to maintain their own throughout the process, through provision of good quality information and support.	Proactively distribute the WellMinds resource developed by East Suffolk Council.	Quarterly	Number supplied to residents and % of residents confirming receipt/having considered the information through follow up surveys.	Data collected from follow up surveys	TBD									Evaluate the portion of host community that has received and considered the resource and if necessary, revise approach to provision to increase engagement with the resource.
EM02		Provide parish/town council representatives with funded, suitable training and support in respect of the project to carry out their duties in supporting the host community.	Quarterly	Number of parish/town Council representatives receiving relevant training and support, to support the host community.	Data collected from provider	TBD									Evaluate the amount of parish/ town council representatives receiving relevant training to support their role in the community.
EM03		Provide funded Mental Health First Aid training for selected members of the community along with networking opportunities, for people adopting this role, to liaise with others for support and supervision.	Quarterly	Number and % of people in host community receiving Mental Health First Aid training from commissioned provider.	Data collected from provider	TBD									Evaluate the portion of host community receiving Mental Health First Aid training and enhance promotion if required.
EM04		Provide funded training for the community on how to have supportive conversations about difficult subjects, such as suicidal ideation and self-harm.	Quarterly	Number and % of people in host community receiving training from commissioned provider.	Data collected from provider	TBD									Evaluate the portion of host community receiving training to hold supportive conversations and enhance promotion if required.

Outcome reference	Indicator	Objective	Frequency	Measurement	Source of measurement data / method	Baseline (optional)	Volume and trajectory over years (Performance Targets - %, number, timescales etc. - or TBD*)								Comments
							Year 1				Year 2				
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
EM05	Increase engagement with SME's.	Work with commissioned local mental health organisations to understand capacity and where necessary, provide funding to enable them to oversee those who volunteer to undertake wellbeing support roles. This would ensure volunteers receive appropriate training, support, and guidance, and would also reduce the feelings of isolation and overwhelm often described by community leaders in these roles.	Quarterly	% of volunteer survey respondents satisfaction levels regarding their capability/competence in their community support role and feelings of isolation and/or overwhelm.	Surveys	TBD									Evaluate results of feedback survey and where necessary identify gaps and/ or enhancements required to the support offered via local mental health organisations so that volunteers are able to undertake wellbeing roles effectively and reduce any feelings they may have of isolation and overwhelm. Where gaps or enhancements are identified, work with the local mental health organisations to provide the required support to the volunteers.
Monitoring															
MO01	Monitor, respond to and increase baseline wellbeing scores using Suffolk's Emotional Needs Audit 2022 as baseline.	Support Suffolk Mind to carry out regular wellbeing audits in the host area, monitor and increase/improve wellbeing scores.	Quarterly	% increase of wellbeing scores amongst host community	Suffolks Emotional Needs Audit	TBD									Evaluate the quarterly progression rates to track improvements in wellbeing scores.

Version 1.0 | 09/2024

Suffolk County Council

EcoPower Suffolk Non-Statutory Consultation

Response of Suffolk County Council

Appendix G: Energy and Climate Adaptive Infrastructure Policy Supplementary Guidance Document – Socio-economic Effects of NSIPs

Suffolk County Council

Energy and Climate Adaptive Infrastructure Policy

The Socio-economic Effects of NSIPs

including the assessment of skills, workforce, and supply chain requirements

Supplementary Guidance Document

Version 1.0 | 01/2025

This is a supplementary guidance document, to support the Energy and Climate Adaptive Infrastructure Policy[1], which was adopted by Suffolk County Council's Cabinet, on the 16th of May 2023.

The scope and purpose of this Supplementary Guidance Document

The principal purpose of this document is to set a methodology for the assessment of the skills, workforce, and supply chain requirements for major infrastructure projects.

Suffolk has natural and geographic advantages that make it attractive to project promoters for locating low-carbon technologies, and the consequent supporting infrastructure. This, therefore, creates significant challenges and opportunities for the economy, environment, and communities of Suffolk.

Major infrastructure projects, both alone and in combination with other projects, require a significant transitory construction workforce to ensure effective delivery. Projects may also require an operational workforce consisting of both permanent staff, and contractors, on a periodic or rolling basis, that engages and involves local and regional supply chains.

To deliver inclusive growth, project promoters will work with Suffolk County Council[2], to identify and deliver additional social value. National toolkits, frameworks, and individual case studies, such as those available through the HMG Social Value model[3], will assist with this process and the measurement of outcomes. A skills programme, for example, could achieve a reduction in long distance commuting, support other local businesses, as well as reduce health inequalities.

The purpose of this document is to set out how the County Council expects project promoters to:

- Identify the anticipated geography from which the workforce will be drawn, and the extent to which any non-home-based workforce is likely to require additional temporary accommodation, particularly during construction.
- Identify skills and labour force needs for the construction, operation and decommissioning of their project, whilst aiming to maximise the opportunities for local companies and employment.
- Identify anticipated workforce numbers, in detail, by skill set, and the duration for which each workforce type will be required, throughout the construction of the project.

1 https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects-including-nsips/energy-infrastructure-policy

2 https://www.suffolk.gov.uk/business/tenders-and-supplying-us/social-value

3 https://www.gov.uk/government/publications/social-value-act-information-and-resources/social-value-act-information-and-resources

- Identify and analyse the linkages and dependencies between these workforce requirements and the implications for, transport modelling, accommodation and housing, and provision of local services including, but not limited to, health and public protection.
- Identify and analyse the extent to which the project's labour and skills demands may capture staff from the existing workforce, both alone and in combination with other projects, and assess any adverse outcomes for the delivery of services or for the local economy more widely.
- Consider and assess specific local sensitivities that may be adversely impacted by the workforce needs of the project, in respect of the natural environment and communities. These impacts must be accurately identified and appropriately mitigated.
- Identify the spatial and temporal relationships between their project and other projects, working collaboratively with other project promoters to both minimise and mitigate adverse impacts, and maximise positive impacts.

In addition to identifying and mitigating any potential harms in respect of workforce and skills, the County Council also expects the developer to support wider economic, employment, skills and educational objectives, in accordance with its Energy and Climate Adaptive Infrastructure Policy, albeit often outside of planning balance considerations.

Project promoters are expected to support the delivery and use of local and regional supply chains by:

- Supporting the increase and acceleration of inward investment of Tier one and Tier two contractors who may be working on multiple projects locally, recognising the project's regional role as part of Suffolk's energy cluster.
- Delivering opportunities for the growth of non-engineering or non-construction related businesses associated with the project, e.g. supporting the delivery of the project, including, but not limited to, catering, transport, and facilities management.

- Identifying and developing opportunities for research, development, and innovation, across the energy and construction sectors in Suffolk, and the region.
- Supporting the delivery of long term, sustainable opportunities, in the energy sector and related sectors, across Suffolk and the region.
- Recognising that it is essential to differentiate between the construction and civils opportunities of the project, and the mechanical and electrical engineering opportunities, during the construction cycle.
- Recognising that the mechanical and electrical engineering opportunities of the construction cycle, are likely to support and enhance the long term, permanent staffing and regional legacy benefits of the project.

Project promoters should deliver and enhance existing and emerging skills and educational initiatives by:

- Establishing with Suffolk County Council an agreed governance framework for the project's skills and educational enhancement, through Suffolk County Council's Regional Skills Coordination Function.
- Ensuring alignment with skills and educational initiatives in Suffolk, the Suffolk Social Value Skills Ask[4] and, where appropriate, the wider region.
- Coordinating, and assisting contractors to develop, initiatives to ensure sufficient supply of skills and capabilities being available at the right time, to enable both project delivery, and the growth of the energy sector in Suffolk.
- Promoting and securing inclusive growth, by working to ensure provision of opportunities that align with the regional need.
- Ensuring that skills and educational initiatives are fully inclusive, recognising and responding to the diverse needs of Suffolk's communities; taking action to create access and remove barriers to opportunities for those groups that require it.

4 https://www.suffolk.gov.uk/business/tenders-and-supplying-us/social-value

The assessment of socio-economic impacts

In several recent NSIP applications, the assessment of socio-economic impacts within the EIA was dominated by the characterisation of the local baseline conditions, with any meaningful assessment of effects being limited, or entirely absent. The Council considers that a focus on reproducing baseline information in the EIA is not effective, or sufficient, to understand the impacts of, or opportunities arising from, a project. Likewise, it does not allow the effective understanding of cumulative impacts or opportunities.

The principal purpose of this guidance is to ensure that project promoters deliver a robust and effective assessment of effects, both positive and negative, arising from their project's labour force and supply chain. The Council considers that these effects should be agreed, and understood, before modelling the project's effects, and consequent development of mitigations on: transport, accommodation and housing, and the provision of local services.

The outputs of socio-economic modelling have to form the foundation for the assessment of effects regarding transport, temporary accommodation, housing, and the provision of local public services and public protection.

The proposed approach to the assessment of socio-economic impact, and the labour force and skills needs, for the project alone, and in combination with other projects, is set out in the methodological guidance.

Methodological guidance for developers

In the absence of any formal or agreed national standards for the assessment of skills and supply chain requirements and effects, the county council outlines a methodology here. This is intended to form the basis of detailed discussions with the project promotor prior to any assessment work being carried out.

The following elements are to be provided or assessed in detail by the project promoter:

- Assess the existing socio-economic environment and baseline.
- Assess the relevant strategy and policy.
- Assess the education and training infrastructure and their capacity to supply, or ability to expand through investment, to provide additional local learning or training opportunities. These are required to support the supply of relevant skills, competencies, and capabilities.
- Provide a comprehensive supply chain assessment, including the details of what relevant businesses exist locally; and what their capacity to supply, or ability to expand is, to meet the project's requirements.

The purpose of assessing these elements is to arrive at agreed and evidenced, percentages of local employment (direct, indirect, and induced) and supply chain effects in low, medium, and high engagement scenarios, allowing the applicant, with confidence, to provide:

- Direct employment numbers (and associated GVA).
- Indirect employment numbers (local/regional supply chain) (and associated GVA).
- A robust temporal model of the needs of the project in terms of labour force numbers and skills, during its construction, operation and decommissioning.

The applicant will also provide evidence that the methodology used to calculate induced employment, (and associated GVA) correlates with the above.

Regarding data sources, the applicant should work with Suffolk County Council's Regional Skills Coordination Function, and the skills and economic functions of Local Authorities, to support identification of relevant and up to date sources of local and regional data.

These findings inform transport modelling, accommodation and housing, and provision of local services, including but not limited to, health and public protection.

Therefore, the project promoter and the County Council will need to agree the detailed assessment methodology, prior to this work being undertaken. Subsequently, the County Council and project promoter will need to agree that the outputs are acceptable and robust, such that they can inform both the socio-economic modelling and the potential impacts, on transport modelling, accommodation, housing and local services.

The most important information for the County Council to understand, from all project promoters, is how many people, and what skills are required, for what period of time, for both the workforce and supply chain.

Most consenting applications spend time and effort scoping what the region looks like, the employment level, skills and attainment levels, unemployment etc. The County Council is aware of the existing conditions, and although these do need to be correctly set out in an EIA, the work should focus on correctly identifying the impacts of the proposal.

The county council considers that the following elements are essential to ensure effective analysis:

1. Identify the workforce requirements and impacts
2. Identify the geography of the supply chain
3. Identify skills and workforce effects during construction, operation and decommissioning
4. Identify supply chain effects during construction, operation and decommissioning
5. These elements should then be combined to create an effective analysis of socioeconomic impacts and opportunities.

1. Identify the workforce requirements and impacts

Project promoters will identify the anticipated geography from which the workforce will be drawn. Due to the distinct difference between workforce and supply chain, the applicant is expected to define a separate economic study area for these two distinct elements.

Inputs

Workforce definition

- Define the distinct workforce phases of the project (e.g. Civils, Mechanical & Electrical, Commissioning etc) at the most granular level that data and knowledge support.
- Identify the duration of phases, and skills required within them.
- Once these elements are defined, the applicant can begin to define an economic study area for the workforce considering the following:
- The propensity for travel is different for skilled and unskilled workers and will also differ depending upon the duration of role.
- The availability of public transport and the local road network.
- The preferred method of travel to work.
- Correlation to Traffic and Transport methodology.

Outputs

Workforce analysis

- A defined geography from which unskilled/semi-skilled labour can be expected to be drawn from, for each distinct work phase.
- A defined geography from which skilled labour could be expected to be drawn from, for each distinct work phase.

2. Identify the geography of the supply chain

Inputs

Supply chain definition

As supply chain can be drawn locally, nationally and internationally, the geography defined here should represent areas that are impactful for the region. Therefore, hyper local should be defined as the Local Authority District hosting the project, local defined as the County hosting the project and then impact also considered at a regional level.

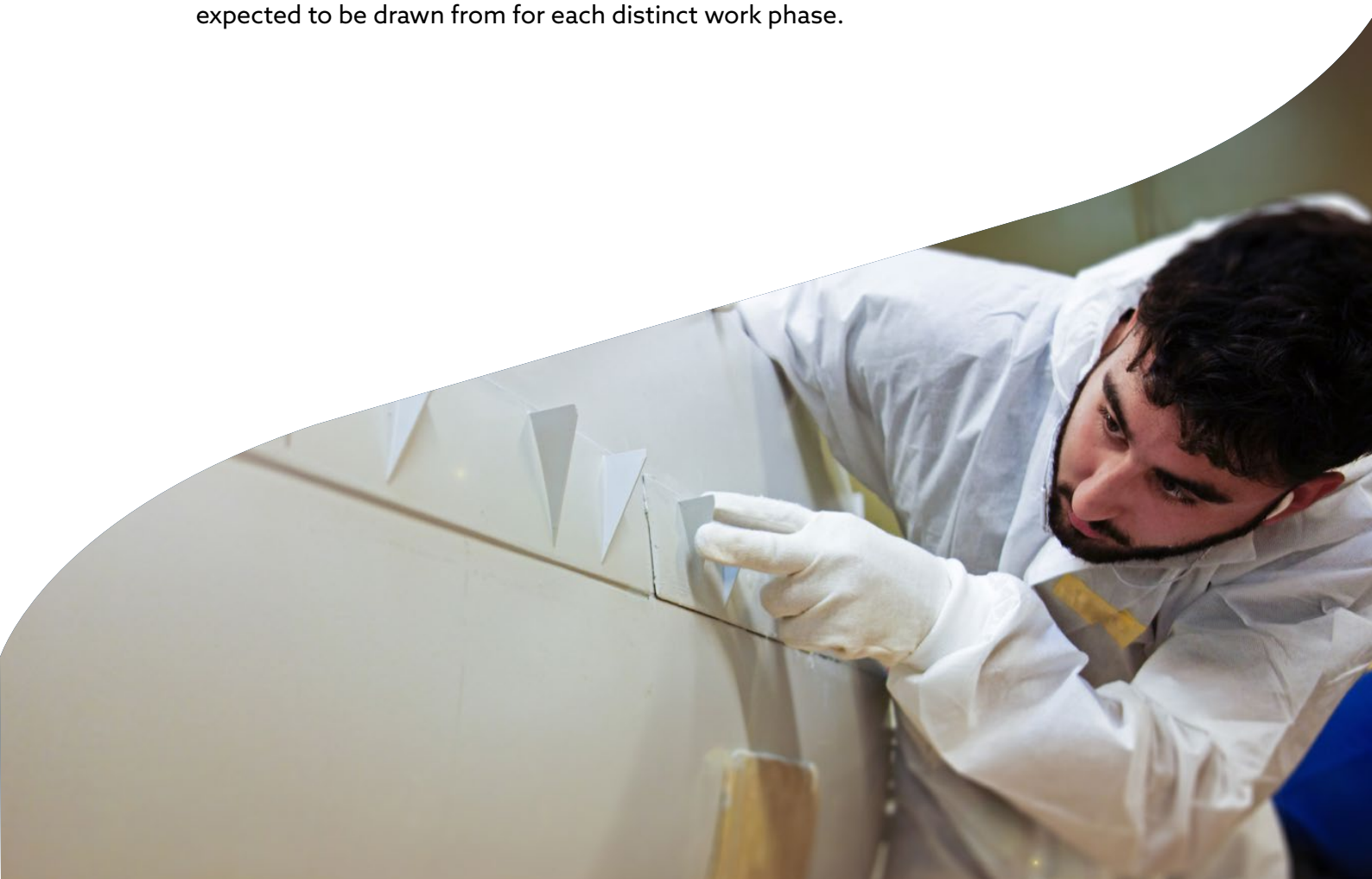
For example, a project located in Stowmarket will use and define its supply chain geography as:

- Hyper Local – Mid Suffolk (Local Authority District).
- Local – Suffolk (County).
- Regional – East of England (Region).

Outputs

Supply chain geography and temporal phasing

A defined geography from which local and regional supply chain companies could be expected to be drawn from for each distinct work phase.



3. Identify skills and workforce effects during construction, operation and decommissioning

Once defined geographies and work phases have been agreed between the applicant and the Council, for workforce and supply chain respectively, these can then be used to identify the size of the home-based employment opportunity. This assessment should be done using a low, medium and high probability scenario for home based employment opportunities. The worst-case scenario should always be the scenario used for identifying impacts and the corresponding effect on transport, accommodation and housing and local services modelling. The probability scenario will also refer to cumulative impact.

Inputs

Skills and workforce analysis

The applicant will need to produce an assessment, for each distinct workforce phase of the project as defined above, this should not include the indirect and induced employment opportunities that would occur if a local company were to receive a contract on the project. These will be accounted for separately, to avoid any double counting of benefit or negative impact.

Probability of home-based employment

Probability of home-based employment opportunity	Descriptors

Low	• Little or no established demand skill sets in the workforce.
	• Reliance on market to respond.
	• No intervention from either the applicant or any local/regional stakeholders.
	• High employment levels leaving little to no capacity in the marketplace.
	• Low levels of applicable skills.
	• Low population level.
	• Short duration of employment opportunity.
	• Significant proportion of population in identified geography are not of working age or economically inactive.
	• Constraints on local capacity:
	  • The project is unique to the area, and therefore limited opportunity to create an employment pipeline.
	  • Comparative projects being developed in the area leading to employment saturation.
	• Limited public transport.

Medium	• Labour force with some appropriate skills. • The usual levels of unemployment in relation to the wider economic geography.
High	• High levels of unemployment. • Significant labour force with appropriate skills. • High proportion of people of working age. • Long duration of employment opportunity. • Plausible transport links including public transport. • Comparative projects being developed in the area, with an opportunity for an employment pipeline to be created. • Planned interventions from the applicant and local and regional stakeholders. • Local training and education offer that can provide relevant skills.

Outputs

Skills and workforce definition and scenarios

This will need to define and quantify the following:

- The definition of a worker.
- The size of home-based employment opportunity.
    - Low scenario will represent worst case scenario to be used in all assessment work on impact.
- The size of non-home-based worker population.
    - Low scenario of home-based employment opportunity is to be used, as this will represent the worst-case scenario for modelling impacts on transport, accommodation, housing, and local services.

Employment should always be referred to as an opportunity. It cannot be assumed that just because there is an opportunity that this will result in employment happening. The job of the Council, collaboratively with the applicant, is to fully understand the size and nature of the opportunity. If it is agreed that there is an opportunity, the Council and applicant will then work to build a skills pipeline to help meet both current and any likely future demand, by working collaboratively with other key stakeholders to develop programmes and processes that will ensure people have the right skill at the right time, and so have an opportunity to gain employment with the project.

4. Identify supply chain effects during construction, operation and decommissioning

The effect on supply chain will be quantified to allow evidenced judgements to be made in the following areas:

- Contribution to the development of, and support of, local and regional businesses.
- Any indirect beneficial impacts for the region hosting the infrastructure, in particular in relation to use of local support services and supply chains.
- Any negative impacts, direct and indirect, for example potential wage inflation that would stifle growth.

At this early stage of the project lifecycle there will be no supply contracts in place. Therefore, a scenario-based approach using probability of supply should be used. The project promoter will need to evidence the supply chain opportunity across all elements of the project, considering cumulative impacts with other projects.

Inputs

Supply chain phasing and capacity

The applicant will produce an assessment that identifies:

- The distinct supply chain opportunities within each identified work phase.
- Businesses within each identified geography that can deliver the service or goods sought.
- The likelihood of these businesses being able to take up an opportunity to compete for this work.

Defining the supply chain opportunity

Probability of supply chain opportunity (Hyper Local, Local and Regional)	Descriptors

Low	• Little or no established businesses offering applicable goods or services.
	• Reliance on market to respond.
	• No intervention from either the applicant or any local/regional stakeholders.
	• Short duration of opportunity.
	• Constraints on local capacity:
	  • The project is unique to the area, and therefore limited opportunity to create a growth opportunity.
	  • Comparative projects being developed in the area leading to saturation.

Medium	• Businesses established with some appropriate skills. • Businesses experiencing their usual levels of work in relation to the wider economy.
High	• There are multiple businesses with appropriate skills. • Long duration of opportunity. • Comparative projects being developed in the area, with an opportunity for growth to be created. • Businesses have capability and capacity to take on additional contracts. • Planned interventions from the applicant and local and regional stakeholders.

Outputs

Supply chain characterisation and scenarios

These shall consist of:

- A defined list of goods and/or services that will be procured, by work phase, including any offsite fabrication/manufacture elements.
- The duration of all the identified elements.
- A scenario-based approach to probability of supply from hyper local, local and regional businesses against the identified elements.
- The size of hyper local, local and regional supply chain opportunities.
    - The low scenario will represent worst case scenario, to be used in all assessment work on impact.

5. Socio-Economic Impacts

Once the above elements have been assessed satisfactorily the promoter alongside Local Authorities can now make evidenced judgements against the areas set out in NPS EN-1 (5.13.4)[5]:

- The creation of jobs and training opportunities.
- The contribution to the development of low-carbon industries at the local and regional level, as well as nationally.
- The provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities.
- Any indirect beneficial impacts for the region hosting the infrastructure, in particular in relation to use of local support services and supply chains.
- Effects (positive and negative) on tourism and other users of the area impacted.
- The impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction area (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on social cohesion depending on how populations and service provision change as a result of the development.
- Cumulative impacts - if development consent were to be granted for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region.

5 https://assets.publishing.service.gov.uk/media/65bbfbdc709fe1000f637052/overarching-nps-for-energy-en1.pdf

Version 1.0 | 01/2025

Suffolk County Council

EcoPower Suffolk Non-Statutory Consultation

Response of Suffolk County Council

Appendix H: Grid Scale Battery Energy Storage System Planning – Guidance for Fire and Rescue Services

NFCC
National Fire
Chiefs Council

Grid Scale Battery Energy Storage System planning – Guidance for FRS

Grid scale Battery Energy Storage Systems (BESS) are a fundamental part of the UK's move toward a sustainable energy system. The installation of BESS systems both in the UK and around the globe is increasing at an exponential rate. A number of high profile incidents have taken place and learning from these incidents continues to emerge.

In the UK, approval for the majority of BESS installations takes place through the Local Authority planning process. Fire and Rescue Services (FRSs) may be engaged throughout the planning process, but this is not a statutory requirement. However, the National Fire Chiefs Council would encourage early engagement with the local FRS, continuing throughout the planning process.

The NFCC's expectation is that a comprehensive risk management process must be undertaken by operators to identify hazards and risks specific to the facility and develop, implement, maintain and review risk controls. From this process a robust Emergency Response Plan should be developed.

Given the rapidly developing nature of the technology, and ever evolving understanding of risks and mitigation measures, there is a need for guidance to support FRSs in providing consistent and evidence-based contributions to the planning process.

The guidance does not seek to provide a full specification or opinion on the entirety of a BESS system design. Instead, the aim is to limit the content to such matters that directly relate to facilitating a safe and effective response, by the fire and rescue service, to a fire or vapour cloud release involving a BESS installation. This includes factors such as facilities for the fire and rescue service, and design factors that contribute to reducing the escalation in the severity of an incident.

This guidance relates specifically to grid scale (typically 1 MW or larger) BESS in open air environments, using lithium-ion batteries.

The guidance is based upon a range of supporting materials including academic research, national and international standards, case studies, and industry guidance. The content of this document is the result of analysis of that supporting material with subsequent professional judgement applied. Every BESS installation will be different and fire and rescue services should not limit themselves to the content of this guidance. Particular reference has been made to the following:

- *State of Victoria (County Fire Authority) (2022), Design Guidelines and Model Requirements: Renewable Energy Facilities*

- *FM Global (2017) Property Loss Prevention Data Sheets: Electrical Energy Storage Systems Data Sheet 5-33*
- *NFPA (2023) Standard for the Installation of Stationary Energy Storage Systems*

Further advice and guidance can be obtained through the NFCC Alternative Fuels and Energy Systems lead officer.

This document contains guidance on:

1. Information requirements
2. System design, construction, testing and decommissioning
3. Detection and monitoring
4. Suppression systems
5. Site access
6. Water supplies
7. Emergency plans
8. Environmental impacts
9. Recovery

Principles

This guidance has been developed with the safety of the public and emergency responders in mind. It is based on trying to help reduce the risk as far as reasonably practicable, whilst recognising that ultimate responsibility for the safe design and running of these facilities rests with the operator.

The guidelines are a starting point and cannot cover every eventuality or type of design.

In developing these guidelines the hazards and risks from lithium-ion batteries, identified in National Operational Guidance, has been considered.

The following principles should be considered by Fire Services, when liaising with owners and operators, and form the basis of this guidance[1]:

1. Effective identification and management of hazards and risks specific to the siting, infrastructure, layout, and operations at the facility.
2. Impact on surrounding communities, buildings, and infrastructure.
3. Siting of renewable energy infrastructure so as to eliminate or reduce hazards to emergency responders.
4. Safe access for emergency responders in and around the facility, including to energy storage infrastructure and firefighting infrastructure.
5. Provision of adequate water supply and firefighting infrastructure to allow safe and effective emergency response.
6. Vegetation sited and managed so as to avoid increased bushfire and grassfire risk.

[1] State of Victoria (County Fire Authority) (2022), Design Guidelines and Model Requirements: Renewable Energy Facilities, p.4

7. Prevention of fire ignition on-site.
8. Prevention of fire spread between site infrastructure (solar panel banks, wind turbines, battery containers/enclosures).
9. Prevention of external fire impacting and igniting site infrastructure.
10. Provision of accurate and current information for emergency responders during emergencies.
11. Effective emergency planning and management, specific to the site, infrastructure and operations.
12. Owner to have a comprehensive Emergency Response Plan, showing full understanding of hazards, risks, and consequences.

Information Requirements

Grid scale BESS should form part of FRS planning in accordance with arrangements required under section 7(2)(d) of the Fire and Rescue Services Act (2004). Site Specific Risk Information (SSRI) should be made available to crews in the form of an effective Emergency Response Plan.

Details of any site access arrangements, such as key codes, should be provided to the FRS.

System design, construction, testing and decommissioning

Information is required as early as possible from the applicant /developer/designer/manufacturer etc., to allow an initial appraisal of the BESS to be made. This information should be provided to the FRS (via the Local Authority Planners in the first instance), with appropriate evidence provided to support any claims made on performance, and with appropriate standards cited for installation.

Such information should also be made available to FRSs for inclusion in Site Specific Risk Information (SSRI) records.

System design and construction

Information required:

1. The battery chemistries being proposed (e.g. Lithium-ion Phosphate (LFP), Lithium Nickel Manganese Cobalt Oxide (NMC)). Because:
    a. Battery chemistries will directly affect the heat released when a cell goes into thermal runaway
    b. Battery chemistries will influence vapour cloud formation.
    c. An understanding of the battery chemistry is useful when requesting scientific advice during an incident.
2. The battery form factor (e.g. cylindrical, pouch, prismatic)
3. Type of BESS e.g. container or cabinet
4. Number of BESS containers/cabinets
5. Size/capacity of each BESS unit (typically in MWh)
6. How the BESS units will be laid out relative to one another.
7. A diagram / plan of the site.

8. Evidence that site geography has been taken into account (e.g. prevailing wind conditions).
9. Access to, and within, the site for FRS assets
10. Details of any fire-resisting design features
11. Details of any:
    a. Fire suppression systems
    b. On site water supplies (e.g. hydrants, EWS etc)
    c. Smoke or fire detection systems (including how these are communicated)
    d. Gas and/or specific electrolyte vapour detection systems
    e. Temperature management systems f. Ventilation systems
    f. Exhaust systems
    g. Deflagration venting systems
12. Identification of any surrounding communities, sites, and infrastructure that may be impacted as a result of an incident.

Testing

Details of any evidence based testing of the system design should be requested, for example, results of UL 9540A testing.

Design

Design features should be made clear. These may include:

- Rack layout and setup
- Thermal barriers and insulation
- Container layout and access arrangements

Detection and monitoring

An effective and appropriate method of early detection of a fault within the batteries should be in place, with immediate disconnection of the affected battery/batteries. This may be achieved automatically through the provision of an effective Battery Management System (BMS) and/or a specific electrolyte vapour detection system.

Should thermal runaway conditions be detected then there should be the facility in place for the early alerting of emergency services.

Detection systems should also be in place for alerting to other fires that do not involve thermal runaway (for example, fires involving electrical wiring).

Continuous combustible gas monitoring within units should be provided. Gas detectors should alarm at the presence of flammable gas (yes/no), shut down the ESS, and cause the

switchover to full exhaust of the ventilation system[2]. Sensor location should be appropriate for the type of gas detected e.g. hydrogen, carbon monoxide, volatile organic compounds.

External audible and visual warning devices (such as cabinet level strobing lights), as well as addressable identification at control and indicating equipment, should be to linked to:

1. Battery Management System (when a thermal runaway event is identified)
2. Detection and suppression system activation

This will enable first responders to understand what the warning is in relation to. This will aid in their decision-making.

Suppression systems

Suitable fixed suppression systems should be installed in units in order to help prevent or limit propagation between modules.

Where it is suggested that suppression systems are not required in the design, this choice should be supported by an evidence based justification and Emergency Response Plan that is designed with this approach in mind (for example, risk assessed controlled burn strategies, and external sprinkler systems).

Whilst gaseous suppression systems have been proposed previously, current research indicates the installation of water based suppression systems for fires involving cell modules is more effective.

The installation of gaseous suppression systems for electrical fires that do not involve cell modules may be appropriate but should be built into a wider suppression strategy.

FM Global cite the following reasons for not recommending gaseous protection systems[3]:

1. **Efficacy relative to the hazard**. As of 2019, there is no evidence that gaseous protection is effective in extinguishing or controlling a fire involving energy storage systems. Gaseous protection systems may inert or interrupt the chemical reaction of the fire, but only for the duration of the hold time. The hold time is generally ten minutes, not long enough to fully extinguish an ESS fire or to prevent thermal runaway from propagating to adjacent modules or racks.
2. **Cooling.** FM Global research has shown that cooling the surroundings is a critical factor to protecting the structure or surrounding occupancy because there is currently no way to extinguish an ESS fire with sprinklers. Gaseous protection systems do not provide cooling of the ESS or the surrounding occupancy.
3. **Limited Discharge.** FM Global research has shown that ESS fires can reignite hours after the initial event is believed to be extinguished. As gaseous protection systems

[2] FM Global (2017) Property Loss Prevention Data Sheets: Electrical Energy Storage Systems, para. 2.5.5.2
[3] FM Global (2017) Property Loss Prevention Data Sheets: Electrical Energy Storage Systems, para. 3.3

can only be discharged once, the subsequent reignition would occur in an unprotected occupancy

The choice of a suppression system should be informed by liaison with a competent system designer who can relate the system choice to the risk identified and the duration of its required activation. Such a choice must be evidence based[4].

Any calculations for sufficient water supply for an appropriate suppression system will need to be completed by a competent person considering the appropriate risk and duration of any fire.

Water run-off and potential impact on the environment, along with mitigation measures, should be considered and detailed in the Emergency Response Plan.

Lack of sufficient water supplies at a particular site location should not be considered as the basis for a suppression system choice. Such an approach could result in potentially ineffective and/or dangerous system designs.

Deflagration Prevention and Venting

BESS containers should be fitted with deflagration venting and explosion protection appropriate to the hazard. Designs should be developed by competent persons, with design suitability able to be evidenced[5]. Exhaust systems designed to prevent deflagration should keep the environment below 25% of Lower Explosive Limit (LEL).

Flames and materials discharged as a result of any venting should be directed outside to a safe location and should not contribute to any further fire propagation beyond the unit involved or present further risk to persons. The likely path of any vented gasses or materials should be identified in Emergency Response Plans to reduce risk to responders.

Explosion/deflagration strategies should be built into the emergency plan such that responders are aware of their presence and the impact of their actions on these strategies[6].

Where emergency ventilation is used to mitigate an explosion hazard, the disconnect for the ventilation system should be clearly marked to notify personnel or first responders to not disconnect the power supply to the ventilation system during an evolving incident[7].

[4] NFPA (2023) Standard for the Installation of Stationary Energy Storage Systems, para C.3
[5] BS EN 16009:2011 Flameless Explosion Venting Devices; BS EN 14373:2021 Explosion Suppression Systems; BS EN 14797:2007 Explosion Venting Devices
[6] UL FRSI (2020) Four Firefighters Injured in Lithium-ion Battery Energy Storage System Explosion – Arizona, pp. 47-49
[7] NFPA (2023) Standard for the Installation of Stationary Energy Storage Systems, para G.1.4.3.3

Access

Site access

Suitable facilities for safely accessing and egressing the site should be provided. Designs should be developed in close liaison with the local FRS as specific requirements may apply due to variations in vehicles and equipment.

This should include:

- At least 2 separate access points to the site to account for opposite wind conditions/direction.
- Roads/hard standing capable of accommodating fire service vehicles in all weather conditions. As such there should be no extremes of grade.
- A perimeter road or roads with passing places suitable for fire service vehicles.
- Road networks on sites must enable unobstructed access to all areas of the facility.
- Turning circles, passing places etc size to be advised by FRS depending on fleet.

Access between BESS units and unit spacing

In the event of a fire involving a BESS unit, one of the primary tactics employed will be to prevent further unit to unit fire spread. Suitable access for firefighters to operate unimpeded between units will therefore be required. This should allow for the laying and movement of hose lines and, as such, access should be free of restrictions and obstacles. The presence of High Voltage DC Electrical Systems is a risk and their location should be identified. Exclusion zones should be identified.

A standard minimum spacing between units of 6 metres is suggested[8] unless suitable design features can be introduced to reduce that spacing. If reducing distances a clear, evidence based, case for the reduction should be shown.

Any reduction in this separation distance should be design based by a competent fire engineer. There should be consideration for the fire separation internally and the total realistic load of fire. Proposed distances should be based on radiant heat flux (output) as an ignition source.

The NFCC does not support the stacking of containers/units on top of one another on the basis of the level of risk in relation to fire loading, potential fire spread, and restrictions on access.

Distance from BESS units to occupied buildings & site boundaries

Individual site designs will mean that distances between BESS units and occupied buildings/site boundaries will vary. Proposed distances should take into account risk and mitigation factors. However, an initial minimum distance of 25 metres is proposed prior to any mitigation such as

[8] FM Global (2017) Property Loss Prevention Data Sheets: Electrical Energy Storage Systems, para. 2.3.2.2

blast walls. Reduction of distances may be possible in areas of lower risk (e.g. rural settings). Where possible buildings should be located upwind.

Site Conditions

Sites should be maintained in order that, in the event of fire, the risk of propagation between units is reduced. This will include ensuring that combustibles are not stored adjacent to units and access is clear and maintained. Areas within 10 metres of BESS units should be cleared of combustible vegetation and any other vegetation on site should be kept in a condition such that they do not increase the risk of fire on site. Areas with wildfire risk or vegetation that would result in significant size fires should be factored into this assessment and additional cleared distances maintained as required.

Water Supplies

Water supplies will depend on the size of the installation. In the majority of cases, initial firefighting intervention will focus on defensive firefighting measures to prevent fire spread to adjacent containers. As a result, proposals for water supplies on site should be developed following liaison with the local fire and rescue service taking into account the likely flow rates required to achieve tactical priorities. This should also take account of the ability of/anticipated time for the fire and rescue service to bring larger volumes of water to site (for example through the provision of High Volume Pumps).

IP ratings of units should be known so that risks associated with boundary cooling can be understood.

As a minimum, it is recommended that hydrant supplies for boundary cooling purposes should be located close to BESS containers (but considering safe access in the event of a fire) and should be capable of delivering no less than 1,900 litres per minute for at least 2 hours. Fire and rescue services may wish to increase this requirement dependant on location and their ability to bring supplementary supplies to site in a timely fashion.

Water supply for any automatic suppression system will be covered by the relevant standard/design depending on which system chosen as appropriate for the risk. For manual water, amounts should come from performance based requirement rather than a reference to a code, unless it can be proven that the code specifically covers BESS. Regarding water storage tanks, volumes will again need to be informed on a performance-based need. Isolation points should be identified.

Any static water storage tanks designed to be used for firefighting must be located at least 10 metres away from any BESS container/cabinet. They must be clearly marked with appropriate signage. They must be easily accessible to FRS vehicles and their siting should be considered as part of a risk assessed approach that considers potential fire development/impacts. Outlets and connections should be agreed with the local FRS. Any outlets and hard suction points should be protected from mechanical damage (e.g. through use of bollards).

Consideration should be given, within the site design, to the management of water run-off (e.g. drainage systems, interceptors, bunded lagoons etc).

Signage

Signage should be installed in a suitable and visible location on the outside of BESS units identifying the presence of a BESS system. Signage should also include details of:

- Relevant hazards posed
- The type of technology associated with the BESS
- Any suppression system fitted
- 24/7 Emergency Contact Information

Signs on the exterior of a building or enclosure should be sized such that at least one sign is legible at night at a distance of 30 metres or from the site boundary, whichever is closer[9].

Adherence to the Dangerous Substances (Notification and Marking of Sites) Regulations 1990 (NAMOS) should be considered where the total quantity of dangerous substances exceeded 25 tonnes.

Emergency Plans

Site operators should develop emergency plans and share these with the Fire and Rescue Service. These include:

A **Risk Management Plan** should be developed by the operator, which provides advice in relation to potential emergency response implications including:

- The hazards and risks at and to the facility and their proposed management.
- Any safety issues for firefighters responding to emergencies at the facility.
- Safe access to and within the facility for emergency vehicles and responders, including to key site infrastructure and fire protection systems.
- The adequacy of proposed fire detection and suppression systems (e.g., water supply) on-site.
- Natural and built infrastructure and on-site processes that may impact or delay effective emergency response.

An **Emergency Response Plan** should be developed to facilitate effective and safe emergency response and should include:

- How the fire service will be alerted
- A facility description, including infrastructure details, operations, number of personnel, and operating hours.

[9] NFPA (2023) Standard for the Installation of Stationary Energy Storage Systems, para G.1.4.2.1.1

- A site plan depicting key infrastructure: site access points and internal roads; firefighting facilities (water tanks, pumps, booster systems, fire hydrants, fire hose reels etc); drainage; and neighbouring properties.
- Details of emergency resources, including fire detection and suppression systems and equipment; gas detection; emergency eye-wash and shower facilities; spill containment systems and equipment; emergency warning systems; communication systems; personal protective equipment; first aid.
- Up-to-date contact details for facility personnel, and any relevant off-site personnel that could provide technical support during an emergency.
- A list of dangerous goods stored on site.
- Site evacuation procedures.
- Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, grassfire and bushfire.

Environmental impacts

Suitable environmental protection measures should be provided. This should include systems for containing and managing water runoff. System capability/capacity should be based on anticipated water application rates, including the impact of water based fixed suppression systems.

Sites located in flood zones should have details of flood protection or mitigation measures.

Recovery

The operator should develop a post-incident recovery plan that addresses the potential for reignition of ESS and de-energizing the system, as well as removal and disposal of damaged equipment[10].

[10] FM Global (2017) Property Loss Prevention Data Sheets: Electrical Energy Storage Systems, para. 2.8.2.3

Suffolk County Council

EcoPower Suffolk Non-Statutory Consultation

Response of Suffolk County Council

Appendix I: Extracts from Suffolk Minerals & Waste Local Plan

Minerals consultation and safeguarding areas

5.46 Paragraph 143 of the NPPF states that in preparing local plans, local authorities should:

"define Minerals Safeguarding Areas and adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development, whilst not creating a presumption that resources defined will be worked; and define Minerals Consultation Areas based on these Minerals Safeguarding Areas."

5.47 The County Council has defined the Minerals Safeguarding Areas (MSAs) based upon sand and gravel resource information provided by the British Geological Survey. The Minerals Consultation Areas (MCAs) are slightly larger because a buffer of 250 metres has been added around the edges. This additional buffer is designed to avoid potential sterilisation issues arising because of conflicts with potentially sensitive land-uses such as proposed residential development. It is expected that Local Plans will include policies that safeguard minerals if the County Council highlights particular sites during their consultation stages.

Policy MP10: Minerals consultation and safeguarding areas

The County Council will safeguard:

a) those Minerals Safeguarding Areas located within the Minerals Consultation Areas identified on the Proposals Map from proposed development in excess of five Ha The County Council will, when consulted by the Local Planning Authority, object to such development unless it can be shown that the sand and gravel present is not of economic value, or not practically or environmentally feasible to extract, or that the mineral will be worked before the development takes place or used within the development;

b) areas falling within 250m of an existing, planned or potential site allocated in the Plan for sand and gravel extraction. The MPA will advise the Local Planning Authority whether any proposed development might prejudice the future extraction of minerals and should be refused, or whether such development itself might be prejudiced by proposed mineral working.

District and Borough Councils should consult the County Council when a proposal falls within the Minerals Consultation Area as defined on the Proposals Map. The County Council will then refer to Policy MP10 before providing a consultation response. Responsibility for any mitigation required falls on the development that receives planning permission last.

Safeguarding of waste management sites

6.34 The safeguarding of waste sites is necessary to protect them from other forms of development which might either directly in indirectly impact upon waste development. Likewise, applications for new development in the proximity to existing or proposed waste development should take into account any potential conflicts.

Policy WP18: Safeguarding of waste management sites

The County Council will seek to safeguard existing sites and sites proposed for waste management use as shown on the Proposals & Safeguarding Maps and will object to development proposals that would prevent or prejudice the use of such sites for those purposes unless suitable alternative provision is made.

Development proposals in close proximity to existing sites, should demonstrate that they would not prejudice or be prejudiced by a waste management facility. The safeguarding policy will also apply to any site where planning permission has already been granted.

Where existing business or other use could have a significant adverse effect in any proposed new development, the applicant must provide suitable mitigation before the development is completed so that the existing use is not disadvantaged by new development.

District and Borough Councils should consult the County Council when a potentially conflicting proposal falls within the 250 or 400 metre safeguarding zones as defined in the Appendix 3 Safeguarding Maps. The County Council will then refer to Policies WP18 before providing a consultation response.

Suffolk County Council

EcoPower Suffolk Non-Statutory Consultation

Response of Suffolk County Council

Appendix J: SCC Public Rights of Way and Solar Farms – Position Statement

Public Rights of Way and Solar Farms - Position Statement

1.1 Public rights of way (PROW) are an important part of Suffolk's landscape and are legally protected. The National Planning Policy Framework specifically refers to PROW at paragraph 100, stating that "Planning policies and decisions should protect and enhance PROW and access…"

1.2 PROW are divided into the following classifications:

- Public Footpath – only for use on foot or with a mobility vehicle
- Public Bridleway – as per a public footpath, and on horseback or by bicycle
- Restricted Byway – as per a bridleway and by a 'non-motorised vehicle' e.g. a horse and carriage
- Byway Open to All Traffic (BOAT) – as per a restricted byway and can be used by all vehicles

1.3 All recorded PROW are shown and described on the Definitive Map and Statement, together forming the legal record of all currently recorded PROW. They are available to view as PDFs divided into parishes at https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/view-definitive-maps-of-public-rights-of-way/. 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.

1.4 In 2019 Suffolk County Council declared a climate emergency and stated the ambition to achieve net-zero carbon emissions by 2030. In 2020 the Suffolk Climate Emergency Plan was published, which documents priority actions all public sector partners can take in order to achieve our goal. We understand the need for greener ways to generate power and are happy to work with organisations to enable this process whilst protecting and enhancing our natural environment. Our position in relation to PROW and solar farms in Suffolk is as follows:

1.5 Early contact and discussion with the Green Access Team is essential to allow for best practice to be followed in developing new sites.

1.6 Applications for planning permission should include full information about PROW in and around the site, including a plan showing the local PROW network and how it interacts with the proposals. They should also include full information about the cumulative effects of other similar applications and sites in the area.

1.7 We require that a full PROW search (including for claims and anomalies) is carried out and the digital data is obtained and plotted on site plans. This includes details recorded on the Definitive Statement and any legally recorded widths. For information about this, and to enquire about fees contact DefinitiveMaps@suffolk.gov.uk

1.8 PROW must remain unobstructed at all times, i.e. no barriers or gates may be erected, and management measures should be put in place to enable PROW to remain open during construction. If closures are temporarily required then the appropriate permissions must be applied for from the Rights of Way & Access Team. More information can be found at https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/

1.9 All PROW must be protected on their legally recorded alignment both within and around the site, and must be accommodated within wide green corridors. Any new planting proposed as screening should be of mixed native species and a minimum of 10m from the edge of the PROW. This is to ensure routes remain well-lit and ventilated and do not create a corridor effect. The length of time it will take for new planting to mature and the impact on the user experience during that time must be considered. Planting should not be allowed to grow any taller than 1.8m. Future cutting and maintenance of hedges, trees and the corridor strip also needs to be taken into account from both a financial and access perspective. We may seek a financial contribution for the maintenance of green corridors unless an alternative agreement is in place. The siting of access tracks outside the fencing could be considered, as per the example shown in Image 1 below:

1 - L-R tree belt - public footpath - grassed solar farm access track - hedge planting – low-level wire fencing - solar arrays

1.10 In limited circumstances it may be possible for a PROW to be diverted if a development cannot otherwise take place. However any diverted route must be no less comfortable and convenient for users and mitigation for any impact such as loss of views etc will be required. Diversion options must be discussed with the Green Access Team and the appropriate legal process followed. We will seek to avoid 'dog-leg' alignments and retain desire lines.

1.11 For fencing, the use of open mesh is preferable. Close boarding or metal palisade type fencing are too intrusive in the landscape and create unpleasant and intimidating alleys, even if used on a relatively wide path. Metal palisade fencing with spikes on top should particularly be avoided anywhere used by horse riders, as it poses a particular hazard. Any fencing should be screened with planting on the PROW side of the fence with reference to the requirements in paragraph 5 above. Fencing must not be above 2m in height.

1.12 The effect of glint and glare on users of PROW must be properly considered. This is particularly relevant in the case of PROW that may be used by horse riders. The British Horse Society has produced guidance in relation to solar farms (available to download at https://www.bhs.org.uk/advice-and-information/free-leaflets-and-advice) and recommends that arrays should be avoided where glare is likely to effect users of an equestrian route.

1.13 Where site access tracks will intersect with PROW, particularly during construction, the safety of people using the PROW must be ensured. Management measures must be put in place to control construction traffic, e.g.

employing banksmen, temporary closures with a convenient alternative route provided etc. All measures must be agreed with the Rights of Way & Access Team. All efforts must be made to avoid damaging the surface of the PROW, and any damage caused must be rectified at the earliest opportunity so that the surface is commensurate with the use of the PROW (e.g. for a footpath it must be suitable for pedestrians to use it safely, for a bridleway it must be appropriate and safe for pedestrians, horse riders and cyclists etc.)

1.14 All structures (including container-style structures) should be sited as far from PROW as possible and should be screened. The noise from inverters may be disturbing to users of bridleways and byways, therefore higher standards of sound insulation on the housing of inverters may be required. Inverters should also be sited as far from bridleways and byways as possible.

1.15 Drainage provision must be taken into account to prevent potentially serious effects on PROW through and immediately adjacent to the site, and for some distance away depending on drainage patterns, outflow, and the terrain.

1.16 Potential loss of amenity value to users of the PROW network generally must be considered, with views of open countryside replaced with hedged paths, restricted views over the landscape, and the visual impact of solar farms both close up and from a distance. Mitigation measures such as wider enhancements to the local network (including the creation of new PROW) may be required, particularly in larger scale solar farm proposals. In some instances new PROW can be created and this option should be explored.

1.17 Labelling of PRoW should be consistent and standard across all documents and follow the same convention as depicted on the Definitive Map, the legal record for PRoW. PRoW are identified by the parish (which has a code) and the path number, for example **E – 354/007/A** is East/parish code (Knodishall=354)/path number =7A, ie Knodishall 7A.