

EcoPower Suffolk

EN0110019

EIA Scoping Consultation

Suffolk County Council

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Glossary of Acronyms

<i>BESS</i>	<i>Battery Energy Storage System</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>EIA</i>	<i>Environmental Impact Assessment</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>

“The Council” / “SCC” refers to Suffolk County Council.

Purpose of this Document

The document has been prepared by Suffolk County Council to respond to the EIA Scoping Consultation for EcoPower Suffolk occurring between 26 January 2026 and 23 February 2026.

1 Introduction

- 1.1 The Planning Inspectorate, under Planning Act 2008 and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11 have been asked by the Applicant to give its opinion on the scope and level of detail that is required for the Environmental Statement for the proposed development.
- 1.2 The project is a solar farm with Battery Energy Storage System (BESS) and with a connection to the existing National Grid electricity substation at Leys Lane, Yaxley, Suffolk. The proposed development is expected to have a generation capacity of around 250 MW and 11 gigawatt hours of energy storage. The proposed development site is approximately 600 hectares (ha) in size, predominantly across five solar array areas situated around the Yaxley substation (on separate land parcels to the southwest of Stuston, northeast of Eye, north of Gislingham, north of Occold, and southwest of Thrandeston).
- 1.3 The proposed development also includes cable route corridors (connecting the solar array areas and new substation to the Yaxley substation). The proposed development is located within the Mid Suffolk District Council area.
- 1.4 The SCC electoral divisions directly affected are as follows:
 - Hartismere
 - Hoxne & Eye
 - Upper Gipping
- 1.5 Further communication and engagement will need to take place with the applicant to ensure that suitable assessment of the proposed scheme can be conducted by all relevant service areas.

2 Cumulative Impacts

- 2.1 SCC considers that cumulative impacts need to be a key part of the scoping for the project due to the interactions between known (proposed and consented) NSIP-scale and TCPA-scale projects in Suffolk and Norfolk.
- 2.2 The Applicant should be cognisant of emerging and existing projects, including the likely expansion of NGET grid connection infrastructure. In particular, it is important to understand the interactions between the construction timelines of the numerous solar and battery energy storage system proposals in North Suffolk and South Norfolk. In Q3 2026, the outcome of Gate 2 connection offers from the National Energy System Operator will be announced. This is likely to enable projects as yet not in the public domain and those indefinitely suspended to progress. As such, the Environmental Statement must include these assumptions within the cumulative impacts assessment.
- 2.3 SCC considers that the infrastructure projects with significant interrelationships with the EcoPower Suffolk proposals to be:

Project Name	Phase	Note
East Pye Solar Farm	Pre-Application	
Tasway Energy Park	Pre-Application	Awarded Gate 1 grid connection offer from NESO (Indefinitely suspended)
White Elm Solar Farm	Pre-Application	Indefinitely suspended
Norwich to Tilbury Grid Reinforcement	Examination	Could be granted consent as early as March 2027
Progress Power Gas-fired Power Station	Construction	

- 2.4 SCC is concerned regarding the workforce demand in the region and during the peak construction of Sizewell C. The cumulative impact resulting from the temporal overlap between the peak construction of Sizewell C and the construction of EcoPower Suffolk may result in labour market pressures for energy-related skills. Workforce availability is therefore a critical concern and may result in an increased non-home-based workforce and exacerbate workforce accommodation shortages in the area.

- 2.5 Therefore, the Council considers that the Applicant will need to take an adaptive and flexible approach to the assessment of cumulative impacts.
- 2.6 Further, SCC would welcome additional clarifications as to how the Applicant intends to co-ordinate their Scheme with the numerous other NSIPs in the region and to mitigate the cumulative impacts.

Impacts by Service Area

3 Archaeology

- 3.1 The entire proposal area has very high archaeological potential, with numerous archaeological sites recorded on the County Historic Environment Record both within and immediately adjacent to all parts of the draft order limits. However, no part of the proposed scheme has previously been subject to systematic archaeological investigation. As such, there is high potential for additional, extensive and as yet unknown archaeological remains to survive across large parts of all areas of the scheme, some of which may be of national significance, and full archaeological field assessment is required at the earliest opportunity.
- 3.2 Archaeological fieldwork, including trial trenched evaluation, 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 considered, to facilitate informed planning decisions. We 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). 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, including giving proper thought to preservation in situ, and will also be essential for effective risk management, project management, programme scheduling and budget management.

Baseline data

- 3.3 Data held by the Historic Environment Record relating to undesignated heritage assets is not currently included on any of the provided mapping and so an HER search must be obtained at the earliest opportunity (as part of a wider Desk Based Assessment) so that the applicant has a comprehensive understanding of the current baseline archaeological record for the application area.
- 3.4 Numerous archaeological sites are recorded on the County Historic Environment Record both within and immediately adjacent to all parts of the order limits. However, the scheme area has not been subject to systematic archaeological

investigation and, therefore, the character, extent and significance of surviving above and below ground heritage assets across the order limits has yet to be defined.

- 3.5 As well as the known archaeological record, there is high potential for additional heritage assets of archaeological significance to survive across 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. 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.
- 3.6 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.
- 3.7 There should not be an assumption that data within the Historic Environment Record (HER) 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 which are recorded within the order limits and for which preservation in situ can already be identified as likely to be the most appropriate mitigation.
- OKY 030 Hengiform prehistoric monument- potential to be worthy of Scheduling
 - EYE 068 Potential Anglo-Saxon cemetery site indicated by finds scatters (could be of regional if not national significance)
 - EYE 003 Anglo-Saxon cremation cemetery site, part excavated in antiquity, but with potential for further cremations to survive (of regional if not national significance)
 - YAX 018 Potential Anglo-Saxon cemetery site indicated by finds scatters (could be of regional if not national significance)
 - GSG 081 Potential Anglo-Saxon cemetery site indicated by finds scatters (could be of regional if not national significance)

- 3.8 There is also high potential for additional sites of regional or national significance to be defined during ongoing archaeological assessment work.
- 3.9 The site is situated very close to a number of Scheduled Ancient Monument (listed below), alongside numerous listed buildings and several conservation areas. Proper assessment of the potential impacts of proposals upon the setting of Designated Heritage Assets will therefore need to be undertaken.
- EYE 009 Eye Priory
 - EYE 012 Cranley Hall moated site
 - EYE 011 Moated site south of Cranley Hall
 - BRM 001 Moated site next to St Mary's Church
 - BUR 004 Stubbing's Entry moated site
- 3.10 A number of areas of very early historic landscape are known to survive within the Eye area, with the pattern of land boundaries thought to have prehistoric or Roman origins, with other areas of well-preserved early (pre 18th century) enclosure present across the order limits. Impacts of the scheme upon the historic landscape therefore also needs proper assessment.

Further assessment required

- 3.11 To inform the final scheme design and routing of the cable corridor, a thorough desk-based assessment and field evaluation is needed prior to/at EIA stage. 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.
- 3.12 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, 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.
- 3.13 A settings impact assessment for above ground and designated heritage assets will also need to be undertaken, following guidance by Historic England and the Conservation Officer.
- 3.14 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. 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.

- 3.15 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).
- 3.16 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.
- 3.17 We advise that all areas which will be impacted on by any element of the scheme (including solar PV array sites and associated development, substations, BESS, ecological mitigation sites, cable corridors, haul routes, works compounds etc), should be subject to a full suite of archaeological assessment (desk-based, geophysical and trial trenched evaluation) prior to/at 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.
- 3.18 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.

- 3.19 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 Gislegham. 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.
- 3.20 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.
- 3.21 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.
- 3.22 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.
- 3.23 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. We 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.

- 3.24 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.

Specific comments on EIA scoping report

- 3.25 2.4.11 Only designated heritage assets are shown of figure 7.4.
- 3.26 3.4.6 What about design principles for areas outside of solar arrays which will impact upon below ground heritage assets? Also, what about provision for appropriate mitigation should heritage assets be located in areas with below ground impacts which cannot be removed by design?
- 3.27 7.3 Study area: previously unrecorded archaeological remains can only be considered once identified- this will only be possible through full archaeological evaluation, which includes trial trenched evaluation.
- 3.28 7.3 Sensitive receptors: what about provisions for appropriate mitigation, such as archaeological excavation, to mitigate impacts upon defined heritage assets which are not able to be PIS and would otherwise be damaged or destroyed by works associated with the project?
- 3.29 7.3 Embedded measures: SCCAS strongly support the planned approach to avoid impacts to defined heritage assets where possible through design solutions and amendments to development layout; however, for this to be possible, early and full archaeological assessment will be critical to enable the character, extent and significance of surviving below ground heritage assets present throughout the order limits to be defined given there is high potential for additional heritage assets to survive across much of this area (currently of unknown significance).
- 3.30 7.3 Embedded measures: It is essential that further refinement of the design of works areas within the order limits should include the results of full archaeological evaluation to enable the impact of the proposed development on heritage assets to be properly considered and to allow appropriate mitigation strategies, which include PIS where necessary, to be secured. Sufficient flexibility must be retained in scheme design until these assessments are completed to allow for modifications to be made should any archaeological remains of national significance be defined.
- 3.31 7.3 Embedded measures: All phases of archaeological evaluation and mitigation must be led by a brief produced by SCCAS and subject to detailed Written Scheme

of Investigations (with the production of an OWSI at application stage setting out the overall strategy for ongoing archaeological assessment and mitigation work for the project), 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.

- 3.32 7.3 Embedded Measures: Completion of any outstanding archaeological assessment work and mitigation will need to be secured by an appropriately worded DCO Requirement and OWSI (supplemented by the appointed archaeological contractor's method statements) to be approved by SCCAS as advisors to the LPA, with provisions also made for ongoing archaeological assessment, reporting, publication and archiving within a suitable timeframe following the completion of on-site archaeological work.
- 3.33 7.3 Embedded measures: The archaeological mitigation strategy must be agreed with SCCAS and provision should be made for full archaeological excavation or strip, map and excavation as appropriate, not only archaeological monitoring.
- 3.34 7.3 Embedded measures: The Provision must be made for a detailed Historic Environment Management Plan (HEMP) to secure the appropriate management of PIS areas during pre-commencement and construction works, site operation and maintenance and also decommissioning.
- 3.35 D.1 Missing NPS EN-1 and EN-3 and local policy e.g. Babergh and Mid Suffolk Joint Local Plan.

4 Ecology and Biodiversity

- 4.1 SCC note that certain ecological surveys have been undertaken and that ecological survey work continues. To date, SCC have not seen any of the reports based on this survey work so the detailed comments that were submitted on 27th March 2025 still stand.
- 4.2 Regarding the EIA Scoping Report and Appendices, SCC would comment that, from an Ecology perspective, this appears to be quite comprehensive.
- 4.3 SCC have minimal issues with the proposed Biodiversity and Ecology – Scope and Methodology (App. 7.2) or the Existing Baseline Conditions (C.1) or the areas proposed to be scoped.
- 4.4 SCC would expect the applicant to ensure that the proposal will not have any negative impacts on invertebrates and give reasons for how this will occur. Alternatively, invertebrates should be scoped in to proposals.
- 4.5 SCC are pleased to note that Roadside Nature Reserves have been recorded and will look forward to specific mention in the LEMP to ensure that measures are

taken to protect them from vehicle poaching and damage in the event that the roads that they are on suffer additional use as a result of this proposal.

- 4.6 One comment that SCC are making is in respect of proposals to replace lost vegetation (see 3.4.6): *“loss of woodland and hedgerow kept to a minimum and only to facilitate access points, cable routing and fencing - where such loss is unavoidable, vegetation will be replaced following construction as far as reasonably practicable”*. SCC are concerned about the loss of ecological connectivity in Suffolk and the Report has commented that hedgerow connectivity is, generally, not the best. We would like to see a much more positive approach than “as far as reasonably practical...” and, notwithstanding any BNG requirements, to make a positive commitment to ensuring that there will be no nett loss to habitats. We expect that, where features (e.g., trees and hedgerows) may need work upon them that, first of all, routes and accesses are chosen for their minimal impact on natural features, then crown raising, pollarding and coppicing are utilised. Loss of natural features must be the very last resort and there must be a formal commitment to replace and enhance with new planting as close as is practically possible to the feature lost.
- 4.7 Generally, although there is a lot of information supplied, there is very little detail about the actual ecology and biodiversity interest of the various sites and cable routes proposed, nor is there a clear aspiration as to what should be achieved in terms of habitat improvements and enhancements. We anticipate that the LEMP will go in to more detail on this point and we shall look forward to seeing much more detail on the BNG and legacy of this proposal. We would welcome the opportunity to discuss what the ecological landscape may look like both after construction and, in the future, to the post-decommissioned sites.
- 4.8 As mentioned above, SCC repeat the general points made in the response of 27th March 2025 but emphasise that early establishment of an Ecology Working Group will be of real benefit to both the Applicant and the various Environmental Stakeholders (e.g., BMSDC, SCC, NE and so on).

5 Economy, Skills, and Tourism

- 5.1 The Scoping Report states that cumulative schemes within 10 km and those already consented or under construction will be used to define the cumulative baseline. SCC cannot support this limitation. In Suffolk, NSIP activity operates within an interconnected labour and skills system that is not geographically constrained in this way. By omitting major projects such as Sizewell C alongside other nationally significant energy and grid schemes in development, the assessment would fail to capture the real cumulative pressures on the labour market, training system, supply chain capacity and accommodation availability. SCC therefore requires that the Applicant’s cumulative assessment explicitly

includes all NSIPs in the region, including Sizewell C, and any other relevant major projects with overlapping timescales and labour demands. Without this, the socio economic outputs presented will not be sufficiently robust or suitable.

- 5.2 SCC also cannot agree with the proposal to scope out socio economics during the operational phase. Although the routine operational workforce is relatively small, operational impacts arise not only from day to day staffing but also from periodic replacement cycles, specialist maintenance requirements, long term retention of electrical and technical skills and the local and regional supply chain relationships that continue throughout the 40 year operational life. Opportunities around apprenticeships, technician development, educational outreach and the long term shaping of Suffolk's clean energy workforce occur predominantly during operation and therefore must be assessed. As with construction and decommissioning, operational socio economics must remain fully scoped in.
- 5.3 SCC notes that the Scoping Report references the Homes and Communities Agency Additionality Guide, including off the shelf leakage, displacement and multiplier assumptions. While these tools can be useful, they cannot be applied generically to Suffolk. The county's workforce characteristics, travel to work patterns, labour shortages, FE/HE training capacity and concurrent NSIP activity create a set of circumstances that are not reflected by national averages. SCC therefore expects the Applicant to work with the Regional Skills Coordination Function to calibrate all assumptions, including multipliers, leakage values, displacement levels and labour availability, using Suffolk specific data.
- 5.4 SCC also requires the Applicant to adopt the probability based scenario approach (low, medium and high opportunity) set out in the Council's Energy and Climate Adaptive Infrastructure Policy Supplementary Guidance. This approach enables realistic modelling of home based employment opportunity and supply chain participation.
- 5.5 To meet SCC's expectations, the socio economic assessment must provide a detailed temporal workforce profile covering all construction phases, including civils, mechanical and electrical, commissioning, cable installation and BESS related activities. This assessment should identify the occupations, competencies and qualifications required at each stage, together with indicative workforce peaks and durations. On the basis of this information, separate economic study areas for workforce and supply chain must be defined, reflecting real travel to work propensity and the structure of the Suffolk and East of England energy market. The assessment must also include scenario based modelling of home based employment opportunity and quantification of non home based workers, with explicit implications for accommodation and transport demand. The low probability scenario must be used as the worst case for all linked assessments.

- 5.6 For supply chain effects, SCC expects the Applicant to adopt a three tier supply chain geography tailored specifically for this project: Hyper local (Mid Suffolk), Local (Suffolk) and Regional (East of England). For each key package of work, the Applicant must identify local market capacity and present low/medium/high probability scenarios for local procurement.
- 5.7 The socio economic assessment must also map relevant FE/HE provision and training capability across the county, identifying where the Applicant can contribute to strengthening capacity or aligning curriculum. SCC expects the Applicant to work with the Regional Skills Coordination Function to develop an evidence based programme of training, apprenticeships, T Levels, work experience and outreach to the local schools located within the study area. This programme should form part of an Outline Skills, Employment and Supply Chain Plan, with a detailed plan to be secured by requirement in the DCO.
- 5.8 SCC therefore requests that the Scoping Opinion requires the Applicant to adopt the Supplementary Guidance methodology in full, including: phase specific workforce modelling; low/medium/high probability scenarios; separate workforce and supply chain geographies; Suffolk specific assumptions; and clear integration with transport, accommodation/housing and local services assessments. In addition, SCC expects that the Applicant will engage with the Regional Skills Coordination Function ahead of drafting the socio economic ES chapter.
- 5.9 For implementation and monitoring, SCC expects the Applicant to commit to an appropriate set of measurable socio economic indicators. These should include home based employment share by phase, local supplier spend, apprenticeship and T Level placements, accredited training completions, education outreach activity, EDI outcomes, and any observed displacement or wage pressure in key occupational groups during peak phases. Monitoring results should be reviewed annually with SCC and used to adjust interventions where necessary.

6 Fire and Rescue Services

- 6.1 Fire and Rescue Services have concerns regarding major accidents and disasters being scoped out of the EIA.
- 6.2 In response to Chapter 8.6, Other Environmental Topics, of the EcoPower Impact Assessment Scoping Report (January 2026), in relation to 'Fire', Suffolk Fire and Rescue Service has the following comments;
- 6.3 We would expect the developer to follow the latest NFCC Grid Scale Energy Storage System Guidance (Dec 2025). Including early engagement with Suffolk Fire and Rescue Service.
- 6.4 Within this guidance is a requirement to consider the potential impact of an incident on the local environment, this should factor into the choice of BESS site

and its associated safety measures. The developer should produce a plan that identifies all sensitive receptors within a 1km radius of the site. This plan should support discussions with planners and other stakeholders regarding site suitability and inform appropriate emergency planning.

7 Highways

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

Cable Crossings of Public Highways

- 7.2 Other than maps showing generic cable routes no details have been provided. SCC as the LHA has a strong preference for HDD (directional drilling) to avoid disruption to part of the Major Road Network.

Construction Access

- 7.3 No consideration of access routes, site accesses or haul road crossing. 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 HGVs access, including Eye which has HGV restrictions. 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. 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.

Pre-commencement Access

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

Grid Connection Site (Yaxley Sub Station)

- 7.5 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 AILs during the operational phase.

Abnormal Load Access

- 7.6 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.

Transport Assessment and a Construction Traffic Management Plan

- 7.7 A Transport Assessment and a Construction Traffic Management Plan will need to accompany the formal planning permission consultation and must adequately consider the impacts of the additional traffic generated by the development, including any AIL's (Abnormal Indivisible Loads). The Local Highway Authority would need to understand the traffic impacts from this development in isolation and cumulatively with other permitted or developing projects in the surrounding area.

Comments on the Environmental Impact Assessment Scoping Report

- 7.8 3.7.2 – SCC would welcome measures to ensure construction workers travel to site in groups, e.g. a car share scheme.
- 7.9 3.8.3 – The anticipated 120 two-way daily HGV movements and 100 two-way worker movements would need to be secured in the CTMP. Whilst in isolation these numbers may not have a significant impact on major roads it has the potential to for minor roads. Also the cumulative impacts on both major and minor roads will need to be assessed, particularly where different projects have combined routes on specific roads (e.g. A143, A140)
- 7.10 3.8.4 - As far as reasonably practical HGV deliveries will avoid peak hours – this would need to be secured in CTMP
- 7.11 3.8.5 – It is stated that an OCTMP plan will be provided, but it is unclear if an OCWTP will also be provided.
- 7.12 3.9.2 – The OCEMP will also need to cover water and debris flowing onto highway.
- 7.13 3.12 - Operation and maintenance. Whilst accepting that traffic volumes are low, care must be taken that suitable access routes are provided for HGVs and AILs.
- 7.14 6.2 - Rochdale Envelope – with respect to transport a realistic worse case (i.e. maximum design parameter) approach should be taken. This will enable securing traffic parameters within the OCTMP / OCWTP to ensure that the impacts assessed for this volume of traffic in the transport assessment and environmental assessment are not exceeded during construction.
- 7.15 6.3.6 - The scope of the transport assessment should be sufficient to include cumulative impacts on major haul routes for HGVs and workers and, in terms of AILs, a feasible route from the SRN or port.
- 7.16 6.3.10 - IEMA guidance should be used for assessing impacts of construction traffic. Where rules are applied the threshold should be allied flexibly noting the variability of traffic survey data.

7.17 Table 6-1- The potential impacts of glint and glare on highway users should be scoped into the assessment, as should air quality if any haul routes pass through Air Quality Management Areas.

7.18 6.9.1 - SCC would expect to see a transport assessment covering for example road safety, junction modelling / delay.

Table 7.9

7.19 Whilst use of existing accesses is supported, care should be taken that they are suitable for the quantity and types of traffic that will use them.

7.20 Note that consideration needs to be given to structural and environmental weight limits in the area (e.g. Eye).

7.21 Any impacts of pre-commencement work need to be assessed and where necessary controlled. For example, SCC would not accept use of field accesses for significant volumes of vehicles.

7.22 SCC does not agree that large loads are scoped out of operational stage.

Table A-2 Initial long list of other existing developments and/or approved developments within 10 km of the draft Order Limits

7.23 1 – States the SWRTS intersects Areas 1 and 2, however this project will also intersect Area 4 (Occold)

7.24 43 - States that the Norwich to Tilbury project is 2.3km west of Areas 1 & 2, however as shown in Figure 6.1 the N2T scheme directly crosses Area 5 (Gislingham) and the cable corridor between Gislingham and Mellis

7.25 **Notes:** Any works within the public highway will be dealt with under a 278 agreement. Please note: It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

8 Landscape

8.1 Further and in addition to the comments provided at the Non-Statutory Consultation, SCC (Landscape) offers the following comments without prejudice to any comments SCC may wish to make at a later date, when further details become available.

The Scheme

Principle Areas of development and proposed areas for Ecological Mitigation, as shown on Figure 4.1 – Indicative Masterplan

8.2 SCC welcomes the proposed areas for Ecological Mitigation but considers that the areas which contain solar PV panels and associated development will require

further mitigative screen planting to integrate the scheme into the wider landscape.

Area 1 Stuston

- 8.3 To the west of the A140 the parcels of land do not appear to have greatly changed from the Non-Statutory Consultation, although small areas for Ecological Mitigation have been included in several locations.
- 8.4 However, to the east of the A140, the original parcel for solar panels has been extended to the south and is now joined by two further parcels, one adjacent on the eastern side of the PRow, and one large field north of the B1118. This will require structural screen planting to the south of the parcel, to mitigate visual effects for travellers on the B1118.

Area 2 Eye

- 8.5 This is an area which includes considerable areas for Ecological Mitigation, which is welcome. However, this is also an area where several additional fields have been included since the Non-Statutory Consultation. SCC considers that in some areas these are too close to the River Dove, as well as to some PRow and that additional/wider buffers will be required.

Area 3 Gislingham

- 8.6 SCC welcomes the proposed area for Ecological Mitigation to the north of Gislingham, which is expected to significantly reduce the visual effects of the scheme for the village and when approaching Gislingham from the east.
- 8.7 SCC also notes that large field has been added to areas for solar panels north-west of Gislingham, which is expected to further adversely affect Burgate Road and will require appropriate mitigation planting.
- 8.8 The Area for Ecological Mitigation around to the north and west of Mellis Common is also welcome. However, SCC considers that this does not go far enough. Visibility in this area is such that the solar panel arrays to the north (between and in front of the two woodlands) would be clearly visible from Mellis Road, and that there would also be extended visibility to the west. SCC therefore considers that the Area for Ecological Mitigation will need to be further extended and that mitigative screen planting will also be required.

Area 4 Occold

- 8.9 This area has remained largely unchanged from that presented at Non-Statutory Consultation, except for small areas for Ecological Mitigation shown. Previous comments apply.

Area 5 Thrandeston and Mellis

8.10 SCC welcomes that most of Area 5 is set aside for and area of Ecological Mitigation. There are also two locations for BESS. The site to the west of Mellis Road is of concern, as SCC considers that this would need to be set back from the road and separated by a suitable buffer. For this reason and for better connectivity of green infrastructure, SCC would welcome if the Area for Ecological Mitigation could be extended northwards along Mellis Road.

SCC comments on Cable corridors as shown on Figure 1.1

8.11 SCC greatly welcomes the removal of the search area for a corridor between Area 4 Occold and Yaxley substation, thereby avoiding the intricate system of wooded valley meadows in this area, where the historic field and vegetation pattern are largely intact.

Area 1 Stuston to Area 2 Eye Cable Corridor – northern most Cable Corridor connecting land parcels to the north-east and south-east of Brome

8.12 SCC remains concerned about the potential landscape and visual impacts and effects of this corridor. Where this corridor crosses The Street, there are several (approximately 8 Nos.) mature roadside oak trees, which would be at risk.

Area 4 Occold to Area 2 Eye Cable Corridor – eastern Cable Corridor connecting land parcels to the north-east and south-east of Eye. Several alignment options are being considered here for the crossing of the River Dove

8.13 The options for crossing the River Dove need to be carefully weighed up in environmental and historic landscape terms. Further detail is required, and options should be assessed and communicated in the ES.

Area 3 Gislingham to Area 5 Thrandeston and Mellis Cable Corridor - running to the west of Mellis connecting south-western and western land parcels

8.14 SCC welcomes the refinement of this corridor and that it is now located outside Mellis Conservation area and Mellis Common.

8.15 **Area 5 Thrandeston and Mellis to Area 1 Stuston Cable Corridor - running to the south of Thrandeston and connecting western and northern land parcels. The corridor here also provides for a connection to the new National Grid Substation at Yaxley**

8.16 SCC welcomes the refinement of the corridor. However, SCC remains concerned that Mellis Road will need to be crossed, where it is currently tree lined and that the hedgerow within the northern search area would be adversely affected. The southern search area appears to cross the highly vegetated green corridor of Judas Lane. These locations need to be considered for HDD, in order to maintain the connectivity of wildlife corridors and visual amenity. There is an opportunity to extend the wildlife corridor to where Judas Lane meets Mellis road again in the south.

The importance of Good Design

- 8.17 SCC notes that section 4.7 of Overarching National Policy Statement for Energy, EN-1 (2025) suggests in 4.7.8 that the Applicant should consider taking independent professional advice on the design aspects of schemes. It further states that: ‘In particular, the Design Council can be asked to provide design review for nationally significant infrastructure projects and applicants are encouraged to use this service. Applicants should also consider any design guidance developed by the local planning authority.’
- 8.18 Furthermore, the SCC notes that the National Infrastructure Commission, Design Group, states in their Project Level Design Principles Guidance Document (May 2024) that: “Project directors should be supported by a board level design champion. Design champions will be accountable for the implementation of a sound design process, delivery of quality design outcomes and for the project maximising wider benefits.” (p.34, paragraph 12).
- 8.19 SCC would support the principle of a Design Champion being engaged sufficiently early in the development of the project, to oversee the design process.
- 8.20 A Design Champion would have the potential to contribute to the consideration of sustainable design issues and to the integration of the proposals into the landscape at the detailed design, construction, and operational stages of the project.
- 8.21 SCC would also support the use of a design review panel, design code/design approach document, and an outline of the design process, setting out key stakeholders, consultees, and the community engagement processes.
- 8.22 The skillset required of a Design Champion has not been clearly defined within the National Infrastructure Strategy. The Institution of Civil Engineers (ICE) and the National Infrastructure Commission Design Group (NICDG) have produced a useful working paper ‘Defining and developing the design champion role’ (August 2022) in this respect.
- 8.23 There is also advice on Good Design for Nationally Significant Infrastructure Projects on the governments’ website: <https://www.gov.uk/guidance/nationally-significant-infrastructureprojects-advice-on-good-design>
- 8.24 SCC expects that these recommendations would be included in the overarching design principles.

The Assessment

Study Area and ZTV

- 8.25 Figure 7.8 - Viewpoints and ZTV - Overview - Sheet 1 of 6

- 8.26 The ZTV is very difficult to read. The base map should remain legible and be OS based. The tone in tone shading of digital surface model, digital terrain model to areas in darker shading representing visibility of multiple locations is unhelpful.
- 8.27 However, even so, it is clear from the ZTV that the study area, offset from the scheme boundaries by 1km, is insufficient and needs to be extended to 3km, particularly considering sensitive areas such a Wortham Ling and the Waveney Valley.
- 8.28 SCC queries at what height the ZTV was run. Given that there will be taller structures (welfare units of up to 5m height) and solar panel arrays of 3.5 m height, this is relevant for the application of the Rochdale envelope presenting the worst-case scenario.
- 8.29 The question regarding the SZTV also has implications with regards to the Study Area. SCC would be content that, in principle, a 3km study area could capture most of the significant adverse effects on landscape and visual amenity of the proposed scheme but the Applicant needs to clarify the parameters of the ZTV used to support this threshold distance limit.
- 8.30 However, it is noted that in any event, because of the topography, there is potential visibility, and therefore the potential for glint and glare, beyond the proposed 3km study area. The Council considers that these areas should not be scoped out of the assessment and that there should remain some flexibility to provide assessment of these locations, should this be warranted, when further information about the project becomes available.

Scoping

- 8.31 SCC considers that effects on landscape receptors should not be scoped out solely on the basis of the ZTV, as there are other, perceptual qualities in landscape terms, which do not rely on the ZTV, such as tranquillity. It would be useful, if the findings of the Noise chapter of the ES would be discussed in the Landscape and Visual chapter, in so far as they are relevant.
- 8.32 SCC considers that cumulative effects of Landscape character and visual amenity beyond 3km from the site should be assessed in the ES, if this is warranted by the effect, for example, sequential effects when travelling through the landscape.
- 8.33 SCC considers that decommissioning effects as well as impacts and effects of intermittent re-powering (such as the replacement of solar panels) should be scoped into the assessment, as these may result in significant adverse effects on habitats and vegetation, both retained and created as part of mitigation, which need to be documented.
- 8.34 SCC considers that the cumulative threshold criteria should be arrived at through consultation with the relevant local authorities.

8.35 The Council considers that any lighting and other night-time effects should be scoped in for landscape and visual amenity, as well as ecological, assessment.

8.36 With regards to scoping SCC considers that the following should be scoped into the assessment:

- The relation of landscape and visual matters to other topic areas.
- Accurate baseline surveys for trees and hedgerows within and adjacent to the DCO limits (in accordance with the current version of BS 5837 Trees in relation to design, demolition, and construction and the Hedgerow Regulations 1997) and an assessment of the impacts on the fabric of the landscape.
- Effects of all elements of the scheme, including, BESS, cable corridors and grid connection point (substation).
- Effects during construction, operation, and decommissioning. This needs to include all impacts and effects resulting from temporary and pre-commencement works, such as the provision of accesses and internal haul roads.
- Nighttime effects (including any lighting, noise etc.)
- Intra- and inter- cumulative effects
- SCC further considers that some flexibility needs to be retained regarding the scoping in/out of assessment of effects beyond the study area or ZTV (both of which need to be further justified), as there may be effects and receptors that may warrant assessment in these locations.

Relevant legislation, policy and guidance summary

8.37 It should be noted that the National Planning Policy Framework (NPPF) is currently being reviewed and that the new version is likely to become relevant for this scheme.

8.38 Reference should also be made to current versions National Policy Statement (NPS) EN-1 Overarching National Policy Statement for energy (EN-1) and National Policy Statement for Renewable Energy Infrastructure (EN-3).

Relationship of Landscape and Visual Matters with other parts of the EIA

8.39 The Scoping Report does not explicitly recognise the relationships between landscape and visual matters and other parts of the EIA, specifically, ecology; historic environment (in particular, archaeology); flood and water management; socio-economics and tourism; and traffic, transport and rights of way. The Council considers that to ensure a comprehensive assessment of landscape and visual effects the relationships between this chapter and other matters in the EIA needs to be clearly recognised and addressed.

Additional data sets

8.40 SCC considers that relevant data sources should be included and clearly referenced in the ES and would welcome a comprehensive list of the relevant data sources proposed to be used for the LVIA. In addition to those listed in the Scoping Report, SCC would ask that the following are considered:

- Local Landscape Character and Key View Assessments
- Historic Landscape Characterisation, available from the Archaeological Service, SCC
- SCC Solar Guidance <https://www.suffolk.gov.uk/asset-library/sccpolicy-large-scale-solar-booklet.pdf>
- Project Level Design Principles Guidance from the National Infrastructure Commission Design Group, May 2024
- Guidance: Nationally Significant Infrastructure Projects: Advice on Good Design <https://www.gov.uk/guidance/nationally-significantinfrastructure-projects-advice-on-good-design>
- The revised Ancient Woodland Inventory (Ancient Woodland - Revised (England) - Completed Counties) shows Ancient Wood Pasture and Infilled Ancient Wood Pasture in or adjacent to Area 2 Eye, south of Brome Street, at Laurel Plantation and Oak Plantation.
- The Suffolk Local Nature Recovery Strategy includes (aside from the areas that are of particular importance for biodiversity – APIP) areas that could become important for biodiversity (ACB), including in areas relevant to this scheme.

8.41 The Council considers that data sourced from third parties will need to be verified by the Applicant and updated as necessary.

8.42 SCC considers that the Applicant will need to demonstrate how the project meets the requirements of the landscape policies it references in the Scoping Report.

LVIA Methodology E.6

8.43 The LVIA methodology is broadly acceptable as an outline. However, SCC provides the following comments, which should be addressed for the ES.

8.44 All elements of the scheme will need to be comprehensively assessed, including the cable corridor to, and any proposals for a new substation site (point of connection), including with regards to landscape character, landscape features and visual amenity. Appropriate mitigation, and where necessary, compensation, would need to be provided.

8.45 The Council considers that a clear definition of short, medium, and long term is essential for the assessment of effects and proposed mitigation and should be

included in the LVIA. The relationship of these definitions to the terms ‘temporary’ and ‘permanent’ should also be defined. For example, the Applicant may wish to refer to construction phase effects, where applicable, as ‘short-term (temporary) effects’, rather than just ‘temporary effects’

- 8.46 With regards to the significance of effects, it will be essential that effects which fall into the category of ‘Moderate or Minor’ are fully considered in the assessment narrative. A judgement will need to be made, whether these effects lean towards ‘moderate’ and would therefore be significant, or not. In this context, it should be noted that an accumulation of minor effects, can become significant in their accumulation.
- 8.47 SCC further considers that minor effects should also be considered within the overall assessment and for mitigation purposes.

Interactive (Intra-project) effects and cumulative (inter-project) effects on receptors

- 8.48 SCC welcomes the proposed assessment of interactive and cumulative effects that various elements or sections of the scheme could have on certain receptors.
- 8.49 Cumulative effects with other projects will need to be fully considered. In particular, the cumulative and combined effects by other projects on landscape character and visual amenity, ecology, water management, cultural heritage (including archaeology) and public rights of ways will need to be assessed, so that a strategy can be developed to reduce and mitigate these effects through engagement and co-ordination with the identified other projects.
- 8.50 Given that users of PRoW are pivotal receptors, especially when it comes to intra-cumulative and sequential effects, SCC considers that considerations for Public Rights of Way should be presented as standalone chapter in the PEIR and the ES.

Landscape Character Areas

- 8.51 Note: The Suffolk LCA describes landscape character types rather than landscape character areas; SCC expects that the Applicant defines the actual landscape character areas in relation to the project and the landscape character type they are located in and assesses in how far the area is representative of the type. Also relevant for Figure 7.7 Landscape Character Areas and Appendix E.3.

Other relevant designations related to landscape (Appendix E.2)

- 8.52 This should include, ancient and veteran trees, trees under Tree Preservation Order and Important Hedgerows under the 1997 Hedgerow Regulations.

Impacts on the fabric of the landscape

- 8.53 An Arboricultural Impact Assessment (including a comprehensive Tree Survey, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement)

in accordance with the up-to date BS 5837 Trees in relation to design, demolition and construction, and an Arboricultural Strategy for the solar site, cable corridor and substation (connection point) site will be required for review and agreement by the relevant local authority.

- 8.54 The loss or reduction of trees will need to be accurately documented.
- 8.55 SCC expects that all trees – not just ancient, veteran and notable trees – within and adjacent to the scheme boundary will be appropriately identified and mapped, and that impacts on all trees, but particularly impacts on ancient, veteran and notable trees are avoided, as far as possible, and compensated where this is not possible.
- 8.56 It will not be sufficient for landscape purposes to account for tree and hedge loss within the biodiversity metric.
- 8.57 To inform landscape mitigation proposals it will be necessary for the Applicant to provide accurate information on how many trees and how many square metres / hectares of woodland would be lost to enable the project and where they would be lost. Information of the type of trees and their condition will also need to be provided.
- 8.58 Further, based on the experience of similar projects elsewhere in Suffolk, a comprehensive approach to Important Hedgerows under the Hedgerow Regulations 1997 will also be required. This should identify all hedgerows within and along the boundaries, of the project area (including substation site and cable corridor) that are important under the various historic criteria, in addition to the ecological matters under the regulations as set out in Section 3 and Schedule 1 of the Regulations.
- 8.59 Additional impacts both on trees and hedgerows are anticipated due to the creation of construction access and laydown areas, and the Council expects that these areas will also be fully considered, assessed and mitigated or compensated.

Viewpoints

- 8.60 Initial viewpoints are set out in Appendix E.1 Proposed viewpoints and Figure 7.8., which also shows the ZTV and the proposed study area of 1km.
- 8.61 It is noted that most viewpoints are taken from location in very close proximity of the scheme/ along the scheme boundaries. This is welcome but does not appear to fully explore even 1km study area. (It is noted that V13c and V23 are outside the 1km study area.)
- 8.62 Overall, the number of viewpoints appears inadequate for the scale of the scheme and to adequately assess each parcel as well as the cable routes.
- 8.63 The Council would welcome a meeting with the Applicant to determine, where additional viewpoints may be required, prior to submission of the Preliminary

Environmental Information Report, and reserves the right to request additional viewpoints, or revised viewpoints, to support the final EIA that will be submitted with the DCO application, should this be warranted at a later stage.

- 8.64 The scoping document refers to representative and specific viewpoints. Given the scale of the project, the Council considers it may be necessary to include both specific viewpoints and illustrative viewpoints, as discussed in paragraph 6.19 of GLVIA 3. (Specific viewpoints may be required to understand impacts on specific heritage assets, which is a matter outside and in addition to the scope of LVIA.)

Views and visual amenity

- 8.65 It should be noted that some roads, such as Mellis Road and Burgate Road, are important assets for recreational activities, to which the visual amenity is important. This needs to be reflected in the receptor sensitivity.

Visual receptor groups

- 8.66 Appendix E.4. should provide a clear overall classification of all proposed visual receptor groups and the sub-divisions between them for each area. It is not clear, why people at work have been omitted. It would be welcome if the visual receptor groups could be based on table E-24 Susceptibility of visual receptors criteria.

Visualisations

- 8.67 There is currently no methodology for visualisations provided.
- 8.68 The Council would expect that the applicant would provide, as soon as is reasonably practicable, a detailed methodology and rationale for the preparation and presentation of visualisations and visualisation types, be that photomontages, wire frame, or annotated viewpoint photography. The latter may be helpful and important in promoting wider public understanding of the project, and of its anticipated effects. Agreement on methodology, with the relevant local authorities, supported with sample pages for each visualisation type, would be welcome prior to the preparation of the visualisations.
- 8.69 A further important aspect of the visualisations would be the realistic representation of any proposed mitigation planting, and its effectiveness. Therefore, both the representation of future mitigation planting, and the anticipated growth rates of that planting, should be agreed with the relevant local authorities and other relevant consultees, prior to preparation of any visualisations.

Design, mitigation and enhancement measures (E.7)

- 8.70 SCC welcomes the implied application of the full mitigation hierarchy and the approach to mitigation, including, but not limited to, off-setting/compensation and the commitment to identify opportunities for landscape restoration and

enhancement (paragraph E.7.1.4), for advanced planting (E.7.1.6), new green infrastructure and permissive recreational routes (E.1.7.7).

- 8.71 SCC expects that the Mitigation Hierarchy will be applied in full (avoid – reduce - mitigate – compensate), to any adverse impacts (in accordance with NPS EN1, para. 4.1.5.), and that this will be reflected and anchored in the design principles and layout of the scheme (this is likely to require planting beyond that required to achieve BNG).
- 8.72 Mitigation planting, including tree and hedgerow planting, will need to be commensurate with the requirements for effective mitigation of adverse landscape and visual effects resulting from the scheme. SCC expects that the Applicant will demonstrate how the project will meet local landscape and design policy requirements.
- 8.73 SCC welcomes the embedded measures (E7.2) and would like to assist with defining suitable buffers from landscape features and sensitive areas, as well as PRoW.
- 8.74 SCC would welcome permissive public access would be in addition to the existing rights of way.

Biodiversity Net Gain (BNG)

- 8.75 Although not yet required by law, SCC considers that it would be best practice to aim for a biodiversity net gain of no less than 10%.

Design measures

- 8.76 As mentioned above, SCC considers that the Mitigation Hierarchy must be applied to its full extent and that this needs to be anchored into the design principles. Embedded design measures should include avoidance and minimisation of vegetation losses (for the purposes of landscape, this means, in particular, losses of trees and hedgerows), before considering mitigation and compensation measures.

Control measures

- 8.77 SCC considers that soft landscape works for landscape and visual mitigation should be included in the proposed works.
- 8.78 SCC expects that adverse effects on landscape and visual amenity resulting from preliminary and temporary works enabling construction will be fully assessed in landscape and visual amenity terms.
- 8.79 SCC considers that the measures to protect sensitive landscape features should also include HDD, micro-siting, reduced working widths (including in cable corridors leading to, and at the grid connection) and traffic management.

- 8.80 SCC considers that it will be necessary for the Applicant to provide an Arboricultural Impact Assessment including a Tree Constraints Plan and a Tree Protection Plan, produced in accordance with the British Standard 5837:2012 'Trees in Relation to Design, Demolition and Construction' (or its update), which would set out protective measures such as fencing and construction exclusion zones within tree root protection areas. SCC considers that heras-type fencing will be required as a standard, unless otherwise agreed with the relevant local authority in exceptional locations.
- 8.81 SCC welcomes the Applicant's commitment to the two-stage approach of providing an Outline Landscape and Ecology Management Plan (OLEMP) for the DCO submission, followed by a post-consent detailed LEMP (Section 3.10 Site reinstatement and habitat creation).
- 8.82 SCC would welcome if the OLEMP was rooted in the principles and proposals for the Suffolk Local Nature Recovery Strategy (LNRS) and if it would be agreed with the relevant planning authorities prior to the DCO submission.
- 8.83 SCC would welcome the provision of an Environmental Masterplan, on the assumption that the contents would be agreed with the relevant planning authority.

Aftercare, Monitoring and Management

- 8.84 Appropriate aftercare, monitoring and long-term management of mitigative planting will need to be provided and secured through measures that are clearly set out in control documents, such as the outline and detailed Landscape and Ecology Management Plan (OLEMP and LEMP). Given the difficulty in establishing new planting over the recent years, because of unpredictable weather patterns, SCC promotes a dynamic or adaptive approach to aftercare, which includes, but is not limited to, temporal flexibility and envisages handover when plants have reached a developmental stage that is equivalent to five growing seasons.

9 Lead Local Flood Authority

- 9.1 The LLFA have reviewed the attached and can advise that the applicant should undertake a site-specific flood risk assessments for each area of proposed development in accordance with the national guidance. The applicant 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, [Guidance on development and flood risk - Suffolk County Council](#).
- 9.2 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.

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

10 Planning

- 10.1 SCC is the Minerals and Waste Planning Authority in Suffolk. The proposed water related infrastructure appears to have the potential to come into conflict with a number of Waste Water Treatment Plant Safeguarding Zones which appear on the safeguarding inset maps in the Suffolk Minerals & Waste Local Plan July 2020¹ (SMWLP).
- 10.2 The surface spread of the County's sand and gravel resources is also shown on the Minerals & Waste Safeguarding & Proposals Map of the SMWLP. In terms of minerals safeguarding, the sand and gravel resources within Suffolk are of at most regional importance as opposed to these proposals which are of national significance.
- 10.3 Furthermore, under normal circumstances proposals for sand and gravel extraction in areas of landscape or ecological constraint for example would in any case not be granted planning permission.
- 10.4 The proposed development would however inevitably sterilize sand and gravel resources. Where possible the aggregates disturbed by the proposed development should be utilised in its construction.
- 10.5 SCC also determines planning applications for its own development including new schools and highways improvements. There are no known conflicts at the time of writing.
- 10.6 SCC have concerns and do not agree that Materials and Waste are proposed to be scoped out.

11 Property

- 11.1 From the perspective of Corporate Property, this proposal does not impact any Suffolk County Council Assets managed or operated by Corporate Property. As such Corporate Property has no issues with the proposed scheme.

12 Public Health

SCC Public Health & Communities make the following observations:

Methodology

- 12.1 The Human Health methodology is broadly considered to be of an acceptable technical standard and generally aligns with recognised determinants-based

¹ <https://www.suffolk.gov.uk/planning-waste-and-environment/suffolk-minerals-and-waste-plan>

health assessment approaches. However, the effectiveness of the methodology is dependent on the adequacy of baseline evidence, the appropriateness of scoping, and the strength of cross referencing between topic chapters. At present, these elements require further refinement to ensure public health impacts are properly captured.

Baseline data

12.2 The baseline health data of page 57 draws on established national datasets including IMD, Census 2021, the ONS Annual Population Survey, and SAMHI. These are appropriate starting points to provide a high-level overview, however, to ensure a more accurate depiction of local health needs, the assessment would benefit from the inclusion of additional datasets such as:

- Suffolk Joint Strategic Needs Assessment²
- Suffolk Observatory³
- Fingertips public health indicators⁴
- The Public Health Outcomes Framework⁵
- Suffolk in 20 Years⁶
- Suffolk Air Quality Strategy⁷

12.3 Baseline evidence directly informs the identification of disproportionately affected populations. The absence of locally specific datasets limits the ability of the assessment to meaningfully consider health inequalities and should be addressed through enhanced desktop review and, where proportionate, targeted primary data collection.

Scoping

12.4 The Council are not yet satisfied that the proposed scope, as currently framed, is sufficient to fully identify, assess and mitigate potential population health impacts, particularly in relation to mental health, access related inequalities, and cumulative effects. Several determinants are scoped out on procedural rather than public health grounds, risking fragmentation of assessment and under representation of health pathways relevant to rural Suffolk.

12.5 The scoping table (page 59) proposes to scope out the following determinants for all phases in respect to their relationship to human health: air quality, noise and vibration, ground water and contamination, healthcare, social care and other

² <https://www.healthysuffolk.org.uk/jsna>

³ <https://www.suffolkobservatory.info/>

⁴ <https://fingertips.phe.org.uk/>

⁵ <https://www.gov.uk/government/collections/public-health-outcomes-framework>

⁶ <https://www.healthysuffolk.org.uk/asset-library/JSNA/suffolk-in-20-years.pdf>

⁷ <https://www.suffolk.gov.uk/asset-library/air-quality-strategy-and-action-plan.pdf>

social infrastructure, employment, income and training and climate change and adaptation. Public Health suggest these decisions warrant further scrutiny. Whilst it is acknowledged that thematic impacts may be assessed in other ES chapters, procedural allocation to another topic does not negate the need to explicitly assess health pathways and outcomes within the Human Health chapter. Without clear cross-referencing and synthesis, there is a risk that cumulative, synergistic, or indirect health effects are not drawn together coherently. For example, construction noise may be assessed acoustically, but its contribution to sleep disturbance, stress, annoyance, and reduced wellbeing is a public health outcome and should be explicitly addressed. Similarly, traffic impacts may be assessed in transport terms, but severance, fear and intimidation, and reduced access to services have direct health implications.

- 12.6 The decision to scope out healthcare, social care, and other social infrastructure from the human health chapter on the basis that these will be addressed under socioeconomics is not considered appropriate from a Public Health perspective. Access to healthcare and social care services is a material determinant of health, particularly in rural Suffolk, where baseline access is often constrained, car dependency is high and older adults and people with disabilities are overrepresented.
- 12.7 Construction related traffic, road closures, or journey time increases have the potential to exacerbate existing access inequalities. These health pathways should be considered within the Human Health assessment to avoid fragmentation between chapters and underestimation of health effects.
- 12.8 Employment, income, and training are similarly scoped out of the Human Health chapter on the basis that effects will be considered socio-economically. However, these factors are strongly linked to health and wellbeing outcomes.
- 12.9 Whilst the scale of employment may be limited, even modest local employment or skills benefits can have positive health implications through improved financial security, self-efficacy, and community resilience. The Human Health chapter should therefore acknowledge both potential positive and negative health effects, even where detailed quantification is provided elsewhere.
- 12.10 The scoping report appropriately identifies vulnerable groups including children, older adults, people with disabilities, and presents age structure data demonstrating a higher-than-average share of older residents within the Study Area. However, the discussion does not extend fully to deprived communities, those with preexisting long-term conditions, or rural populations facing pronounced access challenges. These groups are well documented in Suffolk's JSNA and should be specifically recognised and considered within the health assessment to ensure that inequalities are not overlooked or inadvertently widened by project impacts.

Study area

12.11 We note the study area “has been determined by the likely extent of effects on the physical environment, including noise, visual and traffic effects, effects on PRow and the location of nearby communities” aligning with LSOA boundaries including LSOAs within 1km of the draft order limits, though extended “to include those areas beyond the 1 km buffer that will be partially surrounded”. It is suggested that the Study Area should also incorporate the full extent of construction transport routes. Restricting analysis to a narrow band around the Order Limits risks missing impacts in settlements intersected by construction HGV flows with effects that may disrupt community access to healthcare and other social infrastructure.

Mental Health

12.12 The report acknowledges potential mental health impacts related to construction and landscape change; However, this consideration is high-level and would benefit from substantially greater depth in the ES particularly in relation to cumulative NSIP effects.

12.13 Key issues that should be more specifically considered include cumulative mental health and wellbeing effects arising from multiple infrastructure projects, prolonged uncertainty during pre-application and construction phases and its relationship to stress and anxiety, impacts on sense of place, identity, and perceived control, particularly in smaller rural communities.

12.14 The reliance on SAMHI data alone is insufficient to fully characterise mental wellbeing impacts. While SAMHI provides a useful baseline, it does not capture sub-clinical distress, stress related to environmental change, or community-level psychosocial effects.

12.15 The assessment should also consider the mental health of the construction, operation, and decommissioning workforce across the lifespan of the scheme. This should include recognition that workers may experience hostility or abuse from individuals opposed to the development, consideration of suicide prevention and mental health support, noting that working age males in routine and manual occupations are at higher risk and acknowledgement that risks may be elevated for workers living away from home and established support networks.

12.16 The influx of a non-local workforce may affect community perceptions of safety and security, particularly among older residents. These psychosocial effects should be recognised and considered within the Human Health assessment.

Consultation and community engagement

12.17 Suffolk County Council has a supplementary guidance document focused on Community Engagement and Wellbeing⁸. The Applicant is strongly encouraged to

⁸ <https://www.suffolk.gov.uk/asset-library/community-engagement-and-wellbeing-policy.pdf>

incorporate this guidance alongside BRE (2015) Community Engagement Good Practice Guidance for Solar Farms within their consultation and engagement strategy.

12.18 Meaningful, transparent, and responsive engagement is a key mitigation measure for mental health and wellbeing impacts and should be clearly articulated as such within the ES.

Radiation / Electro-magnetic Fields (EMF)

12.19 SCC Public Health does not have a technical role in validating EMF modelling, compliance, or exposure assessments. Our comments are provided from a population health and wellbeing perspective.

12.20 We would welcome further clarifications as to whether the Applicant intends to comply with the ICNIRP 2020 guidance alongside the 1998 guidance.

12.21 Public Health note that public concern and anxiety relating to perceived radiation risks can itself give rise to adverse mental wellbeing effects, particularly where understanding of EMF is limited or misinformation circulates locally. Whilst these effects are not attributable to EMF exposure per se, they may still constitute a relevant psychosocial health pathway. It is therefore recommended that the ES clearly distinguishes between evidence based physical health risks and perceived risks. The Applicant's community engagement materials should include clear, plain English information on EMF, ICNIRP standards, and how compliance will be ensured. Additionally, mechanisms should be identified for responding to community questions or concerns regarding EMF throughout pre-application through to construction and operation.

Air Quality

12.22 It is the view of Public Health that it is premature to scope out air quality and we would prefer, considering the number of other NSIPs and developments happening in the area, that a precautionary approach is taken and air quality impacts are fully assessed.

12.23 The air quality section concludes (page 100) that with appropriate mitigation in place no significant effects during construction are expected. However, without an air quality assessment how can the appropriate mitigations be chosen and their effectiveness accurately assessed?

12.24 Planning guidance⁹ says that if a development is likely to 'cause a significant change in Heavy Duty Vehicle (HDV) flows on local roads, with relevant receptors, of more than 100 Annual Average Daily Traffic' then an Air Quality Assessment is required.

⁹ Institute of Air Quality Management: Land-Use Planning & Development Control: Planning for Air Quality. Available at - <https://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf>

- 12.25 In relation to this application, 'peak daily traffic flow during construction of the Principal Area and Cable Corridors is expected to be approximately 120 two-way daily HGV or Heavy-Duty Vehicle (HDV) movements. There is no traffic data available for outside this 'peak' and therefore no accurate assessment of whether the 100 AADT will be exceeded. Without accurate traffic data for the whole construction period to include staff vehicle movements alongside construction related traffic an assumption should not be made that an air quality assessment is not required. This is particularly relevant when potential traffic routes are in close proximity to groups more at risk from the health impacts of poor air quality (for example older people, children, and those with a preexisting health condition).
- 12.26 The document states (2.4.31) that the proposed area has an infrequent bus service and community transport schemes. This could mean that local communities are more reliant upon their cars and any additional vehicle movements therefore have the potential to cause congestion and further exacerbate air pollution. We would like this assessed.
- 12.27 Page 99 of the document states: "Highly sensitive human receptors typically comprise residential properties, schools, and hospitals. The immediate surrounding area is predominantly rural, with several residential receptors located within 250 m of the draft Order Limits, including Gislingham, Mellis, Yaxley, Thrandeston, Eye, Brome, Stuston, and Occold". So potentially a number of at-risk groups are in close proximity. In addition, there may be cumulative air quality impacts resulting from other developments happening in the same area at the same time including SWRTS and Norwich to Tilbury.
- 12.28 Based on these factors Public Health would like air quality to be scoped in as a precaution to ensure the health and wellbeing of local communities is protected.

13 Public Rights of Way (PRoW)

- 13.1 The applicant should be aware of SCC Energy and Climate Adaptive Infrastructure Policy Public Rights of Way and Green Access <https://www.suffolk.gov.uk/asset-library/prow-greenaccess.v4.pdf>
- 13.2 When dealing with Rights of Way issues SCC expects promoters of infrastructure projects to consider the importance of, and impacts upon, Public Rights of Way or Green Access when developing their projects.
- 13.3 Public Rights of Way and Green Access need to be treated by applicants in a different way to other types of highways, because of their unique characteristics and status, specifically in terms of their relationship to place, public amenity, historic and landscape character, well-being, and access to nature. Therefore, for example, it is wholly inappropriate to equate a car journey with a countryside walk, when assigning value to usage of rights of way and public open space.

13.4 It is expected that promoters will mitigate and compensate for the adverse impact of construction and operation of their schemes, in accordance with the mitigation hierarchy, as set out in National Policy Statement NPS EN -1 (November 2023).

13.5 The applicant should minimise the adverse impacts during both construction and operation of the project on the Rights of Way Network considering the following factors:

- **Physical changes to resources** (i.e. changes to PRow through diversions or temporary and permanent closures, severance, loss of connectivity, changes to journey length).
- **Changes to the quality of the experience** people have when using recreational resources due to perceptual or actual changes to views, noise, air quality, light pollution, and traffic.
- **User stress**, that is effects experienced by receptors due to route uncertainty and safety fears.
- **Changes to the experience** of people using recreational resources, due to increases in numbers of people using them i.e. displacement of people from one area to another.
- **Tranquillity and ambience experienced** by recreational receptors.

13.6 'SCC PRow does not agree that it is appropriate to assess the effects of the proposal on the PRow network and on its users as simply aspects of other environmental topics (such as within Traffic and Transport). SCC notes that effects on PRow users were scoped in by PINS in the Scoping Opinions on the White Elms and Sunnica Solar Farms (as noted in Table 1-3 of the Scoping Report). SCC considers that 'compartmentalising' effects on PRow users across a wide range of EIA topics is likely to under-assess the impacts on the PRow network and its users. SCC considers effects on PRow should be separately assessed in their own right, as explained further in SCC's comments on the proposed Methodology.

Response from SCC as Highway Authority for Public Rights of Way, Access and Amenity

Planning Policy

13.7 The NPPF December 2024, refers to the Public Rights of Way network specifically: 105. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

Local Planning Policy

13.8 Suffolk County Council Green Access Strategy 2020-2030 (Rights of Way Improvement Plan) should be included as relevant local planning guidance. The plan sets out the council's commitment to ensuring and promoting sustainable travel options for all. The strategy focuses on walking and cycling for commuting, accessing services and facilities, and for leisure reasons. Specifically, 2.1 "Seeks opportunities to enhance public rights of way, including new linkages and upgrading routes where there is a need, to improve access for all and support healthy and sustainable access between communities and services. Funding to be sought through development and transport funding, external grants, other councils and partnership working."

13.9 The council will expect enhancements to the network in addition to mitigation, compensation, and management strategies that will ensure that the public; residents and tourists alike, retain the quantity and quality of access provision.

Methodology

13.10 The EIA does not holistically consider how the potentially significant effects that may arise from construction, operation and decommissioning on the public rights of way & access network and its amenity value, will be assessed. The access network includes public rights of way, permissive access, open access land and promoted routes.

13.11 The assessment considers aspects of this access network within the basic project section, site description and landscape & visual.

13.12 This potentially gives rise to a weakness in the EIA process, as recognised in PINS advice note 9, that when considered individually, an impact might be assessed as not significant, but if the impacts had been considered collectively for that receptor, they could be significant. A walker, cyclist or horse rider using a public right of way or on open access land experiences the countryside, and hence any impacts, holistically; namely the quality and diversity of the views, wildlife and natural features, the sense of wildness, peace and quiet, the presence (and absence) of traffic, noise, lighting and air quality, and the connectivity of the network.

13.13 Therefore, the County Council's position is that the impact on both the physical resource and the amenity value of the public rights of way and access network should be addressed as a separate theme within an Environmental Assessment. This should include the effect on the physical resource from temporary or permanent closures and diversions, and on the quality of user experience. The applicant must refer to the county council's Public Rights of Way & Green Access Supplementary Guidance Document and the county council's Large Scale Solar Schemes Supplementary Guidance Document.

13.14 Consideration should be given to the assessment methodology and cover:

- physical changes to resources (for example, changes to PRoW through diversions or creation of new road crossings)
- changes to the experience people have when using recreational resources due to perceptual or actual changes to views, noise, air quality or traffic movements
- changes to the experience people have when using recreational resources due to increases in the numbers of people using them

Cumulative Impact

13.15 The impact of temporary closures of PRoW should not be underestimated, as their value for local amenity could be severely reduced or removed during works. It will be unacceptable for the public to lose their amenity by the effective sterilisation of an area due to closures and disruptions from parallel or concurrent projects.

13.16 There will need to be mitigation, compensation, and management strategies to ensure that the public; residents and tourists alike, retain the quantity and quality of access provision.

Pre-commencement works

13.17 These can typically include archaeological, ecological, site investigations and site clearance and in other NSIPS have not been included in the post commencement plans or within the DCO controls for temporary closures of PRoW. This raises concerns as to the potential impact of these works on the access network specifically the level and control of traffic using PRoW for site access, and how PRoW will be managed during survey and site clearance works. It is suggested that the applicant consider a pre-construction management plan as was provided for the East Anglia One (North) and East Anglia Two Offshore Windfarms, EA1N and EA2.

PRoW Agreements & Decision Making

13.18 Discussions/decisions and agreements relating to public rights of way and open access land should be with the Highway Authority and Access Authority respectively, namely, Suffolk County Council.

13.19 SCC as Highway Authority should be the discharging authority for any highway works.

The site and surrounding area

13.202.4.30 “There is a wide network of PRoW throughout the Site, including footpaths and bridleways that cross or run adjacent to the draft Order Limits.” Figure 7.6 is referred to as the Landscape designations and public rights of way. But does not list the PRoW and broadly shows them on a map plan of 1:15,000. This plan does not show, promoted routes and long-distance paths.

- 13.21 Consideration needs to be given for the perspective of viewpoints for all users. Covering not only pedestrian access but also increased height for cyclists and equestrian use where applicable.
- 13.22 The impact of light, glint and glare must be considered with regards to the impacts on the Public Rights of Way.
- 13.23 It has not been set out as to how these or the connecting public rights of way will be affected and for how long. SCC are prepared to agree and identify the affected routes. Please ensure all Rights of Way spatial data is shown on future plans. The legal record for PRow, the Definitive Map & Statement is held by Suffolk County Council and so the applicant must request the digital data directly from the county council (definitivemap.enquiries@suffolk.gov.uk).

The proposed Development

- 13.24 3.4.5 Environmental design principles. Public Rights of Way require setbacks to be applied. Our PRow position statement states: 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. Any ploughed field edges should be levelled to enable to form a level surface for all user types. 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.
- 13.25 3.4.6 Environmental design principles. Access to PRow will be maintained during the construction phase or otherwise signed temporary diversion routes to be provided, if required. Suitable diversions where there could be temporary or permanent disruption to PRow & recreational routes should be agreed with the Highway Authority. This should include the management of these routes covering alternative routes and communication to third parties. Please refer to Appendix 1.

Traffic and Transport

- 13.26 Suffolk County Council Green Access Strategy (Rights of Way Improvement Plan) should be included as relevant local planning guidance. It has not been set out as to how these or the connecting public rights of way will be affected and for how long. SCC are happy to agree identify the affected routes. Please ensure all Rights of Way spatial data is shown on future plans. The legal record for PRow, the

Definitive Map & Statement is held by Suffolk County Council and so the applicant must request the digital data directly from the county council (definitivemap.enquiries@suffolk.gov.uk).

Noise and Vibration

13.27 It is requested that the Public Rights of Way and Access is assessed in its own section within the EIA to ensure that the effects on the physical resource from temporary or permanent closures and diversions, and on the quality of user experience is accurately assessed and mitigated for.

Landscape and visual amenity scope and methodology

13.28 Assumptions and limitations: "Impacts to visual amenity resulting from the introduction of lighting during construction, operation / maintenance and decommissioning which are likely to result in significant effects will be assessed in the PEI and ES. Night-time lighting effects will be considered for residential visual receptors only as it is assumed that PRoW will not be used during hours of darkness."

13.29 Without robust PRoW user surveys (locations and parameters to be prior agreed with the highway authority PRoW), thus this should not be assumed. PROWs are open for use at all times to pass and repass.

Appendix 1

Principles for working with Public Rights of Way

13.30 The Council expects the following principles to be adhered to for this development at all sites; Solar Farms, landfall, converter sites, extension to the National Grid substation and the terrestrial corridor:

13.31 Early engagement with the County Council PRoW & Access Team to discuss the impact on and management of the PRoW & access network. Suffolk County Council is the Highway Authority for public rights of way and the Access Authority for Open Access land and the National Trail.

13.32 The Applicant must obtain the Definitive Map and Statement from the PRoW & Access Team at Suffolk County Council. This is the only source of the up-to-date record of the PRoW (supplied digitally).

13.33 Public rights of way should be marked on plans using the SCC digital data and labelled as per the Definitive Map and Suffolk County Council convention (Area - parish number - path number)

13.34 Where PRoW are directly impacted, a pre and post condition survey must be carried out including identification and assessment of surface condition and with a scope of coverage and methodology to be agreed with Suffolk County Council (SCC) as Highway Authority. This should include pre-construction work where

PRoW might be used to gain access to the corridor and reinforcement works might be required prior to use by vehicles.

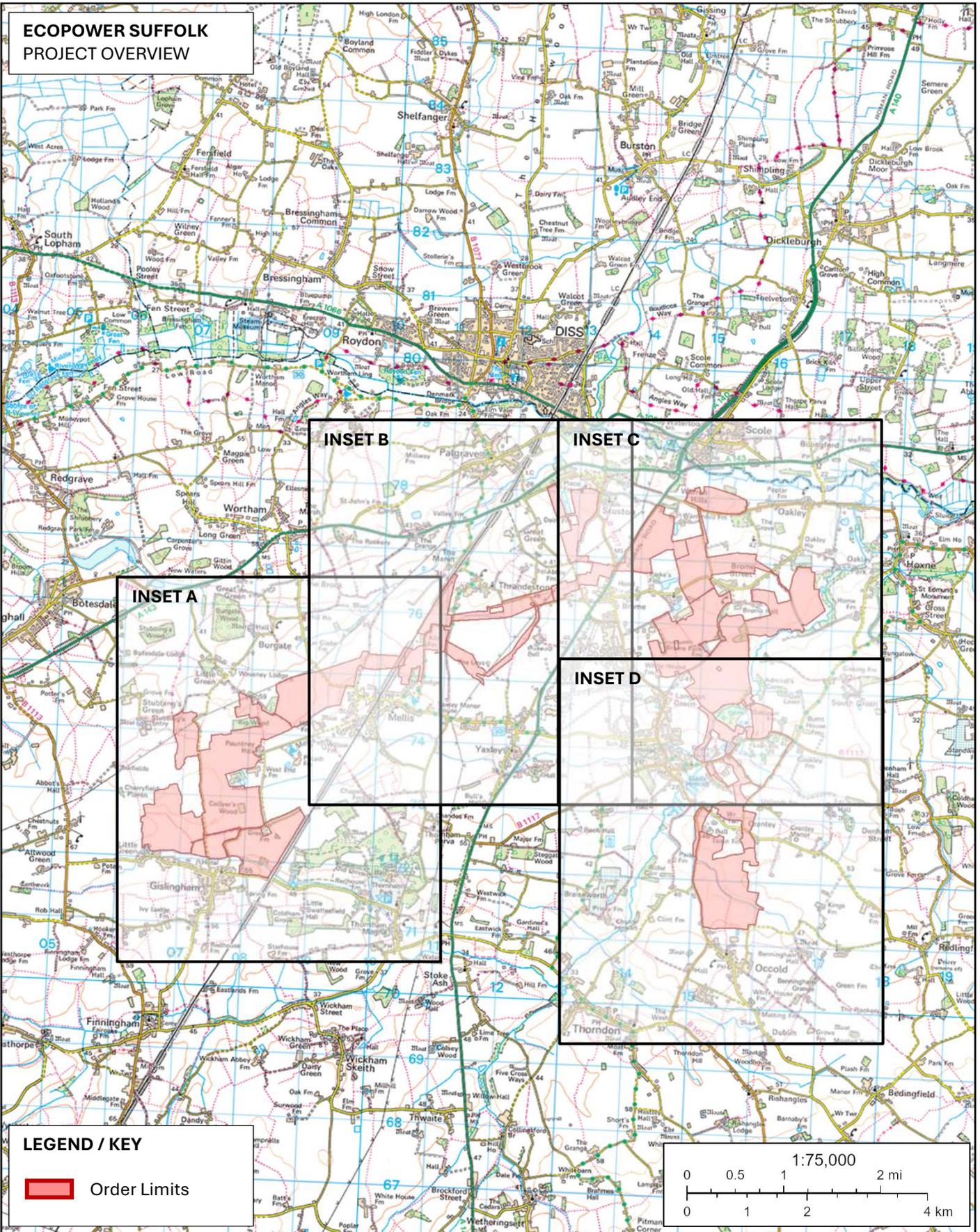
- 13.35 Where impacted by the works, any PROW will be restored to at least their original condition or to a condition agreed with SCC - where there are existing defects, the applicant should agree restoration measures with the County Council.
- 13.36 Where PROW cross the cable corridor, haul road, access tracks and other sites, the surface must be always kept in a safe and fit condition for all users to the satisfaction of the County Council. Banksmen should be employed where there is a potential conflict between construction vehicles and PROW users.
- 13.37 Pre-construction works must not obstruct or disturb any public rights of way (e.g., new fencing, archaeology surveys etc) unless otherwise agreed with the County Council. Management measures or temporary closures not covered in the DCO must be by application to the County Council.
- 13.38 Public rights of way that are used for any stage of construction access should remain open, safe, and fit for the public to always use with management measures put in place with the agreement of the County Council.
- 13.39 Any temporary closure of a PROW must be agreed with the County Council and the duration kept to the minimum necessary. Diversions must not be unreasonably long or circuitous. 'Dog-legs' should be avoided.
- 13.40 An alternative route must be provided for any public right of way that is to be temporarily closed prior to closure to a standard agreed with the County Council.
- 13.41 Any temporary closure and alternative route will be advertised in advance on site and in the local media, and to the local parish councils including a map showing the extent of the closure and alternative route – process and cost to be agreed between applicant and SCC.
- 13.42 There will be no new gates or stiles erected on any public rights of way that are impacted by the cable corridor and any other associated site.
- 13.43 All structures (including container-style structures) should be sited as far from the PROW as possible and screened. Any inverters that may be required are requested to be sited as far from bridleways and byways as possible.
- 13.44 Drainage provision must be taken into account to prevent potentially serious effects on the PROW.

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Appendix A – Order Limits Mapping

Suffolk County Council

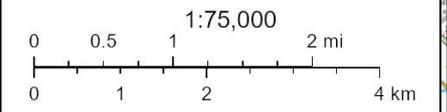
**ECOPOWER SUFFOLK
PROJECT OVERVIEW**



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LEGEND / KEY

 Order Limits



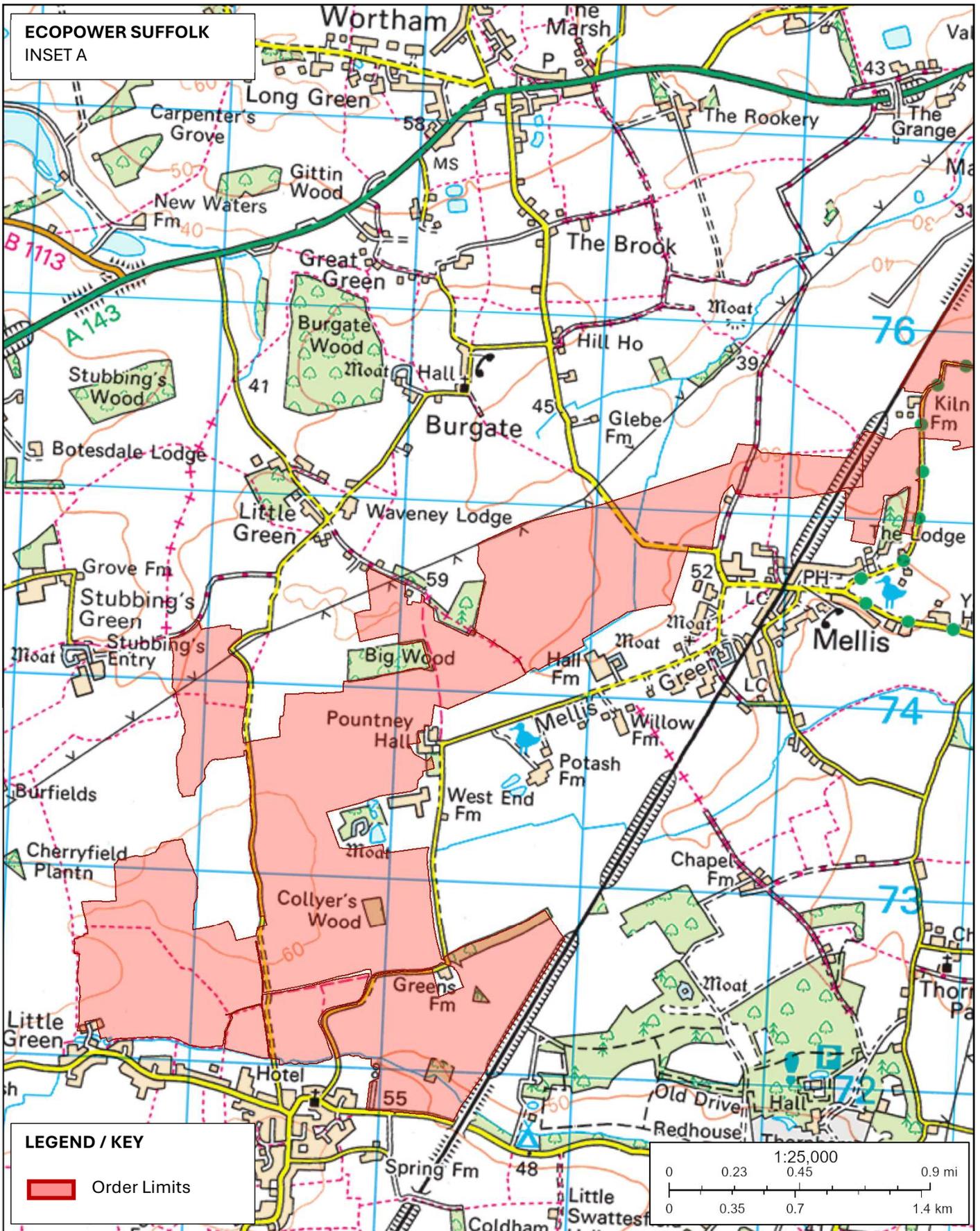
**Growth, Highways,
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Suffolk
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ECOPOWER SUFFOLK

Nationally Significant Infrastructure Project (NSIP)
Solar Photovoltaic (PV) and Battery Energy
Storage System (BESS)

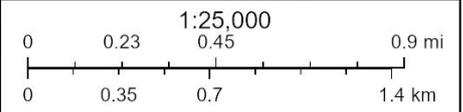


ECOPOWER SUFFOLK
INSET A



LEGEND / KEY

Order Limits



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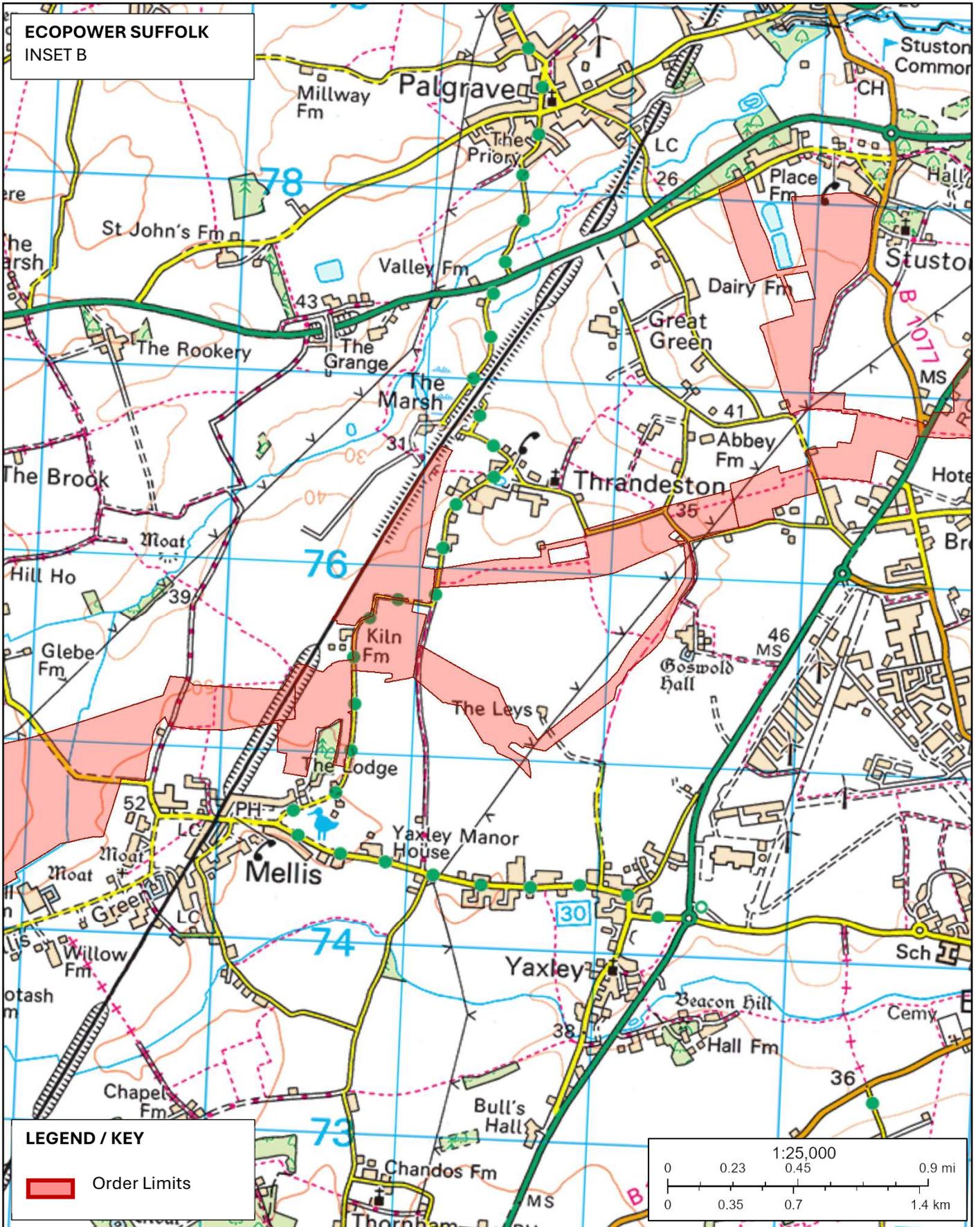


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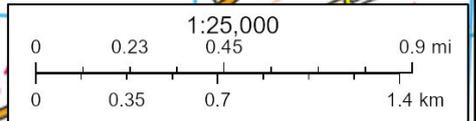


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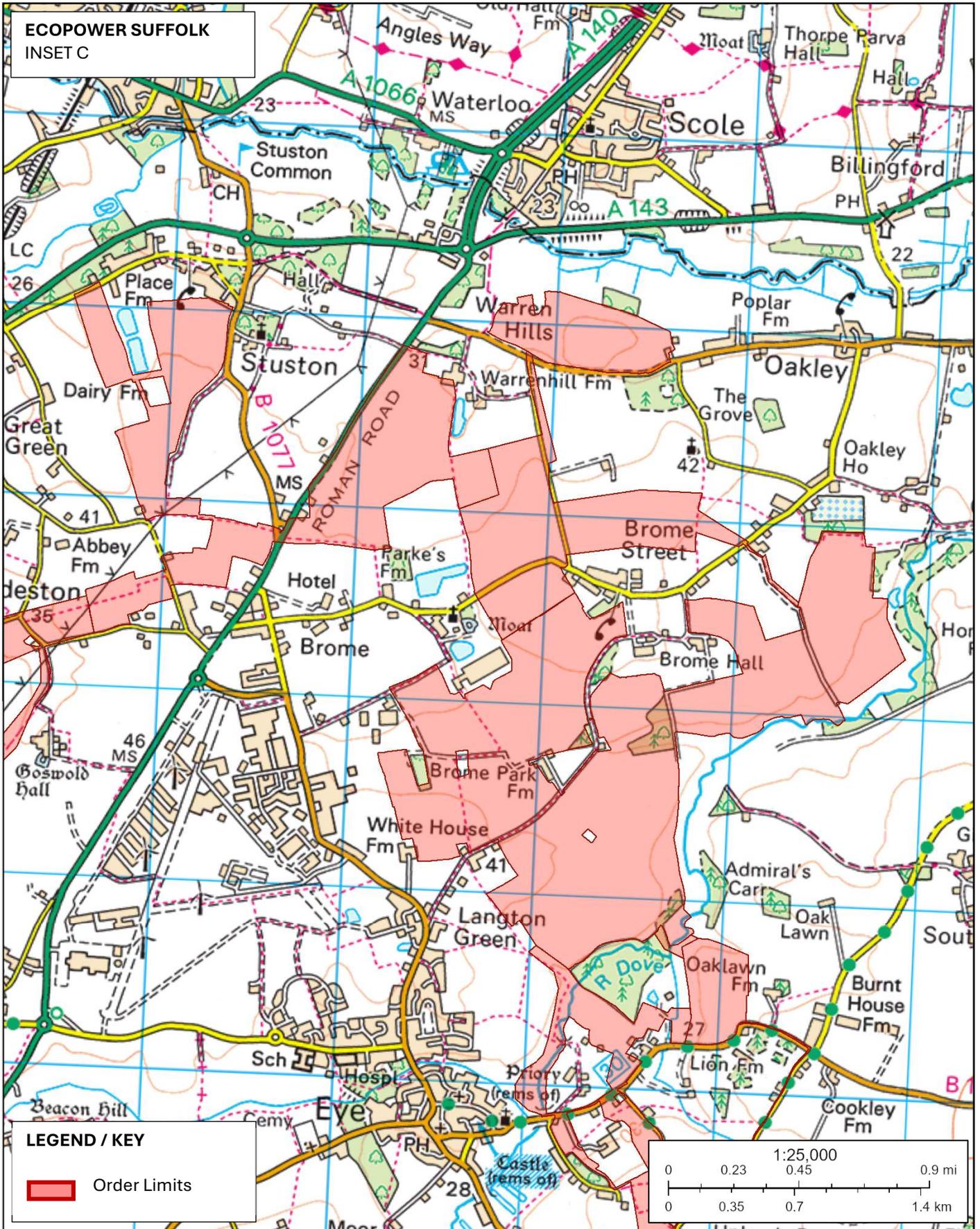
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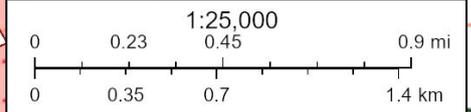


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INSET C



LEGEND / KEY

Order Limits

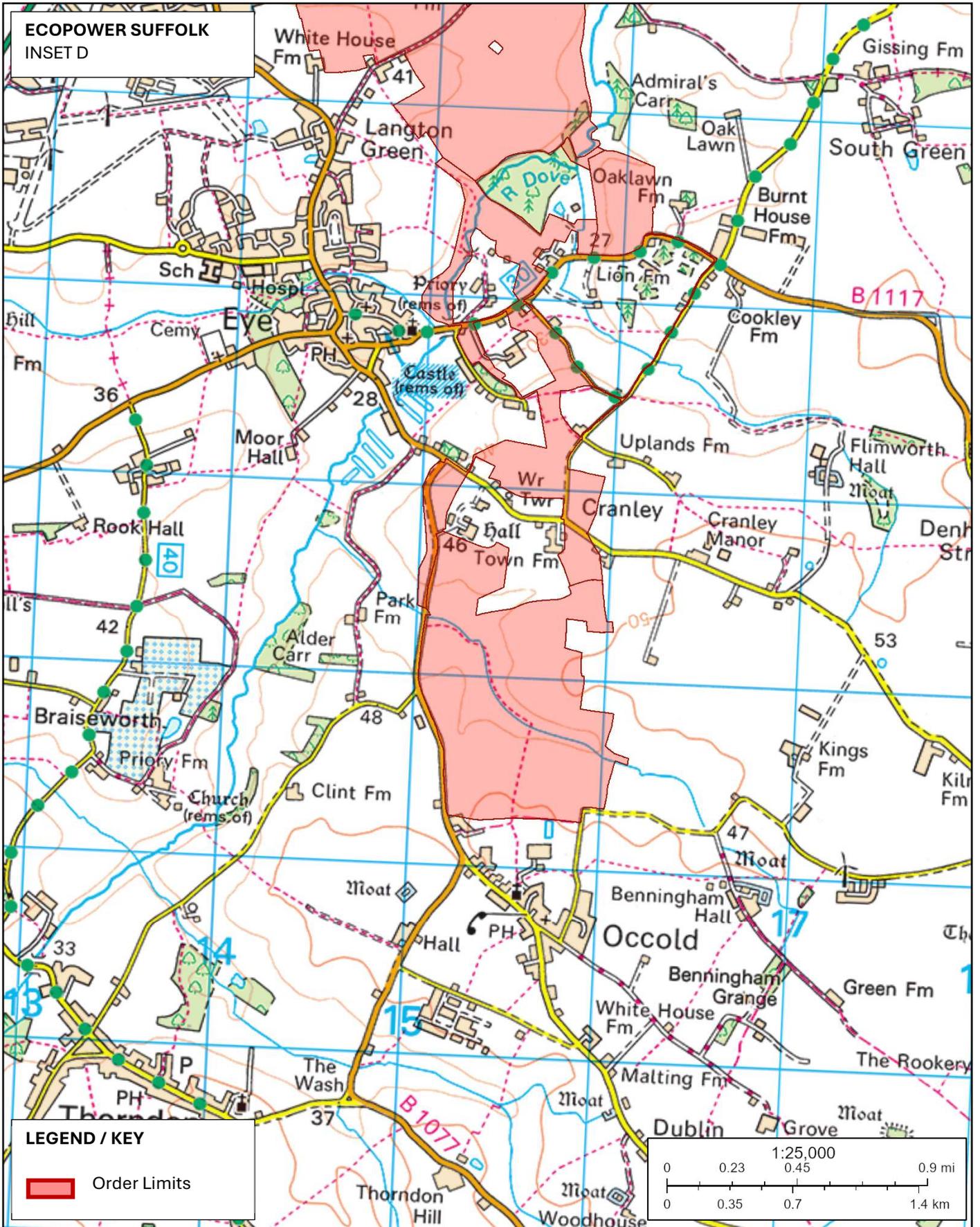


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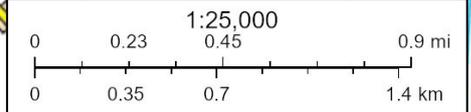


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INSET D



LEGEND / KEY

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