Suffolk County Council

EcoPower Suffolk

EN020033

s42 Statutory Consultation Response

Suffolk County Council

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Glossary of Acronyms and Abbreviations

AILs	*Abnormal Indivisible Loads*
DCO	*Development Consent Order*
DEPZ	*Detailed Emergency Planning Zone*
EA1N&2	*East Anglia One North and Two*
EIA	*Environmental Impact Assessment*
ES	*Environmental Statement*
GW	*Gigawatts*
HDD	*Horizontal Directional Drilling*
HEMP	*Historic Environment Management Plan*
HVAC	*High Voltage Alternating Current*
HVDC	*High Voltage Direct Current*
LPA	*Local Planning Authority*
NGET	*National Grid Electricity Transmission*
NGV	*National Grid Ventures*
NSIP	*Nationally Significant Infrastructure Project*
OffSET	*Offshore Energy Grid Taskforce*
OCTMP	*Outline Construction Traffic Management Plan*
OWSI	*Outline Written Scheme of Investigation*
PEF	*Preliminary Environmental Findings*
PEIR	*Preliminary Environmental Information Report*
PIS	*Preservation in Situ*
PPA	*Planning Performance Agreement*
REPPIR	*Radiation (Emergency Preparedness and Public Information) Regulations 2019*
SCCAS	*Suffolk County Council Archaeological Service*
SPR	*Scottish Power Renewables*

"The Council" / "SCC" refers to Suffolk County Council.

Purpose of this Document

The document has been prepared by Suffolk County Council in response to the (Section 42) Statutory Consultation for EcoPower Solar Farm occurring between 22 June and 16 August 2026.

1 Introduction

1.1 The scheme is located on land in the parishes of Yaxley, Brome, Eye, Gislingham, Mellis and Occold. The project comprises approximately 1,175 ha (hectares), of which 900 ha form the main development areas and 275 ha the Cable Corridors.

1.2 The project will consist of a number of solar arrays in several parcels of land across 5 sites with several cable corridors running between the sites and to the substation in Yaxley which serves as the Grid connection for the project.

1.3 There will be permanent access arrangements for maintenance of the solar arrays and battery energy storage systems and for emergency services.

1.4 The central battery energy storage site will be located in the parish of Yaxley adjacent to the Norwich to London main railway line. Dispersed battery energy storage systems will be located throughout the five sites.

1.5 The SCC electoral divisions affected by the proposals include:

- Hartismere
- Eye
- Upper Gipping

1.6 The first section of this response will summarise the key issues highlighted by the Council's technical specialists, whose full comments are provided in Appendix A.

2 Policy Context

SCC Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy[1]

2.1 At its Cabinet meeting on 24 February 2026, Suffolk County Council updated its adopted Energy Infrastructure Policy, indicating its overall stance on projects required to deliver the UK's Net Zero ambitions. The policy states:

> "Projects will not be supported unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately recognised, assessed, appropriately mitigated, and, if necessary, compensated for." [2]

2.2 The Council will follow this approach in this response, and throughout the subsequent DCO process, however, it should also be noted, the Council's Policy also sets out that:

> "For solar schemes, brownfield, rooftop, and around built infrastructure, such as warehousing, are the Council's preferred sites. Where solar or other large-scale schemes are proposed for agricultural land, developers should commission,

[1] https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(24-02-2026),%20The%20Cabinet
[2] https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(16-05-2023),%20The%20Cabinet

independent land quality assessments to inform the Council's response to a proposal. The Council expects developers to ensure that their schemes do not remove grade 1 and 2, or extensive1 areas of grade 3a land, from food production."

2.3 The Council continues to be willing to collaborate with the Promoter through the issues, towards improvement of the proposals and required mitigations, and looks forward to further engagement over the coming months.

3 The Promoter's Need Case for the Project

3.1 The Promoter states that solar energy is a key part of UK Government policy to deliver clean, secure and affordable energy and reach net zero emissions by 2050. National policy states that rapid expansion of renewable electricity, including solar is essential in achieving this objective.

3.2 The Promoter states that the site has been chosen due to the suitability of the land to accommodate solar photovoltaic and its proximity to grid infrastructure.

3.3 The Promoter also claims that there are limited environmental constraints (with mitigation) and opportunities for biodiversity net gain.

4 Overarching Key issues

4.1 In accordance with its Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy, the Council recognises that the UK government considers that significant new infrastructure is required to ensure energy security, deliver growth, transport resilience, jobs and prosperity, and adapt to the challenges of a changing climate faced by the UK, and the communities and environment of Suffolk. However, projects will not be supported unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately recognised, assessed, appropriately mitigated, and, if necessary compensated for.

4.2 Furthermore, the Council expects developers to ensure that their schemes do not remove grade 1 and 2, or extensive areas of grade 3a land, from food production

4.3 The Ecopower project does not currently meet the tests set by the policy effectively, particularly in relation to best and most versatile agricultural land, therefore SCC objects to the scheme.

Cable route between areas 2 and 4

4.4 Significant concerns exist around the cable route options connecting Areas 2 and 4. There appears to be several options for the routing of this cable, each of which seem likely to have substantial adverse impacts within topics such as landscape and visual, public rights of way, archaeology, ecology, cultural heritage and traffic and transport which are detailed in the relevant technical comments in this response. Concerns include:

i) The high quantity of valuable vegetation which would be lost, particularly if Cock's Road is used as the cable route as it has lots of vegetation and mature trees surrounding it.

ii) Impacts on highway users of Cock's Road.

iii) The potential for extensive valuable archaeology.

iv) Flood plain grazing marsh which is a habitat for bats which are highly protected species.

v) Open-cut trenching would be particularly impactful to the soil, disturbance of potential peat deposits around Abbey Hall as shown in the DEFRA England Peat map below-ground cultural assets and movement of water which should be avoided.

vi) HDD would also have adverse impacts in terms of the temporary compounds needed to facilitate it and the proximity to noise-sensitive receptors which would likely be significantly impacted by for a prolonged period.

vii) Potential for temporary construction impacts on Abbey Hall which is a heritage and community asset and so could face temporary disruption which will have knock on socio-economic, tourism and community wellbeing adverse impacts.

viii) It is likely that any of the options proposed by the Promoter will require compensatory activities due to the limited opportunity for mitigation for certain impacts. This should be discussed and agreed with the relevant authorities prior to submission of the Application.

4.5 It is recognised that little information has been provided at this stage regarding the constraints around the Order limits which will determine which cable route alignment is implemented between areas 2 and 4. However, the Council considers that, based on the information available, any of the currently proposed options will likely have substantial adverse impacts.

4.6 The Promoter should engage with the Council and Mid Suffolk District Council on the cable route to assist in understanding of the relevant constraints influencing the choice of alignment. In particular, the Council is keen to discuss potential alternative cable routes which may avoid adverse impacts further. In any case, the application submission should include a detailed consideration of alternatives in this area and demonstrate why the chosen cable route is the least impactful option.

The Proposed Battery Energy Storage System (BESS)

4.7 The promoter is proposing that BESS will be located both in a consolidated site and dispersed throughout the project. This creates challenges in terms of Fire Safety given the number of locations where access must always be readily available during operation. Careful consideration must be given to the safety of nearby receptors, particularly residential properties, heritage assets and wildlife. Emergency planning arrangements will have to be in place to ensure any fire outbreak can be handled effectively. Access to the BESS and solar array areas and emergency services must be available at all times during the operational period with the internal access tracks of suitable quality to facilitate emergency response.

4.8 **The Promoter must engage** with Suffolk Fire and Rescue Service (SFRS) prior to submission of the application to agree contents of the Outline Battery Safety Management Plan. Other plans referenced within the Outline Battery Safety Management Plans, such as evacuation and emergency plans, should also be discussed with SFRS.

4.9 Further comments on battery fire risk and safety are providing in the SFRS section of this response.

Cumulative Effects

4.10 There are multiple large scale infrastructure projects located within the Mid Suffolk and South Norfolk area. The assessment, avoidance and mitigation of cumulative impacts are, therefore, of high importance to the Council.

4.11 It is noted that the Promoter has provided a list of cumulative developments to be considered within 10km of the Order Limits. However, section 2.2.6 of the PINS Scoping Opinion states that no justification has been provided for this 10km study area and that efforts should be made to agree specific other developments to be included in the cumulative effects assessment.

4.12 **SCC considers that** the type and magnitude of certain other NSIPs in the region warrant inclusion and consideration in this assessment. In particular, Sizewell C's impacts are far-reaching, particularly in terms of socioeconomics and skills, and so should be included in the assessment where there will be overlap of impacts.

4.13 Solar farms outside of the 10km study area should also be considered due to the overlapping skills demands. This includes Tasway Energy Park, Droves Solar Farm and High Grove Solar Farm in Norfolk. Engagement with SCC and other relevant authorities should be sought to agree the list of developments included in the cumulative effects assessment.

Water resources

4.14 No detail has been provided at this stage on the predicted levels of water consumption during the construction and operational phases. The Council understands that substantial quantities of water may be required, including for routine cleaning of the panels during operation and for use during the event of a fire. Essex and Suffolk Water (ESW) have imposed a moratorium on the supply ofwater for all new non-domestic purposes in
the Hartismere Water Resource Zone. Without detail of how the project will meet its demands for water consumption, there appears to be a substantial risk that the promoter will have to use tankers to supply the water to the site. The sourcing of water also has implications for fire safety in relation to Battery Energy Storage Systems (BESS).

4.15 The design of the BESS units must ensure that chemical pollutants are contained in the event of a fire. The application should include sufficient technical detail and appropriate commitments to demonstrate that the design of BESS will not cause contamination of any water sources.

4.16 Water reuse must be implemented as far as possible in accordance with National Standards for SuDS to promote sustainable development. This is particularly necessary in this region due to the known water supply shortages.

Outline Management Plans and Mitigation

4.17 A two-stage management plan process is recommended whereby an outline plan is approved alongside the Development Consent Order. The detailed stage would then apply to the various phases of the development. The temporary impacts arising during construction of multiple projects on local communities is of concern. This impact can be the result of normal construction activities caused by construction vehicles, construction workers vehicles and other fixed and mobile plant. Issues such as road closures, destruction of trees and hedgerows, flooding from construction sites during heavy rain, pollution of water courses, noise and light pollution, and mud of the road can be an issue. Once built, projects if inappropriately designed may continue to cause anxiety as a result of noise creep, planting failures, and poor design.

4.18 Outline management plans are the main vehicles securing mitigation in DCO applications. It is essential that the Promoter engage with the Council and other relevant authorities prior to the submission of the Application to agree the content of outline management plans as far as possible. The detailed comments included in this response provide feedback on the draft versions of these plans provided as part of this consultation.

4.19 **The Council expects** the Promoter to revise the management plans according to these comments as well as the comments provided by other parties in response to this consultation and for there to be engagement on the majority of the planned outline management plans with these comments forming the basis of that engagement.

4.20 There are elements of mitigation which require discussion beyond the content of management plans in relation to the mitigation hierarchy, particularly in terms of avoiding adverse impacts and compensating where residual impacts remain. SCC has raised concerns in this response around several issues where this is relevant such as the proposed construction traffic access routes, mitigation/compensatory measures for health and wellbeing, siting of infrastructure and cable routes and improvements to the PRoW network.

4.21 **The Promoter's engagement with the Council** prior to submission should, therefore, also focus on the application of the mitigation hierarchy outside of the scope of outline management plans.

4.22 In order to provide a robust set of mitigation measures, **it is critical for** the Environmental Statement to utilise robust methodology to ensure the likely significant effects of the project are fully understood as far as possible. Outline methodologies were provided within the promoter's Scoping Report which the Council commented on in response to the Scoping consultation.

4.23 Therefore, **the promoter must engage** with the Council regarding the methodologies of ES chapters as they relate to the Council's concerns set out in consultation responses. The aim of this engagement should be to agree assessment methodologies prior to the submission of the ES. The Council also recommends that a similar exercise is undertaken with Mid Suffolk Council on matters relating to their statutory functions, such as Noise and Vibration.

4.24 Where impacts cannot be adequately within the Order Limits, a s.106 agreement should be sought. **This must be** discussed and agreed, as far as possible, prior to the submission of the application.

Community Benefits

4.25 It is noted that Community Benefits the consultation documents indicate that Community Benefits will be provided to fund beneficial projects for impacted communities. Whilst the Council welcomes the principle of this provision, it is critical that this commitment is made in the right way in order to bring genuine benefits to those who are affected by the project. The fund, which is proposed to be £125,000 annually for the lifetime of the project which is equivalent to £500 per MW per year.

4.26 **The fund must be** index linked to protect the fund from inflation, which would otherwise substantially reduce the effectiveness of the fund over time. Other projects of a similar nature have provided community benefits at a higher rate than what is proposed by the Promoter. For instance, Great North Road offers £1,250 per MW per annum in community benefits. It is clear that £500 per annum per year is insufficient and that a higher figure must be offered.

4.27 **The Promoter should engage with** the relevant authorities on this matter and take into account consultation feedback from relevant stakeholders on what an appropriate fund size would be.

4.28 Engagement with the local authorities is also needed to ensure **the operation and governance** of the scheme can command public confidence.

5 Planning – General Comments

EIA Scoping

5.1 The Council has noted that there are discrepancies between the Planning Inspectorate's (PINS) Scoping Opinion published 4 March 2026 and what is scoped out in the Preliminary Environmental Findings (PEF).

5.2 For example, paragraph 10.1.3 of the PEF states "Air quality impacts to human health are agreed to be scoped out during construction and operation as mitigation will prevent exposure that could lead to population health effects." However, item 3.5.1 of the PINS Scoping Report states "Regarding air quality impacts on human health from construction and decommissioning vehicles, the Inspectorate considers not enough information has been provided to scope this matter out at this stage."

5.3 It is misleading and incorrect for the promoter to portray the scoping out of air quality impacts on human health from construction vehicles as agreed via the PINS Scoping Report. Under 14(3)(a) of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, **the Environmental Statement must** "be based on the most recent scoping opinion adopted". Therefore, the Council expects the application to be submitted in accordance with the PINS Scoping Opinion.

5.4 Part 5, section 16 of the PER sets out that the Promoter will undertake a full glint and glare assessment to be included in the Environmental Statement (ES). The Council considers that it is vital for this assessment to cover all receptors where adverse impacts are likely, particularly in relation to PRoWs, road users including horse riders and cyclist who may experience effects at different heights from what is assumed for most users, green spaces, residential amenity including domestic curtilage, road users and other areas frequented by people.

5.5 **The Promoter should** take into consideration consultation feedback to inform the assessment, particularly from those who reside in close proximity to the solar array areas. The Promoter should also note the PINS Scoping Opinion which states that glint and glare impacts on the setting of heritage assets should be assessed (3.3.6). Section 3.11.7 of the Scoping Opinion states that any glint and glare impacts should inform relevant ES chapters such as landscape and visual and traffic and transport and access chapters. The nature of tracking panels should be reflected in the assessment should that option be pursued by the Promoter as the changing angle of the panels will likely increase the potential for adverse impacts.

5.6 Whilst Materials and Waste was agreed to be scoped out by PINS, this was on the basis that a Site Waste Management Plan would be secured with the application. This management plan is not mentioned in the PEF. The Council expects an Outline Site Waste Management Plan to be included in the DCO application.

5.7 Significant effects are reported in the PEF in several areas, including agriculture and soils, health and wellbeing and landscape and visual. **The Council expects the full application of the mitigation hierarchy** and for the promoter to engage closely with the Council to ensure significant impacts are avoided, mitigated or compensated for. In accordance with the hierarchy as set out in overarching National Policy Statement for Energy EN-1.

5.8 Likely significant effects are also identified for above-ground heritage assets including listed buildings within the Mellis Conservation Area and in close proximity to the wider scheme. Adverse impacts on listed buildings and their setting at locations across the scheme, must be minimised as far as possible. This should be achieved through **engagement with** Mid Suffolk District Council as the statutory authority for above-ground heritage matters.

5.9 The Draft Outline Operational Environmental Management Plan contains Air Quality mitigation measures, including 'Notification of potentially affected members of the public to move to a cleaner air location in the event of a BESS fire'. SCC agrees that such a commitment is necessary but considers that greater detail should be provided on how it will work in practice and what support will be available for vulnerable residents and residents who do not have access to a vehicle. There should also be established thresholds whereby this protocol would activate **which should be agreed with** Mid Suffolk Council's Environmental Health team.

Impacts on residents

5.10 The Order Limits are in close proximity to residential properties in several areas. It appears therefore that construction activity, such as installing solar panels, construction traffic movements and building haul roads, will occur close to residential properties. **The promoter must ensure** that likely adverse effects from these activities are identified and mitigated, particularly in terms of noise and vibration, air quality, and health and wellbeing.

5.11 This is also a concern for the operational period in terms of impacts on residential amenity due to the siting of infrastructure, such as solar panels themselves, noise-producing substations and potential concerns around fire safety for the dispersed BESS units. The existing commitments around offsetting from certain receptors does not refer to offsetting of internal haul roads, BESS units or substations from residential properties and other sensitive receptors such as PRoWs.

5.12 Paragraph 2.14.4 of the Preliminarily Environmental Findings doucment states alludes to offset and setback measures for residential properties, PRoWs and heritage assets. **SCC expects that** these measures will be fully detailed and justified in the ES and for engagement with the local authorities, including Parish Councils, and affected residents, to influence what these measures look like. **The application should take** a precautionary approach to assessment based on the genuine worst-case scenario which should be discussed in advance with SCC and Mid Suffolk Council.

Routing of construction traffic and access

5.13 The rural context of the proposed development means construction traffic will impact particularly sensitive areas based on the proposed access routes. This includes the routing of HGVs through Mellis Common and the villages of Eye, Thornham and Thorndon, as well as affecting nearby rural residential properties. As should be clear, the rural setting of the site means there is a low baseline of HGVs and construction activity meaning the impacts of the proposed development are likely to be disproportionately higher than in other types of places.

5.14 **This should be reflected** in the application's assessment, mitigation, monitoring, reporting and community engagement commitments to ensure adverse impacts are minimised. **Avoidance of adverse impacts should be** prioritised as far as possible in accordance with the mitigation hierarchy detailed in EN-1.

5.15 **The Promoter should seek** to make use of the haul road which is proposed as part of the Norwich to Tilbury Grid Reinforcement scheme, should it receive consent. Such an arrangement is likely to substantially reduce certain adverse impacts from construction traffic.

5.16 Since there is a lack of certainty around whether Norwich to Tilbury will receive consent at this time, **the Promoter should propose a haul road** running alongside Norwich to Tilbury's which would be implemented if the Promoter is unable to use Norwich to Tilbury's haul road. This approach would provide certainty that adverse impacts from construction traffic are being avoided as far as possible by reducing traffic on existing roads and is considered necessary in planning terms given the considerable impacts expected from the access routes proposed in the consultation materials.

5.17 The Council has severe concerns with the proposed construction traffic access route through Mellis Common. Not only is the road unsuitable for HGV traffic, but the area is a designated Countryside and Rights of Way Act 2000 Access area, a County Wildlife site and a Conservation Area, and so **is of extremely high sensitivity**. The disruption caused by construction works to improve the road and the HGV traffic will likely have a substantial impact on the accessibility and use of this green space and **should be avoided**.

5.18 Moreover, it is clear that the Promoter's access route arrangements **will have to be revised** due to the unsuitability of several of the proposed routes for HGV traffic, both in terms of the impacts to residents and road users and the general unsuitability for those roads for HGVs. When revising the proposed access arrangements, **the Promoter should engage closely with SCC** to minimise impacts as far as possible and consider what mitigation measures would be necessary to make the proposal acceptable.

5.19 Discussions around mitigation to make access for construction traffic acceptable in planning terms may involve including extra areas added to the Order Limits for the purposes of road/junction improvements.

5.20 Whilst the site includes many existing farm accesses to the highway, these should be assessed to check whether they meet highways safety standards in terms of things like visibility. The application should, therefore, take into account the need for vegetation removal and bellmouth construction both in terms of assessment of impacts and siting of accesses to avoid impacts.

5.21 If an access point is included for reasons of flexibility, as opposed to certain necessity, **this should be reflected on** the plans produced for the application and **there should be a requirement**/commitment to review the need for those access points during the delivery phase depending on the delivery programme and the balance of environmental impacts, in consultation with the local highway authority.

5.22 Given the fact that the current temporary access to the Yaxley substation is unsustainable, a more resilient solution should be sought. **The Promoter should engage with** National Grid Electricity Transmission (NGET), who are undertaking the works at Yaxley substation, to coordinate an acceptable access solution in consultation with SCC.

Cumulative Impacts

5.23 The promoter has identified a list of cumulative schemes. The Council expects a robust cumulative effects assessment to be included in the application which identifies the full range of potential cumulative effects and the mitigation required. The list of projects included **should be agreed with** the Council and other stakeholders as major NSIPs can have cumulative effects beyond the proposed 10km study area. Coordination and engagement with promoters of cumulative projects is strongly urged to minimise cumulative effects.

5.24 The Council understands that there may have been some errors made by the promoter in the notification process for this consultation. Whilst recognising that such errors are difficult to avoid, the Council will continue to press the promoter to ensure that these are minimised.

Agricultural Land and Soils

5.25 The project includes 996.4 hectares of Grade 1, 2 and 3a agricultural land which is classified as best and most versatile land. This constitutes 87 percent of the total area of the draft Order Limits. The Council notes that item 3.1.4 of the Planning Inspectorate's (PINS) Scoping Report states that "*Specific justification for the use of the land by grade should be provided. Consideration should be given to the use of BMV land in the applicant's discussion of alternatives*". The promoter's discussion of alternatives does not provide a justification for the use of BMV land and so the promoter has not attempted to demonstrate why it is necessary to use such large quantities of BMV land. National Policy does not allow for the use of BMV land without robust justification.

5.26 Therefore, in accordance with national policy, particularly where there will be a permanent loss of BMV land, the Council considers that this should be minimised and a clear justification provided as to why the project promoter considers any such land take to be justified.

5.27 The Council considers that the use of such high quantities of BMV land cannot be justified.

5.28 Nevertheless, the Council will advocate for the project promoter to maximise opportunities to retain agricultural use on agricultural land during the operation of the project, and for robust measures to be implemented to ensure agricultural land is returned to landowners in a state of high quality at the end of the project's lifetime.

5.29 The PEF does refer to a bespoke Soil Management Plan to be included in the application. However, a draft copy of this plan has not been provided in this consultation. Given the significant impacts identified, the promoter should work closely with the local authorities to ensure that robust measures to mitigate, protect and remediate soils are secured.

Appendix A – Detailed Technical Responses

6 Archaeology

6.1 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.

6.2 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).

6.3 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

6.4 Data held by the Historic Environment Record relating to all known 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 promoter has a comprehensive understanding of the current baseline archaeological record for the application area.

6.5 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.

6.6 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.

6.7 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.

6.8 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)
- There is also high potential for additional sites of regional or national significance to be defined during ongoing archaeological assessment work.

6.9 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

6.10 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

6.11 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.

6.12 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.

6.13 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.

6.14 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.

6.15 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).

6.16 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.

6.17 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.

6.18 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.

6.19 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.

6.20 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.

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

6.22 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.

6.23 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.

6.24 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.

6.25 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

6.26 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.

Preliminary environmental findings document

6.27 8.2.10 A further possible Saxon cemetery within the application area is GSG 081.

6.28 8.2.14 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.

6.29 8.3.2 All pre-determination archaeological surveys will need to subject to WSIs approved by SCCAS. At DCO stage, any outstanding archaeological assessment and mitigation work will need to be covered by a scheme wide Outline WSI, with further site specific WSIs required to be produced for each area of the scheme. If any areas of archaeology are to be preserved in situ (either for archaeological reasons or due to design decisions), 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.

6.30 8.4.3 Also in line with other relevant national and local guidance, including SCCAS guidance. All work will also need to be subject to WSIs approved by SCCAS.

6.31 8.4.6 Without further assessment, effects cannot yet be determined. For areas of early historic landscape, impacts have the potential to be significant.

6.32 9.1.1 There is a potential for impacts to any areas of archaeology designated as Preservation in Situ (PIS). As such this needs proper consideration and appropriate provisions made within the HEMP to secure the long-term protection of heritage assets.

6.33 9.1.2 There is a potential for impacts to any areas of archaeological designated to be Preserved in Situ (PIS). As such this needs proper consideration and appropriate provisions made within the HEMP to secure the long-term protection of heritage assets.

6.34 9.2.2 Any areas not subject to pre-determination evaluation will need to be subject to appropriate post-consent assessment in order to inform mitigation strategies.

6.35 9.2.3 Should any activities take place which will impact upon archaeological PIS areas, then further mitigation may be necessary. Suitable provisions for this will need to be set out within the HEMP.

6.36 9.3.1 The DBA must also in include a full and up to date HER search, historic map regression 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. 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. 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.

Draft Outline Construction Environmental Management Plan

6.37 3.5 The CEMP should also set out the provision for an HDD archaeology management plan to be produced in relation to potential impacts of bentonite breakouts upon defined archaeological PIS areas.

6.38 Table 4.4 The CEMP should also set out that prior to the commencement of any pre-commencement or construction works within an area, that the need for any archaeological mitigation work to be undertaken should be assessed and the location of any archaeological PIS areas must be identified. Where there are archaeological constraints identified, these should be mitigated prior to works commencing, in line with the OWSI and site specific WSIs and HEMP. Archaeological constraints should be identified on plans and project constraints mapping to ensure that all archaeological mitigation work is completed prior to commencement of any other works and that defined archaeological PIS areas are suitably protected.

6.39 Table 4.4. Suitable mitigation measures to protect archaeological PIS areas during operation, maintenance and decommissioning and in perpetuity will also need to be implemented.

Draft Outline Landscape and Ecological Management Plan

6.40 4.5 All areas of landscape or ecological management work which involve below ground impacts should be scoped in for archaeological assessment followed by mitigation (as appropriate). No works related to these activities should take place within each area of the scheme until all required archaeological evaluation and mitigation works have been completed within that area. Archaeological PIS areas must also be avoided by planned landscape and ecological management works, with appropriate safeguards put in place to protect below ground remaining during works.

6.41 5 The Archaeological Clerk of Works (ACoW) should also be kept informed of planned landscape and ecological mitigation works to advise how these should be delivered alongside archaeological requirements and ensure that these take place in line with the OWSI and HEMP.

Draft Outline Public Rights of Way and Access Management Plan

6.42 Any new footpaths created as part of the project will need to take the location of archaeological PIS areas into consideration. Where it is not possible for PIS areas to be avoided, construction methods would need to be used which avoided below ground impacts and works would need to take place in line with the requirements of the HEMP. The ACoW will need to be kept informed of any new footpath creation works.

Draft Outline Operational Environmental Management Plan

6.43 Table 4.5 Archaeological PIS areas should continue to be marked upon project constraint mapping post-construction and any additional works during site operation (including repowering) will need to take the location of these areas into consideration and continue to follow the requirements set out in the HEMP. The OEMP and HEMP will also need to provide full details of the methodology to be implemented to secure the ongoing protection of preservation in situ areas during operation of the solar farm, including monitoring and reporting procedures to ensure preservation in situ of archaeological heritage assets throughout the development lifespan and escalation procedures and triggers for archaeological investigation, where preservation in situ is no longer achievable, including response timescales, methodology for archaeological mitigation, post-excavation reporting and archive deposition.

Draft Outline Decommissioning Environmental Management Plan

6.44 Table 4.5 Archaeological PIS areas should continue to be marked upon project constraint mapping post-construction and any additional works during site decommissioning will need to take the location of these areas into consideration and continue to follow the requirements set out in the HEMP. The DEMP and HEMP will also need to provide full details of the methodology to be implemented to secure the ongoing protection of preservation in situ areas during decommissioning of the solar farm, including monitoring and reporting procedures to ensure preservation in situ of archaeological heritage assets throughout all associated works and escalation procedures and triggers for archaeological investigation, where preservation in situ is no longer achievable, including response timescales, methodology for archaeological mitigation, post-excavation reporting and archive deposition.

7 Ecology

Preliminary Environmental Findings: Ecology and Biodiversity

7.1 Assessment of impacts on Coastal & Floodplain Grazing Marsh resulting from the proposed cable route through this Priority Habitat to the east of Eye. Alternative cable route options must be considered for this location.

7.2 Concerns about the proposed use of Cocks' Road (east of Eye) as a site access route and the potential impact on ecology species that would result from this. Alternative site access routes need to be looked into.

7.3 Strict mitigation measures required for works proposed in and close to Mellis Common, which is a valuable wildlife habitat in this area. How does the promoter propose to mitigate potential impacts on ecological features at this location?

7.4 SCC Ecology are happy with the range of proposed and ongoing surveys the promoter has promised to undertake. We would be keen to see the survey results and any proposed mitigation measures that result from these surveys.

7.5 In addition to the surveys being undertaken, SCC Ecology would like to see surveys for Harvest Mouse and Invasive Non-Native Species. It is likely Signal Crayfish will be present within the watercourses present in the DCO boundary and measures to mitigate the potential to unintentionally spread this species must be drawn up if the watercourses are likely to be impacted during works.

7.6 The Ecology Team are concerned about the severance and fragmentation of habitat connectivity and the disturbance to wildlife that will result from the construction works, movement of plant and other machinery, creation of site accesses, haul roads and the proposed construction of the cable routes throughout the DCO boundary. The loss and fragmentation of migration corridors such as hedgerows, lines of trees and minor watercourses and the impacts from the disturbance caused by construction works could negatively impact on bats, reptiles and other species that rely on these ecological highways. The promoter must look at minimising gaps in hedgerows and to use dead hedging or a similar stopgap to restore habitat connectivity overnight or when the accesses/haul roads are not in use.

7.7 Assessment of impacts on Coastal & Floodplain Grazing Marsh resulting from the proposed cable route through this Priority Habitat to the east of Eye. Alternative cable route options must be considered for this location.

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7.12 The Ecology Team are concerned about the severance and fragmentation of habitat connectivity and the disturbance to wildlife that will result from the construction works, movement of plant and other machinery, creation of site accesses, haul roads and the proposed construction of the cable routes throughout the DCO boundary. The loss and fragmentation of migration corridors such as hedgerows, lines of trees and minor watercourses and the impacts from the disturbance caused by construction works could negatively impact on bats, reptiles and other species that rely on these ecological highways. The promoter must look at minimising gaps in hedgerows and to use dead hedging or a similar stopgap to restore habitat connectivity overnight or when the accesses/haul roads are not in use.

7.13 There are concerns about the proposed solar array directly east of Eye (array 2 on the plans). The proposed cable route for this will transect an area of Coastal and Floodplain Grazing Marsh which is both a Suffolk and UK Priority Habitat. The Ecology Team urge the promoter to look at alternative options for this area.

7.14 The cable route for this solar array (2) is along a narrow country lane known as Cock's Road. This is an unsuitable option for site access as it would need significant vegetation removal to make the access wide enough for the plant and machinery for the construction and any other works required. This will impact severely on ecological species that rely on this ecological corridor such as bats, birds, badgers and reptiles.

7.15 The impacts of construction and proposed access road creation off of SCC highways needs to be fully assessed and minimised. These are valuable wildlife corridors that are not just limited to Roadside Nature Reserves. Any impacts on RNRs must be avoided.

7.16 All Ecology surveys must be undertaken by suitably qualified ecologists at the appropriate time of year. All survey results should be shared with the Suffolk Biodiversity Information Service (SBIS).

7.17 SCC Ecology fully expect the proposal to deliver an overall net gain for Biodiversity and are keen to be kept up to date on the promoters' proposals for this.

7.18 SCC Ecology are concerned about the cumulative effects of the various NSIPs that are proposed for this area (Norwich to Tilbury, Suffolk Water Recycling and Transfer scheme). These cumulative effects need to be fully assessed and robust mitigation and avoided measures will need to be drawn up. Impacts on the foraging/migrating capabilities of bats is a particular concern given the potential levels of habitat fragmentation and disturbance that are likely to result from these projects.

7.19 There are concerns about the proposed works within the vicinity of Mellis Common (County Wildlife Site & Suffolk Wildlife Trust Nature Reserve). Works proposed for this area include the siting of a cable route between the proposed solar arrays 3 and 5. It is crucial this sensitive habitat area is not impacted by any of the works and that there are robust mitigation and harm avoidance measures in place to ensure the potential for impacts on this sensitive habitat is minimised. Should there be any impacts on this County Wildlife Site, reinstatement of the habitat to its previous condition is the minimum SCC Ecology expect the promoter to carry out to alleviate any potential damage that may be unintentionally caused to this site.

7.20 A survey for invasive non-native species is recommended and should cover both plants (Giant Hogweed, Japanese Knotweed, Himalayan Balsam) and animals such as Signal Crayfish, which may be present in the watercourses that are within the DCO red line boundary. Up-to-date records of these invasive non-native species (INNS) within the red-line boundary can be obtained from the Suffolk Biodiversity Information Service (SBIS).

7.21 Should any site accesses or haul roads be required for the development, the promoter should investigate the possibility of sharing site accesses and haul roads with the Norwich to Tilbury or the Suffolk Water Recycling & Transfer projects (should these developments be consented and their works coincide with the EcoPower development).

7.22 Any site accesses must make use of existing access points (farm tracks, field entrances, etc) and should ideally avoid established trees. Any trees that require work (from a health and safety perspective) should either be crown lifted, pollarded or coppiced in order to retain the feature as much as possible. Should the tree be removed, SCC Ecology would like to see the trees replaced at least to a 3:1 ratio with further compensation measures considered given the fact that the replacement of mature trees is a decades-long process. These should be planted as close to the original location as possible and should be native species of local provenance.

7.23 Should any new pylons or other power lines be required for the development, these should be sited in areas where the risk of potential bird strikes is low. This can be assessed through monitoring surveys at the proposed pylon locations. This is important particularly if the power lines cross or are close to river corridors and other water bodies.

7.24 Should the EcoPower development be granted consent, it will have to deliver a minimum of 10% net gain for biodiversity (as stated in the Environment Act 2021). The SCC Ecology Team are keen to hear how the promoter proposes to deliver this Biodiversity Net Gain and whether this will be achievable through onsite or offsite habitat creation & enhancements (or a combination of the two).

7.25 The proposed ecological enhancements detailed in the Illustrative Masterplan are acceptable but will need further work to ensure they are appropriate for the location and fit in with the recently published Local Nature Recovery Strategy for Suffolk: https://www.suffolk.gov.uk/planning-waste-and-environment/local-nature-recovery-strategy-lnrs

Outline Landscape and Ecological Management Plan

7.26 More detail regarding how impacts on ecologically sensitive features that could/will be impacted by operations is needed in the LEMP. No reference to mitigation and avoidance measures is present in the oLEMP currently.

7.27 The commitment to maintain, conserve and enhance habitats within the DCO boundary stated in the oLEMP is welcome but there needs to be further detail provided on how the promoter intends to achieve this.

7.28 4.2.7 – protect and enhance local flora and fauna habitats – this section needs more detail on how the promoter proposes to achieve this.

7.29 4.2.8 – improve ecological connectivity – this section should include hedgerow and grassland habitats. Heathland is mentioned but this habitat is unlikely to be within the proposed order limits.

7.30 Embedded measures: section 4.4.4 – 5m from existing ponds should be extended to at least 10m, depending on the ecological sensitivity of the pond and the species associated with the pond (i.e. GCN).

7.31 15m from ecologically statutory and non-statutory sites should be at least 20-25m, depending on what the site is designated for and whether the habitat immediately adjacent to the site can be considered functionally linked.

7.32 30m from active badger setts – this should be assessed on a sett by sett basis. It will depend on how the badgers are using the habitat immediately adjacent to the sett.

7.33 5.2 – management of retained vegetation – habitat connectivity should also be retained and enhanced and/or restored once all works are complete in the respective area.

7.34 There needs to be more detail on how temporary severance of connectivity will be managed – the use of dead hedging to stop up gaps overnight for example.

7.35 Grassland maintenance under the panels – please refer to the report from the Suffolk Wildlife Trust regarding management for biodiversity at solar farms. Link is: https://www.suffolkwildlifetrust.org/news/new-report-suffolk-solar-farm-showcases-ecological-best-practice.

Outline Construction Environmental Management Plan

7.36 HDD method statement should detail how potential harm and disturbance to protected species and habitats will be avoided.

7.37 BD3 – measures should include two-stage vegetation clearance in areas of habitat suitable for reptiles and amphibians.

7.38 BD5 – SCC Ecology welcome the commitment from the promoter regarding gaps in any fencing that will allow badgers and other small mammals to move through the area unimpeded.

7.39 BD8 – SCC Ecology welcome the proposed use of existing gaps in hedgerows and the like for any cable routing and access tracks required.

7.40 BD10 – pre-construction surveys should include breeding bird assessments and checks for reptiles where suitable habitat for these species exist.

7.41 BD12 – the Invasive Non-native Species statement should also cover animal species such as Signal Crayfish (may be present in watercourses crossed by the cable route – particularly relevant if open-cut trenching is to be used to cross the watercourse).

7.42 BD5 – protection of trees with bat roost potential. This should also cover the likely migration/foraging routes connected to the trees. Protecting the trees in isolation is not sufficient.

Outline Operational Environmental Management Plan

7.43 BD2 – Overarching LEMP should be available to be implemented during the operational phase.

7.44 BD3 – sensitive lighting should also take account of potential impacts on badger that may result from lighting.

8 Flood and Water Environment

8.1 **Key Issues**:

8.1.1 The consultation documents indicate that the Promoter will produce an Outline Drainage Strategy, Construction Water Management Plan and Surface Water Management Plan. Outline versions of these plans should be developed with the LLFA, should follow National Standards for SuDS and LLFA guidance and be secured in the DCO.

8.1.2 Assessment of Flood Risk has not yet been undertaken. The minimum requirements for what should be covered in the Flood Risk Assessment (FRA) are set out in paragraph 5.8.16 of EN-1. The Promoter should also ensure it follows further guidance within the NPPF and relevant PPG documents such as https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances and https://www.gov.uk/guidance/flood-risk-and-coastal-change. The Promoter should engage with the LLFA regarding the FRA prior to submission.

8.1.3 Water Reuse needs to be considered for every stage of the life of the development including for fire suppression (Construction, operation, decommissioning) – National Standards SuDS, Hartismere Water Resources Zone wtr0534-mortatoriumleafletimageov_sa_v3.pdf.

8.1.4 Surface water drainage needs to be considered for every stage of the life of the development (Construction, operation, decommissioning) in accordance with NPPF & PPG.

Preliminary Environmental Information Report Chapter 15. Water resources and flood risk

8.2 The promoter has given limited information on matters that the LLFA would be consulted on i.e. flood risk and surface water drainage.

8.3 Parishes with within the redline have stated to the LLFA of existing issues relating to winter flooding of agricultural land partially in Brome (Eye Airfield) and Thrandeston.

8.4 The documents have been reviewed and there is a significant amount of question that can only be answered, once key documents have been submitted i.e. Flood Risk Assessment, Surface Water Drainage Strategy, Construction Surface Water Management Plan, Decommissioning Strategy including surface water reuse.

8.5 The information submitted is very basic at this stage regarding flood risk, as they have not submitted a full flood risk assessment. The LLFA element, which is surface water is shown, but the promoter has not submitted the surface water flood risk maps that include climate change allowance.

They also have not assessed foul nor reservoir flood risk.

No information has been submitted for surface water drainage, and the promoter has stated that "*An Outline Drainage Strategy will be submitted with the DCO application*".

8.6 There is a significant concern regarding the projects ability to source sufficient potable water in the water stressed area (Hartismere Water Resource Zone) and there is current a moratorium on commercial development supply from Essex & Suffolk Water. Therefore, the project needs to provide a supply of water generated from the site i.e. surface water run off for panel cleaning, firefighting reserves, landscaping watering etc.

Land Drainage Act – Ordinary Watercourse consents.

8.7 At this time, the promoter has indicated that watercourse crossings will be HDD were possible. Any cable shall be laid min of 1.5m below the bed of the watercourse and marked/protected from strikes accordingly. The Promoter should ensure that it is following relevant guidance such as that published by the Environment Agency[3].

Outline Operational Environmental Plan

8.8 Due to the water scarcity issues in this area of Mid Suffolk, the LLFA considers it essential that the promoter fully considers and seeks to collect, store and reuse surface water for construction in accordance with National Standards for SuDS Standards 1: Runoff Destination. In the first instance, water runoff must be either reused onsite or discharged to be used by a third party. Examples may include reusing water for wheel washing and cleaning panels within the project or seeking agreement from adjacent landowners for water runoff to be used by them.

8.9 The LLFA welcomes the commitments to offset impermeable surfaces and storage of materials from watercourses and the minimisation of impermeable surfaces in general.

[3] https://www.gov.uk/government/publications/environmental-permitting-regulations-exempt-flood-risk-activities/exempt-flood-risk-activities-environmental-permits

8.10 The promoter will need to prepare and submit a Construction Water Management Plan (CWMP) detailing how they will manage surface water run off during the construction phase to mitigate flooding, ensure any water discharged is clean.

8.11 This document also states that the Promoter will produce a Surface Water Management Plan to manage surface water flood risk and surface water runoff. An outline version of this plan should be secured in the DCO and developed with the LLFA prior to submission of the application.

8.12 No compounds nor material, including soils, should be located or stored within areas at risk of flooding from rivers or from surface water.

8.13 All culvert for crossing shall be temporary in nature and shall be returned to open watercourse as soon as possible. Works can be temporary for a maximum of 5 years and will need consent or a permit from LLFA, IDB or EA.

8.14 The LLFA is concerned with the potential location of temporary construction compounds and materials within areas of flood risk due to the location of HDD. As the Promoter develops its proposals, particular care and careful planning should be employed should location of impermeable surfaces and materials be required to be located in areas of flood risk due to HDD, including additional precautions and mitigation. This should be discussed with the LLFA as the Promoter develops its proposals.

Outline Decommissioning Environmental Management Plan

8.15 Due to the water scarcity issues in this area of Mid Suffolk, the LLFA considers it essential that the promoter fully considers and seeks to collect, store and reuse surface water for decommissioning in accordance with National Standards for SuDS Standards 1: Runoff Destination.

8.16 All culvert for crossing shall be temporary in nature and shall be returned to open watercourse as soon as possible. Works can be temporary for a maximum of 5 years and will need consent or a permit from LLFA, IDB or EA.

9 Highways

Site Access

9.1 These are high level comments based on the information currently available. SCC would expect the Promoter to continue to discuss access routes with the Promoter as more detail information becomes available.

9.2 Many of these use minor local roads with several constraints such as width, alignment, buildings, vegetation, level crossings (Mellis) or narrow bridges (Gislingham).

9.3 Routing of HGVs through Eye is sensitive with residents and the local highway authority particularly the area around the junction of Magdalen / Broad and Lowgate Streets with its constrained geometry, narrow footways and proximity of buildings to the carriageway edge.

9.4 At least one access route north of Yaxley appears to use a temporary road and access that is secured by another project.

9.5 The accesses onto the A140 have typically evolved over the years and are not designed to current standards. It should not be expected that these junctions are fit for use for increased levels of traffic, particularly large vehicles.

9.6 Some junctions such as at Stoke Ash have experienced a frequency of collisions greater than experienced elsewhere on the A140.

9.7 Some routes, such as that through Thornham, are subject to environmental weight limits.

9.8 There appears to be several proposed accesses on roads with no access route associated (as seen in Figure 2.3 - Construction Strategy).

9.9 There appear to be numerous inconsistencies in access locations between Figure 2.3 and the Indicative Masterplans for each of the project's areas.

9.10 SCC would expect Stage 1 Road Safety Audits to be undertaken on each proposed access and access route.

9.11 Due to the inadequacy of the majority of proposed routes alternative access routes, including the use of haul roads with connections to major highway authority roads, where practicable, should be explored and discussed with the LHA.

9.12 Overall, the current details on the proposed accesses and access routes to the various areas are not suitable and require further discussion and detail. The LHA's comments on the proposed access routes are set out in Appendix B.

9.13 SCC queries why Cocks Road outside Eye is included in the order limits.

9.14 All highway works including construction of temporary or permeant accesses must be approved by the highway authority.

Connection to Yaxley Substation

9.15 Lacks permanent access other than the very narrow Leys Lane. Provision of a permanent access should not be scoped out of the assessment. With the scale of development at the Yaxley site it is inconceivable that a substation has such poor highway access.

9.16 It is unclear what AILs are needed for the development and any connection to the substation, and whether these can be accommodated by the roads linking the site to a port (for delivery of large loads such as cable drums and transformers).

Construction Period

9.17 An anticipated construction period starting in 2028 will overlap with that for Norwich to Tilbury. The cumulative impact of construction traffic from both should be assessed on the local network and A140 or other principal road corridors.

9.18 Due to potential overlapping construction period with Norwich to Tilbury, SCC would encourage liaison between the Promoters to potentially share accesses etc.

Outline Construction Traffic Management Plan (oCTMP)

9.19 The Requirement for final Construction Traffic Management Plan (CTMP) shall be discharged by SCC as the local highway authority.

9.20 The preliminary forecast for HGV movements is relatively low for an NSIP. However, even such small volumes may have a disproportional impact on local roads little used by large vehicles.

9.21 Whilst welcoming the use of existing field accesses it should not be expected that these are compliant with current design standards, nor safe for increased use.

9.22 Early engagement with the Highway Authority is essential once sufficient information on use is available, to identify what improvements or alterations are necessary for safe use. Consideration of impacts on nearby vegetation, for example in visibility splays will also be necessary. Assuming suitable access widths does not allow for variability in site conditions such as narrow road widths or bends. Each site will need to be considered, and sufficient survey data will be needed for detailed design.

9.23 SCC guidance can be found at https://www.suffolk.gov.uk/asset-library/TransportTraffic-InfraPolicy.v4.2.pdf.

9.24 A car occupancy of 1.5 is considered by SCC to be optimistic and the authority will expect the Promoter to provide evidence to show this is achievable.

9.25 Where it is anticipated that staff will arrive to site via shared transport (as stated in paragraph 4.3.16), SCC queries how this would work in practice. Would there be a centralised pick-up point, or a route the bus would follow? Examples of where this has been achieved on other comparable sites would be helpful to demonstrate vehicle sharing targets can be achieved.

9.26 It is unclear what the relationship will be between the project team and the Promoter. SCC would be concerned if some or all the roles are filled by contractors or consultants and fully expect the Promoter to take responsibility for complying with the CTMP. While the Principal Contractor may monitor compliance with the CTMP, the details of which shall be agreed with the Local Highway Authority (LHA), but the final responsibility must remain with the Promoter.

9.27 The monitoring, any non-compliance incidents and the actions taken to rectify them must be reported to the LHA. The wording securing this in the OCTMP should be discussed and agreed with the LHA.

9.28 The measures in the management documents shall include compliance with:

- HGV routing
- HGV timing
- Peak hour HGV caps if necessary
- HGV caps (based on realistic, worse case for each route and / or access assessed in the TA/EA
- HGV Emission control
- Feasible AIL routes (including assessment of capacity of highway structures

9.29 For Workers

- Controls on vehicle share ratio
- Securing of shift change times if proposed as mitigation (ie avoiding trips in network peak hours)
- Parking (including fly parking)

9.30 Environmental Controls (Highway)

- Avoidance of mud or other debris being brought onto the highway
- Glint and glare affecting highway users

- Vegetation clearance e/ retention and reinstatement within or adjacent to the highway
- Drainage

9.31 Wording within such documents shall be directive (shall, will, must) rather than optional (could, should, may).

9.32 Where highway alterations are proposed details of the highway boundary must be sought to demonstrate they can be delivered either within the existing highway boundary or additional land secured through the DCO. These areas shall include areas needed for earthworks, drainage, visibility and landscaping as necessary.

9.33 Where alterations are proposed there should be appropriate mitigation, for example replacement trees where vegetation removal is required.

9.34 Any work within Mellis common is likely to be sensitive and dependant on the areas require may require compensation such as creation of replacement common land. Drafting of the order limits must consider this.

9.35 Avoiding working on Sundays and Bank holidays and hence worker trips and HGV deliveries is welcome.

9.36 When crossing roads for construction of the cable corridor SCC's experience is that road closures are normally required rather than temporary traffic signals as the narrow carriageway width precludes acceptable safety zones.

9.37 Monitoring of HGV numbers throughout the project should be shared with the LHA. SCC also questions what the enforcement process will be for exceedances of numbers.

9.38 HGV movement caps should be secured in the oCTMP and be based on the reasonable worst-case scenario.

Abnormal Loads

9.39 The definition of Abnormal Indivisible Loads (AIL) is determined by the UK government, not SCC. Details can be found at https://www.gov.uk/government/publications/special-types-enforcement-guide/special-types-enforcement-guide

9.40 Early engagement with SCC as the authority responsible for most highway structures (bridges) is essential to allow movement of AILs in a timely manner. Reliance on the Electronic Service Delivery for Abnormal Loads (ESDAL) system alone may result in delays or cancellation of AIL movements if structures cannot accommodate the increased loads. For example, the bridge on the A140 at Brockford Street has a STGO2 (Special Types General Order) weight restriction. As a minimum, a feasible AIL route must be provided within the DCO to demonstrate that heavy loads can be delivered to site.

9.41 Temporary overbridging of weak structures is discouraged by SCC due to the significant disruption to other road users.

9.42 There is no information at present on which area(s) would require AIL deliveries, meaning SCC cannot comment on specific routes etc.

Preliminary Environmental Information Report

9.43 Collisions, not accidents, should be considered on all access routes not just within the order limits.

9.44 Traffic surveys must be undertaken in neutral months as per WebTAG guidance and of sufficient duration to give meaningful data. Turning counts may be needed at junctions for modelling. Neither the location of the surveys nor links and junctions assessed have been agreed with the LHA.

9.45 The significance or otherwise of the impacts on road users has not been assessed by the LHA nor sufficient data supplied to do so.

10 Landscape

10.1 The proposed scheme is located on land in the parishes of Yaxley, Brome, Eye, Gislingham, Mellis and Occold. The project comprises approximately 1,175 ha (hectares), of which 900 ha form the main development areas and 275 ha the Cable Corridors and proposes to connect to the National Grid via underground cabling to the Yaxley Substation.

10.2 The scheme is dispersed over five discrete land parcel areas ('Principal Area') proposed for the installation of solar PV panels, ecological mitigation or battery energy storage systems ('BESS'), which are connected with each other and to Yaxley substation by cable corridors.

10.3 SCC (Landscape) welcomes the Illustrative Environmental Masterplan and welcomes that some of the recommendations SCC (Landscape) provided during the Non-Statutory Consultation have been integrated into the design.

Key Issues

10.4 However, there remain key concerns regarding the widespread adverse impacts on landscape and visual amenity and the cumulative adverse impact of multiple energy project including the Norwich to Tilbury pylon scheme and multiple solar and battery storage projects in north Suffolk and south Norfolk.

10.5 SCC (Landscape) identifies the following key issues, which should be resolved pre-submission:

a. Cable corridors: Some of the main concerns about the scheme in terms of landscape, ecology and cultural heritage centre around cable corridors. While it is greatly welcomed by SCC that the cable corridor previously shown around the south of Eye has been removed from the scheme, the remaining cable corridor connecting areas 2 and 4 to the east of Eye leads through a highly sensitive and intricate river valley landscape, which is equally unsuitable for a cable corridor. SCC considers that an alternative route will need to be found, potentially further east.

b. Access routes, Access Points and construction compounds: There are grave concerns with regards to access routes. The primary access route in Stoke Ash, from the A140 to Gislingham via Thornham Magna, the secondary access route through Mellis Common, and the inclusion in the DCO limits of Cock's Road are all considered wholly unsuitable in Landscape and Visual Amenity terms and therefore unacceptable. Access points should be rationalised and temporary accesses, haul routes and works compounds should seek to avoid impacts on existing vegetation, in particular mature trees and woodlands.

c. Suitable buffers need to be agreed between the perimeters of the development and roads, PRoW, residential properties, cultural heritage assets and landscape features.

d. Glint and Glare assessments need to be carried out in time to inform the layout and design of the solar arrays.

e. SCC further expects that there will be a critical need for effective design delivery and safety management of the associated Battery Energy Storage Systems as well as a comprehensive and effective approach to the mitigation of harm to the natural environment and the historic environment that will be caused by the scheme.

f. During a further site visit to some of the land parcels, carried out on 18 June 2026, it was noted that the mapping to date of existing vegetation is greatly lacking. SCC (Landscape) considers that as part of the design principles it should be agreed to work with the existing trees and hedgerows and integrate them into the design (see comments on design principles below). This needs to include sufficient buffer distances from existing trees to enable their continued growth without compromising the efficiency of the solar arrays.

Detailed comments

Area 1: Land south of Stuston (Area 1 Stuston);

10.6 SCC (Landscape) considers that most of this area would, with appropriate screen planting, be capable of hosting solar arrays as indicated on the Illustrative Environmental Masterplan and Figure 2.2a Indicative Masterplan – Area 1 Stuston.

10.7 There is concern with regards to the significant numbers of mature/veteran trees along Public Rights of Way (PRoW), field boundaries, and about the remaining field pattern, which is well defined by hedgerows and hedgerow trees. SCC considers that both the field boundaries and the vegetation would need to be retained and safeguarded and welcomes that the Promoter's Design Parameters for the scheme, which includes the commitment to retention of field boundary trees and hedges.

10.8 The public amenity of the PRoW needs to be safeguarded. This should include appropriate buffers.

10.9 With regards to the parcel east of the A140, SCC welcomes the indicated buffer between the residential properties and the solar array but reserves judgement as to whether this is adequate in depth.

Area 2: Land north of Eye (Area 2 Eye);

10.10 SCC is concerned about the proximity of some of the solar arrays to the River Dove. Views of the arrays, both from the local road and a PRoW, are expected across the river valley from the east, which would erode the rural landscape character of the area.

10.11 SCC welcomes the buffers from solar arrays that have been included along Brome Avenue and The Avenue but considers that these are not sufficient in all areas. The structural planting proposed may detract from The Avenue itself. Further assessment will be required. The solar arrays also appear too close to Brome Hall Lane, where a greater distance and a secondary layer of hedging may be required to sufficiently screen the views to the solar arrays.

10.12 There is further concern with regards to the cable corridor between Area 1 and Area 2 across Brome Avenue, as this section is lined on both sides with mature trees and hedges. SCC considers that trenchless crossing techniques will be required in this area, and that this needs to be secured in the CEMP measures.

10.13 SCC is further concerned about the proposed access off Brome Avenue south of Brome Park Farm and requires further details demonstrating that this access would not have detrimental effects on Brome Avenue and its mature trees.

Area 3: Land north of Gislingham (Area 3 Gislingham);

10.14 SCC welcomes the environmental buffer that has been included to the north of Gislingham but queries the proximity of of the solar arrays to residential receptors north of Mill Street, at Little Green.

10.15 The new parcels west of Burgate Road broadly appear capable of mitigation, however there should be greater buffers to Burgate Road.

10.16 SCC remains concerned about the impacts and effects of the proposed infrastructure development on Collyer's Wood and Moatyard Plantation, and the effects on the local landscape character and the visual amenity along Burgate Road, which is not only used by cars but also as a recreational route by walkers.

10.17 Of particular concern is the proposal of a substation just south of the Moatyard Plantation, which is considered highly unsuitable.

10.18 A buffer and screen planting should also be considered along Mellis Road, leading north to Mellis Common, to alleviate the adverse visual effects on the residential property (Greens Farm) and for recreational receptors.

10.19 At Mellis Common, the Environmental Area at its western end is welcome but needs to be supported by structural planting to screen the proposed solar arrays to its west and north. The substations should be located at a suitable distance from existing and retained vegetation and any residential receptors.

10.20 SCC considers that the road through Mellis Common, which is a highly sensitive area, is wholly unsuitable to be used during construction as a haul and access route and needs to be descoped. This is supported by Figure 2.1 Overview of Environmental Designations.

Area 4: Land north of Occold (Area 4 Occold);

10.21 There is concern with regards to the openness of this landscape and the far-reaching views afforded by the undulating landform and with regards to the proximity of the potential solar arrays to the residential property in the south, the PRoW and the B1077.

10.22 This is an area, where landscape and biodiversity enhancements could be achieved through the creation of proportionate, landscape scale buffers linked by wildlife corridors. The existing vegetation and trees, for example along the northern stretch of the B1077 should be retained and enhanced.

10.23 Appropriate buffers will be required from the residential properties, the B1077 and the PRoW adjacent to and within the site. SCC (Landscape) welcomes the corridor for the existing PRoW, but is concerned that it is not wide enough.

10.24 One of the greatest concerns with this project in landscape and visual amenity terms, remains the connection of Area 4 to Area 2, crossing the highly sensitive river valley landscape, east of Eye. SCC welcomes that the option of a cable corridor south of Eye was descoped after the Non-Statutory Consultation but considers that the currently proposed route is equally unsuitable, not only in landscape terms, but also regarding ecology and archaeology/cultural heritage. Figure 2.1 Overview of Environmental Designations supports this, showing this area as largely within Flood Zone 3, near a Scheduled Monument and Listed Buildings.

10.25 The proposed corridor would lead through the Wooded valley meadowlands and fens landscape character type (Suffolk Landscape Character Assessment) (the same type as south of Eye) which is highly sensitive because of the intricate system of flood plain grazing marsh and tree-lined hedgerows and the potentially sensitive ecological and archaeological receptors. The listed building in proximity would have its setting impacted, and there would likely be significant adverse visual effects on receptors using the recreational route of the Mid Suffolk Footpath.

10.26 SCC considers that that Cock's Road is, in landscape terms, unsuitable as an access, haul route and/or cable corridor, because of its narrow width and the high volume of vegetation, particularly mature trees, on either side of the road, and that it therefore needs to be descoped. A haul route and cable corridor may need to be found further east through the more open agricultural fields. Trenchless crossing techniques may need to be considered where vegetated field boundaries need to be crossed.

Area 5: Land south of Thrandeston and north of Mellis (Area 5 Thrandeston and Mellis).

10.27 SCC welcomes the proposed Ecological mitigation area south of Thrandeston, but queries the location of a substation in close proximity to residential receptors and the railway line. Further information and assessment will be required.

10.28 SCC considers that the cable corridor needs to cross Mellis Road in such a way that mature trees will be retained. Where the corridor would need to cross the highly vegetated Green Corridor of Judas Lane/Green Lane, trenchless crossing techniques should be considered to maintain the connectivity of the wildlife corridor and visual amenity. There is an opportunity to extend the wildlife corridor to where Judas Lane meets Mellis Road again in the south.

Construction Strategy (Figure 2.3)

Potential access routes

10.29 SCC (Landscape) is concerned with regards to the potential access routes and required associated road works, as there is a high potential for mature trees (and hedges) being lost, both within and outside the highway boundary and the DCO limits.

10.30 In particular, the proposed primary access route from the A140 to Gislingham via Thornham Magna is wholly unsuitable in landscape terms, as it is a narrow road, which is in large sections lined with mature trees on either side. There is grave concern that the proposed access route would necessitate pruning, crown lifting or crown reductions and removal of numerous mature trees, which is unacceptable.

10.31 Equally unsuitable is the inclusion of Mellis Road, where it passes through Mellis Common, into the order limits. This is a significant historic common, a nature reserve, and also part of Mellis Conservation Area.

10.32 Along Brome Avenue, Eye and along Rectory Road between Brome and Upper Oakley grave concerns remain for the mature trees, where cable corridors cross and potentially construction access may be required. These are areas that are considered unsuitable for accesses and where trenchless crossing techniques should be considered for the cable installation.

10.33 The proposed route between Occold and the A140 would require careful management with regards to mature trees.

10.34 SCC requires further clarification as to which highways, other than those shown as potential access routes shown in the Construction Strategy, are considered for access purposes, both during construction and operation. There are numerous small and unclassified roads, which may not be suitable to serve as access routes, and where vegetation, including mature trees, could be impacted.

Potential Temporary Construction Compounds

10.35 Area 3. Locating a construction compound into the vicinity of the Moatyard Plantation, a Scheduled Monument north of Gislingham appears inappropriate, and SCC would require further justification in this matter.

10.36 Area 5. It will be important that the construction compound is located at a sufficient distance from the existing woodland.

Potential construction accesses

10.37 The potential construction accesses will need to be carefully considered and micro-sited to minimise adverse effects on existing vegetation, not only at the bell mouth locations, but also throughout the visibility splays. They should be further rationalised, in particular in Areas 1 and 2.

10.38 SCC would also request further information with regards to the potentially proposed highway improvements on the existing farm track leading south-east from Upper Oakley.

Intra- and Inter-cumulative effects

10.39 Potential harm to the natural environment will arise both from the construction and operation of this project itself, and from its in combination and cumulative effects with overlapping and consecutive projects, such as National Grid's grid reinforcement from Norwich to Tilbury. The ES will need to demonstrate a clear understanding of the wider development environment for their project, and the Promoter is expected to work with the Council and other solar and energy promoters, to manage and mitigate these impacts. It is critical that NSIP solar promoters consider the cumulative impacts of their project in combination with solar and other energy projects of any scale within the locality.

10.40 Any assessment of intra- and inter-cumulative effects with regards to landscape and visual sensitivity must consider that the receptors can move through the landscape (PRoW), that therefore sequential effects need to be assessed and that a series of non-significant effects can become significant in accumulation. The effects on the receptors are also not restricted to visual effects: Even, when the infrastructure is not seen, is the knowledge that the infrastructure is there (for example, behind screen planting) likely to affect how the landscape is perceived and valued.

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

Mitigation

10.42 As set out in the National Policy Statement EN-1, the County Council expects that project promoters will ensure the effective application of the mitigation hierarchy, including, were required, compensation measures.

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

10.44 While embedded mitigation will be essential to make the proposed scheme acceptable in landscape terms, the Mitigation Hierarchy will need to be applied in full, including compensation for impacts that result in adverse landscape and visual effects that cannot be avoided or mitigated through embedded measures.

10.45 Strategic landscape proposals are expected, and The Council welcomes the Illustrative Environmental Masterplan. The Council considers that this will need to be defined more clearly in order to integrate the requirements for of landscape and visual amenity with those of ecology, heritage (archaeology and settings of Listed Buildings) and recreation (PRoW).

10.46 To aid mitigation of the proposals an Environmental Colour Assessment (ECA) should be considered, to inform the choice of colours used for the built structures of the scheme.

10.47 For any mitigation planting proposals, it will be essential to apply realistic expectations to annual growth rates.

Aftercare

10.48 A dynamic and adaptive approach should be applied to aftercare and long-term management, which is focused on achieving the agreed mitigation and enhancement goals. This may result in extended periods of higher-intensity aftercare, and replacement planting, in areas where milestones are not met. The post construction monitoring of the effectiveness of all landscape and ecological mitigation and enhancements, including Biodiversity Net Gain, requires a robust mechanism, secured through the terms of the Development Consent Order, and relevant control documents. This will ensure that the agreed mitigation and enhancement goals are achieved.

10.49 It is always preferable that landscape and ecological mitigation and enhancements, once effective, should be retained beyond the lifetime of the scheme, and this should be secured through the terms of the development consent order, or by private treaty with the relevant landowners.

Design approach

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

10.51 Therefore, given the transformational nature of these developments, the Council considers it is essential for project promoters to take an exemplary approach to the design and construction of these schemes.

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

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

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

10.55 The Council expects the developer to apply the Mitigation Hierarchy in full. This includes (after avoidance, minimisation, and mitigation) compensation for residual adverse effects, which are significant in their own right or become significant in accumulation.

10.56 In addition, the Council has prepared some interim design principles, which should inform project promoters' thinking from the earliest stage.

Design Principles for siting and layout of panels battery storage and substations

10.57 Solar array parcels, substations, and battery storage, should be located to minimise or eliminate permanent adverse impacts on the fabric of the landscape, historic features and landscape character, or ecological features such as trees, hedges, woodlands, wetlands etc.

10.58 Solar array parcels, substations, and battery storage should be set out in such a way, as to reasonably accommodate the future growth of retained trees and allow for the effective management of hedgerows.

10.59 Landscape design should respond effectively to the character of the site and the receiving landscape, as well as effectively incorporating water management, ecological, archaeological, and public access requirements.

10.60 Whilst it is recognised that the design of most of the infrastructure for a project will be shaped by engineering necessity, the project promoter should identify any elements that are capable, in principle, of design treatment.

10.61 The siting of all infrastructure must protect residential amenity. It must not have, in line with the Lavender Test, an overbearing or oppressive impact on residential amenity.

10.62 Solar array parcels, cable corridors, substations and battery storage should be located to minimise or eliminate permanent adverse impacts on visual amenity and the setting of historic assets.

10.63 Harm to built heritage assets and their setting should be minimised, substantial harm should be avoided.

10.64 The potential of glint and glare on residential and other visual receptors will need to be fully assessed and designed out or appropriately mitigated.

10.65 Lighting should wherever possible be eliminated or minimised. Where lighting is necessary, light spill and sky glow should be effectively controlled.

10.66 Detailed scheme design should, during both the construction and operational phase, not add to local surface water or fluvial flood risk; or should provide an opportunity to eliminate such additional risks as may be created.

10.67 Detailed scheme design should achieve acceptable operational site access, and where required temporary construction access that can be reasonably remediated following commencement of site operation.

10.68 Any ecological impacts that cannot be mitigated within the red line area of the development will require effective mitigation elsewhere, as close as possible to the site.

10.69 Mitigation proposals, and biodiversity and environmental net gain measures, should be climate resilient, and, or, capable of adaptation to current and emerging climate change impacts.

10.70 The aftercare and long-term management of schemes should be outcome-led, rather than focused on time-limited aftercare-periods. This is particularly important, as successful mitigation is the essential basis on which the additionality of Biodiversity Net Gain can be achieved.

Design Principle for cable corridors, temporary haul routes, and construction access and laydown

10.71 All elements of a scheme, including cable corridors, associated haul routes, construction compounds and access points, should, actively seek to avoid, or minimise loss of, and adverse effects on, trees, hedgerows, woodland, and other landscape features, historic landscape character and wildlife.

10.72 Cable corridors associated haul routes, and construction compounds and access points should actively seek to avoid or minimise temporary adverse impacts on public and private amenity in respect of noise, dust, availability of rights of way and other disturbance.

10.73 Cable corridors, haul routes and construction access should be located and designed in such a way that they are capable of effective restoration.

10.74 Haul routes and construction access and site compounds must be designed and located they are designed in such as a way as to eliminate permanent harm, in particular, they should avoid the loss of trees.

Hedgerows and Important Hedgerows

10.75 It should be anchored in the ES and in the definitions of the DCO that “hedgerow” and “important hedgerow” have the meaning given in the Hedgerow Regulations 1997. Any important hedgerows that are to be removed should be listed in a Schedule (Removal of Important Hedgerows) and identified on an appropriate plan.

10.76 No works, including pre-commencement works, should be allowed to commence until full and complete hedgerow surveys have been carried out. This is necessary to inform the baseline against which Biodiversity Net Gain and the success of the LEMP would be assessed and to agree replacements as part of the landscaping scheme.

10.77 The Council considers that important hedgerows for the purposes of this scheme should include:

- Hedgerows meeting the Hedgerow Regulations, including the criteria for Archaeology, History, Wildlife and Landscape as listed in Schedule 1 of the Regulations.
- Hedgerows, where bat surveys identify 20 or more passes by bats the hedgerow should be considered important as a bat corridor.
- All hedgerows where one or more passes of a barbastelle have been recorded - due to the rarity of the species and margin for error in recording.

Hedges that perform an important visual function.

10.78 Any required hedgerow removal will need to be compliant with the Wildlife and Countryside Act 1981 which restricts the timings of this in relation to nesting birds. Also, as hedges are an invaluable habitat resource the removal of hedges, if required, must have a degree of control, suitable assessment and adequate mitigation, including that hedges can only be removed in accordance with any up-to date approved plans.

10.79 To enable full understanding and assessment of locations of important hedges, and areas, where either Horizontal Directional Drilling (HDD) needs to be undertaken, or offsetting of residual impacts needs to be agreed, The Council would ask the Promoter to:

- Append a column which identifies, by reference to the hedgerow regulations, why hedgerows are considered important.
- Display the above hedges on a colour – coded map of an appropriate scale, distinguishing between the different criteria and include the additional hedgerows covered by points 2 (bat passes) and 3 (visual importance) above.
- Confirm that the hedgerows in the cable corridor have been assessed against all the criteria in the hedgerow regulations, regarding, for example the presence of other protected species (Part II 6 (3)) and proximity to rights of way (Part II 8).
- Provide photos of each of the hedgerows which fall within the definition of 1, 2 and 3 above as and in accordance with point C. This will provide a reference for the baseline.
- Confirm which hedgerows the Promoter is proposing to HDD.
- Confirm how adverse impacts on hedgerows are minimised, for example by defining a minimised width for the cable corridor, when crossing hedges. This should be individual for each hedgerow (as circumstances may differ).

Trees

10.80 The Arboricultural Impact Assessment, which should be included in the ES, should provide full Tree Surveys in accordance with BS 5837:2012 Trees in relation to design, demolition and construction. These Tree Surveys should then be used to inform the detailed design stage and micro-siting of all works and required tree protection measures, such as protective fencing.

10.81 Ancient and veteran trees and ancient woodlands are considered irreplaceable habitats and landscape features and any impacts on these should be avoided.

10.82 Please note: All Category A and B mature trees (not only ancient and veteran trees) should be identified, if they are within a hedgerow or part of a group.

10.83 Post Consent, no works should be allowed to commence until a full Arboricultural Impact Assessment (including Tree Survey and Tree Protection Plan) and an Arboricultural Method Statement, (including location specific special construction method statements, where works are to be carried out within rootzones of trees that are to be retained) in accordance with BS 5837:2012 (or a subsequent version thereof) are submitted to and agreed with the relevant LPAs in writing.

10.84 There should also be an article in the DCO requiring powers to harm, damage or remove vegetation to only be used where necessary for the purposes of the authorised development. Specifically, this should involve proactive measures during delivery to minimise vegetation removal when finalising the design of the project, including the designs of temporary accesses.

10.85 No article in the DCO should automatically authorise any works to any tree subject to a tree preservation order. Such works, if demonstrated to be unavoidable, should be agreed with the relevant LPA on a case-to-case basis so that appropriate compensation can be agreed and secured.

Outline Landscape and Ecology Management Plan (oLEMP)

10.86 SCC welcomes the two-tier approach and the Promoter's commitment to providing one or more detailed LEMP(s) for approval, subject to receiving consent and secured through the DCO.

10.87 While the timeframe for BNG planting is 30 years, SCC considers that the planting in connection with the development will need to be maintained for the lifetime of the scheme, even if this is longer.

10.88 SCC welcomes the overarching objectives of the oLEMP and would be happy to further engage with the Promoter to translate these into tangible design principles for the submission stage. SCC would welcome if buffers from panel arrays, battery storage (BESS) and substations from landscape features, residential properties, PRoW (including permissive routes through the scheme) and public highways were to be agreed prior to submission.

10.89 SCC welcomes measures to avoid impacts (Section 4.4) and the Promoter's commitment to environmental-led design strategy and principles.

10.90 The design parameters at paragraph 4.4.4 are broadly welcome but will need to be scrutinised as to their effectiveness to avoid harm to existing landscape and ecological features. For example, it will need to be ensured that existing hedgerows and hedgerow trees not only are retained as far as possible but also provided with the potential for unrestricted future growth without negatively affecting the functionality of solar arrays, for example through shading.

10.91 SCC welcomes that paragraph 7.5.2 of the PEF (part 2) commits to providing an Arboricultural Impact Assessment and Method Statement. This must be carried out in accordance with BS 5837:2012 Trees in relation to design, demolition and construction or the document that succeeds it. Hedgerow surveys will also need to be carried out, and schedules provided for Important Hedgerows under the 1997 Hedgerow Regulations.

10.92 SCC would welcome clarification, through which control document protection measures for retained and planted vegetation, such as Tree Protection Plans and Planting Plans will be secured, and whether this will also influence where the baseline surveys, such as Tree and Hedgerow surveys will be placed. Paragraphs 4.4.6 and 5.2.1 imply that this may be within the oCEMP, oOEMP and oDEMP. However, there is only one reference to trees in the current oCEMP at BD15-CEMP, the wording of which is insufficient to adequately protect all vegetation that is to be retained. Likewise, Good Practice Measures are mentioned in two commitments of the oCEMP but not, as paragraph 4.4.6 of the oLEMP suggests, set out in any detail.

10.93 The oLEMP currently contains no prescriptions for re-instatement for any habitats and no details for aftercare and management. While the Contractor may be responsible for the implementation, establishment maintenance, management, and monitoring of all landscape and ecology reinstatement (paragraph 5.1.1), the framework for these needs to be set out and secured through the oLEMP.

10.94 Section 5.3 Monitoring and evaluation, 5.3.3 - Monitoring reports will need to be submitted to the relevant LPA at agreed regular intervals during the aftercare period of 5 years or until the planting is suitably established.

Outline Construction Environmental Management Plan (oCEMP)

10.95 Section 3.7 Control of light, SCC welcomes the control parameters which are set out to mitigate the effects of lighting on nearby ecological receptors. The 'Bats and Artificial Lighting at Night' ILP Guidance Note (2023) could have been referred to here, and SCC expects that it will be used for the lighting strategy in the oCEMP at submission.

10.96 In addition to the brightness/lux levels of luminaries, light colour temperature (K) should also be considered as part of the construction phase and operational lighting schemes. SCC welcomes lighting of 2700K and not exceeding 3000K.

10.97 The focus on ecological receptors is accepted, but residential receptors and even road users also need to be considered and protected. Assuming that a lighting strategy suitable for wildlife will also be suitable for human receptors may work in most scenarios. However, there need to be contingencies in place, for cases where human receptors are affected by the lighting. SCC would ask the Promoter to set out, how adverse effects on human receptors will be avoided, and how complaints will be addressed and resolved, should they occur.

10.98 Visual disruption caused by construction activities: While LV1 to LV3 CEMP are welcome, they are not sufficient to deal with wider landscape and visual impacts and effects and are at best a starting point. Equally the requirement for monitoring does not cover the aspects of the presented LV measures. SCC expects to see clear measures to minimise vegetation loss, accurate tree and hedgerow surveys, protection of retained features, replacement planting and compensation, where required (for example for the removal of veteran trees).

Comments on Mitigation Measures

10.99 BD4-CEMP: This should specify the timeframe for the pre-removal surveys.

10.100 BD15-CEMP: In order to align with the scheme's design parameters and vision, this measure needs to be applied to all trees, not just trees with roosting potential. The protection of trees, and hedgerows, is not only an ecological matter, but also a landscape and visual matter, as trees, and hedgerows, are important landscape features that contribute to the local landscape character and the visual amenity for local human receptors. The provision in this measure is insufficient.

10.101 TT3-CEMP: The creation of passing places or widening of the highway must avoid the loss of roadside vegetation, where possible. This should be anchored into this measure.

10.102 It should be anchored into the CEMP measures that Traffic Management Measures will be employed to actively avoid and minimise the loss of vegetation to accesses and haul roads, including through temporary traffic lights, reduction of the speed limit and site personnel.

Outline Construction Traffic Management Plan (oCTMP)

10.103 The objectives of the oCTMP should include the minimisation of impacts on trees and hedgerows, either as its own objective or as part of Objective C. (minimise the impacts both for the local community and visitors to the area).

10.104 Comment relates to Table 4-2 Potential access routes and locations for the Principal Area - All areas: this may be a typo and should probably read A140.

10.105 Comment relates to Table 5-1 Summary of construction traffic mitigation and management measures, and monitoring requirements - This should also include the potential impacts on existing vegetation.

10.106 Section 4.3.7 Construction vehicle routes – Table 4-2. Mellis Road, leading through Mellis Common, is, as stated previously, considered wholly inappropriate for construction traffic, as it is highly sensitive, which is expressed in the facts that it is included in the Mellis Conservation Area and that itis a Nature Reserve.

10.107 Section 5.6 Site access traffic management – SCC (Landscape) welcomes the use of existing field/ vehicle accesses where practicable. Going forward SCC (Landscape) would encourage the detailed access designs to consider the extent of vegetation clearance as part the access proposals and make use of management practices i.e. pruning, pollarding, crown lifting and selecting branch removal instead of blanket coppicing as means of achieving sufficient visibility splays associated with proposed temporary accesses.

10.108 Please see further comments on proposed construction routes above in relation to the Construction Strategy drawing.

Draft Outline Operational Environmental Management Plan (oOEMP)

10.109 Section 3.2.4, d. - SCC (Landscape) notes that no intrusive ground works would be required to replace the solar panels or BESS over the 40-year operational phase of the development. However, measures should be in place to de-compact soil, if this becomes necessary.

10.110 Section 3.2.8 - SCC (Landscape) notes the programme of maintenance visits which is expected to receive around five maintenance visits per month in the form of mostly LGV's. As for accessing underground cables, SCC (Landscape) would query whether any significant vegetation or ecological receptors which might have established over the top of the buried cables would need to be surveyed and assessed before works can be carried out excavating the buried cables.

10.111 Section 3.5 - Control of light – SCC welcomes the provisions set out within this outline plan in mitigating the effects of lighting i.e. light spill and glare on nearby receptors and that there will be no continuous lighting for any part of the project. The Light temperature (K) will also need to be considered for the operational lighting and its impact on sensitive ecological receptors. Levels of 2700(k) or less are preferred.

10.112 Section 3.9 Management of vegetation planting - It is welcome that this section clearly references the oLEMP and future detailed LEMP.

10.113 Section 3.11 Security – the provisions outlined in this section are broadly acceptable, including maximum height of 2m and 2.5m for fencing. The proposed fence colour (Moss Green) should be agreed with the relevant planning authority.

10.114 Table 4-7 Summary of mitigation and management measures, and monitoring requirements – Landscape and Visual Amenity - LV2-OEMP falls behind the vision of the project which aims to avoid the loss of trees and boundary features. SCC considers that this commitment needs to be stronger by deleting the words 'or reduce'. LV3 – OEMP is welcome but will need to be spelled out more. There should be defined buffers from landscape features. For example, the buffers from mature trees should enable further unhindered growth.

Draft Outline Decommissioning Environmental Management Plan

10.115 Table 4-7 Summary of mitigation and management measures, and monitoring requirements – Landscape and Visual Amenity needs to include provisions for making good, restoration and reinstatement within the development areas after infrastructure removal. Measures to adequately protect existing vegetation during decommissioning works should be included, which are comparable to those during construction. Should it become necessary to remove any vegetation, this will need to be appropriately reinstated and maintained until establishment is achieved.

10.116 SCC (Landscape) would appreciate further clarity on topics like soil management and traffic associated with the decommissioning phase of the development.

Draft Outline PRoW and Access Management Plan

10.117 Section 5.2 Design measures - From a Landscape and visual amenity perspective SCC (Landscape) considers that the PRoW corridors should be lined on either side with hedgerows that over time will screen or filter views of the development. To achieve this and retain an open corridor SCC (Landscape) considers that 10m buffers either side of PRoW should be the standard, and anything less should be reserved for highly constraint locations, where buffers of reduced depth can be justified.

Comments on Chapter 11 Landscape and Visual Amenity of the Preliminary Environmental Findings

10.118 Paragraph 1.11.1: LVIA usually stands for Landscape and Visual Impact Assessment rather than Amenity and should not be used here.

Design parameters

10.119 SCC welcomes many of the design parameters of the scheme and will endeavour to engage with the Promoter to further progress these.

10.120 For example, a 50m minimum distance of solar arrays from residential dwellings (PEF, paragraph11.3.2) would be considered the absolute minimum and would need to be subject to the consideration of several factors, which may in some circumstances, require a greater distance. A prime example would be the potential for glint and glare that might be experienced at the neighbouring residential dwellings, and the acceptable distance would need to be established through assessing the risk and exploring the options for mitigating it.

10.121 SCC welcomes that the design will aim to minimise potential construction effects; to position the development in the least prominent positions and wherever practicable; to maximise the distance from nearby visual receptors; to make use of existing natural features such as landform and vegetation to screen views; and avoid or minimise the loss of other existing landscape features of value, such as trees, woodland, and hedgerows wherever practicable. (paragraphs 11.3.5 and 11.3.6).

10.122 While it is welcome that vegetation losses will be minimised, and field boundary vegetation including trees largely retained and strengthened, SCC considers that it is unlikely that all infrastructure can be accommodated in and through existing gaps. SCC considers that Horizontal Directional Drilling (HDD) will have an important role to play to safeguard prominent landscape features.

10.123 SCC will comment of the design of the dispersed and larger substations in due course, as further information becomes available, but would welcome further engagement with the Promoter prior to a design freeze to agree design parameters to agree design parameters for these elements of the scheme.

Landscape and Visual Impact Assessment (LVIA)

Methodology

10.124 SCC would welcome if a detailed LVIA Methodology, which addresses previous comments, was to be made available for review and agreement prior to the assessment being carried out.

10.125 The preliminary findings for landscape and visual amenity are high level. Justification will need to be provided for the professional judgements made in the LVIA. This this applies particularly to the finding that there would be no significant effects on residential receptors, even though the proposed minimum distance to the development would be only 50m.

10.126 While it can be accepted that decommissioning impact and effects would be not significantly worse than construction effects, SCC does not accept that no further mitigation would be required. If, at decommissioning, vegetation needs to be removed, this would need to be re-instated.

Figures and Visualisations

10.127 Figure 11.1 Topography and Hydrology. SCC welcomes the information provided on this figure.

10.128 Figure 11.2 Landscape Designations and Public Rights of Way. SCC welcomes the information provided on this figure but considers an OS base map would be useful. The colours of the various rights of way seem pale and can be quite difficult to read.

10.129 Figure 11.3 Landscape Character Areas. In Area 2 there is a grey-shaded area along the River Dove, which seems to be missing from the key. SCC would welcome clarification.

10.130 Figure 11.4 Proposed Viewpoints. SCC welcomes the clarity and differentiation with regards to viewpoint cones but considers their size in relation to the scale of the map to be unfortunate, as they cover up a large area. SCC would suggest retaining the overall viewpoint map, as only this can show more remote viewpoints, but to also provide area-specific viewpoint maps at a larger scale. An OS base would also be preferable to the current base provided. It will be important to retain the legibility of PRoW in relation to the development and to the viewpoints.

10.131 Figure 11.5 Zone of Theoretical Visibility. Superimposing the Digital Surface Model and the Digital Terrain Model in tones of beige and brown makes this drawing difficult to read. It may be preferable to split these out. And an OS base map would be preferable to the currently used base map.

10.132 Figure 11.6 Assessment of Landscape Effects. SCC welcomes this visualisation of landscape effects.

10.133 Figure 11.7 Assessment of Visual Effects. SCC welcomes the visual summary of effects provided in this drawing. However, SCC considers that the scale and differentiation are insufficient. This information would be more useful, if it was provided for each area, on an OS base map. SCC also considers the list of receptor groups should include residential receptors and receptors at work.

10.134 The Project Visualisations are welcome in their clarity and for the information they provide. They are well annotated. The inset maps are sufficiently clear and well annotated to help orientation. An OS basemap would be preferred for the shown sections of the Environmental Masterplan.

- View A

  Appropriate.

- View B

  Appropriate.

- View C

  This view may be better located further north along the PRoW, looking across the valley and solar arrays or where Redlingfield Road turns east, looking north-west. The existing view would could be retained as an illustrative viewpoint showing effects from the village edge.

- View D

  The viewing cone does not represent the view, which is, as it should be, facing more towards the west. At the western end of Mellis Common an additional, closer view should be provided of the solar arrays to the north and west of the common, approximately where the PRoW leaves the DCO limits, looking west to north-east. The reason is the high sensitivity of this area and the cumulative impacts with Norwich to Tilbury.

- View E

  The elements of the proposed substation all appear to be housed, barely higher than the perimeter fence and kept in a muted grey. This does not align with the illustrations provided to show what the infrastructure could look like (for example in the Consultation Information Booklet, page 19).

SCC would welcome clarification. The marker for VP37 should be removed from the location map.

- View F

  The viewing cone does not quite align with the view shown. SCC queries whether this is the best location for a Type 3 or 4 visualisation, as visibility of the development would be limited from here. This could be retained as an illustrative viewpoint. An additional viewpoint could be provided along the PRoW which leads south-west from Stuston Lane (towards the existing powerline).

11 Public Health

Key Issues

11.1 The principal issues identified by Public Health relate to:

i) The scope and methodology of the Human Health assessment.

ii) The treatment of health inequalities, vulnerable groups and protected characteristics.

iii) The assessment, mitigation and monitoring of mental health and wellbeing effects, including cumulative effects arising from multiple infrastructure projects.

iv) The integration of findings from other technical disciplines including transport, socio economics, air quality and noise into the health assessment.

v) The mitigation, monitoring and management of health effects.

vi) Engagement with the Council and relevant stakeholders to ensure adverse impacts are avoided, assessed and mitigated as far as possible.

11.2 SCC (Public Health) considers that these matters should be addressed through the ES, however, should the Promoter wish to engage prior to submission, SCC would welcome discussion on these matters to clarify expectations and support the development of mitigation and monitoring measures.

Statement of Community Consultation

Adequacy of Consultation materials and information

11.3 The SoCC states in page 8 that “The PEI will be informed by the initial information compiled as part of the Scoping Report, Scoping Opinion received from the Planning Inspectorate, ongoing baseline surveys and feedback received through engagement with stakeholders.” However, there appear to be discrepancies between matters that the Promoter has treated as scoped out within the PEI and the position set out within the Planning Inspectorate’s Scoping Opinion.

11.4 For example, in relation to air quality impacts on human health for all project phases, the Planning Inspectorate states in 3.5.1 “The Scoping Report proposes to scope this matter out on the basis that effects on local air quality arising from fugitive emissions from dust, plant and other equipment are not expected to be significant. The report states that a construction dust risk assessment will be submitted as an appendix to the ES. The Inspectorate agrees that significant effects from dust are unlikely to occur and can be scoped out of further assessment, subject to the provision of the construction dust risk assessment being undertaken in line with relevant IAQM guidance and confirming that there is no potential for significant effects.

11.5 Regarding air quality impacts on human health from construction and decommissioning vehicles, the Inspectorate considers not enough information has been provided to scope this matter out at this stage. The ES should either provide an assessment of this matter or demonstrate why the number of vehicle movements would not lead to LSE on human health from changes to air quality."

11.6 The Planning Inspectorate outlines a similar position in 3.11.2 relating to Air quality impacts from construction vehicle emissions and 3.11.4 relating to Air quality – decommissioning impacts on sensitive receptors from dust and non-road mobile machinery (NRMM)/vehicle emissions, in each case concluding that "not enough information has been provided to scope this matter out at this stage".

11.7 In relation to traffic related effects on access and connectivity, paragraph 10.1.3(f) of the PEI states that "Impacts on access and connectivity due to traffic generated by all phases of the Proposed Development are agreed to be scoped out...". However, the Planning Inspectorate's Scoping Opinion appears to take a different position. At 3.5.7, the Planning Inspectorate notes that the Promoter's proposed approach is unclear and states: "Table 7.5 of the Scoping Report proposes to scope out an assessment of transport and access impacts on human health for the operational phase of the proposed development. This appears to contradict the corresponding text in Table 7.5 which states that on the basis that there is potential for traffic effects during all phases of the proposed development which may lead to adverse effects on population health and wellbeing, this matter is scoped in. As such, the promoter's proposed approach is unclear.

11.8 For the avoidance of doubt, the Inspectorate considers that this matter should be scoped in for all stages of the proposed development where likely significant effects could occur, or a justification should be presented in the ES as to why significant effects are not likely to occur." This suggests that the issue was not unconditionally agreed to be scoped out at the scoping stage.

11.9 Where environmental topics remain subject to assessment, or where further evidence is required before they can be scoped out, consultation materials should clearly communicate this position. Failure to do so risks consultees being provided with an incomplete understanding of the matters that remain under consideration, potentially affecting the ability of communities to engage meaningfully with the consultation process.

11.10 Meaningful consultation requires consultees to have access to sufficiently complete and accurate information to understand potential impacts and provide informed feedback. If environmental topics that remain under consideration in the EIA process are presented as having already been agreed or excluded, there is a risk that consultation responses will not fully address matters that remain relevant to decision making. The Promoter should therefore review all consultation materials and ensure that they accurately reflect the Planning Inspectorate's Scoping Opinion and clearly identify topics that remain subject to assessment.

Consultation Information Booklet not routinely distributed within the PCZ

11.11 The SoCC explains in page 14 that every home and business within the PCZ will receive a consultation letter, but that the Consultation Information Booklet will only be available at events, information points, online or on request by post.

11.12 Given the scale of the project, the geographic extent of potential impacts and the complexity of the information involved, SCC is concerned that households within the PCZ are not automatically being provided with the Consultation Information Booklet. The consultation letter is described only as a "high-level overview".

11.13 Many residents may not realise that further information is available or may be unwilling or unable to actively request additional documents. This risks reducing participation and creating unequal access to information, particularly amongst older residents, digitally excluded individuals, those with limited mobility, and people who may already feel overwhelmed by multiple concurrent infrastructure proposals.

11.14 SCC consider that the Promoter should provide the Consultation Information Booklet routinely to all homes and businesses within the PCZ.

Charge for hard copies of the PEI

11.15 The SoCC states in page 15 that "The consultation materials are available in hard copy for individuals at no extra charge (except the PEI – hard copies of which can be requested for a charge of £0.35 per page to cover printing and posting costs)."

11.16 Whilst SCC recognises that large PEI documents can be expensive to reproduce, the proposed charge could result in a substantial cost for consultees wishing to review the environmental information in hard copy. For some residents this may represent a barrier to participation, particularly for those on lower incomes, older residents, digitally excluded individuals and people who rely primarily on printed information.

11.17 The Promoter should therefore provide transparency regarding the basis upon which the charge has been calculated and demonstrate that the fee reflects actual reproduction and postage costs. Furthermore, SCC recommend that consideration should be given to whether the charge could be waived to ensure that cost does not become a barrier to meaningful engagement in the consultation process.

Nature of engagement and community wellbeing

11.18 Suffolk's Community Engagement and Wellbeing Supplementary Guidance[4] emphasises that consultation for projects of this scale should move beyond simply informing and consulting communities and seek to involve and collaborate with them wherever possible. The guidance highlights the importance of creating trust, supporting community wellbeing and enabling communities to influence the development of proposals.

11.19 The SoCC contains a number of commitments that consultation responses will be considered and may influence the ongoing design of the Proposed Development. For example, the Promoter states in page 9 that it will "take stakeholder and community input into account", page 8 "address feedback as part of design development", and demonstrate how feedback has "shaped and influenced" the proposals as detailed in page 18. However, the SoCC provides limited detail regarding the mechanisms through which feedback will be evaluated, how consultees will be informed of resulting changes to the project, or how ongoing engagement processes, including the Community Liaison Group, will influence project development prior to submission of the DCO application. Greater clarity on these matters may assist communities in understanding how their participation can shape the final proposals.

[4] https://www.suffolk.gov.uk/asset-library/community-engagement-and-wellbeing-policy.pdf

Quality of the Assessment

11.20 Public Health has concerns regarding the quality and robustness of the Preliminary Environmental Findings (PEF) Human Health chapter. While it is recognised that the assessment is preliminary in nature, and noting the Promoter's statement in Paragraph 10.1.4 that *"Full responses to comments received as part of the EIA Scoping Opinion will be provided as part of the ES submitted with the DCO application,"* the current assessment lacks sufficient clarity and robustness. In particular, the methodology is not described, the range of health determinants considered appears limited, and the assessment does not set out the regulatory, planning policy, or health assessment guidance that has informed its approach.

11.21 The assessment also lacks explanation of how findings from other technical chapters, including Air Quality, Noise and Vibration, Socio-economics and Transport and Access have been integrated into the Human Health assessment. Whilst the PEF identifies that a number of health relevant topics are assessed elsewhere, it does not demonstrate how those findings have informed the assessment of health outcomes, cumulative effects, health inequalities, or the overall significance of effects. As a result, it is not possible to understand how the various environmental and socio-economic effects have been considered collectively to reach the conclusions presented.

Regulatory, Planning Policy Context and Guidance

11.22 We would expect the PEF to identify and apply relevant guidance and policy, including:

- Overarching National Policy Statement for Energy EN-1[i]
- Overarching National Policy Statement for Renewable Energy Infrastructure EN-3[ii]
- Planning Practice Guidance, including healthy and safe communities[iii]
- The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017[iv]
- National Planning Policy Framework[v]
- IEMA's 2022 guidance on determining significance for human health in environmental impact assessment[vi]
- Wales Health Impact Assessment Support Unit[vii]
- Suffolk Community Engagement and Wellbeing Supplementary Guidance Document[viii]

Regional and Local Policy

11.23 The assessment does not reference the full range of relevant regional and local policy and evidence relating to human health. This should include, but not be limited to, the Local Planix, relevant Neighbourhood Plans, the Suffolk Health and Wellbeing Strategyx, and other local health strategies. The ES should clearly explain how these policies and strategies have informed the assessment, including how the current and future health needs of the local population have been identified and how the proposed development has considered and responded to those needs.

11.24 The baseline presented within the PEF also appears limited and does not demonstrate that it has been informed by a sufficiently comprehensive range of local public health evidence. Whilst Chapter 10 refers to Lower Layer Super Output Area (LSOA) data, rurality, age structure, deprivation, self-rated health, disability under the Equality Act, the Small Area Mental Health Index (SAMHI), employment and population trends, the considerations are not considered comprehensive and the assessment does not clearly demonstrate that the baseline has been informed by wider sources of local health intelligence. These should include:

- The Suffolk Joint Strategic Needs Assessment[xi] (JSNA)
- Suffolk Observatory[xii]
- Fingertips[xiii]
- The Public Health Outcomes Framework[xiv]
- The Suffolk Mental Health Needs Assessment[xv]
- Suffolk in 20 Years[xvi]
- Suffolk Air Quality Strategy[xvii]
- Local evidence relating to access to services
- The full range of Index of Multiple Deprivation (IMD) domains

11.25 Drawing upon these sources would provide a more robust understanding of local health needs, vulnerabilities and inequalities and ensure that the assessment reflects the best available evidence.

11.26 The assessment does not appear to consider the full range of protected characteristics defined by the Equality Act 2010[xviii], including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Public Health considers that the ES should clearly demonstrate how groups with protected characteristics have been identified and assessed, and how potential disproportionate effects have been avoided, reduced or mitigated where appropriate. The ES should also provide a more comprehensive population health and health inequalities profile to ensure that vulnerable groups, protected characteristics and the effects of rurality and access barriers are appropriately identified, rather than being obscured by broad conclusions that the local population generally experiences "*low levels of social deprivation and good physical and mental health.*"

11.27 The assessment lacks explanation as to how significance conclusions have been derived. The methodology should describe how factors such as the nature of changes to health determinants, whether effects are beneficial or adverse, duration, frequency, extent of exposure, sensitivity of affected populations, vulnerability, magnitude of effect and health inequalities have been considered in reaching significance conclusions. The text does not include a transparent assessment framework or methodology explaining how these factors have been combined through professional judgement to determine significance. Consequently, conclusions such as "*Moderate Adverse*" and "*Significant*" cannot be readily understood or scrutinised. The ES should include a clear methodology, supported by assessment criteria and significance matrices, to demonstrate how conclusions have been reached and to enable effective review and examination.

Consistency with the Planning Inspectorate's Scoping Opinion

11.28 Public Health notes that paragraph 10.1.3 presents several matters as "agreed to be scoped out" of the Human Health assessment. As mentioned above in regard to the Statement of Community Consultation, the Planning Inspectorate's position set out in the Scoping Opinion was more qualified than this wording suggests. For example, in relation to air quality impacts on human health for all phases (ID 3.5.1), the Inspectorate indicated that insufficient information had been provided to scope the topic out, stating further that "The ES should either provide an assessment of this matter or demonstrate why the number of vehicle movements would not lead to LSE on human health from changes to air quality.". PINS outline a similar position in ID 3.11.2 relating to Air quality impacts from construction vehicle emissions and ID 3.11.4 relating to Air quality – decommissioning impacts on sensitive receptors from dust and non-road mobile machinery (NRMM)/vehicle emissions, in each case concluding that "not enough information has been provided to scope this matter out at this stage", providing further guidance on ES provisions.

11.29 The Scoping Opinion adopts a similar position in relation to traffic related effects on access and connectivity. The Inspectorate notes that the Promoter's proposed approach is unclear and states in ID 3.5.7: "Table 7.5 of the Scoping Report proposes to scope out an assessment of transport and access impacts on human health for the operational phase of the proposed development. This appears to contradict the corresponding text in Table 7.5 which states that on the basis that there is potential for traffic effects during all phases of the proposed development which may lead to adverse effects on population health and wellbeing, this matter is scoped in. As such, the Promoter's proposed approach is unclear. For the avoidance of doubt, the Inspectorate considers that this matter should be scoped in for all stages of the proposed development where likely significant effects could occur, or a justification should be presented in the ES as to why significant effects are not likely to occur." This suggests that the issue was not unconditionally agreed to be scoped out at the scoping stage.

11.30 The PEF does not clearly demonstrate how these aspects of the Scoping Opinion have been addressed. In particular, it is not evident how the Inspectorate's concerns regarding air quality and transport related health effects have informed the scope of the Human Health assessment or whether sufficient evidence has since been generated to justify excluding any of these matters from further consideration.

11.31 Public Health therefore recommends that the ES avoids presenting these topics as having been unconditionally scoped out. Instead, it should clearly explain how the Inspectorate's Scoping Opinion has been addressed, with cross reference to the relevant technical assessments where appropriate, and provide a robust justification where any matters are proposed to be excluded from the assessment.

Scope of the Human Health Chapter, Paragraph 10.1

11.32 Paragraph 10.1.1 of the PEF identifies two health determinants as being scoped into the Human Health assessment: (a) community, identity, culture, resilience and influence; and (b) access to open space and nature. Public Health supports the inclusion of these determinants but considers that, on their own, they do not provide a sufficiently comprehensive assessment of the potential health and wellbeing effects arising from the proposed development.

11.33 The Human Health chapter should adopt a broader determinants-based approach consistent with recognised health impact assessment practice. A range of other factors have the potential to influence population health and wellbeing, including air quality, noise and vibration, ground and water contamination, transport and accessibility, healthcare and social infrastructure, employment and skills, climate change, and wider socio-economic effects. Whilst Public Health acknowledges that many of these topics are assessed within separate technical chapters, the Human Health chapter should provide a clear synthesis of those findings and explain how they have informed the overall assessment of health outcomes, cumulative effects, health inequalities and the significance of effects.

11.34 Public Health also notes that mental health has not been assessed as a distinct health outcome, with elements instead incorporated within the determinant relating to community, identity, culture, resilience and influence. In our view, this does not adequately reflect the range of pathways through which the Proposed Development could affect mental health and wellbeing. For example, changes to access to healthcare and other community infrastructure, disruption arising from traffic, noise and vibration, even where these remain within statutory thresholds, and prolonged uncertainty associated with the planning and construction phases may all contribute to stress, anxiety and reduced wellbeing, particularly for vulnerable individuals and those with sensory sensitivities. The assessment should also clearly set out the cumulative mental health effects arising from multiple infrastructure projects in the area.

11.35 Public Health therefore recommends that the ES adopts a more comprehensive assessment of health determinants and clearly identifies how each determinant influences population health, which groups may be disproportionately affected, and how these findings have informed the identification of mitigation and enhancement measures. Without such an integrated approach, there is a risk that health effects become fragmented across individual technical chapters and that cumulative, indirect and health inequality impacts are not fully identified or assessed.

Existing conditions on site, Paragraph 10.2

11.36 Public Health notes the baseline information provided in section 10.2. The acknowledgement at paragraph 10.2.12 that population growth, particularly among older age groups, may increase demand for health and social care services, and that existing health inequalities may remain constant or deepen, is particularly relevant.

11.37 Whilst it is unclear what sources have been used, and without awareness of the Promoters methodology for assessment, the conclusion in 10.2.3 that the population generally has low levels of social deprivation and good physical and mental health should be treated with caution. Area level averages can mask localised vulnerabilities, particularly in rural areas where barriers to services, transport dependence, digital exclusion, older age profiles and long-term conditions may not be fully reflected by headline deprivation or health indicators.

11.38 Paragraph 10.2.8 notes that 18% of the study area population is considered disabled under the Equality Act, with 10.2.12 indicating that population growth, including amongst older age groups may increase demand for health and social care services. Public Health considers that these baseline findings should be carried through more specifically into receptor sensitivity, significance judgements and mitigation. The ES should explain how older people, disabled people, people with existing physical or mental health conditions, residents without access to a private vehicle, digitally excluded residents and people affected by rural isolation may experience impacts differently.

11.39 This is particularly important because several pathways identified in the assessment, including traffic disruption, access to open space, noise, community identity and perceived control, are likely to be experienced unevenly across the population. The ES should therefore include an Equality Impact Assessment, showing how vulnerable and protected groups have been identified and how this has influenced mitigation, engagement and monitoring.

11.40 The baseline lacks wider consideration of population health indicators that have direct relevance to vulnerability and health inequalities. Examples include prevalence of long term health conditions, multimorbidity, dementia prevalence, frailty indicators, unpaid caring responsibilities, ethnicity, access to healthcare and social care, travel times to key services, car ownership, access to public transport, digital exclusion, fuel poverty, social isolation and loneliness. These factors are particularly relevant within rural Suffolk and may influence both sensitivity to impacts and the ability of communities to adapt to or mitigate disruption arising from the proposed development.

11.41 In respect to Paragraph 10.2.9, as indicated in our scoping response, we do not consider that SAMHI alone is sufficient to fully characterise mental wellbeing impacts. SAMHI provides a useful baseline, it does not capture sub-clinical distress, stress related to environmental change, or community level psychosocial effects and as such, we expect the ES to provide much greater consideration for baseline and assessment through all phases of development. It is suggested that locally relevant mental health indicators could support a comprehensive understanding of baseline conditions and service pressures. For example, data sources such as the Public Health Adult Psychiatric Morbidity Survey (APMS)xix, NHS Talking Therapies (IAPT) dashboard data (e.g. access, recovery rates, waiting times)xx, Secondary care mental health access / activity dataxxi, or the Mental Health Services Dataset (MHSDS)xxii could provide valuable insight into underlying levels of need, service utilisation and potential capacity constraints.

Design Principles, embedded and good practice measures, Paragraph 10.3

11.42 The section identifies design principles and broad management measures, including maintaining PRoW access or providing new permissive paths where possible, and using management plans to address dust, noise and traffic. The chapter does not however distinguish between embedded mitigation, standard good practice mitigation and additional mitigation required in response to significant health effects. The draft oCEMP contains some relevant measures, including stakeholder communications, a Dust Management Plan, inspections, complaints logging and responsibilities for air quality and dust management, but the Human Health chapter should more clearly explain which mitigation measures are relied upon for each health pathway and whether additional mitigation is required where significant adverse effects are expected to remain.

Preliminary assessment of effects, Paragraph 10.4

11.43 The limited baseline has implications for the preliminary assessment of effects presented in section 10.4. Whilst the assessment identifies effects in relation to community identity, culture, resilience and influence in paragraph 10.4.10, there is limited evidence demonstrating how the vulnerability of different population groups has informed the assessment. For example, the assessment does not appear to consider how impacts may differ for older people, disabled people, those with long term health conditions, carers, people facing access barriers to healthcare and social infrastructure, or communities experiencing rural isolation. Without this evidence, it is difficult to understand how significance conclusions have been reached for different population groups or how health inequalities have influenced the assessment.

11.44 The consideration of vulnerable sub-population groups should be included and evidenced in the Environmental Statement in accordance with the ISEP (formerly IEMA) *Determining Significance for Human Health in Environmental Impact Assessment guidance* which the Promoter stated would be applied to the proposed health assessment methodology in the Scoping Report[5]. This is detailed in several places by ISEP in that guidance document such as chapter 5. Moreover, paragraph 9.9 of Annex 2 provides a worked example whereby consultation feedback informs the determination of significance for an effect among vulnerable groups. It is, therefore, vital that the Promoter considers consultation feedback in its assessment of impacts of vulnerable sub-populations, especially where there is a lack of existing available evidence of the presence of certain vulnerable groups.

Health Inequalities

11.45 The baseline presented in section 10.2 provides some relevant information, including rurality, age structure, self-rated health, one aspect of disability under the Equality Act, SAMHI and some population trends. However, it does not provide a sufficiently detailed inequalities profile for the affected communities. In particular, the assessment does not consider the range of indicators needed to understand differential vulnerability, including:

- Income
- Employment
- Long term health conditions
- The challenges associated with rural communities
- Specific characteristics including those protected under the equality act 2010
- Mental Health conditions

- Age
- Vulnerable groups (such as migrants or Gypsy, Roma & Traveller communities)
- Multimorbidity
- Dementia
- Frailty
- Unpaid caring responsibilities
- Ethnicity
- Access to healthcare and social care
- Travel times to key services
- Car ownership
- Public transport availability
- Digital exclusion
- Fuel poverty
- Social isolation and loneliness

11.46 Health inequalities are avoidable and unjust differences in health outcomes between groups of population groups. Health inequalities affect some communities more than others, contributing to poorer health and shorter lives for those who are most disadvantaged. Public Health considers that health inequalities have not yet been given sufficient attention within the Human Health assessment. The Promoter should use and clearly set out data and evidence to understand existing health inequalities within the affected communities, identifying which groups may be particularly vulnerable to the impacts of the proposed project, and assess how those inequalities may be affected during construction and operation. Notwithstanding this, Chapter 10 states that "existing health inequalities are expected to remain constant or deepen, with continued higher levels of multiple health conditions in poorer areas", but the assessment does not then clearly explain how this finding has influenced receptor sensitivity, significance judgements, mitigation or monitoring.

[5] https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110019-000008-EcoPower%20Suffolk%20Solar%20EIA%20Scoping%20Report%20Part%201%20-%20Main%20Report%20and%20Appendices%20A%20to%20J.pdf

11.47 Public Health raised this issue at scoping stage, noting in Paragraph 12.3 that 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. Public Health also identified in Paragraph 12.10, the need to consider deprived communities, people with pre-existing long term conditions and rural populations facing pronounced access challenges. These concerns remain relevant, the ES should therefore draw on locally specific sources as listed above.

11.48 Public Health reiterate that the ES should include an Equality Impact Assessment to qualify differential and disproportionate impacts and to identify both positive and negative impacts so that negative consequences can be eliminated or mitigated where possible.

Mental Health and Wellbeing

11.49 Public Health welcomes Paragraph 10.1.6 items (a)-(c) acknowledging concerns raised by Thrandeston Parish Council, Yaxley Parish Council and SCC regarding traffic, noise, vibration, loss of PRoW, visual impacts, property related concerns, cumulative effects, prolonged uncertainty, sense of place, identity and perceived control and mental health. However, the Promoter does not go on to meaningfully indicate how these considerations have been applied to the assessment.

11.50 Paragraph 10.1.7 explains that the assessment adopts the WHO definition of health, which includes the definition of health to be “a state of complete physical, mental and social wellbeing”, Public Health suggest that health determinants should be separated for focus, not summarised under holistic terminology through concern that specific effects and impacts could be overlooked. This should include physical health, mental health, social wellbeing separately from the proposed determinants detailed in 10.1.1 (a) and (b). Further, it is expected the Promoter will consider cumulative effects, both inter and intra in comprehensive detail within the ES.

11.51 Whilst the Promoter acknowledges concerns relating to mental health and wellbeing in Paragraph 10.1.6 and identifies significant effects relating to community identity, culture, resilience and influence at Paragraph 10.4.10, mental health is not assessed as a distinct health outcome and is instead incorporated within a broader determinant framework. In SCC's view, mental health and wellbeing represent a central consideration for this project, particularly given the potential for effects to arise through multiple pathways including changes to community identity and sense of place, impacts on access to open space and Public Rights of Way, perceived loss of control, prolonged uncertainty, cumulative infrastructure development and changes to local environmental conditions. Public Health does not consider that the PEF provides sufficient consideration of, or weight to, mental health and wellbeing. Therefore, SCC considers that the ES should provide a substantially more comprehensive assessment of mental health and wellbeing effects, including cumulative effects, the implications for vulnerable and disadvantaged groups, and the effectiveness of proposed mitigation and monitoring measures.

Consultation and Engagement as Mitigation

11.52 Public Health welcomes the recognition in Paragraph 10.3.5 10 that consultation and engagement can help reduce anxiety arising from uncertainty. The oCEMP proposes a Stakeholder Communications Plan, a complaints procedure, a display board, website information, a Community Liaison Officer and continuation of the Community Liaison Group through construction. These measures are relevant to public health because timely information, accessible engagement and responsive complaints handling can help reduce uncertainty and perceived lack of control.

11.53 Public Health considers that the ES would benefit from a stronger commitment to meaningful, wellbeing focused engagement throughout the lifecycle of the Project. In particular, the Promoter is encouraged to have regard to Suffolk County Council's Community Engagement and Wellbeing Policy, which recognises that effective engagement is not simply a mechanism for sharing information, but can itself be an important determinant of health and wellbeing through promoting trust, participation, empowerment and community resilience. The ES should therefore demonstrate how engagement activities will be inclusive, accessible and responsive to community concerns, including those of seldom heard groups, and how feedback will influence project design, mitigation, construction management and ongoing community relations.

Access to Healthcare, Social Care and Other Social Infrastructure

11.54 Public Health notes that paragraph 10.1.3 scopes access to healthcare, social care and other social infrastructure out of the Human Health assessment and states that the Socio-economics chapter of the ES will assess potential impacts of construction workers on the local housing rental market and services. PINS agreed to scope this matter out of Human Health on the basis that the ES considers the potential impact of construction workers on capacity of local accommodation and services.

11.55 Public Health accepts that detailed consideration may sit within the Socio-economics chapter of the ES, but considers that the ES should not reduce this issue solely to construction workforce demand. Access to healthcare and social care is a material determinant of health in rural areas, particularly for older people, disabled people, those with long-term conditions and those reliant on private vehicles or limited public transport. The ES should therefore clearly demonstrate how healthcare and social care accessibility has been considered, including travel times, construction-related road disruption, cumulative effects with other projects, access for community health and care staff, and potential effects on vulnerable residents.

Public Rights of Way, Open Space and Nature

11.56 Public Health welcomes access to open space and nature as scoped into the Human Health assessment and that Chapter 10 recognises significant effects on PRoW/open space access in paragraph 10.4.18. This is important because PRoW and countryside access support physical activity, social interaction, local identity and mental wellbeing.

11.57 However, the ES should assess not only whether physical access is maintained, but also the quality and usability of that access. Temporary diversions, construction activity, traffic, noise, visual change and perceived safety issues may reduce the wellbeing value of routes even where access remains technically available. The oCEMP states that PRoW will be managed in accordance with the oPRoWAMP (SE3-CEMP) and that existing access to community facilities/assets will be maintained or a suitable equivalent provided (SE1-CEMP). Public Health recommends that the ES clearly demonstrates how PRoW mitigation will protect accessibility, user experience, tranquillity and perceived safety for a range of users, including older people and disabled people.

Working Hours and Community Respite

11.58 Public Health welcomes the proposed core construction working hours of 08:00–19:00 Monday to Friday and 08:00–13:30 on Saturdays, with activities required outside these hours secured through written approval from the local planning authority. Predictable periods of respite are important for health and wellbeing, especially where construction is prolonged and communities may be affected by multiple infrastructure proposals and Public Health feel these hours offer such protections.

11.59 Public Health recognises that some activities, including HDD, abnormal load deliveries, concrete pours, nighttime cable works or emergencies, may require activity outside core hours and public health agree it is appropriate for these exceptions to be agreed with the LPA.

Cumulative Health Effects

11.60 Public Health considers cumulative effects to be a particularly important issue. PINS required the ES to provide a robust justification for the cumulative effects assessment study area, identify all cumulative developments, and make efforts to agree the cumulative schemes with relevant consultation bodies.

11.61 SCC consider that the ES should provide comprehensive assessment of cumulative impacts in respect to human health, considering overlapping or sequential construction periods, traffic impacts, access to services, disruption to open space and PRoW, mental wellbeing, community identity, perceived control and cumulative anxiety from multiple infrastructure proposals. This should include consideration of how cumulative impacts may fall unevenly on smaller rural communities, vulnerable groups and those with limited transport options.

Noise and Vibration

11.62 Noise and vibration matters, including compliance with relevant standards, thresholds and guidance, falls principally within the remit of Environmental Health. Public Health does however have an interest in the way that noise, vibration and associated disturbance may influence health and wellbeing outcomes across the population, particularly where effects may be experienced unevenly by different groups.

11.63 The PEF does not acknowledge that some groups may be more sensitive to noise and vibration than the general population, nor does the assessment clearly explain how differential vulnerability has been considered within the assessment of effects. This may include, for example, older people, disabled people, those with existing physical or mental health conditions, and some neurodivergent individuals or people with sensory sensitivities who may experience environmental noise, vibration and disturbance differently.

11.64 Susceptibility to noise, vibration and associated disturbance is not uniform across the population. The assessment should have therefore explained how receptor sensitivity, significance judgements and the identification of any residual uncertainty has been informed, recognising the potential for impacts to be experienced disproportionately and to contribute to existing health inequalities.

11.65 The assessment should have demonstrated that potentially vulnerable groups have been identified and considered, and that mitigation, communication and engagement measures have been developed with their needs in mind, to support the objective of avoiding or reducing disproportionate effects on population health and wellbeing. Public Health considers it essential that these omissions are addressed through the ES and supporting management plans.

Draft Outline Construction Environmental Management Plan

11.66 As noted above, the PEF Paragraph concludes moderate adverse significant effects in 10.4.10 on community identity, culture, resilience and influence, and temporary moderate adverse significant effects at 10.4.18 from impacts relating to Public Rights of Way. Despite this, Public Health note that the Management Plan does not currently include any specific arrangements for monitoring health and wellbeing outcomes. Whilst this may be proportionate at the PEF stage, pending completion of the Environmental Statement and supporting assessments, Public Health considers that the identification of significant health effects provides a clear justification for Health and Wellbeing Monitoring. Public Health therefore recommends that a proportionate Health and Wellbeing Monitoring Plan is secured and implemented by the Promoter, or alternatively delivered by Suffolk County Council through an Promoter funded arrangement. Monitoring should incorporate both physical and mental wellbeing considerations, with clear reporting routes, defined review points and mechanisms to identify emerging community concerns. Such a framework could draw on information received through complaints procedures, stakeholder engagement and Community Liaison Group discussions.

12 Public Rights of Way

Key Issues

12.1 SCC PRoW considers that the following key issues require engagement prior to submission to reach agreement as far as possible:

- Assessment methodology relating to the production of the Environmental Statement, including sensitivity of receptors, evidence base and estimation of significance of effects.
- Wording of the Outline Public Rights of Way and Access Management Plan (OPROWAMP) to mitigate adverse impacts as far as possible.
- Improvements to the local PRoW network to offset adverse impacts.

Planning Policy

12.2 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

12.3 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."

12.4 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.

Public Rights of Way (PRoW) to be assessed in its own chapter

12.5 The County Council's clear preference therefore is that Public Rights of Way and amenity should be dealt with in their own chapter of the environmental impact assessment in order that the impact of a scheme on the rights of way network and its receptors can be properly understood, including the interactions between different parts of the scheme, both temporally and spatially. The county council considers it a failure if PRoW and amenity is not addressed holistically.

12.6 The County Council considers that this approach is appropriate and reasonable because public rights of way have unique additional characteristics that are not generally shared with other highways. Specifically, they make a significant contribution to the local communities' sense of place, mental health, physical health, and overall well-being.

12.7 In addition, the contribution that public rights of way make to community access and sense of place have an important relationship to the offer and function of the visitor economy, particularly in rural areas of Suffolk where economic activity beyond food production and processing is limited.

12.8 Therefore, whilst public rights of way do form part of the whole transport network, they have a unique function and relationship to people and place, that the county council considers should be effectively evaluated by project promoters. This will ensure the impacts are properly understood and weighed in the planning balance, and effective mitigation measures can be designed and delivered to maintain, and where appropriate enhance, these unique characteristics and contribution to Suffolk's countryside and communities.

12.9 The County Council considers that the effective evaluation of impacts, both temporary and permanent on the public rights of way network and its receptors, is particularly important for very large projects such as but not limited to, solar energy schemes and transmission infrastructure, as these projects are likely to have widespread impact across the public rights of way network during operation and construction respectively.

12.10 The impact assessment must reflect the cumulative impact of multiple closures or disruptions to the green access and amenity value from works within the application but also from other large developments and NSIPs within the area. It will be unacceptable for users to lose their amenity by the effective sterilisation of an area due to closures and disruptions from multiple or concurrent developments or works.

12.11 SCC expects the Promoter to consult the following guidance when writing the ES: https://www.suffolk.gov.uk/asset-library/green-access-prow-guidance.pdf

Preliminary Environmental Findings

12.12 13.4.6. refers to engagement with SCC PRoW Manager with regards to routes. SCC PRoW as the local highway authority PRoW will welcome engagement on and not limited to, routes, surveys (locations, days/times, methods), road safety audits on diverted PROWs on or new to carriageways, diversion routes, closures and permissive paths.

12.13 13.4.15 with regards to permissive paths, SCC PRoW as the local highway authority PRoW, would wish to be included in any consultation and we request clarity on how any permissive paths will be secured in the DCO, along with associated signage, waymarking and surfacing.

12.14 Table 14.1 There are quite a few assumptions on no significant effects on PRoW in the table, especially with regards to Safety, amenity and fear and intimidation. Whilst the HGVs are to use main roads as per the construction strategy figure 2.3, some of the minor roads linking the classified roads to the site access points are single track roads with high banks with little to no step off areas. These roads are often used to link PRoW. For example, Cocks Road, Eye. These routes should be designed out the application or suitable mitigation found to ensure safety and amenity to PRoW users.

Improvement to the PRoW network

12.15 Based on the information provided at this time, there is a high likelihood that there will be substantial adverse impacts on, and not limited to:

i) Stuston W-505/006/0 needs to keep hedging along this corridor, as provides a welcome shelter from the heat on hot days. If this hedging is removed, mitigation should be provided to provided alternative shaded routes for PRoW users.

ii) Eye W-239/019/0 is in a very corridor between proposed solar panels and Brome W-165/006/0 is not clearly shown on the plan as to how close the panels are to the PROW and the plantation. This may mean that PRoW users will have close proximity to panel arrays. If the recommended clearance widths as quoted in our solar guidance cannot be adhered to, other mitigation should be provided for PRoW users such as alternative permanent routes.

iii) Brome W-165/007/0 is along an access track that may be used as a construction access. If this is to be used for HGV's what mitigation is being provided to mitigate fear and intimidation of construction vehicles, can alternative permanent routes be provided to give PRoW users a safe route to walk for health and wellbeing.

iv) Cock's Road, if used as a cable route, would be substantially impacted for a prolonged period of time and would have to be restored to a satisfactory condition.

v) The Mid Suffolk Footpath runs through Abbey Farm and the historic priory. This area has extensive views from the promoted long-distance trail and SCC PROW would recommend looking at alternative routes to avoid disturbance to this area with its long views over the water meadows to the church and beyond.

vi) Burgate W-172/022/0, W-172/034/0 and W-172/035/0 need consideration due to being bridleways and BOATS with regards to user types. Horse riders and cyclists will require higher mitigation and wider corridors during construction due to noise and disturbance, especially to horses by construction traffic. Please refer to BHS guidance re construction.

vii) Yaxley W-583/004/0 and Thrandeston W-522/011/0 need consideration due to being bridleways with regards to user types. Horse riders and cyclists will require higher mitigation and wider corridors during construction due to noise and disturbance, especially to horses by construction traffic. Please refer to BHS guidance on construction.

viii) Thrandeston Bridleway W-522/011/0 is totally encompassed in the DCO order limits for the corridor. This route is one of very few in the area and needs to be diverted and not temporarily closed. Any diversions where they emerge onto the highway will need an RSA. The loss of amenity here along with the closeness of the array panels, loss of views and sense of space will require extra mitigation and new permanent routes to mitigate the losses to a bridleway which can be used by pedestrians, cyclists and horse riders.

12.16 These impacts are unlikely to be adequately mitigated. Therefore, **SCC considers that the potential for a s.106 agreement** should be explored to allow the project to improve the PRoW network outside the Order Limits. This should be discussed with SCC prior to submission of the application to ensure suitable enhancement measures are included with the application submission.

Outline Public Rights of Way and Access Management Plan

12.17 The draft outline public rights of way and access management plan have been provided to set out a framework for the management of walking, cycling and horse riding through each phase of the development.

Introduction

12.18 1.1.2 states a key objective is to keep the PRoW open and safe at all times which is to include permissive paths. SCC PRoW as the local highway authority supports this approach over closures.

Methodology

4.2 Assumptions

12.19 Uses the term 'stopping up'. SCC PRoW as the local highway authority seek clarity on this terminology. Are paths being 'stopped up' or temporarily being closed and diverted where due to safety reasons a route cannot remain open or have managed temporary closures. Any diversion routes where they interact with motorised traffic, should have a road safety audit undertaken to assess any potential risks with that diversion route.

Identification of PRoW

12.20 As requested in the EIA from SCC PRoW, the legal record for PRoW, the Definitive Map & Statement is held by Suffolk County Council and so the promoter must request the digital data directly from the county council (definitivemap.enquiries@suffolk.gov.uk). The other sources may have useful information, however the definitive maps for Suffolk are held by the above team.

12.21 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.

12.22 The information in table 4.1 is welcome, however it does not cover some promoted routes around Gislingham and Hoxne.

12.23 These routes can be found here: https://www.discoversuffolk.org.uk/walk/treasured-suffolk-hoxne/ and https://www.discoversuffolk.org.uk/walk/gislingham-circular-walks-walk-1a/

12.24 And all other local promoted routes can be found on our interactive map here: https://www.discoversuffolk.org.uk/explore-suffolk/

Mitigate and Management

12.25 5.1.1a mentions the term temporarily stop up, would this be better phrased as temporary closure with diversions.

12.26 5.2.1 states a 5m buffer, this is contrary to SCC PRoW Solar position statement which requests a 10m buffer from edge of PRoW to avoid tunnelling form fencing and allows for growth of planting.

12.27 5.3.1 All signage should be notified and prior agreed with the local highway authority in a timely manner prior to works.

12.28 5.3.2 should include Suffolk County Council as well as Norfolk County Council.

12.29 SCC PRoW would seek to work with the promoter when reviewing any closures and diversions to the PRoW network to be included in the emerging PRoW management plan, to ensure user safety and the PRoW network remaining as open and accessible, as is practicably possible. SCC PRoW needs to prior agree the PRoW survey areas, with regards to locations, days, times, how and where they are positioned.

12.30 Along with our landscape officer comments, all PRoWs visually affected/impacted during construction, decommissioning and usage in between, should be provided.

Cumulative Impact

12.31 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.

12.32 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.

12.33 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.

12.34 The impact of light, glint and glare must be considered with regards to the impacts on the Public Rights of Way.

12.35 It has not been set out as to how these or the connecting public rights of way will be affected and for how long.

Landscape and visual amenity scope and methodology

12.36 The use of yellow on the maps figures 2.2 a-e is very hard to read with the other colours, especially when other colours are overlaid above them. Could the same colour convention as the OS maps be employed, such as green.

12.37 The map scale is also not a scale that can be easily measured to assess the widths of corridors being proposed.

Public Rights of Way Addendum 1

Principles for working with Public Rights of Way
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:

- 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.

- 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).

- 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).

- 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.

- 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.

- 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.

- Pre-construction works must not obstruct or disturb any public rights of way (e.g., newt 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.

- 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.

- 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.

- 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.

- The location of alternative routes to be agreed with the Council.

- Any alternative route must be safe and fit for the public to always use – suitable surface, gradient and distance with no additional road walking between the natural destination points.

- 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.

- 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.

- 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.

- Drainage provision must be taken into account to prevent potentially serious effects on the PRoW.

Public Rights of Way Addendum 2

Suffolk County Council

Public Rights of Way and Solar Farms - Position Statement

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

PRoW are divided into the following classifications:

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

All recorded PRoW are shown and described on the Definitive Map and Statement, together forming the legal record of all currently recorded PRoW. They are available to view as PDFs divided into parishes at https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/view-definitive-maps-of-public-rights-of-way/. There may be other PRoW that exist which have not been registered on the Definitive Map. These paths are either historical paths that were not claimed under the National Parks and Access to the Countryside Act 1949 or since, or paths that have been created by years of public use.

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

1. Early contact and discussion with the Green Access Team is essential to allow for best practice to be followed in developing new sites.
2. Applications for planning permission should include full information about PRoW in and around the site, including a plan showing the local PRoW network and how it interacts with the proposals. They should also include full information about the cumulative effects of other similar applications and sites in the area.

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

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

5 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, as per the example shown in Image 1 below:

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

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

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

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

9 Where site access tracks will intersect with PRoW, particularly during construction, the safety of people using the PRoW must be ensured. Management measures must be put in place to control construction traffic, e.g. employing banksmen, temporary closures with a convenient alternative route provided etc. All measures must be agreed with the Rights of Way & Access Team. All efforts must be made to avoid damaging the surface of the PRoW, and any damage caused must be rectified at the earliest opportunity so that the surface is commensurate with the use of the PRoW (e.g. for a footpath it must be suitable for pedestrians to use it safely, for a bridleway it must be appropriate and safe for pedestrians, horse riders and cyclists etc).

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

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

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

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

For further information and advice about public rights of way please contact:

Rights of Way & Access Team, Growth, Highways and Infrastructure, Suffolk County Council, Phoenix House, 3 Goddard Road, Ipswich IP1 5NP. PROWplanning@suffolk.gov.uk

13 Skills and Economic Development

Key Issues

Workforce demand and labour market assessment

13.1 Provision of a detailed workforce assessment covering construction, operation and decommissioning phases, including workforce numbers, occupations, skills requirements, labour sourcing assumptions, accommodation requirements and local employment opportunities.

Alignment with SCC Supplementary Guidance

13.2 Application of SCC's Energy and Climate Adaptive Infrastructure Policy Supplementary Guidance, including the probability-based methodology for workforce and supply chain assessment and the use of appropriate local, regional and cumulative assessment geographies.

Cumulative labour market impacts

13.3 Assessment of cumulative workforce, skills and accommodation effects arising from EcoPower alongside other major infrastructure projects in Suffolk and the wider East of England, including Sizewell C, Sea Link, LionLink, East Anglia ONE North, East Anglia TWO, Nautilus and other relevant energy projects.

Skills, education and training opportunities

13.4 Development of proposals to support apprenticeships, work experience, T Level placements, careers engagement, STEM outreach and workforce development in collaboration with SCC's Regional Skills Coordination Function and local education and training providers.

Local employment and supply chain benefits

13.5 Identification of opportunities for local recruitment, local procurement and SME participation, supported by an evidence-based assessment of likely supply chain opportunities and constraints.

Outline Skills, Employment and Supply Chain Plan (oSESCP)

13.6 Agreement must be sought with SCC regarding the scope, content, governance arrangements, monitoring framework and mechanism for securing the oSESCP through the DCO, including measurable commitments and reporting requirements.

13.7 SCC welcomes the Promoter's commitment to prepare an Outline Skills, Employment and Supply Chain Plan (oSESCP) and recognises the potential for the Proposed Development to generate employment, skills and supply chain opportunities. However, whilst the PEF is preliminary in nature, the information currently presented is insufficient for SCC to verify the promoter's conclusions regarding employment, skills, education and supply chain effects.

13.8 SCC, therefore, expects the Environmental Statement (ES) to provide additional evidence demonstrating how the project will address the requirements of NPS EN-1 and SCC's Energy and Climate Adaptive Infrastructure Policy Supplementary Guidance. In particular, the current assessment does not provide sufficient information on employment and training opportunities, local and regional supply chain participation, workforce-related effects on local services and infrastructure, or cumulative labour market impacts. As a result, SCC cannot currently support the conclusions reached regarding the scale, significance or distribution of the socio-economic benefits associated with the scheme.

Preliminary Environmental Findings

13.9 The PEF identifies approximately 200 gross on-site construction jobs per annum over a 30-month construction programme and concludes this would result in a minor positive effect. However, insufficient evidence has been provided regarding workforce requirements, occupational demand, skills requirements, qualifications, workforce sourcing assumptions and likely levels of local participation. SCC's Supplementary Guidance expects assessments to identify workforce requirements by project phase, define workforce geography, assess labour demand across construction, operation and decommissioning, and consider implications for transport, accommodation, housing and local services. The PEF does not currently provide sufficient information for SCC to understand how these matters have been assessed or to verify the conclusions presented.

13.10 The ES should therefore provide a detailed workforce assessment covering all project phases, including civils, electrical and mechanical installation, cable installation, BESS-related activities, commissioning, operation and decommissioning. This should identify workforce numbers, duration of demand, occupational requirements, qualifications and competencies, proportions of home-based and non-home-based labour, travel-to-work assumptions and accommodation requirements. SCC also expects the Promoter to apply the probability-based methodology set out in the Council's Supplementary Guidance, including low, medium and high opportunity scenarios for workforce participation and local employment outcomes, with the low home-based employment scenario used as the worst-case basis for assessing impacts on transport, accommodation, housing and local services.

13.11 SCC does not agree with the exclusion of operational socio-economic effects from detailed assessment. Operational effects extend beyond routine staffing levels and include maintenance activity, asset replacement programmes, long-term supply chain expenditure, technician development, apprenticeships, educational outreach and the long-term development of Suffolk's clean energy workforce. These effects should therefore be assessed alongside construction and decommissioning impacts. Should operational socio-economic effects remain scoped out, the Promoter should, nevertheless, implement activities such as those listed above to support social value and benefits to communities/the region, to maintain the knowledge of specialist skills and replacing outgoing workers.

13.12 The PEF also provides insufficient assessment of cumulative labour market effects. SCC expects cumulative assessment to reflect the wider East of England labour market and energy sector and to consider the combined effects of overlapping workforce demand, labour shortages, displacement, recruitment pressures, wage inflation, accommodation demand and impacts on local employers, services and training provision. This assessment should include all relevant NSIPs and major infrastructure projects with overlapping timescales and labour requirements , including (at a minimum) Sizewell C, Sea Link, LionLink, the East Anglia Hub projects (including East Anglia ONE North and East Anglia TWO), and other energy and infrastructure projects within Suffolk and the wider East of England that may draw on the same labour pool during construction and operation.

13.13 SCC further expects the Promoter to apply the Council's methodology in full, including separate study areas for workforce and supply chain assessment. Supply chain opportunities should be assessed at Hyper Local (Mid Suffolk), Local (Suffolk) and Regional (East of England) levels using low, medium and high probability scenarios. The assessment should identify principal work packages, evaluate business capacity and capability, quantify potential opportunities and consider both beneficial effects and potential adverse impacts such as market constraints and displacement.

13.14 Insufficient attention has also been given to local education, training and skills infrastructure. The ES should assess the capacity of further education, higher education, private training and employer-led provision to respond to project demand and identify any interventions required to increase capacity or improve alignment with workforce needs. This work should be undertaken in collaboration with SCC's Regional Skills Coordination Function and should consider apprenticeships, T Level placements, work experience, technician pathways and engagement with schools and colleges.

13.15 SCC expects assumptions relating to labour availability, leakage, displacement, multipliers and local employment participation to be based on Suffolk-specific evidence rather than generic national assumptions. The Promoter should work with SCC's Regional Skills Coordination Function and other stakeholders to develop an evidence base that reflects local labour market conditions and cumulative infrastructure pressures.

13.16 With regard to mitigation and delivery, SCC welcomes the proposed oSESCP but considers significantly more detail is required. The oSESCP should be secured through a DCO Requirement and include measurable commitments, governance arrangements, delivery mechanisms and monitoring requirements agreed with SCC. It should set out how the Promoter will maximise local recruitment, apprenticeships, T Level placements, work experience, accredited training, careers engagement, education outreach, local procurement and inclusive growth outcomes throughout the project lifecycle.

13.17 The oSESCP should also include a Supply Chain Engagement and Procurement Framework and a Skills and Employment Governance Framework, developed jointly with SCC's Regional Skills Coordination Function, to oversee delivery of workforce, skills, employment and supply chain commitments. A proportionate monitoring framework should be established covering local employment participation, procurement outcomes, education and skills delivery, equality and inclusion objectives and wider labour market impacts.

13.18 In summary, whilst SCC recognises that the PEF is preliminary in nature, the information currently presented is insufficient to enable the Council to understand and verify the Promoter's conclusions regarding the skills, employment, education and supply chain impacts and opportunities associated with the Proposed Development. The ES should provide a substantially enhanced assessment aligned with NPS EN-1 and SCC's Energy and Climate Adaptive Infrastructure Policy Supplementary Guidance, including workforce requirements by project phase, operational socio-economic effects, cumulative labour market assessment, supply chain opportunities, skills and education infrastructure assessment, and robust arrangements for implementation, governance and monitoring.

13.19 The promoter should engage with SCC to agree the details of how these things are implemented in the ES and the wider application. On the basis of the information currently available, SCC is not satisfied that the likely socio-economic effects of the Proposed Development have been fully identified, assessed or evidenced and therefore cannot currently support the Promoter's conclusions regarding the significance of those effects.

Skills Opportunities

13.20 Opportunity 1 – Apprenticeships The Promoter could consider a programme to promote apprenticeships during the various phases of the proposed development.

13.21 Opportunity 2 – STEM Education and Careers - The Promoter could investigate the potential for a programme of activities which promote science, technology, engineering, and mathematics (STEM) education and careers. This could be targeted at primary school pupils, secondary school pupils, college students and/or other young people in the area.

Employment Opportunities

13.22 Local Recruitment - The Promoter should investigate measures to promote take up of jobs generated by the Scheme by local people, such as engagement with Local Authorities and Job Centre Plus, to tap into existing local employment support networks.

13.23 The promoter should be mindful of other NSIPs currently in development across Suffolk and consider where possible the cumulative effects of multiple simultaneous construction schemes. Whilst there could be a heavy draw upon the local labour force, there are also potential opportunities, if proper liaison occurs, for workers to move between NSIPs and energy projects according to workloads and requirements.

Economic benefits

13.24 If workers are to temporarily relocate to Suffolk, then there are opportunities for the visitor accommodation and hospitality to benefit. Again, liaison with other NSIPs will help to shape accommodation strategies etc and working with the tourism sector (LVEP DMOs etc) will help to ensure benefits are maximised and are not detrimental to the sector. This will also help with managing construction traffic to minimise effects on visitor traffic, deliveries etc

14 Socioeconomics and Tourism

14.1 As per previous submissions, there is still concern that the cumulative effect that other NSIPs will have a detrimental effect on aspects of the visitor economy. There is already considerable pressure on the accommodation sector (self-catering and private rental) as a result of Sizewell C.

14.2 At the time of writing, over 2000 workers are already onsite for Sizewell C alone. Whilst there are some short-term benefits to be made for the accommodation sector and wider visitor economy, we need to ensure that we have a viable tourism economy once all NSIPs are complete. The sector has expressed concerns and the need to ensure that Suffolk still has a tourism economy which is attractive and accessible to visitors.

14.3 Given the number of projects taking place over a relatively short period of time, it is inevitable that there will be some crossover, and it is important that the effects of all of them are taken into consideration. It would therefore be very difficult to consider them in isolation. One NSIP alone is likely to have some impact, to a greater to lesser degree. Multiple projects will definitely have a significant impact

14.4 Consideration is required regarding the practical aspects of how the construction phase would impact the visitor experience in a number of areas:

Perception

14.5 Is Suffolk likely to be viewed as a viable place for a short break or holiday? Word of mouth, particularly in an age of TripAdvisor and/or social media, can quicky lead to negative experiences and perceptions becoming widespread. Excess traffic and diversions create bad first impressions on arrival. Add to this excess noise, road closures, visual blight during construction phase and afterwards) etc and Suffolk could acquire an image which would be problematic. This in turn has the potential to lead to people holidaying elsewhere or at the very least not returning in the short to medium term.

Practical effect on tourism businesses

14.6 Roadworks, delays, road closures etc all pose issues for businesses. The visitor economy relies on shift workers as well as prompt deliveries of fresh food and other supplies. If these need to be accommodated, then they need to be planned for, and mitigation measures need to be put in place to ensure that these can be overcome.

Timescale

14.7 Whilst Suffolk welcomes visitors all- year round and is a popular out of season weekend and short break location, there is clearly a traditional "high season" of July- early September where visitor numbers are at their peak. Whilst we strive to have good public transport links, we need to acknowledge that the bulk of visitors will travel by car and so traffic will be heavier during the peak period. There needs to be a balance struck between accommodating visitors, while acknowledging the practical benefits of a construction project taking place when the weather is good. Whilst we acknowledge that the EcoPower scheme is not located within a traditional tourism hot spot area, we nevertheless need to see evidence of sone thought where potential visitors are concerned.

Marketing and publicity

14.8 If NSIPs are likely to happen, then there needs to be adequate notice given and the operators need to work with the sector to ensure that the messages convey the fact that Suffolk is still open for business and welcoming visitors. Sizewell C has a tourism mitigation fund, which is working with the sector to convey such messages. As part of this work, it is carrying out perception studies and collating baseline data on visitor numbers, spend etc across the district, in order to measure the effects on individual businesses, towns and the county as a whole. Organisations such as the Suffolk Coast Destination Management Organisation (DMO) and the Suffolk and Norfolk Local Visitor Economy Partnership (LVEP) will be useful sources of support and information.

14.9 On a wider economic point, consideration needs to be given where the workforce and materials will be drawn from for this and other NSIP initiatives. Again, coming back to the point about the cumulative effect, we need to be mindful of how EcoPower would work alongside the other projects. While we would obviously want to see the economic benefits for the Suffolk economy (and an appropriate sourcing tool might be something like the Suffolk Supply Chain) we need to ensure that we are able to provide the labour and materials when required. If done effectively, then it will be a welcome boost for Suffolk businesses and employment figures. If materials and workforce are to be transported into Suffolk, then we need to return to the point about additional traffic on the county's roads and pressure on bedspaces and need to ensure that any potential disbenefits of the EcoPower scheme are considered and effectively mitigated against.

15 Suffolk Fire and Rescue (SFRS)

15.1 SFRS acknowledge that the Detailed Battery Safety Management Plan (DBMSP) will provide more detailed design information and an incident impact assessment which will identify all sensitive receptors within a 1 km radius. But SFRS would like to ensure the following points are addressed within this plan:

15.2 Consider the potential impact of any incidents within area 3 on the railway and ensure Network Rail are aware. The Promoter should also consider what bespoke emergency response arrangements may be necessary for incidents affecting the railway.

15.3 SFRS are aware of poor water mains pressure around the proposed sites and suggest early engagement with water authority to discuss options with water companies. Greater detail is needed on how water will be supplied to the site.

15.4 The nature of the proposed dispersed BESS units creates added challenges and risks in terms of fire safety. Separation distances between solar array areas, associated infrastructure, and BESS units must ensure that the risk of fire spread is minimised and there is sufficient space for emergency response to contain any fire. SFRS requests clarification on why dispersed BESS is considered necessary given the added risk posed.

15.5 Section 4.6.2 of the OBMSP states "The separation distances between BESS blocks and arrays will be confirmed at detailed design stage. The final separation distances will comply with both the relevant NFPA codes and the NFCC BESS Guidance 2026". However, SFRS is not aware that the NFCC guidance specifics separation distances between solar array areas and BESS units. Further detail is needed to demonstrate how safe separation distances will be achieved, justified with relevant evidence. It is imperative for this to be provided at the application stage, rather than only within the DBMSP, to demonstrate the feasibility of fire safety in relation to the dispersed BESS.

15.6 SFRS would like to be consulted when separation distances between BESS containers and ancillary equipment have been confirmed and when separation distances between BESS containers and arrays have been confirmed.

15.7 DBSMP should be drafted and discussed with SFRS at earliest opportunity.

15.8 SFRS engagement is requested throughout.

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[i] https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1-2025/overarching-national-policy-statement-for-energy-en-1-2025-accessible-webpage
[ii] https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3-2025
[iii] https://www.gov.uk/guidance/health-and-wellbeing

[iv] https://www.legislation.gov.uk/uksi/2017/572/contents
[v] https://www.gov.uk/government/publications/national-planning-policy-framework--2
[vi] https://www.iema.net/media/yljb2nbs/iema-eia-guide-to-determining-significance-for-human-health-nov-2022.pdf
[vii] https://phwwhocc.co.uk/whiasu/
[viii] https://www.suffolk.gov.uk/asset-library/community-engagement-and-wellbeing-policy.pdf
[ix] https://www.midsuffolk.gov.uk/w/babergh-and-mid-suffolk-joint-local-plan-part-1
[x] https://www.healthysuffolk.org.uk/asset-library/Health-and-Wellbeing-Strategy-22-27.pdf
[xi] https://www.healthysuffolk.org.uk/jsna
[xii] https://www.suffolkobservatory.info/
[xiii] https://fingertips.phe.org.uk/
[xiv] https://www.gov.uk/government/collections/public-health-outcomes-framework
[xv] https://www.healthysuffolk.org.uk/jsna/jsna-reports/mental-health-needs-assessment-2026
[xvi] https://www.healthysuffolk.org.uk/asset-library/JSNA/suffolk-in-20-years.pdf
[xvii] https://www.suffolk.gov.uk/asset-library/air-quality-strategy-and-action-plan.pdf
[xviii] https://www.legislation.gov.uk/ukpga/2010/15/contents
[xix] https://digital.nhs.uk/data-and-information/publications/statistical/adult-psychiatric-morbidity-survey
[xx] https://digital.nhs.uk/data-and-information/data-tools-and-services/data-services/mental-health-data-hub/dashboards/nhs-talking-therapies
[xxi] https://www.gov.uk/government/statistics/mental-health-services-monthly-statistics-performance-october-2025
[xxii] https://digital.nhs.uk/data-and-information/data-collections-and-data-sets/data-sets/mental-health-services-data-set

Appendix B
The LHA's comments on the proposed access routes

Area	Potential Access		Description	SCC Comments
	Type	Route		
All Areas	Primary	The A120	A-road providing north-south connectivity, accommodating higher traffic flows and linking local areas to the wider SRN. This A-road would be used by all vehicle types via the A1066 from the north and the A14 from the south.	Should be Labelled the A140 Construction vehicles using the A1066 would be routed through Diss, this needs to be discussed with Norfolk County Council albeit SCC recognises the concerns regarding additional construction traffic
1	Primary	Old Bury Road	Local road connecting nearby settlements, generally of moderate width with rural characteristics and lower traffic volumes than strategic routes. Old Bury Road would provide access to Stuston Lane, with the Scole–Stuston Bypass connecting to Old Bury Road.	Whilst SCC has no issues regarding the proposed access on Old Bury Road and the access route from the A143, the eastern end should not be used as a link to Stuston Lane as this is better accessed from its roundabout with the A143 (see below)
	Primary	B1077 Stuston Lane	B -road providing north-south connectivity between the A1066 Victoria Road and the A140, typically single carriageway with rural frontage and moderate traffic levels. Stuston Lane would provide direct access to Area 1. HGVs would approach Stuston Lane via Old Bury Road from either the north or the south via the A143/ Stuston Lane roundabout.	Subject to an environmental 7.5t weight limit heading south from the A143 roundabout Historic flooding and carriageway degradation outside property called New Cottage
	Primary	B1118 Lower Oakley	Rural road serving local properties and agricultural land, characterised by narrower carriageway widths and limited capacity. HGVs would access Lower Oakley from the A140 via a priority junction. A new access point would be required to accommodate all vehicle types, including HGVs.	
	Primary	Buck Lane	Narrow unclassified rural lane, providing local access to farms and residential properties, with constrained geometry and low traffic volumes. HGVs would access Area 1 from the north via Buck Lane, approaching from Lower Oakley to the west. A new access point would be required to accommodate all vehicle types, including HGVs.	Single track road - would require passing places potentially resulting in vegetation loss. Strong likelyhood of verge over-run and edge deterioration with HGVs using narrow carriageway. Poor visibility to west at junction with B1118
2	Internal	Internal access route via Area 1	An internal access route serving Area 2, typically of limited width and designed for localised movements rather than through traffic. A new access point would be required internally to accommodate all vehicle types, including HGVs	Appears to cross Rectory Road / The Street, Brome & Oakley. Mitigation will be required at the crossing point to minimise vegetation loss
	Primary	Nicks Lane	A narrow unclassified and private rural lane, providing access to farms and residential properties with low traffic volumes and constrained geometry. HGVs would access Area 2 via Nicks Lane, which is accessed from B1077 Brome Lane to the west, connecting to the A140 via a roundabout. Existing access is suitable for all vehicles, including HGVs.	Private road SCC disagrees that the access is currently suitable and would recommend improvements. Junction with B1077 narrow and two vehicles cannot pass.
3	Primary	Major Lane	A minor rural road serving local properties and agricultural land, generally characterised by limited carriageway width and rural alignment. HGVs would access Major Lane from the A140, approaching from both the north and south on the A140. A new access point would be required to accommodate all vehicle types, including HGVs. Passing places may be required to accommodate HGV movements	Junction with the A140 is not suitable for HGVs due to acute angle and width and has poor visibility Major Lane is very narrow with poor geometry. Would require passing places resulting in major vegetation loss including mature trees. Access route turns onto Thornham Road: Major flooding issues near junction with Major Lane Narrow and poor geometry Access route to Thornham Walks (brown signed tourist area) 4.8m railway bridge next to proposed site access Norwich to Tilbury are proposing to use the section of this road under the railway bridge as a Primary Access Route linking two of their site accesses
	Secondary	Mellis Road	A local road connecting nearby settlements, typically single carriageway with rural frontage and moderate traffic levels. HGVs would access Mellis Road from the A140, approaching from both the north and south, before turning west into Mellis Road. A new access point would be required to accommodate all vehicle types, including HGVs	Crosses railway line Turning south this becomes a single track road and would require passing places. This may not be possible due to both sides of the carriageway being common land Unclear from current drawings how access will be gained from Mellis Road to Area 3. I believe the drawing is showing the incorrect location of the proposed access point There is a school along this road resulting in high numbers of parked cars along the carriageway at pick up and drop off times

4	Primary	B1117 Yaxley Road / Magdalen Street	A rural connecting route linking local villages and Eye, generally of modest width with constrained alignment and limited capacity. HGVs would access Yaxley Road from the A140, approaching from both the north and south, before turning east onto Yaxley Road and then heading south toward Castle Hill. A new access point would be required to accommodate all vehicle types, including HGVs	Narrow footway heading into Eye will affect pedestrians Junction with Lowgate Street is narrow and unsuitable for HGVs. On street parking High pedestrian presence in the town centre Several pinch points along Lowgate Street HGV routing through Eye is a sensitive local issue
	Secondary	B1077 Castle Hill	A B-road providing local connectivity between settlements, single carriageway in nature with moderate traffic flows and rural characteristics. HGVs would access Castle Hill from Yaxley Road. Castle Hill then provides direct access to the Site. A new access point would be required to accommodate all vehicle types, including HGVs	Historic flooding / drainage issues from the junction with Barric Lane to the property called Castle Hill Farm, leading to frequent water on the road and also repeated degradation of the road surface Pinch point near Castle Hill Frm due to high banks on the western side of the road
	Primary	Stoke Road / Rishangles Road	A local road serving nearby communities and agricultural land, typically of moderate width with rural characteristics and relatively low traffic volumes. HGVs would access Stoke Road from the A140 by turning east. HGVs would then turn north onto Castle Hill from Stoke Road, which provides direct access to the Site. A new access point will be required to accommodate all vehicle types, including HGVs	Safety issues at the junction with the A140 Environmental 7.5 tonne weight restriction from junction with the A140 to Castle Hill junction Narrow width - not suitable for 2 HGVs to pass Passes through the village of Thorndon Thorndon has a primary school on Stoke Road resulting in high numbers of parked cars along the carriageway at pick up and drop off times
5	Primary	Mellis Road	A local road connecting nearby settlements, typically single carriageway with rural frontage and moderate traffic levels. HGVs would access Mellis Road from the A140, approaching from both the north and south, before turning west into Mellis Road. A new access point would be required to accommodate all vehicle types, including HGVs	A140 roudabout heading west to Thrandeston Road junction: Part of the National Cycle Route network Passes Mellis Primary School which frequently has cars parked on the carriageway Access route turns north from Mellis Road onto Thrandeston Road: Single track road requires passing places. This may not be possible due to common land
	Primary	*Thrandeston Road*		*Short length from Mellis Road appears to be used as a primary access route. Straight but narrow and may need passing places within common land.*