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**West Suffolk**  
Council

 **Suffolk**  
County Council

Dear Sir/Madam,

Thank you for the opportunity to comment on the Sunnica Energy Farm Non-statutory public consultation report. This is a joint response of the two Suffolk local authorities relevant under Section 43(1) of the Planning Act 2008. It is understood that Cambridgeshire County Council and East Cambridgeshire District Council will also provide responses relating to the parts of the scheme that fall in their respective areas. This response should be read in conjunction with the joint response submitted to PINS in respect of the EIA Scoping Report dated March 2019.

The proposal is an unprecedented development both in terms of scale and nature and can be expected to have significant likely impacts on local communities and the environment. It is clear that the proposal will require an exemplary approach to design, mitigation and compensation to address these impacts.

The following text comprises our answers to the consultation questions. We have focused on questions 1 a), 1 d), 4 and 5 throughout this letter, with comments grouped by our own areas of responsibility.

### **County as Minerals & Waste Planning Authority**

Sunnica East and the associated electricity transmission cable falls within a Minerals Consultation Area and includes in its entirety Bay Farm Quarry, Worlington which is an operational sand and gravel quarry and inert waste landfill site. There is also a concrete batching plant and inert waste recycling facility on that site.

Minerals Core Strategy Policy 5 “Safeguarding mineral resources” applies:  
<https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/minerals-core-strategy/>

Minerals Specific Site Allocations Policy MSSA1 “Proposed Sites” applies:  
<https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/minerals-specific-site-allocation-documents/>

Draft Suffolk Minerals & Waste Local Plan (SMWLP) Policies MP9 “Safeguarding of port and rail facilities for the manufacture of concrete, asphalt and recycled materials” MP10 “Minerals consultation and safeguarding areas” and WP18 “Safeguarding of waste management sites” apply:  
<https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste->

[Policy/SMWLP-Pre-submission-Consultation-Document/Index-and-Chapters-1-to-6.pdf](https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/SMWLP-Pre-submission-Consultation-Document/Index-and-Chapters-1-to-6.pdf)

Draft SMWLP Policy MS10: Worlington, also applies.

<https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/SMWLP-Pre-submission-Consultation-Document/Proposed-Minerals-Sites-Chapters-7-to-17.pdf>

In interpreting the above policies, Suffolk County Council as Minerals & Waste Planning Authority is mindful of the non-irreversible nature of the proposed development. However it will also be concerned to safeguard existing minerals and waste developments and potential future areas of extraction including those which might offer further potential extensions in the foreseeable future to the existing quarry in addition to those already identified in the SMWLP. It is also possible that existing previously worked and restored areas of the quarry might be utilised for the proposed solar farm development so long as it does not prejudice the overall objectives of the proposed restoration such as biodiversity net gain.

### **County as Lead Local Flood Authority**

It is noted in the consultation report that the environmental assessment process will cover flood risk and water resources. This is welcomed, but we would add that this should specifically include a Flood Risk Assessment and Drainage Strategy (FRA/DS) which should be submitted as part of the EIA. The Drainage strategy must follow national guidance (Non-Statutory Technical Standards for SuDS, BS8582:2015 & Ciria SuDS Manual C753) and our local policy (Appendix A of Suffolk Flood Risk Management Strategy). We expect the drainage strategy to utilise infiltration type drainage pending preliminary site investigations and ground-intrusive investigations. But please make sure the FRA/DS assesses all areas of hardstanding and all building types of the development i.e. substations and battery compound and not just the main solar farm itself. BRE 365 infiltration testing has been referenced in the scoping report and we will expect data gathered from these tests to form the basis of the FRA/DS.

The greatest potential impact to the water environment will be during the construction phase of the development when site works have potential for ground compaction and pollution, this is especially important given the site will likely use infiltration. SCC will expect the EIA to distinguish between main phases of the development lifecycle (construction, operation, decommissioning) and its impact on the water environment (hydrology and hydrogeology). A construction surface water management plan (CSWMP) or similar should be submitted in support of the EIA to outline procedures that will be in place to reduce impacts of the construction phase.

Any alterations or construction within watercourses will need prior land drainage consent from SCC under the Land Drainage Act 1991.

### **County and District Ecology**

The authorities will be expecting a site-specific plan for managing biodiversity. To inform this, a full suite of surveys for wildlife and habitats must take place. Ecological design should be informed by the mitigation hierarchy and be guided by the site's location, in Suffolk, on the edge of the Brecks. In addition, monitoring must take place throughout construction and operation and this must inform a site management plan and a dedicated management team.

These should be prepared even at the pre-DCO stage so that fears regarding negative impacts can be resolved and a clear path to biodiversity net gain can be mapped.

We will expect all surveys to meet the appropriate guidelines and guidance (especially those produced by CIEEM and Natural England). All data should be shared with the relevant Biological Records Centres, which for Suffolk is the Suffolk Biodiversity Service (<http://www.suffolkbis.org.uk/>).

We expect the bare bones of a monitoring strategy to be shared as early as possible. An idea of the various parts of a Construction and Environment Management Plan (CEMP) should be submitted as soon as the biodiversity data informs the contents of such a plan. This will also be informed by the mitigation hierarchy.

Along with the CEMP, we shall expect a long-term Landscape and Environment Management Plan (LEMP) to be, at least, sketched out prior to DCO submission which will show who will be undertaking the site's management and how they will be informed by and react to the essential and on-going monitoring. This will be informed by the mitigation hierarchy and include realistic proposals for Biodiversity Net Gain.

We do not expect the CEMP and the LEMP to contain exhaustive detail until such time as the relevant survey data has been collated and analysed. We should, however, have an agreed structure into which these essential documents can fit prior to DCO submission.

## **County and District Landscape**

### *Site Description and context – Sunnica East*

The site is located west of the A11 and stretches out between the villages of West Row (to the north), Freckenham (to the south-west) and Worlington (to the north-east). Its southern edge is north-west of Red Lodge.

Within the red line, the land use is predominantly agricultural. However, there are also active gravel extraction sites, woodlands, rows of trees, road-side hedges, minor roads linking the above villages, and some PRowS.

The land is relatively flat to gently sloping, allowing far-reaching views of open countryside, often with wooded horizons, where roadside hedges do not confine the view.

The landscape is perceived as tranquil, and human activity is present in the form of the agricultural land use. Overall the landscape appears to have changed very little over the last hundred years, providing a sense of time-depth.

Despite the vast extent of Sunnica East, public access to the site is limited. There are few PRowS in the area, which lends the existing ones potentially greater importance and value. Similarly, the country lanes from where views of the site are to be expected, are important areas from which this landscape is perceived.

Roadside hedges and existing blocks of vegetation (such as small woodlands) will be crucial to successful mitigation; there should be an assumption to retain and strengthen existing

structural vegetation (hedges, tree lines, tree belts, woodlands), and creative ways sought to work around them, wherever possible. New mitigative planting will however also need to take into account the open nature of the landscape in this area.

### *Likely landscape and visual effects*

The proposed solar farm (in combination with Sunnica West and the necessary links to Burwell Power Station) will be the largest solar farm in the UK, if implemented.

The area potentially affected is vast (approx. 800ha for Sunnica East). The landscape between the villages of West Row, Freckenham and Worlington will be transformed substantially.

Due to the scale of this proposal, it is insufficient to consider this solar farm as a development sitting within a particular landscape. The implementation of this proposal is more akin to the creation of an entirely new landscape, with its own character, which will be experienced from within as well as from the outside.

This has implications for the approach to the baseline studies, landscape and visual assessment and the design and mitigation process.

### *Baseline studies (local landscape character and sensitivity) and preliminary design*

The proposals of Sunnica East will mean a profound change of the landscape character around and between the three villages of West Row, Worlington and Freckenham. The potential effects on the residents of these villages are likely to be greater than the sum of the potential roadside views. There needs to be consideration of the 'cumulative' effect within the Sunnica East site, as it is equivalent to multiple traditional solar plants. Local parish level landscape character assessments should be carried out, assessing the value, sensitivity and expected change of the landscape for each of the three villages and the connecting routes between them, key views need to be identified, and measures taken within the design to protect and retain these.

An accurate understanding of the local landscape character, the local landscape sensitivity and key views from and to the villages will be essential.

Based on this it will be possible to discern areas within the red line that will be more suitable for solar panels/ battery stations etc. and areas that are more sensitive to change and that will need to be protected (heat map). These are then the areas which can be set aside to enhance the local landscape character and achieve the biodiversity net gain. It is important that these areas are identified through detailed field work. A formulaic approach (i.e. standard setbacks of the development from roads etc.) will be insufficient and possibly counter-productive.

### *Visual assessment*

The suggested viewpoints for the Visual Assessment, require some refinement in their exact location.

However, they only represent viewpoints looking towards the proposal site from locations outside of, or from the edge of the red line.

Due to the scale of the proposal, and the fact that the connecting roads between the three villages traverse the proposal site, internal viewpoints will be critical to comprehend the magnitude of the change that is to be expected.

Winter viewpoints will be essential for full assessment.

For comments on individual viewpoints and recommendations for additional viewpoints, please see Appendix 1, at the end of this document.

### *Design and enhancement*

The approach to design needs to address and integrate both local sensitivities (such as key views on the settlement edge) and overall requirements, (such as a green infrastructure).

Given the extent of the red line, the opportunities to achieve ecological benefits (biodiversity net gain), a well-designed landscape and improved pedestrian access through links to existing footpaths should be fully realised.

It will not be possible to completely hide a project of this scale. It will be insufficient to screen the edges. The challenge for the design will be to avoid a solar panel desert and instead aim to create a 'solar park landscape', that proudly showcases this large-scale renewable energy farm, integrated successfully into the surrounding landscape.

Examples of detailed design should be provided for key areas (such as PRowS, stretches of road, settlement edge locations). This will allow to clarify and agree the design approach and desired outcomes at an early stage.

It is further considered that a project of this significance is likely to require detailed design to be subjected to an External Design Review Panel of Landscape Architects prior to discharge of the conditions relating to landscape.

### *Conclusion*

The Sunnica Energy Farm proposal is of a very large scale, which requires an iterative design process, utilising the large size of the whole proposal site to address its effects on a small scale, localised level.

Emerging principles, strategies and priorities for the assessment and design include (but are not limited to) the following:

#### Landscape

- The design and layout of Sunnica must be sensitive to place. For Sunnica East this does not only refer to the Suffolk LCA landscape character types (Estate sandlands and Rolling estate chalklands) and the Norfolk and Suffolk Brecks LCA, but also to the local character of the villages (West Row, Freckenham and Worlington) and their interconnecting routes.
- Cumulative effects between each part of the project must be assessed and minimised.
- Landscape mitigation must be a bespoke response to local requirements, emerging from detailed landscape character and sensitivity assessments, as well as being part of a wider landscape strategy for the whole site.
- Key views must be identified, and measures taken within the design to protect and retain these.
- Views of solar panels or other structural parts of the development (such as storage battery stations) from villages (both from residential properties and public spaces, such as streets and squares) must be avoided.

### Public Amenity

- Existing amenities, such as PRowS, both permissive and statutory, are to be retained and enhanced and must be fully considered as part of the design. Any rights of way affected directly or indirectly by the development should be restored to their original, or an agreed, enhanced, state after construction is completed.
- The possibilities for new/additional PRowS should be fully explored.
- The potential effects of the development on an existing travellers' site within the red line must be fully assessed and minimised.

### Ecology

- The design of the site must support West Suffolk Council's Natural greenspace study for the former Forest Heath area, which sets out a recreation strategy to support growth in the Local Plan  
[https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/16-11-23-Accessible-Green-Space-Study-Jan-17.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/16-11-23-Accessible-Green-Space-Study-Jan-17.pdf)
- The effects of the development must result in a net gain for biodiversity. Possible ways to achieve this include:
  - creation of replacement habitat;
  - maintaining the connectivity of wildlife corridors across the site;
  - avoidance of the most sensitive habitats and species;
  - suitable construction methods.
- Ecologically sensitive areas, such as river valley locations, should be prioritised as areas for mitigation.

### Overall Design

- The requirements for cohesive green infrastructure, incorporating public amenity, landscape and ecology (biodiversity net gain) must form an integral part of the overall design.
- All temporary infrastructure used to facilitate the construction of Sunnica East must have consideration of the visual amenity of permissive and statutory routes and must be removed following construction. The visual impact of any remaining 'footprint' or remnant of temporary development must be minimised.
- It is considered that for key areas (such as PRowS, important stretches of roads, and settlement edge locations) examples of detailed design should be provided with the submission of the DCO such that the Examining Authority and consultees can clearly understand the approach to design and mitigation.
- A project of this significance is likely to require detailed, post-consent design to be subjected to an External Design Review Panel of Landscape Architects prior to discharge of the requirements relating to landscape. The decision rests with the local authority, West Suffolk Council.
- A detailed scheme for the protection of environmental and landscape assets during construction will be required. It is anticipated that details of this will form part of the Construction Environment Management Plan (CEMP) as a requirement of the DCO.
- The design of security systems and lighting should be such as to minimise adverse landscape and visual impacts. Infrared security lighting will be preferable in terms of minimising adverse effects on wildlife and the nocturnal character of the landscape.

### Decommissioning

- A detailed scheme of decommissioning and restoration of the site and an appropriate bonded fund must be in place. This can be expected to be a requirement of the DCO.

## **County Archaeology**

This extremely large proposal affects an area of known archaeology recorded in the County Historic Environment Record (HER). Within the red line development boundary itself, both above and below ground archaeological remains and extensive multi-period find scatters have been recorded (see baseline information below), with large numbers of further archaeological finds and features recorded surrounding the Sunnica East site. However, the majority of the proposed development area has never been subject to systematic archaeological investigation and, therefore, the character, extent and significance of surviving below ground heritage assets which will be impacted upon by this scheme has yet to be defined.

The proposed development (including temporary land take areas for construction, infrastructure improvement works, landscaping and screening works and any other mitigation works involving ground disturbance) would have a direct impact upon heritage assets as the planned works will damage or destroy any surviving remains which exist within the site, however, without further assessment, the impacts cannot be fully understood. The scale of this proposed development scheme means that it has the potential to cause wholesale destruction of an archaeological landscape. Thorough desk top assessment and field evaluation is therefore needed to allow the archaeological potential of the different parts of the study area and therefore the likely impacts of the proposed development, to be fully assessed. Evaluation will provide sufficient baseline information to enable design decisions to be made and to inform planning decisions. The potential impact of this development upon the setting of designated heritage assets as well as the historic landscape also needs to be assessed.

Our detailed archaeological comments to the Planning Inspectorate also apply to this consultation. Full details can be found at Appendix 2.

## **Agricultural Land Classification, Economic and Employment Considerations**

The consultation report states that there is an aim to use land which is not considered by the Government to be 'Best and Most Versatile' land. The land within the red line boundary for Sunnica East is predominantly arable farmland, in regular use for the production of a variety of crops. It is expected that the EIA will include an Agricultural Land Classification assessment together with details of current and historic use of the land and likely impacts on food production in the area.

The removal of land from agricultural use will directly impact local employment and the effects of this should be also fully assessed.

Bay Farm Anaerobic Digester is located adjacent to the site boundary for Sunnica East. The land surrounding the plant is a source of sugar beet and maize feedstock and a planning condition was imposed on the planning permission for the plant (DC/15/2109/FUL) requiring feedstock to only be sourced from certain areas. A copy of the plan referred to within the planning condition is attached as Appendix 3. The areas denoted for Sunnica East and Sunnica West includes large swathes of the land that is expected to generate the feedstock for the plant. This conflict needs to be considered and it is recommended that Sunnica undertakes consultation with the operator of the plant.

## **Impact on future growth and employment opportunities in West Suffolk**

An Employment Land Review (October 2016), produced to support the emerging Forest Heath Local Plan which is currently at an advanced stage in the planning process, recognises that a wide range of employment sites in the area rely on their proximity to the A11 corridor (and connected A14 Newmarket Bypass) for strategic road access, providing a route down to London in the South and Norwich in the East. It is a long-term aspiration of West Suffolk and adjoining authorities to achieve employment growth in this location.

In light of the above, consideration should be given whether Sunnica East would prejudice the council's long-term cross boundary aspirations for employment growth along the A11 corridor through the review of its Local Plan.

### **Transport strategy**

In Transport terms very little detail is provided in the consultation material. We would welcome more information on the impacts of traffic on the roads and Public Rights of Way (PRoW) maintained by Suffolk County Council.

While welcoming undergrounding of cables we note that these will cross a number of public highways and PRoW. As the Local Highway Authority (LHA) we would expect to approval of the technical aspects of this and any access road cross overs or access points for construction and maintenance

As LHA we would expect to see a detailed Transport Assessment and Construction Traffic Management Plan to support any application.

One of our main concerns is the quantity and routing of traffic during construction. A specific concern is how any large vehicles to/from Ipswich and Felixstowe via the A14 will access the sites. As it is not possible to access the northbound A11 at the A11/A14 Junction 38 interchange traffic has three options:

- Routing cross country via Tuddenham or Cavenham,
- Travelling to the A14/A142 Junction 37 at Newmarket and turning around to use the eastbound slip from the A14 to the A11 at Junction 38,
- Leaving the A14 at Junction 43 at Bury St Edmunds and travelling via the A134 to Thetford and joining the A11 there.

The first option is not acceptable to the LHA while the others present their own difficulties. The nature, volume and routing of Abnormal Indivisible Loads (AILs) also concerns the authority and no details are provided. While infrequent movement of transformers from Ipswich Docks to the Burwell Sub Station has an impact on road users along the A14 corridor and the cable network supporting this scheme requires cable drums and drilling equipment, both delivered and removed as AILs.

Any PRoW within or adjacent to the sites and cable corridor must to be retained both during and after construction, Temporary closures will only be accepted when other options have bene exhausted.

### **Future growth in and around Mildenhall – highways issues**

The United States Visiting Forces in Europe (USVF) have set out their intention to withdraw from RAF Mildenhall by 2024 at the earliest. The MoD has identified that part of the site should be



released for housing, and the council is committed to reviewing this issue as part of a new West Suffolk Local Plan, the preparation of which has recently commenced.

A cumulative impact transport study (August 2016) produced by AECOM for the Forest Heath Plan has identified highways constraints at key junctions within Mildenhall which will be difficult to mitigate and states that the potential for a relief road should be explored.

[https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/AECOM-Cumulative-Impact-Study-with-appendices.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/AECOM-Cumulative-Impact-Study-with-appendices.pdf)

Given the nature conservation constraints to the east of Mildenhall, it is likely that any future relief road is likely to be located to the west of Mildenhall and south of Worlington, with the potential to link through to the A11 at Red Lodge. In light of this, it would be appropriate to give consideration to whether the Sunnica East proposals would prejudice both the bringing forward Mildenhall USAF base, and additional development in Mildenhall and the surrounding area, through the review of the West Suffolk Local Plan.

Cambridge and Peterborough Combined Authority are developing a Cambridge Autonomous Metro (CAM) mass rapid transit network which will include regional connections to service locations with significant planned or potential growth including Mildenhall. The [Strategic Outline Business Case](#) commissioned by the Combined Authority states an ambition for a Newmarket Road Park and Ride to Mildenhall route (30km) as one of the outer corridor routes with an indicative delivery date of 2028. These metro corridors would serve existing towns that have the potential for significant growth, and can potentially support the development of new settlements. The Sunnica development could impact on proposed route alignments for the CAM route to Mildenhall, therefore the Cambridgeshire and Peterborough Combined Authority should be consulted as key stakeholder.

### **Community engagement with design details**

The DCO application should propose a model to use the discharge of requirements process to ensure community engagement in the detailed design of specific aspects of the development relating to design and landscaping. This should include a process of seeking community input into design details at an early stage before making applications to discharge, and then a process of public consultation and feedback by the relevant discharging authority after application.

Pre-application engagement could take inspiration from the Enquiry by Design (EbD) model, which is used by the Princes Foundation for the Built Environment for proposals for housing development. Involving the local community at an early stage in the design process can result in increased community buy-in for a proposal and improves the quality of final outcomes.

### **Conclusion**

The scale and nature of this proposal are unprecedented in the UK; if approved it would be this country's largest solar farm. It will require a bespoke approach on the part of the promoter and the local planning authorities. The sheer extent of the proposal means that it has potential to make a significant contribution to meeting the need to reach net zero carbon emissions by 2050 and to addressing the climate emergency.

But the large scale also means that the project will have significant impacts on the local environment and communities, both during construction and operation, that must be addressed. In order for this impact to be acceptable the project will need to be exemplary in design and

execution to minimise its impacts on the local community and the quality and character of the place.

The local authorities encourage the applicant to consider further interim consultation with communities after reviewing the responses to this consultation in order to address emerging concerns.

The scale of the scheme is so large that even with the best mitigation proposals it is very likely that there will be significant residual impacts. The local authorities will therefore expect these to be addressed with a robust and effective s106 agreement alongside a community benefit scheme.

Yours sincerely,

*John Pitchford*

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Head of Planning  
Growth Highways & Infrastructure  
Suffolk County Council

*David Collinson*

David Collinson  
Assistant Director  
Planning & Regulatory  
West Suffolk Council

## **Appendix 1: Comments on viewpoints suggested by Aecom and recommendations for further viewpoints**

### **1 B1506, The Limekilns**

Due to mature roadside hedges, views for motorists along the B1506 are limited to occasional access points; the visual link to Sunnica West is likely to be much stronger from within the Limekilns Gallops; although private land, there appears to be some use of the land granted to the general public.

### **5 PRoW, Elms Road, Freckenham**

Needs to be a multidirectional viewpoint to convey effects.

Additional viewpoints needed along the footpath and from Mildenhall Road southwards.

### **6 B1102, Freckenham Road, Worlington**

Hedge reinforcement along Freckenham Road required.

### **7 PRoW, Mortimer Lane, Freckenham**

There will definitely be direct views from this viewpoint, particularly as the land rises to the north-east.

Additional viewpoints are required along this footpath all the way to Beck Bridge, some will need to be multi-directional (some stretches of the footpath may be well screened, at least during summer months, but possibly not along the whole length; it also needs to be considered that part of the attraction of this footpath is the variation from secluded path to open views into the countryside).

### **8 Bay Farm, Newmarket Road**

From this viewpoint the anticipated visual effects may be less severe, as existing mature vegetation will screen most of the proposal site from here, at least during summer months. This is useful in showing that in this landscape, the visual effects are not always far reaching.

However, additional viewpoints are required along Newmarket Road further north as it approaches Worlington, one at the southern site boundary and at least one further multi-directional viewpoint from within the site along Newmarket Road.

## 9 PRow, Jude's Ferry Public House, West Road

(NB Grid ref. for viewpoint is not at the public house, but further east along the river)

Views from river here are likely to be limited, due to topography. Better views from pub grounds.

West of the public house there are no views towards the Sunnica East site, due to an earth bund along the southern bank of the river blocking any views. This bund continues to the woodland south of Gravel Gardens.

It is however unclear which, if any, views are available from the footpaths between Gravel Gardens and Isleham Marina. This area should be considered for further viewpoints.

## 10 Golf Links Road, at Royal Worlington and Newmarket Golf Course

This viewpoint will show a limited part of the area for solar panels as dense vegetation provides a screen towards the extensive site area beyond. Additional viewpoints are required from the location of this vegetation, from Golf Links Road at the boundary of the golf course. It should also be established, if there are any potential viewpoints from the golf course.

There should also be at least one additional viewpoint looking south-west from the junction of Golf Links Road and Newmarket Road, and one from the footpath beginning at Newmarket Road leading to The Grange Farm.

## 14 Ark Project Isleham

Viewpoint needs to be multidirectional from here and also explore views to the north-east, across Lee Brook.

Hedge reinforcements/planting at western site boundary, parallel to access to Lee Farm required.

### Additional viewpoints

Additional viewpoints in various directions should also be considered from crossroads/ bridge at Fourways Farm (Beck Road) and between this crossroads and Mildenhall Road.

## **Appendix 2: Suffolk Archaeology comments to Planning Inspectorate**

Please find below our comments and advice in relation to all elements of this Major Infrastructure Project which are located in Suffolk. This is primarily Sunnica East, alongside a small section of the connection corridor. Cambridgeshire County Council Archaeological Service should also be consulted on this cross-county scheme, as well as Historic England and the Forest Heath Conversation Officer regarding the settings impacts upon above ground and designated heritage assets within and surrounding the development area. This includes Scheduled Ancient Monument, Listed Buildings, Registered Parks and conservation areas.

### *Potential Impact:*

This extremely large proposal affects an area of known archaeology recorded in the County Historic Environment Record (HER). Within the red line development boundary itself, both above and below ground archaeological remains and extensive multi-period find scatters have been recorded (see baseline information below), with large numbers of further archaeological finds and features recorded surrounding the Sunnica East site. However, the majority of the proposed development area has never been subject to systematic archaeological investigation and, therefore, the character, extent and significance of surviving below ground heritage assets which will be impacted upon by this scheme has yet to be defined.

The proposed development (including temporary land take areas for construction, infrastructure improvement works, landscaping and screening works and any other mitigation works involving ground disturbance) would have a direct impact upon heritage assets as the planned works will damage or destroy any surviving remains which exist within the site, however, without further assessment, the impacts cannot be fully understood. The scale of this proposed development scheme means that it has the potential to cause wholesale destruction of an archaeological landscape. Thorough desk top assessment and field evaluation is therefore needed to allow the archaeological potential of the different parts of the study area and therefore the likely impacts of the proposed development, to be fully assessed. Evaluation will provide sufficient baseline information to enable design decisions to be made and to inform planning decisions. The potential impact of this development upon the setting of designated heritage assets as well as the historic landscape also needs to be assessed.

### *Baseline Information:*

Suffolk County Council Archaeological Service (SCCAS) are pleased that archaeology has been scoped in as part of the EIA, however, the high potential of proposals to impact upon both known and previously unrecorded below ground heritage assets is not adequately recognised.

The Sunnica East development area is situated in a very favourable topographic location for archaeological activity from all periods, on light soils and in close proximity to the River Lark and Lee Brook. Existing data regarding heritage assets present within the proposed development areas comes from information recorded within the County HER, with archaeological finds and sites identified through archaeological investigations, aerial photography, metal detecting and fieldwalking. Existing records show that that this proposed development area is located within a landscape of known multi-period archaeology.

Extensive archaeological finds and features are recorded on the County HER within the red line development boundary, as well as in the immediate vicinity. Within the Sunnica East site itself, a Bronze Age barrow cemetery is recorded. This includes the barrow BTM 004, which is a Scheduled Ancient Monument and therefore must not be disturbed by development. Setting implications will also need to be considered and development within

the field in which the barrow is situated is unlikely to be supported by Historic England. Remains of further barrows (BTM 017 and 028) are also situated within the proposed development area, with further barrow sites and finds of human remains, recorded just outside of the red line development boundary (BTM 027, WGN 003, 013, 039). As such there is high potential for archaeological remains relating to prehistoric funerary activity to survive within the Sunnica East site.

A ploughed out medieval moated site is also recorded near Freckenham (FRK 004) and extensive multi period finds scatters have also been identified throughout the proposed Sunnica East development area, with a particular focus of activity in close proximity to the River Lark and Lee Brook near Freckenham and West Row (WGN 009, 021, 025, FRK 002, 003, 010, 031, 032, 033, 037, 053, 053, 059 063, 064, 066, 068, 069, 077, 079, 084, 106 and 109). Further extensive multi-period scatters have also been recorded just beyond the red line site boundary. These finds are indicative of settlement and funerary activity from all periods. This is evidenced through the results of the limited archaeological investigations which have taken place within and on the edge of the red line development area, with prehistoric features recorded within Worlington Quarry (WGN 028, 033 and 034) and an Anglo Saxon hut site and Roman inhumations identified during historic archaeological works just beyond the proposed development boundary near West Row (FRK 01 and FRK 012). A Roman building of some status is also indicated immediately adjacent to the development area, through extensive scatters of building material and other finds (WGN 023). There is also potential for paleoenvironmental and waterlogged archaeological remains to survive within the part of the development area located within the floodzone of Lee Brook.

As well as known archaeological remains, there is also extremely high potential for additional extensive and significant below ground heritage assets to survive within the proposed development area, which are as yet unknown, due to only limited systematic archaeological investigation having been undertaken previously.

There is a strong likelihood for remains of national significance to survive within the proposed development area, given the high potential for remains of funerary and settlement activity to be present within this site. The landscape and multi-period nature of archaeology which is likely to exist enhances its potential significance. As a result, there is high potential for remains which are worthy of preservation in situ to survive within the Sunnica east site.

#### *Methodology:*

Given the above evidence, the impact of this development cannot be assessed (or permission granted) until a full archaeological evaluation has been undertaken. All archaeological, heritage and landscape assessments should therefore be undertaken prior to the submission of the EIA. The results of this work will enable an accurate review of the archaeological resource (both in quality and extent). This is in accordance with paragraphs 189 and 190 of the National Planning Policy Framework and also NPS EN-1 paragraphs 5.8.8 - 5.8.10.

SCCAS would advise that all of the Sunnica East site and associated connection corridor should be subject to archaeological assessment at this stage in considering the layout and design of new development, to allow for preservation in situ where appropriate of any sites of importance that might be defined (and which are currently unknown) and to allow archaeological strategies to be designed. A desk-based assessment would be appropriate in the first instance, including a search of the Historic Environment Record, a historic map regression, a study of aerial photography (including historical imagery), an assessment of

LIDAR data, and predictive modelling of potential based upon topographic and geological evidence. A site walkover site should also be undertaken.

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

Geophysical survey (a combination of magnetometry and resistivity as appropriate), also accompanied by fieldwalking and a metal detecting survey, should form a first phase of field evaluation for the entire development area. The results of these assessments should be used to then inform a programme of trial trenched evaluation. Paleoenvironmental assessment should also be undertaken as appropriate.

Upfront work will ensure all options can be properly considered (including giving proper thought to preservation in situ and alternative solutions). The results of all of the above evaluation and assessment techniques should then be used to develop a mitigation strategy for the site, which should be presented as part of the EIA and planning application. Proposals should be discussed and agreed with SCCAS. Some areas (as yet unidentified) may require preservation in situ where appropriate. For surviving below ground archaeological heritage assets, where (1) development impacts are proposed that will damage or destroy remains and (2) where mitigation through recording is considered acceptable, the resultant mitigation included in the EIA 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, and the definition of areas which require further investigation, will be based upon the results of the suite of evaluation and assessment work undertaken. Proposals for outreach and enhanced public understanding as part of this mitigation work should also be included as part of the EIA.

#### *Note*

The Conservation Team of the Suffolk County Council Archaeological Service would be pleased to offer guidance on the archaeological work required and will, on request, provide a brief for each stage of the archaeological investigation.

Please see our website for further information on procedures and costs:  
<http://www.suffolk.gov.uk/libraries-and-culture/culture-and-heritage/archaeology/>)

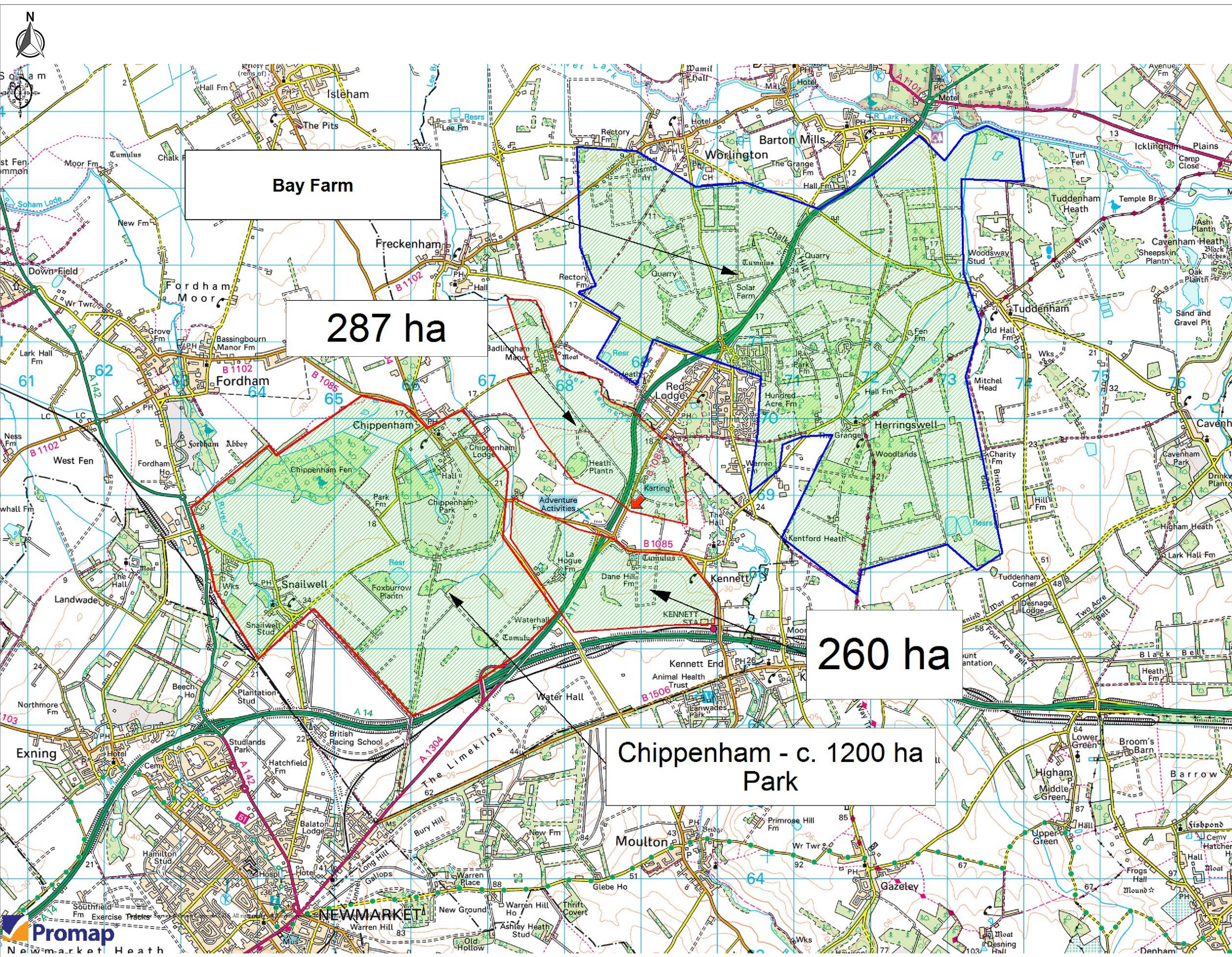
Please do get in touch if there is anything that you would like to discuss, or if you require any further information

**Appendix 3: Geographical Extent of Bay Farm anaerobic digester feedstock sources**





Proposed On-Farm AD Plant at Bay Farm, Worlington, IP28 6BS



Title	Geographical extent of feedstock sources
Reference	S&P-Bay-001 Revision: A
Date	17-2-2016
Paper size	A3
Scale	1:50,000

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