



**The Droves Solar Farm Limited (EN0110013)**

**Mid Suffolk District Councils submission to relevant representations**

Introduction

Mid Suffolk District Council (MSDC) welcomes the opportunity to submit this Relevant Representation in relation to The Droves Solar Farm application. This submission builds upon comments previously made during the non-statutory consultation and sets out the key matters that MSDC considers require detailed examination as part of the process.

MSDC acknowledges the national importance of renewable energy generation, however, due to the considerable number of Nationally Significant Infrastructure Projects (NSIPs) and other major renewable schemes in the region, the Council must ensure that cumulative impacts are appropriately assessed, mitigated, and coordinated.

Principle of Development

The council acknowledges the contribution the scheme would make to increasing renewable energy generation, required to meet net zero targets. The Council must balance the urgent need for decarbonisation with its responsibility to protect the character, wellbeing, and long-term interests of Mid Suffolk's communities, environment, heritage assets, agricultural land, and local economy. The district's rural character, historic landscape, and pattern of small settlements are particularly sensitive to large-scale development, and the potential harms arising from the cumulative burden of numerous simultaneous NSIPs in the region are of significant concern.

For these reasons, the Council is clear that large-scale renewable development must be strategically planned, appropriately sited, and fully coordinated with other regional NSIPs. The approach must also be supported by robust evidence demonstrating that adverse impacts have been minimised and effectively mitigated. At present, the volume of energy generation, storage and transmission proposals coming forward across the eastern region including several within and around Mid Suffolk, makes a strategic, coordinated approach essential. Without such coordination, there is a real risk of disproportionate and avoidable cumulative effects on local communities, rural settlements, heritage landscapes, biodiversity, local businesses, the agricultural economy, the highway network, construction logistics, and the capacity of the local housing and tourism sectors to absorb temporary workforces.

While the Council remains open to supporting well-designed renewable energy schemes, acceptance depends on the applicant demonstrating that environmental and heritage impacts have been fully and transparently assessed, that cumulative impacts have been modelled realistically, and that proposed mitigation is deliverable, enforceable and secured. The Council also expects developers to show how their proposals will integrate with a wider, coordinated



approach to infrastructure delivery in the region rather than contributing to piecemeal pressure on sensitive landscapes and communities.

This position reflects the Council's commitment to both climate action and the long-term protection of Mid Suffolk's communities and landscapes.

### Transport and Construction Logistics

#### *Port of Entry and Freight Routing*

MSDC notes that the Applicant has not confirmed the intended port of entry for the delivery of major components. This lack of certainty limits the robustness of any construction traffic modelling and prevents a complete understanding of transport impacts.

The Council therefore requests:

- Confirmation of the specific port(s) to be used.
- A complete end-to-end freight routing strategy, including movements from port to site.
- Details of AIL routing which should avoid the A140 at Brockford, necessitating overbridging and resulting in significant disruption for this part of Mid Suffolk.
- Evidence that the A14, A140, and local distributor roads within Mid Suffolk can accommodate the cumulative pressures from regional NSIPs during overlapping construction periods.

### Cumulative Transport Impacts

Mid Suffolk is within a region seeing the delivery of multiple concurrent infrastructure schemes. Together, these may generate significant cumulative construction traffic pressures.

MSDC seeks:

- A revised cumulative transport assessment using realistic build-out assumptions for other interrelated NSIPs and large-scale developments.
- Clear identification of pinch points, peak construction overlaps, resulting impacts and adequate mitigation.
- A robust Construction Traffic Management Plan (CTMP) that includes enforceable conditions and cross-project coordination.

### Workforce Accommodation and Socio-Economic Effects

#### *Labour Catchment Area Pressures*

Mid Suffolk sits within the wider Labour Catchment Area for several major NSIPs and large-scale development projects. MSDC remains concerned about the potential cumulative demand for temporary accommodation, with associated risks including:

- Pressure on tourism accommodation stock;
- Competition for private rental properties, potentially restricting access for local households;
- Increased affordability challenges for Mid Suffolk residents.



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- Appropriate and effective social integration of temporary workforce populations.

MSDC therefore requests:

- A fully detailed breakdown of workforce size, duration, and accommodation needs;
- A cumulative assessment of impacts on the tourism and private rental sectors;
- Appropriate mitigation measures, including coordination with other developments, consideration of temporary accommodation solutions and appropriate management of social integration issues.

### *Cross-Project Coordination*

Given the extraordinary scale of infrastructure delivery across Suffolk and the wider region, MSDC emphasises the need for early coordination between developers, local authorities, and agencies involved in other NSIPs and large-scale developments to manage cumulative accommodation and labour market pressures effectively.

### Adequacy of the Cumulative Impact Assessment

MSDC continues to have concerns regarding the adequacy and methodological robustness of the cumulative impact assessment (CIA). In particular, the CIA must:

- Incorporate up-to-date construction programmes from all relevant NSIPs and large-scale developments;
- Provide transparent assumptions regarding construction period overlaps;
- Demonstrate that cumulative traffic, accommodation, environmental, and socio-economic impacts have been assessed consistently and comprehensively;
- Assign responsibility for delivering mitigation where cumulative effects are significant.

### Conclusion

Mid Suffolk District Council supports the transition to renewable energy but considers that several matters must be clarified or mitigated before the project can be considered acceptable.

These include:

- Transport routing and cumulative network impacts;
- Workforce accommodation pressures;
- Adequacy of the cumulative impact assessment.

MSDC respectfully requests that the Examining Authority explores these matters fully during the Examination and reserves the right to provide further detailed submissions as the process progresses.

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