



9<sup>th</sup> February 2025

██████████  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich  
IP1 2BX

By email only

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*Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development.*

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**Application:** DC/26/00298  
**Location:** EcoPower Suffolk Solar Project  
**Proposal:** Consultation on Application received by the Planning Inspectorate - Scoping Opinion for the EcoPower Suffolk Solar project

Thank you for consulting us on the Scoping Opinion for the EcoPower Suffolk Solar project.

### **Summary**

We have reviewed the Environmental Impact Assessment Scoping Report (Parts 1 – 9) prepared by ARUP Ltd (January 2026), relating to the above EIA Scoping Opinion application. As a result, we have the following comments on the scope of the assessment:

### **Baseline Information:**

The desktop assessment has been prepared in consultation with the Suffolk Biodiversity Information Service & Norfolk Biodiversity Information Service and these records inform the survey requirements. International designated sites, national



designated sites, Non-designated Wildlife Sites (non-statutory designated sites) and Priority habitats have been considered adequately.

Irreplaceable habitats have not been specifically referenced within the baseline, but Veteran trees have been referenced within 'Table C-9 Priority habitats'. As a result, we would expect that irreplaceable habitats to be referenced separately in the baseline information, with the following irreplaceable habitats included, even if impacts can be ruled out:

- ancient trees
- veteran trees
- ancient woodlands

Protected and Priority species have been considered adequately. Records from new or updated surveys undertaken should be shared with the local record centres.

**Methodology:**

We support the methodology, subject to our comments above being embedded with regard to irreplaceable habitats.

We are satisfied that nationally agreed guidelines have been followed for the proposed ecology surveys, as well as the surveys completed to date, based on the overview provided. All survey work will need be undertaken in the appropriate season by appropriately qualified ecological consultants. Survey and assessment for protected species and ancient woodland, ancient trees and veteran trees should meet the requirements of Natural England Standing Advice.

In accordance with Regulation 14 of the EIA Regulations, the finalised ES should provide a statement about the relevant expertise or qualifications of the competent experts involved in its preparation. In addition, any report on badgers should be submitted as a separate confidential appendix clearly marked as containing sensitive information.

**Potential Impacts:**

We have assessed the potential impacts of the proposal during the construction, operation and maintenance and decommissioning phases of the project and agree with the scope of the potential impacts listed.

In terms of the detailed scoping assessment, we have the following comments set out in the table below:



**Table 1. Review of the scope for biodiversity.**

Biodiversity Sub-topic:	Assessment of scope rationale:
International Statutory Designated sites within 10 km of the draft Order Limits	We agree no likely significant effects are likely to occur on Waveney & Little Ouse Valley SAC and Redgrave & South Lopham Fens Ramsar. Therefore, we agree that impacts can be scoped out.
National and locally important statutory designated sites within 2.5 km of the draft Order Limits	We agree with the scope for National and locally important statutory designated sites and agree that no impacts are expected during the operation and maintenance phase.
Local wildlife sites within 2 km of the draft Order Limits	We agree with the scope for Local wildlife sites and agree that no impacts are expected during the operation and maintenance phase.
Ancient woodland and priority habitats within 200 m of the draft Order Limits	We agree with the broad scope for ancient woodland Local wildlife sites and agree that no impacts are expected during the operation and maintenance phase. However, we suggest that irreplaceable habitats a specifically referenced to include considerations on ancient and veteran trees, as well as ancient woodlands.
On-site habitats including, arable field margins, cropland hedgerows, deciduous woodland and ponds within / adjacent to draft Order Limits.	We agree with the scope for on-site habitats and agree that no impacts are expected during the operation and maintenance phase.  We would expect botanical surveys to be completed by a suitably qualified botanical specialist to assess whether there is any notable flora (i.e. BSBI - <a href="#">Rare Plant Registers</a> ) present across the proposed order limits.
Amphibians	We agree with the scope for amphibians and agree that no impacts are expected during the operation and maintenance phase.
Great crested newts	We agree with the scope for Great Crested Newt and agree that no impacts are expected during the operation and maintenance phase.
Badgers	We agree with the scope for Badger and agree that no impacts are expected during the operation and maintenance phase.



Bats	<p>We agree with the scope for Bats and agree that impacts during the operation and maintenance phase must be scoped in.</p> <p>It is highlighted that the LPA will likely recommend further on-going monitoring commitments to assess the impacts upon bats during the operation phase of the development.</p>
Birds (breeding and wintering)	<p>We agree with the scope for birds and agree that impacts during the operation and maintenance phase must be scoped in.</p> <p>It is highlighted that the LPA will likely recommend further on-going monitoring commitments to assess the impacts upon birds during the operation phase of the development.</p>
Barn owls	<p>We agree with the scope for birds and agree that impacts during the operation and maintenance phase must be scoped in.</p>
Aquatic fauna	<p>We agree with the scope for Aquatic fauna and agree that no impacts are expected during the operation and maintenance phase.</p>
Otter and water vole	<p>We agree with the scope for Otter and Water Vole and agree that no impacts are expected during the operation and maintenance phase.</p>
Hazel dormouse	<p>We agree in principle that the scope can exclude Hazel Dormouse. However, we would expect further professional judgement within the Environment Statement / accompanying Preliminary Ecological Appraisal on why the habitat conditions on-site are not suitable.</p>
Reptiles	<p>We agree with the scope for Reptiles and agree that no impacts are expected during the operation and maintenance phase.</p>
INNS	<p>We agree with the scope for INNS and agree that no impacts are expected during the operation and maintenance phase.</p>
Invertebrates	<p>Based on existing habitat on-site, comprising of predominantly intensively managed agricultural</p>



	land, we agree that invertebrates can be scoped out.
Other mammals	We agree with the scope for 'other mammals' and agree that no impacts are expected during the operation and maintenance phase.

We are satisfied that potential impacts of the development upon biodiversity can likely be addressed via appropriately worded conditions or obligations.

**Opportunities:**

There is an opportunity to contribute to coherent ecological networks and enhance the order limits for the purposes of biodiversity. It is acknowledged that biodiversity net gains is not currently a mandatory requirement for NSIPs, but this expected to shortly to become a statutory requirement. Therefore, the proposals should fully evidence how a 10% biodiversity net gain will be achieved for all biodiversity unit types, as well as how the biodiversity gain hierarchy has been applied.

The EIA should also thoroughly explore all reasonable options to enhance the development for protected and Priority species, notably amphibians, reptiles, farmland birds and mammal priority species.

**Conclusion:**

We broadly agree with the scope of the Biodiversity section of the Environmental Impact Assessment Scoping Report, subject to irreplaceable habitats being included in the baseline / assessment methodology.

If you have any queries regarding the information stated above, please do not hesitate to contact us.

Yours sincerely,

**ACIEEM BSc (Hons)**

Senior Ecological Consultant

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**Place Services provide ecological advice on behalf of Mid Suffolk District Council**

**Please note:**

- *This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.*
- *We are unable to respond directly to applicants/agents or other interested parties.*
- *Any additional information, queries or comments on this advice that the applicant/agent or other interested parties may have, must be directed to the Planning Officer at the relevant LPA, who will seek further advice from us where appropriate.*



Date: 13/02/2026

For the attention of: [REDACTED]

**Ecopower Suffolk Solar – BMSDC: EIA Scoping Report | Reference: DC/26/00298**

Thank you for consulting with Place Services on the above application. The following advice concerns the Ecopower Suffolk Solar EIA Scoping Report issued on the 23<sup>rd</sup> January 2026. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

The following response summarises the specialist views of Place Services' Built Heritage, Landscape, and Ecology teams.

**1.0 Historic Buildings**

- 1.1. The following advice concerns the EcoPower Suffolk Solar EIA Scoping Report issued on 23 January 2026. This response reviews the Scoping Report and identifies areas requiring further work to ensure the impacts of the scheme upon built heritage assets within the Mid Suffolk District are understood, prior to the submission of the scheme as a formal application for planning consent.

**Heritage Baseline and Study Area**

- 1.2. Chapter 2 of the Scoping Report provides an overview of the site and surrounding area. Section 2.4 Paragraph 2.4.5 confirms there are no designated heritage assets within the Site boundary. The proposals are thus anticipated to impact the setting of designated built heritage assets only, not their physical fabric.
- 1.3. Paragraph 2.4.6 identifies there are 620 listed buildings located within 2km of the Draft Order Limits, some of these being directly adjacent. The 620 listed buildings are said to comprise:
- 16 buildings at Grade I
  - 46 buildings at Grade II\* - five of these are located within 50 metres of the Draft Order Limits.
  - 558 buildings at Grade II – three of these are located within 20 metres of the Draft Order Limits, and a further eight are within 50 metres.
- 1.4. NB the above numbers of Grade II and Grade II\* buildings have been transposed in the summary provided in Chapter 2 and these numbers are shown correctly

above and presented correctly in the table on page 46 in Chapter 7.3 (page 55 of the PDF document).

- 1.5. Seven Conservation Areas have been identified as being located within 2km:
  - Mellis Conservation Area (located directly adjacent to Area 3 Gislingham, Area 5 Thrandeston and Mellis and Area 3 Gislingham to Area 5 Thrandeston and Mellis Cable Corridor). It is noted on page 48 of the Scoping Report (page 57 of the PDF) that the Conservation Area is located within 5 metres of the Order Limits.
  - Thrandeston Conservation Area (adjacent to Area 5 Thrandeston and Mellis)
  - Eye Conservation Area (adjacent to Area 4 Occold to Area 2 Eye Cable Corridor). It is noted on page 48 of the Scoping Report (page 57 of the PDF) that the Conservation Area is located within 50 metres of the Order Limits.
  - Palgrave Conservation Area (approx. 750m north-west of Area 1 Stuston)
  - Scole Conservation Area (approx. 1km north-east of Area 1)
  - Hoxne Conservation Area (approx.. 1.2km north-east of Area 2 Eye)
  - Diss Conservation Area (approx. 1.2km north-west of Area 1 Stuston)
- 1.6. Sixteen Scheduled Monuments have been identified as being located within 2km, several are located within 500m of the Draft Order Limits and two of these are located within 5 metres of the draft Order Limits: Moated site 170m south east of Cranley Hall (List entry number 1020140) and Remains of Eye Priory at Abbey Farm (List entry number 1020174).
- 1.7. Non-designated built heritage assets have apparently been identified within the Site and wider Study Area. Paragraph 2.4.11 says that Figure 7.4 shows the locations of all identified designated and non-designated heritage assets. It is unclear from the key to Figure 7.4 how non-designated heritage assets are represented.
- 1.8. Chapter 7.3 of the Scoping Report refers to Cultural Heritage which considers all aspects of the historic environment including built heritage and the historic landscape.
- 1.9. The table on page 46 (page 55 of the PDF document) identifies the proposed Study Area. We are able to support the proposal to consider all designated heritage assets and non-designated built heritage assets within the Draft Order Limits and 500m from the draft Order Limits, and all designated heritage assets within 2km from the five Areas of solar panels and associated equipment. The Study Area is proposed to be reduced to 500m from the Cable Corridors which we deem to be acceptable on the basis that the cables are to be underground.
- 1.10. We also note that within 5km of the five Areas it is proposed to review designated heritage assets to identify those with the potential for change within their setting

and we support the suggested criteria including consideration of physical and historic connectivity and relationships with other sites and the wider landscape as well as the Proposed Development's Zone of Theoretical Visibility which is shown in Figure 7.8. We note further that it is anticipated that Scheduled Monuments and Grade I and Grade II\* listed buildings located within the Study Area and within the ZTV are considered likely to be the most sensitive to changes within their setting based on the EIA methodology (though what value/sensitivity is to be assigned to these assets has not yet been set out).

### **Proposed Viewpoints**

- 1.11. We note the proposed viewpoint locations and directions shown on Figure 7.8 but consider that there should be additional viewpoints and visualisations to specifically inform the assessment of impact on the setting and significance of heritage assets.
- 1.12. Views looking towards and out from Mellis Conservation Area would be a key priority due to the proximity to Area 3 Gislingham and Area 5 Thrandeston and Mellis, including views from and towards the listed buildings located at the western end of the Conservation Area:
- Grade II Pountney Hall (List entry number 1352239)
  - Grade II Barn About 40m North East of Poutney Hall (List entry number 1032805)
  - Grade II West End Farmhouse (List entry number 1181793)
  - Grade II Potash Farm House (List entry number 1284856)
- 1.13. And those located at the north-eastern end of the Conservation Area:
- Grade II\* Elm Tree Farmhouse (List entry number 1181795)
  - Grade II Barn about 40m North of Elm Tree Farmhouse (List entry number 1032815)
- 1.14. Due to their proximity to the proposed areas of solar panels, other viewpoints and visualisations should represent views from and towards:
- Grade II Gibsons Farmhouse (List entry number 1181694) – located to the north-west of Area 3 Gislingham
  - Grade II Stubbings Entry (List entry 1181712) – located to the west of Area 3 Gislingham
  - Moated Site at Stubbings Entry Scheduled Monument (List entry number 1016700) – ditto
  - Grade II\* Manor House (List entry number 1033163) – located in proximity to the south-west corner of Area 3 Gislingham
  - Grade II\* Ivy House Farmhouse (List entry number 1180705) – located in proximity to the south of Area 3 Gislingham

- Grade II Marsh Farmhouse (List entry number 1032768) – located to the north-west of Area 5 Thrandeston and Mellis
- 1.15. Further viewpoints and visualisations should be provided looking out from and towards the Thrandeston Conservation Area which is located to the east of Area 5 Thrandeston and Mellis. The following listed buildings are located at the western edge of the Conservation Area for which viewpoints and visualisations should be provided:
- Grade II\* The Manor House (List entry number 1182711)
  - Grade II The Old Cottage (List entry number 1032769)
- 1.16. We would also request additional viewpoints and visualisations should be provided for the following designated heritage assets:
- Grade II Stuston Place Farmhouse (List entry number 1352254) – located to the north-east of Area 1 Stuston
  - Grade II Hauntons Farmhouse (List entry number 1032796) – located to the north of Area 1 Stuston
  - Grade II\* Church of All Saints (List entry number 1032794) – located to the east of Area 1 Stuston (also located to the west of the eastern part of Area 1, but in less close proximity)
  - Grade II Cottrell's (List entry number 1032492) – located in proximity to the east of the eastern extremity of Area 1 Stuston)
  - Grade II Little Thatch (List entry number 1032496) – located to the north of Area 2 Eye
  - Grade II Byways (List entry number 1284922) – ditto
  - Grade II Barn 45 Metres South of Brome Park Farmhouse (List entry number 1316538) – located in a small area of land surrounded by Area 2 Eye
  - Grade II Conifer Cottage (List entry number 1316539) – located to the south of Area 3 Eye
  - Grade II Mustardpot Barn (List entry number 1409518 – ditto
  - Grade II\* Cranley Hall (List entry number 1316627) – located to the north of Area 4 Occold
  - Moated Site at Cranley Hall Scheduled Monument (List entry number 1019670) – ditto
  - Moated site 170m south east of Cranley Hall Scheduled Monument (1020140) – ditto

## Data Sources

- 1.17. The scoping baseline has thus far been informed by desktop sources including Historic England's National Heritage List for England (NHLE), Historic England's record of Conservation Areas and the Suffolk Historic Environment Record. These sources are acceptable, and I note that it is also proposed to consult Conservation Area appraisals and/or management plans and associated mapping

where available, which is supported. Whilst there is no published local list of buildings for the affected part of the district, there is also the potential to identify non-designated built heritage assets from walkover surveys (field investigations) of the Study Area guided by reference to historic mapping. We would expect to see this as part of the methodology to identify the heritage baseline.

### **Methodology and Impact Assessment**

- 1.18. For each heritage asset identified in the heritage baseline but scoped out of further assessment, a clear explanation should be provided. Likewise, where assets are proposed to be grouped for assessment, a clear rationale should be provided.
- 1.19. We note that effects resulting from change(s) to the setting of non-designated heritage assets within the Study Area are not proposed to be part of the ES assessment. This pre-empts any assessment of the significance of built non-designated heritage assets and assumes they will all be of low value/sensitivity. Non-designated built heritage assets within the Study Area should be clearly identified (including details of their location) and an assessment of their significance should be provided in the baseline study in accordance with paragraphs 5.9.9 and 5.9.12 of the Department for Energy Security & Net Zero's Overarching National Policy Statement for Energy (EN-1) (December 2025).
- 1.20. Parameters for the assignment of high, medium, low and very low receptor sensitivity to all designated and non-designated heritage assets should be clearly set out in the Environmental Statement.
- 1.21. Any non-designated heritage assets identified to be of higher than low value/sensitivity should be subject to an assessment of the contribution of setting to their significance and the impact on that significance arising from the proposed development. All setting assessments for designated and non-designated heritage assets should be carried out in accordance with the approach provided in Historic England's GPA Note 3 The Setting of Heritage Assets (2017).
- 1.22. It should be noted that some mitigation measures, for example screen planting may have as intrusive an effect on the setting of heritage assets as the development it seeks to mitigate, so where it is necessary, it too merits careful design. This should take account of local landscape character and seasonal and diurnal effects, such as changes to foliage and lighting. The permanence or longevity of screening in relation to the effect on the setting and significance also requires consideration.
- 1.23. Where designated and non-designated heritage assets are located within a Conservation Area, the assessment of the contribution of setting to significance and the impact of the development on that significance should be carried out for each individual heritage asset (or groups of assets where appropriate and justified) as well as for the Conservation Area.

- 1.24. Whilst we recognise the EIA methodology for impact assessment, the impact of the proposed development on the significance of designated and non-designated heritage assets should ultimately be expressed in terms of harm to significance (substantial harm, total loss, or less than substantial harm in the case of designated heritage assets) which is as set out in paragraphs 5.9.28 to 5.9.34 of NPS EN-1. Where a level of less than substantial harm to significance is identified, this should be expressed on a scale ranging from the lowest to the highest level.
- 1.25. We note that an Outline Construction Environmental Management Plan (OCEMP) will be submitted with the Application which is to include measures to reduce impacts during construction including the control of noise and vibration. I would expect this to include an assessment of whether any designated heritage assets are likely to be at risk of physical damage arising from construction activities.

## 2.0 Landscape

### National Policy Statement for renewable energy infrastructure (EN-3)

- 2.1. Solar NSIPS are covered by National Policy Statement for Renewable Energy Infrastructure (EN-3). The following paragraphs are relevant to this application.
- 2.2. Para 2.5.2: 'Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity...'
- 2.3. Para 2.10.29: While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible.'
- 2.4. Para 2.10.35: Applicants will need to consider the suitability of the access routes to the proposed site for both the construction and operation of the solar farm with the former likely to raise more issues.
- 2.5. Para 2.10.43: Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.
- 2.6. Para 2.10.44: Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way.
- 2.7. Para 2.10.48: Applicants should consider the need to minimise the impact on the landscape and the visual impact of security measures.

- 2.8. Para 2.10.74: Applicants should provide information on relevant impacts as directed by this NPS and the Secretary of State.
- 2.9. Para 2.10.86: Given the temporary nature of solar PV farms, sites should be configured or selected to avoid the need to impact on existing drainage systems and watercourses.
- 2.10. Para 2.10.94: The approach to assessing cumulative landscape and visual impact of large-scale solar farms is likely to be the same as assessing other onshore energy infrastructure. Solar farms are likely to be in low lying areas of good exposure and as such may have a wider zone of visual influence than other types of onshore energy infrastructure.
- 2.11. Para 2.10.97: Applicants should carry out a landscape and visual assessment and report it in the ES. Visualisations may be required to demonstrate the effects of a proposed solar farm on the setting of heritage assets and any nearby residential areas or viewpoints.
- 2.12. Para 2.10.98: Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays.
- 2.13. Para 2.10.99: Whilst there is an acknowledged need to ensure solar PV installations are adequately secured, required security measures such as fencing should consider the need to minimise the impact on the landscape and visual impact (see paragraphs 2.10.46 – 2.10.48 above).
- 2.14. Para 2.10.100: The applicant should consider as part of the design, layout, construction, and future maintenance plans how to protect and retain, wherever possible, the growth of vegetation on site boundaries.
- 2.15. Para 2.10.131: Applicants should consider the potential to mitigate landscape and visual impacts through, for example, screening with native hedges, trees and woodlands.
- 2.16. Para 2.10.132: Applicants should aim to minimise the use and height of security fencing. Where possible applicants should utilise existing features, such as hedges or landscaping, to assist in site security, or screen security fencing.
- 2.17. Para 2.10.133: Applicants should minimise the use of security lighting. Any lighting should utilise a passive infra-red (PIR) technology and should be designed and installed in a manner which minimises impact.

### **Review of submitted information**

- 2.18. In terms of Landscape impact, there are opportunities for biodiversity enhancement across the various sites, however the impact if the indicative

proposals will be significant. The introduction of solar panels and supporting ancillary infrastructure, (including security fencing) are incompatible with the existing landscape and setting. The combined impact of each of these sites will each have a degrading impact on the landscape and therefore the cumulative impact between each of the site and connecting cable corridors should be carefully reviewed.

- 2.19. Key considerations should also be considered to determine appropriate site boundaries and setbacks from roads and PROWs, BNG enhancements and landscape and visual mitigation.

**Environmental Impact Assessment Scoping Report Reference: 302827-00/EIASR Issue P01 (23rd January 2026)**

**Section 7.6 Landscape and visual amenity**

- 2.20. For a development of this scale, quantum and reach, we recommend that the area considered for the 'Principal Area Visibility' is extended to 2km. Figure 7.8 details the terrain mapping which indicate that the visual envelope of the development will be broader than the proposed viewpoints suggest. Additional viewpoints should be considered to establish the wider/longer views to the site/s. (See comments on Fig7.8.)

**Errors**

- 2.21. Page E-7-10; various references are made to East Suffolk- the site is over 10km from East Suffolk. These references should be reviewed and updated.

**Changes to Site Area**

- 2.22. The site areas have been expanded since our comments on the pre-engagement proposals (April 2025). From a landscape perspective the extended areas include some of the most visually open and sensitive locations, including Area 3 Gislingham (extended to the southeastern corner), Area 1 Suston (a new field to the north) and Area 2 Eye (large extended area to the south).

**Viewpoints**

- 2.23. Fig 7.8 Viewpoints and ZTV Overview (Drawing number YSF-SR-00013) Sheets 1to6
- 2.24. Comments:
- No viewpoints have been selected to show the impact of the cable corridors. The undergrounding of the cable route will likely include grid connection infrastructure as well as other ancillary elements which will have a significant impact on the landscape in these locations. This needs

to be recorded as part of the LVIA assessment with additional viewpoints and modelling.

- The mapping fails to show the full extent of the Digital terrain and surface modelling or the extent of the 1km buffer,
- A viewpoint overlay should be provided showing PROW, road network, heritage assets and conservation areas
- The number and location of the proposed viewpoints is inadequate for a development of this scale and significance, for example Area 3 Gislingham has an area of circa 300 hectares and only has 3no. viewpoints from the south, 1no. viewpoint from the west, 2no. viewpoints from the north and 2no viewpoints from the east.
- Based on our initial site analysis, (and in addition to the cable corridor locations) we would seek to include additional viewpoints in the following locations:
  - Sheet 2 (Area 3) The various public rights of way (PROW) southeast of the site as well as the lane connecting Gislingham with Little Green, views to the site from the north
  - Sheet 3 (Area 5) Views to the site from the east and north of Mellis,
  - Sheet 4 (Area 1) Views from Suston, Brome and south/north of the B1118,
  - Sheet 5 (Area 2) Views from the south of the site and the various PROW from the west. No current viewpoints are proposed from the west of the site.
  - Sheet 6 (Area 4) Views to the site from the B1077 (west), as well as the PROW running north-south both through the site and to the northwest.

## Page 68 Assumptions and limitations

- 2.25. Bullet point one states, *“All fieldwork will be undertaken from publicly accessible locations. Professional judgement will be used to assess residents’ views, aided by aerial photography and fieldwork observations.”*
- 2.26. In terms of supporting information, a Landscape and Visual Impact Assessment (LVIA) which follows the principles set out on the third edition of "Guidelines for Landscape and Visual Impact Assessment" (GLVIA3), should be undertaken and submitted as part of any future work and should include specific reference to:
- Context and character appraisal
  - Landscape constraints and opportunities
  - Analysis of visual impact from key viewpoint locations for each parcel and key receptors based on an accurate and appropriately identified Zone of Theoretical Visibility (ZTV)

- Mitigation proposals and recommendations
- 2.27. All visual representation with any submitted Landscape and Visual Impact Assessment (LVIA) should be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019) to ensure the assessment of visual impact is accurate and in turn an appropriate judgement of the assessed impacts can be made with viewpoint photographs should be formatted accordingly. Viewpoint locations should be agreed with the local Planning Authority.
- 2.28. The LVIA should be carried out by a suitably qualified or experienced practitioner. The fieldwork should be undertaken following best practice and be scheduled within winter months where vegetation and leaf cover show the worst-case scenario. Wire frame visualisations will be an important element of the field work, analysis and methodology.

### 3.0 Ecology

- 3.1. We have reviewed the Environmental Impact Assessment Scoping Report (Parts 1 – 9) prepared by ARUP Ltd (January 2026), relating to the above EIA Scoping Opinion application. As a result, we have the following comments on the scope of the assessment:.
- 3.2. **Baseline Information:** The desktop assessment has been prepared in consultation with the Suffolk Biodiversity Information Service & Norfolk Biodiversity Information Service and these records inform the survey requirements. International designated sites, national designated sites, Non-designated Wildlife Sites (non-statutory designated sites) and Priority habitats have been considered adequately.
- 3.3. Irreplaceable habitats have not been specifically referenced within the baseline, but Veteran trees have been referenced within 'Table C-9 Priority habitats'. As a result, we would expect that irreplaceable habitats to be referenced separately in the baseline information, with the following irreplaceable habitats included, even if impacts can be ruled out:
- ancient trees
  - veteran trees
  - ancient woodlands
- 3.4. Protected and Priority species have been considered adequately. Records from new or updated surveys undertaken should be shared with the local record centres.
- 3.5. **Methodology:** We support the methodology, subject to our comments above being embedded with regard to irreplaceable habitats.

- 3.6. We are satisfied that nationally agreed guidelines have been followed for the proposed ecology surveys, as well as the surveys completed to date, based on the overview provided. All survey work will need to be undertaken in the appropriate season by appropriately qualified ecological consultants. Survey and assessment for protected species and ancient woodland, ancient trees and veteran trees should meet the requirements of Natural England Standing Advice.
- 3.7. In accordance with Regulation 14 of the EIA Regulations, the finalised ES should provide a statement about the relevant expertise or qualifications of the competent experts involved in its preparation. In addition, any report on badgers should be submitted as a separate confidential appendix clearly marked as containing sensitive information.
- 3.8. **Potential Impacts:** We have assessed the potential impacts of the proposal during the construction, operation and maintenance and decommissioning phases of the project and agree with the scope of the potential impacts listed.
- 3.9. In terms of the detailed scoping assessment, we have the following comments set out in the table below:

3.10. Biodiversity Sub-topic:	Assessment of scope rationale:
International Statutory Designated sites within 10 km of the draft Order Limits	We agree no likely significant effects are likely to occur on Waveney & Little Ouse Valley SAC and Redgrave & South Lopham Fens Ramsar. Therefore, we agree that impacts can be scoped out.
National and locally important statutory designated sites within 2.5 km of the draft Order Limits	We agree with the scope for National and locally important statutory designated sites and agree that no impacts are expected during the operation and maintenance phase.
Local wildlife sites within 2 km of the draft Order Limits	We agree with the scope for Local wildlife sites and agree that no impacts are expected during the operation and maintenance phase.
Ancient woodland and priority habitats within 200 m of the draft Order Limits	We agree with the broad scope for ancient woodland Local wildlife sites and agree that no impacts are expected during the operation and maintenance phase. However, we suggest that irreplaceable habitats a specifically referenced to include considerations on ancient and veteran trees, as well as ancient woodlands.
On-site habitats including, arable field margins, cropland hedgerows, deciduous	We agree with the scope for on-site habitats and agree that no impacts are expected during the operation and maintenance phase. We would expect botanical surveys to be

woodland and ponds within / adjacent to draft Order Limits.	completed by a suitably qualified botanical specialist to assess whether there is any notable flora (i.e. BSBI - Rare Plant Registers) present across the proposed order limits.
Amphibians	We agree with the scope for amphibians and agree that no impacts are expected during the operation and maintenance phase.
Great crested newts	We agree with the scope for Great Crested Newt and agree that no impacts are expected during the operation and maintenance phase.
Badgers	We agree with the scope for Badger and agree that no impacts are expected during the operation and maintenance phase.
Bats	We agree with the scope for Bats and agree that impacts during the operation and maintenance phase must be scoped in.  It is highlighted that the LPA will likely recommend further on-going monitoring commitments to assess the impacts upon bats during the operation phase of the development.
Birds (breeding and wintering)	We agree with the scope for birds and agree that impacts during the operation and maintenance phase must be scoped in.  It is highlighted that the LPA will likely recommend further on-going monitoring commitments to assess the impacts upon birds during the operation phase of the development.
Barn owls	We agree with the scope for birds and agree that impacts during the operation and maintenance phase must be scoped in.
Aquatic fauna	We agree with the scope for Aquatic fauna and agree that no impacts are expected during the operation and maintenance phase.
Otter and water vole	We agree with the scope for Otter and Water Vole and agree that no impacts are expected during the operation and maintenance phase.
Hazel dormouse	We agree in principle that the scope can exclude Hazel Dormouse. However, we would expect further professional judgement within the Environment Statement / accompanying

	Preliminary Ecological Appraisal on why the habitat conditions on-site are not suitable.
Reptiles	We agree with the scope for Reptiles and agree that no impacts are expected during the operation and maintenance phase.
INNS	We agree with the scope for INNS and agree that no impacts are expected during the operation and maintenance phase.
Invertebrates	Based on existing habitat on-site, comprising of predominantly intensively managed agricultural land, we agree that invertebrates can be scoped out.
Other mammals	We agree with the scope for 'other mammals' and agree that no impacts are expected during the operation and maintenance phase.

- 3.11. We are satisfied that potential impacts of the development upon biodiversity can likely be addressed via appropriately worded conditions or obligations.
- 3.12. **Opportunities:** There is an opportunity to contribute to coherent ecological networks and enhance the order limits for the purposes of biodiversity. It is acknowledged that biodiversity net gains is not currently a mandatory requirement for NSIPs, but this expected to shortly to become a statutory requirement. Therefore, the proposals should fully evidence how a 10% biodiversity net gain will be achieved for all biodiversity unit types, as well as how the biodiversity gain hierarchy has been applied.
- 3.13. The EIA should also thoroughly explore all reasonable options to enhance the development for protected and Priority species, notably amphibians, reptiles, farmland birds and mammal priority species.
- 3.14. **Conclusion:** We broadly agree with the scope of the Biodiversity section of the Environmental Impact Assessment Scoping Report, subject to irreplaceable habitats being included in the baseline / assessment methodology.

Please do not hesitate to contact us if you have any queries in relation to this advice.

## Place Services Single Response

Email: [SingleResponse@essex.gov.uk](mailto:SingleResponse@essex.gov.uk)



Place Services provide and coordinate specialist planning advice on behalf of Essex County Council.

*Please note:*

- *This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.*
- *We are unable to respond directly to applicants/agents or other interested parties.*
- *Any additional information, queries or comments on this advice that the applicant/agent or other interested parties may have, must be directed to the Planning Officer and the relevant LPA, who will seek further advice from us where appropriate.*