



SCOPING OPINION:

Proposed EcoPower Suffolk Solar Project

Case Reference: EN0110019

Adopted by the Planning Inspectorate (on behalf of the Secretary of State)
pursuant to Regulation 10 of The Infrastructure Planning (Environmental
Impact Assessment) Regulations 2017

04 March 2026

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1. INTRODUCTION

- 1.0.1 On 23 January 2026, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from EcoPower Suffolk Ltd (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed EcoPower Suffolk Solar Project (the proposed development). The applicant notified the Secretary of State (SoS) under regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and by virtue of regulation 6(2)(a), the proposed development is 'EIA development'.
- 1.0.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a Scoping Report, available from:

[Documents | EcoPower Suffolk Solar](#)

- 1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the proposed development as currently described by the applicant. This Opinion should be read in conjunction with the applicant's Scoping Report.
- 1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in appendix 1 in accordance with EIA regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.0.6 The Inspectorate has published a series of advice pages, including '[Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#)'. AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.
- 1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

['Nationally Significant Infrastructure Projects: Advice pages'](#)

- 1.0.8 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Section 3)

ID	Ref	Description	Inspectorate's comments
211	Section 1.1.3	Site boundary	The Scoping Report states that the site boundary will be refined as the detailed design develops. The ES should describe any alterations to the final boundary for the Development Consent Order (DCO), including an explanation of the reasons for the changes. The applicant should ensure that the scope of assessments within the ES reflects the maximum extent of the proposed development.
212	Sections 2.1.3 and 4.2.1	Electricity export connection to Yaxley Substation	<p>The Inspectorate notes that the proposed development proposes to export electricity to the transmission network via the new National Grid Substation at Yaxley. Scoping Report section 4.2.1 states that the new substation at Yaxley is currently being constructed.</p> <p>The applicant's attention is drawn to the comments from National Grid at Appendix 2 of this Scoping Opinion regarding the capacity of the existing Yaxley substation and ongoing optioneering to connect new customers to the transmission network.</p> <p>The ES should clearly describe the relationship between the proposed development and connected projects, including an assessment of alternatives and reasoning as to why the preferred option has been chosen. This should include the extent to which the proposed development is dependent on the delivery of other projects, the development timelines and anticipated consenting routes of the other projects, and an explanation of how these will be coordinated. Cumulative effects with connected projects should be fully assessed in the ES.</p>
213	Section 2.3	Construction compounds	The Scoping Report states that the proposed development would require temporary construction compounds within the site, however, the exact location and scale is yet to be determined. To ensure a robust assessment of likely significant effects, the ES should provide details regarding the number, location and dimensions of construction compounds.

ID	Ref	Description	Inspectorate's comments
			The applicant's attention is drawn to the consultation response from Anglian Water at Appendix 2 of this Scoping Opinion regarding the location of construction compounds to minimise impacts on underground water assets.
214	Sections 3.1.3 and 6.2	Maximum design parameters	At this stage of development, the locations of project elements such as Battery Energy Storage Systems (BESS) have not been determined. The Inspectorate notes the applicant's intention to apply a 'Rochdale Envelope' approach to maintain flexibility within the design of the proposed development. The Inspectorate expects that at the point an application is made, the description of the proposed development will be sufficiently detailed to include the design, size, capacity, technology, and locations of the different elements of the proposed development or where details are not yet known, will set out the assumptions applied to the assessment in relation to these aspects. This should include the footprint and heights of the structures (relevant to existing ground levels), as well as land-use requirements for all elements and phases of the development. The description should be supported (as necessary) by figures, cross-sections, and drawings which should be clearly and appropriately referenced. Where flexibility is sought, the ES should clearly set out and justify the maximum design parameters that would apply for each option assessed and how these have been used to inform an adequate assessment in the ES. The Inspectorate advises that each aspect chapter includes a section that outlines the relevant parameters / commitments that have informed the assessment.
215	Section 3.1.3	Panels	The Scoping Report states that there are two options for the proposed solar PV panels: fixed or tracking. The Inspectorate recommends that this decision is made prior to submission of the DCO application. If this is not possible, the ES should identify and assess the worst-case scenario for applicable topics (including Landscape and Visual, Cultural Heritage and Glint and Glare) during operation. The ES should consider the potential for tracker panels to cause noise emissions which could be perceptible to sensitive receptors and should assess these accordingly where significant effects are likely to occur.

ID	Ref	Description	Inspectorate's comments
216	Section 3.13	Operational lifespan	The Inspectorate notes that the operational life of the proposed development is assumed to be 40 years for the purposes of the Scoping Report and subsequent ES. However, section 3.13 of the Scoping Report states there is potential for the operational lifespan to be extended. The ES should explain how the uncertainty around the design life of the proposed development has been accounted for in reaching the assessment conclusions. Any potential impacts that are likely to result in significant effects arising from the proposed development should it operate beyond the 40-year timeframe should be assessed in the relevant ES aspect chapters.
217	Section 3.4.6	Horizontal Directional Drilling (HDD)	The Inspectorate notes that there is potential for trenchless crossing techniques for the cables, including Horizontal Directional Drilling (HDD) under or in close proximity to watercourses. Where HDD is employed, the ES should be accompanied by a drilling fluid breakout plan which should provide detail on how any accidental spillages would be managed. Any potential significant effect to hydrological or groundwater receptors should be assessed in the ES.
218	Section 3.8	Access routes	The ES should describe the proposed site entrance/s and routes to be used for all vehicular access during construction and operation of the proposed development, and this information should be clearly presented on supporting plans within the ES. The ES should describe and assess the potential impacts (both positive and negative) associated with any improvements/ changes to the access routes which are either required to facilitate construction of the proposed development or are required for restoration purposes on completion of the works. For the assessment of impacts during construction, the ES should explain how the proposed access route(s) relate to sensitive receptors.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 6)

ID	Ref	Description	Inspectorate's comments
221	n/a	Professional judgement	The ES should clearly identify where professional judgement has been relied upon to determine the level of significance of effects. Any use of professional judgement to assess significance should be fully justified within the ES.
222	n/a	Presentation of information / cross-referencing	There are references in the Scoping Report to information contained in "Section 0". The Inspectorate assumes that this is a textual error and the references are to other sections of the report. Care should be taken to ensure that cross-referencing in the ES is accurate and consistent.
223	n/a	Environment Agency data	The Environment Agency has published new flood and coastal erosion risk data in 2025 following the release of its "National assessment of flood and coastal erosion risk in England 2024". Further updates are also expected to follow. The applicant should ensure that assessments take account of updated data sets as these become available through Defra's Data Services Platform. Where relevant, the applicant is encouraged to liaise with the EA to determine the implications for project design and the scope of assessments.
224	n/a	Baseline conditions	The Inspectorate notes that a number of surveys have been undertaken which have informed the Scoping Report but have not been appended or included. Any information relied upon for the assessments in the ES should be appended to the ES to allow the Inspectorate to gain a full understanding of issues.
225	n/a	Guidance – air quality	The applicant's attention is drawn to the DEFRA advice 'PM2.5 Targets: Interim Planning Guidance'. The ES should explain how key sources of

ID	Ref	Description	Inspectorate's comments
			air pollution within the proposed development have been identified and how action has been taken to minimise emissions of PM2.5 or its precursors.
226	Section 6.4.4 and Table A-1	Cumulative effects with other developments	<p>The Scoping Report states that a review of developments within 10km of the draft order limits has been undertaken to inform the assessment of cumulative effects. No justification has been provided for the use of a 10km study area for this assessment. The ES should contain a robust justification to support the study area for the Cumulative Effects Assessment (CEA).</p> <p>Scoping Report section A.1.3.7 (Appendix A) states that the location of each of the cumulative schemes that has been considered is shown in Figure 6.1. The Inspectorate notes that NSIPs identified in Table A-2, including the Norwich to Tilbury Great Grid Upgrade and East Pye Solar Farm are not identified in Figure 6.1. The ES should include a figure depicting the locations of all cumulative developments in relation to the proposed development.</p> <p>The applicant's attention is drawn to the comments from Suffolk County Council, Natural England and National Grid at Appendix 2 of this Scoping Opinion regarding the co-ordination of this scheme with other NSIPs in the region. Effort should be made to agree the specific other developments for inclusion in the CEA with relevant consultation bodies.</p>
227	n/a	Transboundary	The Inspectorate on behalf of the SoS has considered the proposed development and concludes that the proposed development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the proposed development's likely impacts including consideration of potential pathways and the

ID	Ref	Description	Inspectorate's comments
			<p>extent, magnitude, probability, duration, frequency and reversibility of the impacts.</p> <p>The Inspectorate considers that the likelihood of transboundary effects resulting from the proposed development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision.</p> <p>Note: The SoS' duty under regulation 32 of the 2017 EIA Regulations continues throughout the application process.</p> <p>The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the annex to its Advice Page 'Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process', links for which can be found in paragraph 1.0.7 above.</p>

3. ENVIRONMENTAL ASPECT COMMENTS (TOPICS SCOPED-IN)

3.1 Agricultural land and soils

(Scoping Report Section 7.1)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
31.1	Table 7.1	Impacts to agricultural land - operation	<p>The Scoping Report proposes to scope this matter out on the basis that effects from the resumption of sheep grazing are unlikely to be significant in the context of overall agricultural land availability.</p> <p>The Inspectorate agrees that significant effects on agricultural land availability during operation are unlikely and is content to scope this matter out.</p>
31.2	Table 7.1	Impacts to agricultural holdings – operation and decommissioning	<p>The Scoping Report proposes to scope this matter out on the basis that landowners have already signed up to voluntary agreements and so will have considered the long-term impacts of removing land from agricultural use on the viability of their farm holdings and effects are also to be considered as part of the socio-economic assessment.</p> <p>The Inspectorate is content to scope out this matter, subject to providing evidence of such agreements. The Inspectorate also considers that it is appropriate to assess agricultural businesses in a single chapter rather than repeating the assessment between the socioeconomics and agricultural land chapters.</p>

ID	Ref	Description	Inspectorate's comments
31.3	N/A	ALC Guidance	The assessment should have regard to the updated Guidelines for Grading the Quality of Agricultural land (DEFRA, 2025).
31.4	N/A	Agricultural land	The ES should contain a clear tabulation of the areas of land in each Best Most Versatile (BMV) classification to be temporarily or permanently lost as a result of the proposed

ID	Ref	Description	Inspectorate's comments
			development, with reference to accompanying map(s) depicting the grades. 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.

3.2 Biodiversity and ecology

(Scoping Report Section 7.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321	Table 7.2, Table C-6	International Statutory Designated sites within 10 km of the draft Order Limits – all project phases	<p>The Scoping Report proposes to scope this matter out on the basis that there is no plausible pathway for impacts given the distance from the draft order limits and intervening land use.</p> <p>The Inspectorate does not consider sufficient information has been presented to provide confidence that all potential pathways for effects on the Redgrave and South Lopham Ramsar site and Waveney and Little Ouse Valley Fens SAC site have been adequately considered, for example through impacts to air quality or hydrological pathways. The ES should provide an assessment of likely significant effects or provide evidence demonstrating agreement with relevant consultation bodies and the absence of likely significant effects.</p> <p>The applicant's attention is drawn to the comments from Natural England at Appendix 2 of this Scoping Opinion regarding the assessment of potential water and air quality impacts on designated sites from the proposed development.</p>
322	Table 7.2	National and locally important statutory designated sites within 2.5 km of the draft Order Limits and local wildlife sites within 2km of the draft order limits – impacts from sediment	<p>The Scoping Report proposes to scope this matter out on the basis that effects during operation are expected to be reduced compared to those during construction and decommissioning due to the limited frequency and extent of proposed activities.</p> <p>No supporting evidence has been provided to justify scoping out operational phase effects on these sites. Nevertheless, given the nature of the operational phase, the Inspectorate considers significant effects from sediment and dust pollution are unlikely and this matter can be scoped out of the ES.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		and dust pollution during operation	
323	Table 7.2	Ancient woodland and priority habitats within 200 m of the draft Order Limits – impacts from habitat degradation and sediment / dust pollution during operation	<p>The Scoping Report proposes to scope this matter out on the basis that effects during operation are expected to be reduced compared to those during construction and decommissioning due to limited frequency and extent of proposed activities.</p> <p>The Inspectorate agrees that significant effects are unlikely to occur during operation and this matter can be scoped out of the ES.</p>
324	Table 7.2	On-site habitats including, arable field margins, cropland hedgerows, deciduous woodland and ponds within / adjacent to draft Order Limits – impacts from habitat degradation during operation	<p>The Scoping Report proposes to scope out impacts from habitat degradation during operation on the basis that effects during operation are expected to be reduced compared to those during construction and decommissioning due to limited frequency and extent of proposed activities.</p> <p>The Inspectorate agrees that significant effects are unlikely to occur during operation and this matter can be scoped out of the ES.</p>
325	Table 7.2	Amphibians and great crested newts - operation	<p>The Scoping Report proposes to scope out impacts from:</p> <ul style="list-style-type: none"> • loss or degradation of breeding ponds; • fragmentation of dispersal routes; and • loss of foraging habitat and places of shelter. <p>With respect to amphibians and great crested newts, this is on the basis that effects during operation are expected to be reduced compared to those during construction and development will be sited away from breeding ponds.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			The Inspectorate agrees that significant effects are unlikely to occur during operation and this matter can be scoped out of the ES.
326	Table 7.2	Badgers - operation	<p>The Scoping Report proposes to scope out impacts from:</p> <ul style="list-style-type: none"> • loss or damage / disturbance to setts; • loss or disturbance to dispersal routes; and • loss or disturbance of foraging areas. <p>With respect to badgers during operation, this is on the basis that effects during operation are expected to be reduced compared to those during construction. The Scoping Report also states that development will be sited away from breeding ponds. The Inspectorate assumes this to be an error which should be corrected within the ES.</p> <p>Given the nature of the operational phase, the Inspectorate considers significant effects on badgers are unlikely to occur and this matter can be scoped out of the ES.</p>
327	Table 7.2	EMF impacts on aquatic fauna - operation	<p>The Scoping Report proposes to scope out impacts from EMF on aquatic fauna during operation on the basis that all interconnecting cables and grid connection cables will be buried and grid connection cables will not cross watercourses.</p> <p>On the basis that the 400 kV grid connection cables will not cross any watercourses the Inspectorate agrees that this matter can be scoped out. However, if the design of the proposed development changes and grid connection cable crossings under watercourses are required, the potential effects of EMF on fish should be assessed.</p>
328	Table 7.2	Otter and water vole - operation	<p>The Scoping Report proposes to scope out impacts to otters and water vole on the basis that operational activities will be of limited frequency and extent and sited away from watercourses where possible.</p> <p>The Inspectorate agrees that impacts to these species during operation are unlikely and is content for this matter to be scoped out.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
329	Table 7.2	Hazel dormouse – all project phases	<p>The Scoping Report proposes to scope out impacts on hazel dormice for all project phases on the basis that the nearest recorded populations of this species are located 19 km from the proposed development, and the draft Order Limits are highly unlikely to support or be functionally linked to dormouse populations.</p> <p>The Inspectorate agrees that impacts to hazel dormice are unlikely and is content for this matter to be scoped out.</p>
3210	Table 7.2	Reptiles - operation	<p>The Scoping Report proposes to scope out impacts from:</p> <ul style="list-style-type: none"> • loss or degradation of habitat; • loss of foraging habitat and places of shelter; and • direct injury from habitat clearance. <p>With respect to reptiles, this is on the basis that operational activities will be of limited frequency and extent.</p> <p>The Inspectorate agrees that impacts to reptiles during operation are unlikely and is content for this matter to be scoped out.</p>
3211	Table 7.2	INNS - operation	<p>The Scoping Report states that activities during operation will be restricted to areas of solar PV panels and are therefore unlikely to result in the introduction or spread of INNS. Noting the Inspectorate's comments in ID 3.2.19 regarding the inclusion of an INNS management plan to support the ES, the Inspectorate agrees that the introduction or spread of INNS during operation is unlikely to result in significant effects and is content to scope this matter out.</p>
3212	Table 7.2	Invertebrates – all project phases	<p>The Scoping Report proposes to scope out impacts on invertebrates for all project phases on the basis that the majority of habitats within the draft order limits comprise agricultural land which is unlikely to support protected invertebrate species, and areas of higher habitat</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>value such as arable field margins and hedgerows will be retained. Table 7.2 of the Scoping Report states that no survey work is planned for these species.</p> <p>Table C-8 of the Scoping Report (Appendix C) describes the Burgate Little Green CWS (located 0.7km from the proposed development) and Mellis Common CWS (bordering the proposed development) as containing numerous ponds which support wildlife, including amphibians and invertebrates. The Inspectorate considers that impacts from the proposed development, such as changes in water quality, could result in significant effects on invertebrates. This matter should be assessed in the ES, or evidence provided that these species are absent from the proposed development site. The applicant's attention is drawn to the comments from Suffolk County Council at Appendix 2 of this Scoping Opinion for further information.</p>
3213	Table 7.2	Other mammals (brown hare) - operation	<p>The Scoping Report proposes to scope out impacts on brown hare from loss of habitat and direct mortality during operation on the basis that operational activities will be of limited frequency and extent.</p> <p>The Inspectorate agrees that impacts to brown hare during operation are unlikely and is content for this matter to be scoped out.</p>

ID	Ref	Description	Inspectorate's comments
3214	Table 7.2	Study area and Zone of Influence (Zoi)	<p>The ES should ensure that the study area reflects the proposed development's Zoi and should consider the potential for effects to occur beyond fixed distances, particularly where sites are designated for mobile species such as birds and bats, or where there is hydrological connectivity. Effort should be made to agree the study area(s) with relevant consultation bodies.</p>
3215	Table 7.2,	Nearest International Designated Sites	<p>Scoping Report section 7.2 states that two designated sites have been identified within 2km of the draft order limits. Table C-6 of Appendix C states that two designated sites are located 6km northwest from the nearest point of the order limits. The description in the ES</p>

ID	Ref	Description	Inspectorate's comments
	Table C-6		should be consistent to ensure that the assessment considers the correct location and extent of all designated sites.
3216	n/a	Desk study	The applicant's attention is drawn to the comments from the Environment Agency at Appendix 2 of this Scoping Opinion regarding the use of the EA Ecology and Fish Data explorer to inform the baseline ecology assessment for the proposed development.
3217	n/a	Survey timing	<p>The Inspectorate notes that construction is estimated to commence in 2028, however the Scoping Report does not confirm whether repeat surveys to ensure that individual species survey data does not become out of date will occur.</p> <p>The applicant's attention is drawn to the comments from the Environment Agency at Appendix 2 of this Scoping Opinion regarding the requirement to conduct repeat surveys prior to construction as per the CIEEM Advice Note 'On the lifespan of ecological reports and surveys', particularly for highly transitory species such as otters.</p>
3218	n/a	INNS	The Inspectorate notes that the suite of environmental management plans set out in section 3 of the Scoping Report does not include an INNS management plan. The ES should be supported by an INNS management plan which includes a pathway-specific risk assessment identifying any pathways for spread of INNS. The applicant's attention is drawn to the comments from the EA at Appendix 2 of this Scoping Opinion for further information.
3219	n/a	Confidential Annexes	Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution, or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.

3.3 Cultural heritage

(Scoping Report Section 7.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
33.1	Table 7.3	Physical effects to archaeological assets close to the draft Order Limits – operation and decommissioning	The Inspectorate notes that no justification has been provided in the Scoping Report for scoping this matter out. On the basis that likely significant effects to archaeological assets close to the draft order limits from changes to below ground hydrology have been identified for the construction phase, the Inspectorate does not agree to scope out an assessment of operation or decommissioning effects at this stage. The ES should include an assessment of potential effects on archaeological assets which are likely to result in significant effects or otherwise present a justification in the ES as to why significant effects are not likely to occur.
332	Table 7.3	Direct physical effects to designated and non-designated built heritage assets within the draft Order Limits – all project phases	<p>The Scoping Report proposes to scope out this matter for all project phases on the basis that no designated or non-designated built heritage assets have been identified within the draft order limits. This appears to contradict section 2.4.10 of the Scoping Report which states that 'multiple recorded non-designated heritage assets are located throughout the site and wider study area'. Figure 7.4 of the Scoping Report only identifies designated heritage assets, and therefore the number and locations of non-designated heritage assets within the study area is unclear.</p> <p>For the avoidance of doubt, the Inspectorate considers that this matter should be scoped in for all stages of the proposed development where significant effects are likely, or a justification should be presented in the ES as to why significant effects are not likely to occur.</p>
333	Table 7.3	Effects resulting from changes to the setting of non-designated heritage assets within the study Area – all project phases	The Scoping Report proposes to scope out this matter for all project phases on the basis that while non-designated built heritage assets can be sensitive to change within their setting, their cultural significance is typically lower and significant effects are not expected.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>Noting the Inspectorate's comments in ID 3.3.2, the Inspectorate considers that insufficient information has been presented in the Scoping Report and does not agree to scope this matter out. Accordingly, the ES should include an assessment of effects resulting from the change to the setting of non-designated heritage assets, or information demonstrating agreement with the relevant consultation bodies and the absence of likely significant effects.</p> <p>The applicant's attention is drawn to the comments from Suffolk County Council at Appendix 2 of this Scoping Opinion relating to the likely presence of undesignated heritage assets within the proposal area.</p>

ID	Ref	Description	Inspectorate's comments
334	Table 7.3, Section 2.4.6	Baseline	<p>Scoping Report Table 7.3 states that 46 Grade II* and 558 Grade II Listed buildings have been identified within the study area, but in Section 2.4.6 it states that 46 Grade II and 558 Grade II* Listed Buildings have been identified. The description in the ES should be consistent to ensure that the assessment considers the correct location and extent of all designated sites.</p>
335	Table 7.3	Study area	<p>The ES should contain a robust justification to support the study areas and sensitive receptors selected for the purposes of the cultural heritage assessment, with reference to relevant approaches such as the ZTV developed for the Landscape and Visual Impact Assessment (LVIA). It should be clear how the approach taken ensures that any heritage assets or conservation areas with long views towards or out from the application site have been identified and considered. Effort should be made to agree the approach and sensitive receptors with relevant consultation bodies.</p>

336	n/a	Impacts to setting of heritage assets	<p>The Inspectorate notes that there is no reference to consideration of impacts from noise and vibration in the Cultural Heritage section of the Scoping Report. For the avoidance of doubt, the Cultural Heritage ES chapter should assess any impacts from noise and vibration which are likely to result in significant effects on heritage assets and/ or their setting.</p> <p>The ES assessment of impacts to setting should consider other relevant factors such as dust, traffic, lighting, glint and glare and changes to land use, cross-referencing to other aspect chapters as appropriate. The assessment should be supported by appropriate visualisations such as photomontages to help illustrate the likely impacts of the proposed development. Effort should be made to agree appropriate viewpoint locations for such visualisations with relevant consultation bodies</p>
337	n/a	Heritage receptors	<p>The Scoping Report identifies designated heritage assets which have the potential to be affected by the proposed development. The applicant's attention is drawn to the consultation responses from Historic England, Suffolk County Council and Thrandeston Parish Council at Appendix 2 of this Scoping Opinion with regard to designated and non-designated receptors which should be considered within the assessment. The applicant should seek to agree the heritage assets for inclusion within the assessment with the relevant consultation bodies and provide evidence of this consultation within the application documents.</p>

3.4 Greenhouse gas

(Scoping Report Section 7.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
34.1	Table 7.4	Refurbishments	The Scoping Report states that as there are no planned alterations or improvements for the proposed development to perform a future function, refurbishment is scoped out of the Greenhouse Gas (GHG) assessment. On the basis of the information presented in the Scoping Report, the Inspectorate is content that this matter can be scoped out of further assessment.
34.2	Table 7.4	Operational energy use	The Scoping Report explains that there will only be minimal operational energy use associated with the proposed development associated with electric lighting or security measures which are unlikely to contribute significant GHG emissions. The Inspectorate agrees that significant effects are unlikely and is content that this matter can be scoped out of further assessment.
34.3	Table 7.4	Operational water use	The Scoping Report proposes to scope this matter out on the basis that expected water use during operation (associated with irrigation or use of welfare facilities) is expected to be minimal and unlikely to contribute significant GHG emissions. The Inspectorate agrees that significant effects are unlikely and is content that this matter can be scoped out of further assessment.

ID	Ref	Description	Inspectorate's comments
34.4			n/a

3.5 Human health

(Scoping Report Section 7.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
35.1	Table 7.5	Air quality impacts on human health – all project phases	<p>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.</p> <p>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.</p> <p>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. Please also see the Inspectorate's comments on this matter in ID 3.11.2 and 3.11.4 of this Scoping Opinion.</p>
352	Table 7.5	Noise and vibration impacts on human health – all project phases	<p>On the basis that the relevant technical chapters of the ES will consider the potential effects of noise and vibration on residential properties and other sensitive receptors, the Inspectorate is content for this matter to be scoped out of the human health assessment. The ES should clearly signpost where noise and vibration impacts on human health have been considered in the relevant technical chapters.</p>
353	Table 7.5	Ground and water contamination impacts on human health – all project phases	<p>The Scoping Report proposes to scope this matter out on the basis that the technical chapters of the ES will consider the potential effects of water quality, and mitigation will ensure compliance with the water quality standards which are designed to protect human health. The Inspectorate agrees that this topic can be scoped out of the human health</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			assessment, however the ES should clearly signpost where water contamination impacts relating to human health have been considered in the relevant technical chapters.
354	Table 7.5	Radiation impacts on human health – all project phases	The Scoping Report proposes to scope out an assessment of impacts from radiation on human health as due to the scale and nature of the proposed development the potential for effects is negligible. The Inspectorate agrees that significant effects are unlikely and this matter can be scoped out of further assessment.
355	Table 7.5	Health care, social care and other social infrastructure impacts on human health – all project phases	The Scoping Report proposes to scope this matter out as these matters will form part of the socio-economics assessment. Given the location and nature of the proposed development it is also considered that any effects will be minor and temporary and are not likely to have potential to significantly affect population health. Noting the Inspectorate's comments in ID 3.8.5, the Inspectorate agrees to scope this matter out on the basis that the ES considers the potential impact of construction workers on capacity of local accommodation and services.
356	Table 7.5	Housing impacts - operation	The Scoping Report explains that whilst the incoming workforce is likely to generate demand for housing during construction and decommissioning of the proposed development, the workforce during operation is expected to be substantially lower. On the basis of the information presented in the Scoping Report, the Inspectorate is content to scope this matter out of the ES.
357	Table 7.5	Transport and access impacts – operation	<p>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 applicant's proposed approach is unclear.</p> <p>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</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			justification should be presented in the ES as to why significant effects are not likely to occur.
358	Table 7.5	Employment, income and training – all project phases	The Scoping Report proposes to scope this matter out of the assessment of human health, as effects on employment, income and training will be considered in the socio-economic assessment. The Inspectorate is content with this approach. Please also see the Inspectorate's comments on this matter in ID 3.8.5 of this Scoping Opinion.
359	Table 7.5	Climate change and adaptation – all project phases	The Scoping Report proposes to scope this matter out of the human health assessment on the basis that greenhouse gas emissions associated with all phases of the proposed development will be assessed in other relevant technical chapters of the ES, and the proposed development will not affect thermal comfort and resilience for the study area population. The Inspectorate agrees that no significant health effects associated with climate change and adaptation are likely and is content for this matter to be scoped out.

ID	Ref	Description	Inspectorate's comments
35.10		n/a	n/a

3.6 Landscape and visual amenity

(Scoping Report Section 7.6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
36.1	Table 7.6	Impacts to South Norfolk District LCA E2 and LCA B4 – All phases	The Scoping Report proposes to scope out an assessment of these Landscape Character Areas (LCA) on the basis that they are over 3km away from the proposed development. Considering the extent of visibility displayed on the Zone of Theoretical Visibility (ZTV), the Inspectorate agrees that impacts to LCAs further than 3km from the proposed development are unlikely to be significant. This matter can be scoped out of the ES.

ID	Ref	Description	Inspectorate's comments
362	Table 7.6	Study area	<p>The Scoping Report states that a 1km study area would be sufficient to identify any potentially significant landscape and visual effects as a result the proposed development. However, the ZTV shows visibility beyond the proposed study area. The Inspectorate considers that the LVIA study area should be based on the furthest extent of likely significant effects. Effort should be made to agree the study area with the relevant stakeholders.</p> <p>The applicant's attention is drawn to the comments from Suffolk County Council at Appendix 2 of this Scoping Opinion regarding the landscape and visual assessment study area.</p>
363	Table 7.6	Mitigation	The Inspectorate notes that while the assessment methodology (Section 3 of the Scoping Report) defines the general approach to mitigation and enhancement it does not outline any specific mitigation measures or enhancement plans for the proposed development. For the avoidance of doubt, the ES should describe any relevant mitigation measures identified from the LVIA assessment and explain how delivery of these measures has been secured.

ID	Ref	Description	Inspectorate's comments
364	Figure 7.8	Viewpoints	<p>Figure 7.8 of the Scoping Report sets out representative viewpoints for the proposed development. The Inspectorate notes that most of these viewpoints are in close proximity to the proposed development boundary. The applicant should justify the location of viewpoints, ensuring these capture a worst-case scenario of impacts from the proposed development and are representative of visual receptors. Efforts should be made to agree the number and location of viewpoints as well as the locations for photomontages with relevant consultation bodies including local authorities, Historic England and Natural England. The applicant's attention is drawn to the comments from Suffolk County Council at Appendix 2 of this Scoping Opinion regarding the inclusion of additional representative viewpoints in the LVIA to capture any long-distance views of the proposed development.</p>

3.7 Noise and vibration

(Scoping Report Section 7.7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
37.1	Table 7.7, Section 3.8	Road traffic vibration - construction	<p>The Scoping Report states that impacts on people and risk of damage to buildings or other structures from construction road traffic vibration will be minimal and proposes to scope this matter out.</p> <p>Section 3.8 of the Scoping Report states that there will be approximately 120 two-way daily HGV movements during peak construction periods, however site access points and routes have not yet been determined.</p> <p>The Inspectorate considers not enough information has been provided to scope this matter out at this stage. The ES should clarify the routing of construction road traffic and identify any sensitive receptors along those routes and assess significant effects where they are likely to occur.</p>
37.2	Table 7.7	Plant vibration - operation	<p>The Scoping Report states that there are unlikely to be any stationary sources or equipment used for replacement activities that will generate significant levels of vibration.</p> <p>On this basis, the Inspectorate agrees that significant effects are not likely and this matter can be scoped out of the ES. However, the detailed description of the proposed development within the ES should demonstrate that operational plant and equipment is of a type and to be used in locations that would be unlikely to result in significant vibration effects on sensitive receptors.</p>
37.3	Table 7.7	Road traffic noise and vibration - operation	<p>The Scoping Report proposes to scope out road traffic noise and vibration on the basis that the proposed development is unlikely to generate significant traffic movements during operation.</p> <p>The Inspectorate is content that minimal road traffic movements would occur during operation and that significant effects are unlikely. On this basis, this matter can be scoped</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			out of further assessment. However, the ES should confirm operational vehicle types and numbers (with reference to thresholds within guidance) to justify this position.

ID	Ref	Description	Inspectorate's comments
374	Table 7.7	Description of receptors	Scoping Report Table 7.7 states that sound level surveying will be undertaken to establish the baseline at locations representative of existing sensitive receptors as part of the noise assessment. The ES should explain how the study area and sensitive receptors for the noise assessment have been selected with reference to the extent of likely impacts and relevant supporting evidence such as modelling and/or relevant guidance. Effort should be made to agree the study area and sensitive receptors with relevant consultation bodies.

3.8 Socio-economics

(Scoping Report Section 7.8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
38.1	Table 7.8	Employment and skills - construction related employment, training and apprenticeship opportunities - operation	The Scoping Report states that employment opportunities during operation of the proposed development are expected to be relatively limited (up to three permanent staff). On the basis of the information presented in the Scoping Report, the Inspectorate is content that this matter can be scoped out of the ES.
38.2	Table 7.8	Potential closure or diversions of Public Rights of Way (PRoW) and recreational routes - operation	The Scoping Report explains that effects from changes to PRoW during operation will be considered within the transport and access section of the ES. The Inspectorate is content with this approach.
38.3	Table 7.8	Potential impacts on sensitive receptors including residential, commercial and community receptors - operation and decommissioning	<p>The Scoping Report states that there will be no direct effects on sensitive residential, community and commercial receptors during operation and that any indirect effects (such as noise) will be assessed within the relevant specific topic chapter. The Inspectorate is content with this approach and agrees to scope this matter out.</p> <p>Regarding decommissioning, the Inspectorate notes that no justification has been provided for scoping this matter out. On the basis that likely significant effects have been identified for the construction phase, the Inspectorate does not agree to scope out an assessment of decommissioning at this stage. The ES should include an assessment of potential effects on sensitive receptors during decommissioning which are likely to result in significant effects or otherwise present a justification in the ES as to why significant effects are not likely to occur.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
384	Table 7.8	Potential temporary and/or permanent adverse amenity impacts – all project phases	The Scoping Report proposes to scope this matter out on the basis that any wider amenity effects on the local population from the proposed development will be indirect and avoid residential areas. The Scoping Report explains that any such indirect amenity effects will be assessed as part of relevant specific topic chapters (such as noise and LVIA) and mitigated as necessary. The Inspectorate is content with this approach and agrees to scope this matter out.

ID	Ref	Description	Inspectorate's comments
385	n/a	Workforce demand	<p>The applicant's attention is drawn to the comments from Suffolk County Council at Appendix 2 of this Scoping Opinion regarding workforce demand in the region during the peak construction phase of the Sizewell C project and associated labour market pressures and workforce accommodation shortages.</p> <p>The ES should provide the anticipated number of jobs proposed to be created for each of the phases of the proposed development and consider the potential impact of construction workers on capacity of local accommodation and services.</p>

3.9 Transport and access

(Scoping Report Section 7.9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
39.1	Table 7.9	Traffic and transport impacts - operation	<p>The Scoping Report proposes to scope out impacts from:</p> <ul style="list-style-type: none"> • Severance; • driver delay; • fear and intimidation; and • accidents and safety. <p>This is on the basis that the estimated 5 vehicle movements per month during operation falls below the 30% change in traffic flows threshold for a low impact.</p> <p>The Inspectorate is content that this matter can be scoped out of further assessment. However, the ES should confirm the operational vehicle types and numbers (with reference to thresholds within guidance) to justify this position.</p>
39.2	Table 7.9	Large loads - operation	<p>The Scoping Report states that a low frequency of large load deliveries is expected during operation for the replacement of solar PV panels and BESS.</p> <p>On this basis, the Inspectorate agrees that significant effects are not likely and this matter can be scoped out of the ES.</p>

ID	Ref	Description	Inspectorate's comments
39.3	n/a	Cumulative impacts	The applicant's attention is drawn to the comments from Norfolk and Suffolk County Council at Appendix 2 of this Scoping Opinion regarding the consideration of cumulative impacts associated with other NSIPs in the Construction Traffic Management Plan (CTMP)

ID	Ref	Description	Inspectorate's comments
			and ES transport chapters, and the suitability of local roads (particularly the A140) for HGV access.
394	Section 3.7.2	Construction traffic assumptions	Section 3.7.2 of the Scoping Report states that construction workers are likely to travel to and from the proposed development site in groups each day. The Inspectorate considers that such assumptions can only be made if there are clear commitments to vehicle sharing within management plans or through the DCO. If commitment cannot be secured, the assessment of construction traffic should be based on the relevant worst-case (i.e. the absence of the proposed ride-sharing arrangements).
395	Table 7.9	Study area	<p>The Scoping Report states that the initial study area has been defined based on routes most likely to be used for construction and decommissioning traffic and will be discussed and agreed with National Highways and Suffolk County Council prior to assessment.</p> <p>The applicant's attention is drawn to the comments from National Highways at Appendix 2 of this Scoping Opinion regarding the consideration of potential effects on the wider SRN from construction traffic, in particular the A11, A14 and A47.</p>

3.10 Water resources and flood risk

(Scoping Report Section 7.10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	n/a	n/a	No matters are proposed to be scoped out.

ID	Ref	Description	Inspectorate's comments
3.102	n/a	Horizontal Directional Drilling (HDD)	The Inspectorate notes that Horizontal Directional Drilling (HDD) is to be used for cable crossings. Where HDD is proposed for watercourse crossings, the ES should include an assessment of the potential effects from release of drilling fluids during crossings and also consider potential effects on existing flood defences from noise and vibration. Please also see the Inspectorate's comments on this matter in ID 2.1.6 of this Scoping Opinion.
3.103	n/a	Groundwater heating	The ES should include consideration of the impacts of heat pollution on groundwater from buried high voltage cables. The applicant's attention is drawn to the Environment Agency's consultation response at Appendix 2 of this Scoping Opinion for further information.
3.104	Section 3, Table 3-2	Drainage	It is noted that the applicant intends to submit an Outline Drainage Strategy with the DCO application. It is the Inspectorate's opinion that this should also address the foul drainage measures needed for elements of the site. The applicant's attention is drawn to the consultation response from Anglian Water at Appendix 2 of this Scoping Opinion regarding this matter.
3.105	Table 7.10	Water demands	It is noted that the Scoping Report does not provide an estimate of consumptive water demands. The Inspectorate is of the opinion that the ES should provide a strategy for water supply which includes estimates of water demands. The applicant's attention is drawn to the Environment Agency's consultation response at Appendix 2 of this Scoping Opinion for further information.

ID	Ref	Description	Inspectorate's comments
3.106	Table 7.10	Water abstractions	The Inspectorate notes that there are number of potential water abstractions in proximity to the site and within the red line boundary. For the avoidance of doubt, the ES should consider any potential impacts that may occur on lawful water users as a result of the proposed development. The applicant's attention is drawn to the Environment Agency's consultation response at Appendix 2 of this Scoping Opinion for further information.
3.107	Table 7.10	Water Framework Directive (WFD)	For the avoidance of doubt, the ES should also include a standalone WFD assessment as an appendix to the ES. The applicant's attention is drawn to the Environment Agency's consultation response at Appendix 2 of this Scoping Opinion for further information.

3.11 Environmental Topics Scoped Out

(Scoping Report Section 8)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.11.1	Table 8.1	Air quality impacts from construction dust	<p>The Scoping Report states that subject to the implementation of suitable mitigation measures significant effects are unlikely. A construction dust risk assessment is proposed to support the DCO application and to identify site-specific mitigation measures to mitigate and suppress construction dust.</p> <p>The Inspectorate agrees that this matter can be scoped out, 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.</p>
3.11.2	Section 3.8.3 and Table 8.1	Air quality impacts from construction vehicle emissions	<p>The Scoping Report states that there will be approximately 120 two-way daily HGV movements during peak construction periods, and employee trips will be approximately 100 two-way movements per day. Scoping Report paragraph 3.8.1 states that site access points and routes have not yet been determined.</p> <p>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 from changes to air quality. Please also see the Inspectorate's comments on this matter in ID 3.5.1 of this Scoping Opinion with regard to potential air quality impacts on human health from construction vehicle emissions.</p> <p>The Inspectorate notes that an assessment of potential effects as a result of nitrogen deposition on habitats and species will be undertaken as part of the biodiversity and ecology assessment and is content with this approach. The applicant's attention is also drawn to the comments from Natural England at Appendix 2 of this Scoping Opinion regarding the assessment of increased air pollution from construction traffic on nationally and internationally designated sites.</p>

3.11.3	Table 8.1	Air quality – operational impacts from NRMM and vehicle emissions, dust and accidental emissions from BESS fires.	<p>The Scoping Report proposes to scope out an assessment of vehicle emissions during operation on the basis that minimal road traffic movements (5 per month) would occur, and air quality impacts will be negligible. On this basis, the Inspectorate is content that this matter can be scoped out of further assessment. However, the ES should confirm the operational vehicle types and numbers (with reference to thresholds within guidance) to justify this position.</p> <p>Section 8.2 of the Scoping Report states that dust emissions are not anticipated to arise from operation and maintenance activities. Given the nature of the proposed development, the Inspectorate agrees that significant effects from dust and particulate matter during the operational phase are unlikely and this matter can be scoped out of further assessment.</p> <p>The Scoping Report proposes to scope out an assessment of accidental air quality emissions due to a BESS fire event on the basis that the applicant intends to prepare an outline Battery Fire Safety Management Plan (oBFSMP) to support the DCO.</p> <p>The Inspectorate agrees that this matter can be scoped out, subject to the BFSMP being prepared in line with relevant guidance and confirming that there is no potential for significant effects.</p>
3.11.4	Table 8.1	Air quality – decommissioning impacts on sensitive receptors from dust and non-road mobile machinery (NRMM) / vehicle emissions	<p>The Scoping Report states that air quality impacts from dust during decommissioning will be similar to those during construction, and that the construction dust risk assessment will be used as worst-case representation of effects during decommissioning.</p> <p>The Inspectorate agrees that this matter can be scoped out, 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.</p> <p>Regarding air quality impacts from NRMM and vehicle emissions during decommissioning, 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 emissions from NRMM and vehicles would not lead to LSE from changes to air quality. Please also see the Inspectorate’s comments on this matter in ID 3.11.2 of this Scoping Opinion.</p>

3.11.5	Table 8.2	Climate change (resilience and in-combination effects)	<p>The Scoping Report proposes to scope out a detailed assessment of climate change on the basis that measures set out within the suite of environmental management plans and Operational Adverse Weather Plan that will support the DCO enhance resilience against extreme heat, wind and storm events. The report also explains that risk from flooding will be assessed as part of the water resources topic chapter and FRA, and drought effects will be considered in the agriculture and soils assessment.</p> <p>The Inspectorates is content with this approach, subject to clear signposting within the ES as to where climate change effects have been considered in the relevant technical chapters.</p>
3.11.6	Section 8.3	Electromagnetic fields	<p>The Scoping Report proposes to scope out a detailed assessment of EMF on the basis that only a limited amount of 400kV cabling is required to provide a connection to the new National Grid Substation at Yaxley and other cables would not be more than 132kV. Scoping Report section 8.2 states that an EMF impact risk assessment of the risks associated with magnetic fields from the Interconnecting Cables and Grid Connection Cables on human and ecological receptors will be submitted as an appendix to the ES.</p> <p>The Inspectorate considers that the information provided aligns with the requirements of the Nationally Significant Infrastructure Projects: Technical Advice Page for Scoping Solar Development and accompanying Solar Scoping Table. On this basis and providing that the EMF impact risk assessment is completed as proposed, the Inspectorate agrees that this matter can be scoped out of further assessment.</p>
3.11.7	Section 8.4	Glint and glare	<p>The Scoping Report proposes to scope out a detailed assessment of glint and glare effects. Scoping Report section 8.4 states that a standalone glint and glare risk assessment will be submitted as an appendix to the ES.</p> <p>The Inspectorate is content with this approach; however the standalone glint and glare assessment should assess the worse-case scenario and provide a description of any relevant mitigation measures and safety considerations. If glint and glare effects are identified the assessment should be used to inform the relevant ES chapters, in particular the landscape and visual amenity and transport and access chapters.</p>

3.118	Section 8.5	Ground conditions	<p>The scoping report proposes to scope out an assessment of ground conditions from the ES for the following reasons:</p> <p>The supplied Preliminary Risk Assessment concludes that the risk of significant effects from ground contamination during construction is low and any identified contamination would be sufficiently mitigated through an iterative design process.</p> <p>Excavation required for the cable corridors and installation of the solar panels will remove shallow potentially contaminated soils, potential operational impacts would have already been mitigated during construction and impacts from BESS fire water are assessed in Section 7.10.</p> <p>Effects during decommissioning are expected to be similar or less than those experienced during construction and below ground cabling will be left in-situ following decommissioning.</p> <p>The Inspectorate considers that the information provided generally aligns with the requirements of the Nationally Significant Infrastructure Projects: Technical Advice Page for Scoping Solar Development and accompanying Solar Scoping Table. However, the Inspectorate notes the recommendation for additional ground investigation within the Preliminary Risk Assessment (PRA). Providing a commitment to completing the additional ground investigations is secured and the recommendations for further works made in the PRA are completed as proposed, the Inspectorate is in agreement that these matters can be scoped out of further assessment.</p> <p>The applicant's attention is drawn to the consultation response received from the Environment Agency at Appendix 2 of this Scoping Opinion for further information.</p>
3.119	Section 8.6	Major accidents and disasters	<p>The Scoping Report proposes to scope out a separate detailed major accidents and disasters assessment on the basis that the risk of a major accident or disaster is very low and specific risks associated with flooding, glint and glare and contamination will be considered within separate supplementary or topic assessments to be submitted with the Application.</p> <p>The Inspectorate has considered the characteristics of the proposed development and is content with this approach, however the oBFSMP should include information on the fire</p>

			<p>risk associated with battery storage facilities and relevant mitigation such as firefighting and containment measures.</p> <p>The applicant’s attention is drawn to the comments from Suffolk County Council Fire and Rescue Service at Appendix 2 of this Scoping Opinion regarding the potential impact of a BESS fire on the local environment and sensitive receptors.</p>
3.11.10	Section 8.7	Materials and waste	<p>The Scoping Report proposes to scope out a detailed assessment of materials and waste on the basis that appropriate design principles, site-specific mitigation measures and management practices will be implemented to ensure there are no significant effects on materials resource availability or landfill capacity.</p> <p>The Inspectorate notes that a report has been prepared in line with the ISEP waste guidance to identify the potential for likely significant effects associated with the management of materials consumption and waste arising from the construction, operation and decommissioning of the proposed development. This is provided as an appendix to the Scoping Report.</p> <p>The Inspectorate is content that this matter can be scoped out of further assessment, subject to the inclusion of final estimates of material use and waste generation for each material type and waste stream within the ES and the submission of an Outline Site Waste Management Plan (OSWMP) with the application.</p>

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Secretary of State for Defence	Ministry of Defence
The relevant parish council or, where the application relates to land in Wales or Scotland, the relevant community council	Scole Parish Council
	Diss Town Council
	Brockdish and Thorpe Abbots Parish Council
	Hoxne Parish Council
	Walsham-le-Willows Parish Council
	Rickinghall Superior Parish Council
	Thorndon Parish Council
	Finningham Parish Council
	Gislingham Parish Council
	Occold Parish Council
	Eye Town Council
	Denham Parish Council
	Bedingfield Parish Council
	Stradbroke Parish Council
	Brome and Oakley Parish Council
Syleham Parish Council	
Botesdale Parish Council	

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Wickham Skeith Parish Council
	Wortham and Burgate Parish Council
	Mellis Parish Council
	Yaxley Parish Council
	Thrandeston Parish Council
	Horham and Athelington Parish Council
	Palgrave Parish Council
	Wingfield Parish Council
The Environment Agency	The Environment Agency
Natural England	Natural England
The Forestry Commission	The Forestry Commission East & East Midlands
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The relevant internal drainage board	Waveney Lower Yare and Lothingland Internal Drainage Board
The relevant Highways Authority	Suffolk County Council Highways Department
The relevant Highways Authority	National Highways
The Civil Aviation Authority	Civil Aviation Authority
The Health and Safety Executive	Health and Safety Executive
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

‘Statutory undertaker’ is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	Police and Crime Commissioner for Norfolk
	Police and Crime Commissioner for Suffolk
The relevant ambulance service	East of England Ambulance Service NHS Trust
The relevant fire and rescue authority	Norfolk Fire and Rescue Service
	Suffolk Fire and Rescue Authority
The relevant Integrated Care Board	NHS Norfolk and Waveney Integrated Care Board
	NHS Suffolk and North East Essex Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	East of England Ambulance Service NHS Trust
The relevant NHS Foundation Trust	Hartismere Hospital (Norfolk and Suffolk NHS Foundation Trust)
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England

STATUTORY UNDERTAKER	ORGANISATION
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Anglian Water
	Essex and Suffolk Water
	Northumbrian Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
National Gas	

STATUTORY UNDERTAKER	ORGANISATION
The relevant electricity generator with CPO Powers	Progress Power Limited
	Derwyn (Wales)
	Thrive Renewables (Wicken) Limited
	Conrad (Yaxley) Limited
The relevant electricity distributor with CPO Powers	Eastern Power Networks Plc
	London Power Networks Plc
	South Eastern Power Networks Plc
	Advanced Electricity Networks Ltd
	AGR Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
Mua Electricity Limited	
Optimal Power Networks Limited	

STATUTORY UNDERTAKER	ORGANISATION
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Energy System Operator (NESO)

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
Mid Suffolk District Council
Babergh District Council
Ipswich Borough Council
South Norfolk District Council
Breckland District Council
East Suffolk Council
West Suffolk Council
Broads Authority
Cambridgeshire County Council
Suffolk County Council
Norfolk County Council
Essex County Council

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Anglian Water
Brome and Oakley Parish Council
Cambridgeshire County Council
Denham Parish Council
Environment Agency
Eye Town Council
Forestry Commission
Fulcrum Pipelines
Historic England
Health and Safety Executive
Ipswich Borough Council
National Grid
National Highways
NATS Safeguarding
Natural England
NHS Suffolk and North East Essex
Norfolk County Council
Occold Parish Council
Palgrave Parish Council
Royal Mail
Suffolk County Council
Thraneston Parish Council

UK Health Security Agency
Waveney Lower Yare and Lothingland Internal Drainage Board
Yaxley Parish Council

Deb Glassop
Environmental Advisor
The Planning Inspectorate
By email: EcoPowerSuffolkSolar@planninginspectorate.gov.uk

Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
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www.anglianwater.co.uk
strategicgrowth@anglianwater.co.uk

Our ref: Ecopower Suffolk/Scoping

12 February 2026

Dear Deb Glassop,

ECOPOWER SUFFOLK SOLAR EIA SCOPING NOTIFICATION AND CONSULTATION – ANGLIAN WATER RESPONSE

Thank you for the opportunity to comment on the scoping report for the above project. Anglian Water is the statutory water and sewerage undertaker for the proposed project area, and this response is in our statutory capacity regarding water resources, water supply network, water recycling centres (WRCs), water recycling assets, and the sewer network, as well as the related role of surface water drainage.

Anglian Water works to support the construction and operation of nationally significant infrastructure projects that are conducted in accordance with the Water Industry Act 1991. We would expect the next stages of the project to include reference to any existing infrastructure managed and owned by Anglian Water, and any provision of replacement infrastructure or requirements for new infrastructure.

Anglian Water works with developers, including those constructing projects under the 2008 Planning Act, to ensure requests for alteration of sewers, wastewater and water supply infrastructure are planned to be undertaken with the minimum of disruption to the project and customers. We would encourage on-going engagement to ensure that AWS and the developer have reached agreement on the approach to assets and connections in order that these matters in advance of the submission of the draft DCO for examination.

3 THE PROPOSED DEVELOPMENT

The project area [Figure 1.1 Site Location Plan] is located within Mid Suffolk District Council and Suffolk County Council areas. Anglian Water is the statutory sewerage undertaker for the entire project area. Our water recycling centre (WRC) catchments are focussed around settlements, however the nature of the catchments in rural areas can extend between settlements, meaning that our assets can be impacted by nationally significant infrastructure schemes.

Of the five solar array areas identified, there are Anglian Water assets within some of these or sites near the scheme where access to our sites may be inhibited. Of the cable corridor options [subsection 3.1.2] identified, the corridor between Area 2 Eye and Area 4 Occold [Figure 1.1] will include interfaces with our sewer pipes.

We would advise that the route with least number of interfaces and potential diversions (or additional protection measures) is identified, to reduce the risk of interruption to the operation of our sewer networks, and consequent risks to the environment and local residents.

Associated Development:

Paragraph 3.2.1 and Table 3-2 list the associated development including new substations within the proposed order limits, and maintenance and welfare facilities. The proposal should demonstrate whether foul drainage connections are required to support these elements of the project. Anglian Water would encourage early engagement to ascertain whether there is a sustainable point of connection into our networks and whether capacity is available to accommodate wastewater flows at our WRCs, to ensure there is no risk of environmental deterioration.

Drainage and utility works:

It is noted that Table 3-2 sets out the measures to address drainage. The preparation of a Flood Risk Assessment and Outline Drainage Strategy to be submitted with the DCO is welcomed by Anglian Water. We would seek to ensure that the Outline Drainage Strategy also addresses the measures that will be needed for foul drainage for various elements of the site (see our comments in relation to associated development above). We agree with the provision of SuDS at source - no surface water flows will be accepted into our foul drainage network, and our surface water sewer network is limited in the project area.

Highway works including temporary and permissive access tracks:

The measures outlined in Table 3-2 should include opportunities to avoid, where possible, interfaces with our underground assets, or undertake necessary construction measures to protect our assets from failing due to vibration and compaction from plant vehicles when constructing haul roads and access points. These mitigation measures should be set out in the outline Construction Environment Management Plan (oCEMP) supporting the Environmental Statement (ES).

Temporary Construction Compounds:

These elements of the project are not set out in Tables 3-1 or 3-2 but are referenced in paragraph 3.4.7 and 3.6.2. We would advise that temporary construction compounds are carefully located to minimise any impacts on our assets. The removal of topsoil, creation of bellmouths and laydown areas for storing materials can increase risk of damage to our underground assets through traffic vibration and soil compaction, affecting the operation of our networks, including interruptions to supply.

Any temporary wastewater connections required to serve the compounds should be requested through our Inflow platform at an early stage, when designs are fixed, to ensure these can be planned for effectively.

Cable Corridors:

Section 3.4 Environmental Design Principles should also include reference to the protection of existing underground utility services such as Anglian Water sewers.

3.5 Construction Programme and 3.6 Indicative construction activities

It is noted that the construction phase is expected to last 24 months from Q3 in 2028. Anglian Water emphasises that early engagement with utility providers is a fundamental element of planning the specific construction details in the DCO application, particularly regarding any diversions.

Anglian Water has a considerable programme of investments in AMP8 (2025-2030) and will be managing the interfaces with our assets and diversions for a significant number of NSIPs within our region during the same period. Where interfaces/diversions cannot be avoided, we would recommend that NSIP Promoters that have a large number of Anglian Water assets (or assets of a strategic nature) interfacing with the Project, engage with us on the specific detail of these interfaces at an early stage, as this will help inform the extent of the order limits, should any diversions be required, and help to reduce delays later in the process when the project reaches delivery stage.

It is noted that the site preparation includes marking out locations of permanent infrastructure - it is not clear whether this refers to the permanent infrastructure for the project or locations of existing permanent infrastructure within the proposed order limits [3.6.2]. Anglian Water would endorse this activity to ensure the protection of our assets and the safety of the construction team. We would advise on trial holes with a watching brief to ascertain the location of our assets where this will directly interface with construction activities, unless already identified through other surveys such as ground investigations.

The implementation of crossing methodologies for infrastructure is welcomed, as there can be implications relating to 'heave' from HDD on our assets, which could cause them to fail.

3.8 Construction traffic management and site access

As previously referenced, we have concerns regarding the haul roads and site accesses when these interface with our underground assets or potentially inhibit access to our operational sites.

3.9 Construction Environmental Management

Anglian Water supports the preparation and submission of an outline Construction Environmental Management Plan (oCEMP) to support the application, and the identification of the processes that will be outlined therein, including utilities diversions and addressing run-off/drainage. Anglian Water would also wish to see appropriate measures undertaken in respect of utility interfaces.

The oCEMP will help ensure robust measures are in place to manage the construction processes and should be consistent with the Protective Provisions for Anglian Water for inclusion in the DCO. Further detailed advice and technical assurance can be provided by Anglian Water, which will assist

with measures for inclusion in the oCEMP to help de-risk the delivery of the project at a later stage (see Next Steps).

5 CONSULTATION

Anglian Water supports the intention to engage with statutory and non-statutory consultees outside the formal consultation stages. We welcome further discussion with the project team on matters raised in this consultation and our previous non-statutory consultation response.

6 EIA APPROACH AND REQUIREMENTS

6.9 Standalone assessments: Anglian Water supports the standalone assessments to be appended to the Environmental Statement (ES) - particularly the Flood Risk Assessment and preliminary Surface Water Drainage Strategy. Anglian Water supports the submission of a standalone Utilities Statement with the DCO application (as outlined in section 8.6) this should identify both utility connection requirements (including sewerage/drainage) and interfaces with existing assets, including any potential diversions that might be required.

7 TOPICS SCOPED INTO THE EIA

7.4 Greenhouse gas (GHG) scope and methodology

Anglian Water agrees that construction and installation activities are scoped in for further assessment in the PEIR/ES in respect of GHG emissions. Anglian Water considers that the diversion of utility assets, such as sewer pipes, will have capital and operational carbon impacts, and should be avoided wherever possible through the design and layout of the scheme and appropriate mitigation measures to address utility asset interfaces.

7.7 Noise and Vibration:

Anglian Water considers that both piling activity and vibration (soil compaction) from construction traffic on temporary haul roads, construction compounds and access/bellmouths can have adverse impacts on the structural integrity of our existing undergrounds assets such as sewers, within the proposed order limits. We agree that construction vibration is scoped in for assessment in the PEIR/ES and appropriate mitigation measures set out through the outline CEMP and Construction Traffic Management Plan (CTMP).

7.10 Water resources and flood risk

Anglian Water agrees that all the sub-topics in this category are scoped in, and we support the preparation of a site-specific FRA and Preliminary Surface Water Drainage Strategy (PSWDS) to be included as supporting technical assessments for submission with the DCO application. Anglian Water should be consulted in relation to this topic area as a Risk Management Authority responsible for managing the risk of flooding to sewerage facilities and flood risks from any failure of our infrastructure, as well as drainage responsibilities.

Surface Water Drainage Strategy:

Anglian Water would seek to ensure that any potential embedded design measures in the PSWDS such as Sustainable Drainage Systems (SuDS) will effectively manage rainfall run-off and achieve sufficient attenuation to avoid increases in surface water flood risk, whilst offering the potential for integrated water management measures (e.g. rainwater harvesting and reuse). Similar factors

should be applied to manage surface water run-off at temporary site compounds. Anglian Water is responsible for management of the risks of flooding from surface water which are directed to surface water sewers or combined water sewer systems - noting that these networks are limited within or adjoining the proposed project area. Our preference would be for surface water run-off from above ground permanent buildings and impermeable surfacing to be managed by SuDS with reuse opportunities considered first (e.g. for fire suppression during operation and dust suppression during construction), followed by any outfall to a watercourse, in accordance with the drainage disposal hierarchy. We welcome the approach to engage with the LLFA to agree on the design and layout for the SWDS.

Subject to confirmation that all surface water will be managed through SuDS, Anglian Water would seek to ensure that the draft DCO will have no powers to connect to the public sewer network for the discharge of water during construction or for operations. This would then negate the need for the draft DCO Order to provide for any connection and so require consequent Requirements to ensure any connections did not compromise the wastewater services of existing customers.

Wastewater discharge:

It is noted in the embedded measures that it is assumed at this stage that any foul drainage from the operation / maintenance phase will be directed to the existing sewer network (and any construction phase foul drainage will be tankered off-site to existing treatment works). We would suggest that this is confirmed at an early stage, or that a pre-application is made to request a connection through our [Inflow](#) platform, so that foul drainage connections can be appropriately planned for.

8 OTHER ENVIRONMENTAL TOPICS

8.6 Major accidents and disasters

Anglian Water notes that Utilities Failure is scoped out as a potential major accident and/or disaster in this section of the Scoping Report. Anglian Water supports the preparation of a Utilities Statement to be submitted with the DCO application (see our comments under section 6.9). This statement should also address the potential impact of heat dispersion from underground cables on our assets. The project promoter in designing the layout of solar arrays should ensure that sufficient space is left where our assets intersect with the project, to ensure that access and suitable working distances are provided to ensure the pipe can be maintained or repaired in an emergency without impacting the safety of our operations, or the operation of the solar array. This measure will help to avoid the need for costly diversions. Maps of Anglian Water's underground assets are available to view at the following link: <http://www.digdat.co.uk/>

We advise Applicants for nationally significant infrastructure projects, particularly those likely to have a number of interfaces with our underground assets, to contact Anglian Water to discuss provision of further assessments for clash detection, identification of potential diversions, and asset protection measures. This will help to ensure that the proposed order limits are suitable to accommodate such works and help de-risk the delivery programme for the Project if such matters are identified at an early stage.

We suggest that the oCEMP should encompass any additional mitigation measures required to safeguard below-ground utilities from interference and that Protective Provisions would be expected to be agreed with statutory undertakers.

Anglian Water requires that the following standoff distances are applied for working each side of the medial line of our pipes. The text is drawn from our template Protective Provisions which will need to be agreed with Anglian Water prior to the DCO submission.

- (a) 4 metres where the diameter of the pipe is less than 250 millimetres.
- (b) 5 metres where the diameter of the pipe is between 250 and 400 millimetres, and
- (c) a distance to be agreed on a case-by-case basis and before the submission of the Plan under sub-paragraph (1) is submitted where the diameter of the pipe exceeds 400 millimetres.

These distances are a starting point for design, assessment, diversion, or mitigation measures including crossing provisions.

NEXT STEPS

Anglian Water would welcome the progression of discussions with the Applicant, in line with the requirements of the 2008 Planning Act and guidance. Experience has shown that early engagement and then agreement is required between NSIP applicants and statutory undertakers during design and assessment and well before submission of the draft DCO for examination. Consultation at the statutory PEIR stage would in our view be too late to inform design and may result in objections and delays to the project, including potentially requests to change the project's Order Limits to ensure Anglian Water services to existing customers and to support growth are not prejudiced. As part of the wider progression of the project alongside the ES, Anglian Water recommends discussion on the following issues:

- Impact of development on Anglian Water's drainage and water recycling assets.
- The design of the project to minimise interaction with Anglian Water assets/ critical infrastructure and specifically to avoid the need for mitigation works and diversions which have associated carbon costs.
- Requirement for water recycling/drainage connections (if any).
- Confirmation of the project's cumulative impacts (if any) with Anglian Water projects.
- The Draft Development Consent Order (DCO), including draft Protective Provisions and requirements specifically to ensure Anglian Water's services are maintained during construction.

Advice on the form and content of suitable Protective Provisions in the draft Development Consent Order should be sought. Please do not hesitate to contact strategicgrowth@anglianwater.co.uk on these aspects or should you require clarification on the above response or during the pre-application to decision stages of the project.



Yours sincerely,



Strategic and Spatial Planning Lead

Cc contact@ecopowersuffolk.com

BROME and OAKLEY PARISH COUNCIL

Tel: [REDACTED]

Email clerk@bromeandoakleyparishcouncil.gov.uk

16 February 2026

This letter is submitted by email to EcoPowerSuffolkSolar@planninginspectorate.gov.uk

Dear Sirs,

Reference EN0110019

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11
Application by EcoPower Suffolk Limited (the applicant) for an Order granting Development Consent for the EcoPower Suffolk Solar project (the proposed development)
Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Brome and Oakley Parish Council thank you for the opportunity to comment on the EIA Scoping consultation and offer the following response after the consultation documents were considered by Brome and Oakley Parish Council at its February meeting.

Firstly, the Council is concerned for the evident lack of local knowledge in how the EIA Scoping Report is presented. The Council feels it is not appropriate to use the generic term of 'Brome' throughout the report when describing the areas which will be affected by the development. The Council trusts the map below serves to inform and demonstrate how part of the parish of Oakley, namely Upper Oakley, is as affected by the proposal as the parish of Brome and that there are three distinct population centres in Brome - Rectory Road, Brome Street and a small area to the west of the A140 locally known as Abbey Close.



BROME and OAKLEY PARISH COUNCIL

The Parish Council submits the following requests for inclusion in the Scoping Report:

TOPICS TO BE SCOPED INTO THE EIA			
<i>For reference, grey text denotes how the Scoping Report is currently presented.</i>			
Agricultural Land and Soils	The report notes how good the quality of the land is in our area and this has already been included in submissions to EcoPower. We have no further comment.		
Biodiversity and Ecology	Construction	Operation	De-Commissioning
Amphibians – not scoped in during operational phase ‘as development away from breeding ponds. We do not agree and should be scoped.	<i>ALREADY INCLUDED</i>	INCLUDE	<i>ALREADY INCLUDED</i>
Badgers – should be scoped in as routinely move along sets whilst foraging	<i>ALREADY INCLUDED</i>	INCLUDE	<i>ALREADY INCLUDED</i>
Aquatic Fauna – should be scoped in due to proximity to River Dove	<i>ALREADY INCLUDED</i>	INCLUDE	<i>ALREADY INCLUDED</i>
Barn Owls – other species of Owls such as Tawny and Little Owls should be included as present in vicinity and are also protected species.	INCLUDE	INCLUDE	INCLUDE
Red Deer and Roe Deer – these should be added as a separate line in the scoping and be treated as protected species. Proposed fencing could affect feeding and migration routes.	INCLUDE	INCLUDE	INCLUDE
Brown Hare – should be added as a separate line in the scoping. Proposed fencing could affect feeding and migration routes.	INCLUDE	INCLUDE	INCLUDE
Cultural Heritage	No further comments		
Greenhouse gas	No further comments		
Human Health	Construction	Operation	De-Commissioning
Air quality – airborne dust, and emissions from vehicles using as yet undefined construction access routes.	INCLUDE	<i>NOT INCLUDED</i>	INCLUDE
Noise and Vibration – may not be significant at a community level, but at the level of individual dwellings and local neighbourhoods the potential for disruption is immense.	INCLUDE	<i>NOT INCLUDED</i>	INCLUDE
Transport and Access – needs to be scoped in during operation. What is going to be taken into account and how will the local community be affected? For the wellbeing of the local community and to allay anxiety over impacts to the rural improvement, transport and access at all stages should be included.	<i>ALREADY INCLUDED</i>	INCLUDE	<i>ALREADY INCLUDED</i>
Landscape and Visual Amenity	No further comments		

BROME and OAKLEY PARISH COUNCIL

Noise and Vibration	Construction	Operation	De-Commissioning
Construction traffic vibration – it is essential that this is included at construction stage. There are many rural roads and heritage properties which will be affected.	INCLUDE	<i>NOT INCLUDED</i>	<i>NOT INCLUDED</i>
De-commissioning noise and vibration – with reference to our comment above please ensure consistency for considerations in this section. Vibration is scoped in at decommission but not for construction.			<i>ALREADY INCLUDED</i>
Socio-economics	Construction	Operation	De-Commissioning
Sensitive receptors – this should be included at all stages as residential dwellings are particularly close to access roads.	INCLUDE	INCLUDE	INCLUDE
Traffic and Access Scope and Methodology	No further comments		
Water, Flood and Resources	No further comments as all areas are scoped in		
Air Quality	Construction	Operation	De-Commissioning
Air quality should be scoped in at every stage, particularly as no construction routes have yet been named	INCLUDE	INCLUDE	INCLUDE
Climate Change	No further comments		
Electromagnetic Interference	No further comments		
Glint and Glare	Construction	Operation	De-Commissioning
It is noted that Glint and Glare are intended to be a separate report, however, an assessment should be part of the scoping for the operational stage of the project.		INCLUDE	
Ground Conditions	No further comments		
Major Accidents	No further comments		
Materials and Waste	Construction	Operation	De-Commissioning
The management of materials and waste should be included particularly at the de-commissioning stage.	INCLUDE	INCLUDE	INCLUDE
Human Health Scope and Methodology	Construction	Operation	De-Commissioning
Transport and Access	<i>ALREADY INCLUDED</i>	INCLUDE	<i>ALREADY INCLUDED</i>

In addition to the above comments which relate directly to scope within the report, the Parish Council would like to make the following general comments:

Scoping Report reference	Comment
Pages 1 (1.1.2) and Page 8 (2.1.1)	There are many references to Brome but none to Oakley. Please refer to start of this letter and map provided.
Page 11 (2.4.21)	Residential receptors mentions Diss (2km to the north) but not Brome Street, Rectory Road or Abbey Close in Brome, or Upper Oakley.
P12 (2.4.29) local roads	It is stated that Nicks Lane and Brome Avenue may be used for access. This is conflicted with other references in plan. Nicks Lane

BROME and OAKLEY PARISH COUNCIL

	and access to B1077 is not included in red line for draft development order. Draft order needs to be reviewed to include Nicks Lane if it is intended to be used.
Page 15	An area has been allocated for maintenance and welfare facility which has a maximum height listed but not width or breadth. This detail should also be included
Page 18 temporary haul routes	The Parish Council has already stated a preference for traffic to go out to the west on to the B1077. Further consultation on haul routes is required.
Page 34	A welcome observation is made about the land (predominantly 'very good Grade 2 agricultural land ')and this should be considered where planning panel locations and cable routes..
Page 64	It is incorrect to state that Brome and Oakley does not have an adopted Neighbourhood Development Plan. These parishes are part of the adopted Diss and District Neighbourhood Plan which was adopted in October 2023. https://www.diss.gov.uk/_files/ugd/39e873_1a7250efbad6429f9601c56ad586ed09.pdf
Page 65	Describes residents of parts of Brome but does not mention Upper Oakley. The development is likely to affect all users of public rights of way and visitors to the villages on a daily basis.
Page 66	It is suggested that the views are likely to limited, however, this is a very subjective statement and there cannot be a reliance on presuming that Oakley is a village predominately situated along the B1118 (Lower Oakley). Upper Oakley (see map) will be directly affected by the proposal.
Page 71	Again, both Brome and Oakley need to listed and it is incorrect to not include Oakley for the list of noise sensitive receptors.
Table C-10 Protected and notable species within the draft Order Limits	Include red and roe deer in list of species. Under birds, grey partridge should be included as well as Kites, Sparrow Hawks and Kestrels.
Table C-8 Non-designated Wildlife Sites within 2 km of the draft Order Limits	Brown Hare to be added.
E-2 View Point 2 (Rose Farm)	This should include motorists and cyclists.
E-7	Generically, mentions Oakley but no mention of Upper Oakley or Brome Street. Further consideration should be given to local areas as set out in the map above.
E-8 Transport Routes	Brome Hall Lane is cited as a major transport route, however, this lane is little more than a narrow pathway. This is one of several incidents where there is a clear lack of local knowledge and all routes should be re-examined as part of the scoping consultation.

BROME and OAKLEY PARISH COUNCIL

Visual Assessment	It is suggested that the height of panels will be from one meter to 3.5 meters with the notion of sheep grazing the grass. The Parish Council would rather lower height panels and have the grass managed by alternative source. Therefore, we request that the examination considers the use of lower to the ground panels to minimise visual intrusion.
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Finally, the Parish Council remains fundamentally opposed to the use of productive agricultural land for solar farms. It is believed there is potential for significant harm to both the well-being of the community and to the natural environment. Previous representations made directly to EcoPower can be viewed here

1. <https://bromeandoakleyparishcouncil.gov.uk/assets/Uploads/Response-to-EcoPower-Suffolk-Non-Statutory-Consultation.pdf>
2. <https://bromeandoakleyparishcouncil.gov.uk/assets/Uploads/EcoPower-response-May-2025.doc>
3. <https://bromeandoakleyparishcouncil.gov.uk/assets/Uploads/EcoPower-response-January.doc>

The Parish Council welcomes continued consultation and engagement and is willing to provide further information if so requested.

Yours faithfully,



 FSLCC
Clerk.

From: [REDACTED]@gmail.com
To: Eco Power Suffolk Solar; [REDACTED]
Subject: RE: EN0110019 EcoPower Suffolk Solar Project EIA Scoping Notification
Date: 21 February 2026 21:01:24
Attachments: [image001.png](#)
[image003.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.jpg](#)
[image002.png](#)

Dear Deb

As per our previous email, please see the final response from Denham Parish Council below.

Denham Parish Council would like to make the following comments in relation to the EN0110019 EcoPower Suffolk Solar Project EIA Scoping Notification.

- The Parish Council is aware of a large number of significant national infrastructure projects planned for this area. According to the applicants' own assessment of the area, this is a historic landscape containing a significant number of listed buildings, conservation areas, ancient woodlands and scheduled monuments. The area is currently being considered for the Norwich to Tilbury pylon route, a significant reservoirs project to reduce drought risk and a number of solar developments including the nearby East Pye Solar. The area has also seen significant development in the form of a number of intensive chicken farms feeding the Cranswick processing plant on the A140 at Eye.

All these developments have and will continue to put a huge strain on existing infrastructure leading to increased traffic with the attendant road damage, increased noise, pollution and disruption. We would therefore ask that this development is considered in conjunction with all the other projects currently planned for the area so that impacts of these important projects which provide national benefit are not disproportionately focused on one relatively small area.

- The documentation states that *"The Site predominately comprises relatively flat agricultural land, primarily used for arable cultivation, as well as traditional hedgerows, scattered trees, copses and areas of woodland within the National Character Area: 83 – South Norfolk and High Suffolk Claylands²³"* The Council would argue that the cumulative impacts of planned developments in this locality are fundamentally changing the national character of the area.

National Character Area Profiles provide a framework for decision-making and planning and help to guide land management and other activities to strengthen character and resilience. This area is described as follows:

It is mostly an ancient, long-settled landscape, and above all this is farming

country, with a strong utilitarian and rural character, evoked best in its ancient irregular field patterns that are still discernible over much of the area, its medieval churches, historic timber-framed barns and houses with colour washed walls and thatched or tiled roofs. This is an area of mixed settlement patterns with nucleated villages found in the west and along the river valleys, intermixed with dispersed hamlets and moated farmsteads. Large, often interconnected village greens or commons are a key feature of the area. Market towns such as Eye and Framlingham have largely retained their medieval character, derived from their vernacular architecture. [cd8-2-nca-83-norfolk-suffolk-claylands](#).

The Council believes that should this development go ahead, it will fundamentally and irreversibly change the character of this area.

- The Council noted the fact that Agricultural Land Classification (ALC) mapping published by Natural England²⁴ indicates the Site comprises predominantly Grade 2 and Grade 3 land. ALC Grade 1, 2 and 3a are classified as providing Best and Most Versatile (BMV) agricultural land. This would mean that high quality agricultural land will be sacrificed to build this solar development. Bearing in mind the impacts of current geopolitical uncertainty and the future anticipated impacts of climate change on food security, the Council does not believe that we should be using prime agricultural land for such developments which could be built on Grade 3b, Grade 4 and Grade 5 land which is not considered BMV land.
- The Council also believes that the scoping must include ecological and arboricultural and traffic surveys in the first instance - not after the scheme has been designed. This will ensure that these are considered as a priority and will provide comprehensive details of the whole project if communities are asked to consider the application further should the application proceed to the next planning stage.

Kind regards

[REDACTED]

[REDACTED]

Chair

Denham Parish Council

From: Eco Power Suffolk Solar <EcoPowerSuffolkSolar@planninginspectorate.gov.uk>

Sent: 19 February 2026 13:04

To: [REDACTED] <clerk@denhamparishcouncil.gov.uk>; Eco Power Suffolk Solar <EcoPowerSuffolkSolar@planninginspectorate.gov.uk>

Cc: [REDACTED]@gmail.com) [REDACTED]@gmail.com>

Subject: RE: EN0110019 EcoPower Suffolk Solar Project EIA Scoping Notification

Good afternoon [REDACTED].

Thank you for your email. Noted, we will disregard your initial comments and await a

further response from you by the 28-day deadline for consultation responses.

Thanks,

Deb.



Deb Glassop | Environmental Advisor
The Planning Inspectorate



@PINSgov



The Planning Inspectorate



planninginspectorate.gov.uk

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DPC:76616c646f72



From: [REDACTED] <clerk@denhamparishcouncil.gov.uk>

Sent: 11 February 2026 08:53

To: Eco Power Suffolk Solar <EcoPowerSuffolkSolar@planninginspectorate.gov.uk>

Cc: [REDACTED] <[\[REDACTED\]@gmail.com](mailto:[REDACTED]@gmail.com)> <[\[REDACTED\]@gmail.com](mailto:[REDACTED]@gmail.com)>

Subject: RE: EN0110019 EcoPower Suffolk Solar Project EIA Scoping Notification

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Good morning.

Please can we withdraw the comments sent on the email yesterday.

Our chair Cllr [REDACTED] will be submitting a revised comment before the closing date on the 23rd February.

Best Regards

[REDACTED]
Parish Clerk/Responsible Finance Officer

Denham Parish Council

Tel: [REDACTED]

Email: clerk@denhamparishcouncil.gov.uk

Please note that this in-box is not monitored daily.

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You may request to be removed as a contact at any time, contact: clerk@denhamparishcouncil.org

To view Denham Parish Council's Privacy Notice please [Denham-Privacy-Notice.pdf \(onesuffolk.net\)](#)

From: [REDACTED]

Sent: Tuesday, February 10, 2026 11:11 AM

To: Eco Power Suffolk Solar <EcoPowerSuffolkSolar@planninginspectorate.gov.uk>

Subject: RE: EN0110019 EcoPower Suffolk Solar Project EIA Scoping Notification

To whom it may concern.

Please note below the responses from Denham Parish Council with regard to EN0110019 EcoPower Suffolk Solar Project EIA Scoping Notification.

1. Taken in isolation there may be little to object to (if anyone had time to read all the pre-application information in full!)

However, taken in the context of the Norwich to Tilbury project and the reservoirs project, this is yet another huge infrastructure project in the same location as the other projects and will lead to mass disruption in the area. This

doesn't even consider the other projects on the Eye Airfield, which should be prioritised as this is the right location for this sort of project.

So, in short, this locality is being totally overwhelmed with the number of projects currently being proposed and consideration should be given to the total impact of the proposed projects rather than just considering each in isolation.

2. The cumulative effects of these projects will show a very strong adverse effect on the National Character Area (83). It is extremely unusual for any development to have a meaningful impact on the NCA and this is usually just mentioned in passing.

So, in terms of my comment, the cumulative effects for the local area in terms of development around Eye are excessive, but the overall longer-term effect on the National Character of the Area is unacceptable. The effect on the Local Character Area is likely to be unacceptable too, but I have had a chance to look at this as yet. I object to the use of BMV farmland for solar infrastructure for both the loss of current arable land which should be used for our food security and the longer-term adverse effects on the soil quality due to compaction and contamination etc. Solar arrays are likely to exacerbate flood risk, and noise, traffic and ecological disruption will be an issue. The scoping must include ecological and arboricultural and traffic surveys in the first instance - not waiting until the scheme has been designed, since we have found that the schemes do not change significantly once at the consultation stage even when issues arise as the developer cannot afford to do so having pumped so much money in already.

Best Regards

[REDACTED]

Parish Clerk/Responsible Finance Officer

Denham Parish Council

Tel: [REDACTED]

Email: clerk@denhamparishcouncil.gov.uk

Please note that this in-box is not monitored daily.

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From: Eco Power Suffolk Solar <EcoPowerSuffolkSolar@planninginspectorate.gov.uk>

Sent: Monday, January 26, 2026 11:16 AM

Subject: EN0110019 EcoPower Suffolk Solar Project EIA Scoping Notification

FAO Parish Clerk

Dear Sir/Madam

Please see attached correspondence on the proposed EcoPower Suffolk Solar project.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **23 February 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

Joseph Jones



Joseph Jones
Environmental Advisor
The Planning Inspectorate
T [REDACTED]



@PINSgov



The Planning Inspectorate



planninginspectorate.gov.uk

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DPC:76616c646f72



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From: [NSIPs](#)
To: [Eco Power Suffolk Solar](#)
Cc: [NSIPs](#)
Subject: RE: EN0110019 EcoPower Suffolk Solar Project EIA Scoping Notification
Date: 29 January 2026 15:46:49
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

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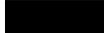
Good afternoon

Further to the email below, Cambridgeshire County Council do not wish to provide any comments in relation to the EIA scoping at this time.

Kind regards


Consents Coordinator

Place and Sustainability

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Phone: 
PO Box 761, ALC2660, Huntingdon, Cambs PE29 9QR



From: NSIPs <nsips@cambridgeshire.gov.uk>
Sent: 27 January 2026 08:20
To: EcoPowerSuffolkSolar@planninginspectorate.gov.uk
Cc: NSIPs <nsips@cambridgeshire.gov.uk>
Subject: RE: EN0110019 EcoPower Suffolk Solar Project EIA Scoping Notification

Good morning

Thank you for your email in relation to EcoPower Suffolk Solar.

As Cambridgeshire County Council is a neighbouring authority, we would appreciate being kept informed of the scheme's progress.

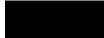
Please could you remove planningdc@cambridgeshire.gov.uk from the distribution list and add nsips@cambridgeshire.gov.uk.

We will be responding in terms of the EIA Scoping in due course.

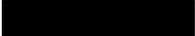
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Consents Coordinator

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Phone: 

PO Box 761, ALC2660, Huntingdon, Cambs PE29 9QR



From: Planning DC <PlanningDC@cambridgeshire.gov.uk>

Sent: 26 January 2026 15:53

To: M and W Policy <mandwpolicy@cambridgeshire.gov.uk>

Subject: FW: EN0110019 EcoPower Suffolk Solar Project EIA Scoping Notification

Good afternoon,

Please see the attached letter. As it has us as a listed consultee, I've forwarded it to you. If you're not the intended recipient, please let me know.

Thank you

Planningdc

01223 715518



From: Eco Power Suffolk Solar <EcoPowerSuffolkSolar@planninginspectorate.gov.uk>

Sent: 26 January 2026 11:45

Subject: EN0110019 EcoPower Suffolk Solar Project EIA Scoping Notification

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FAO Head of Planning

Dear Sir/Madam

Please see attached correspondence on the proposed EcoPower Suffolk Solar project.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **23 February 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

Joseph Jones



Joseph Jones
Environmental Advisor
The Planning Inspectorate
T [REDACTED]

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Planning Inspectorate

Our ref: XA/2026/100544/01

By email

Your ref: EN0110019

EcoPowerSuffolkSolar@planninginspectorate.gov.uk

Date: 23 February 2026

Dear Sir/Madam

EIA SCOPING OPINION: application by ECOPOWER SUFFOLK LTD (the applicant) for an order granting consent for EcoPower Suffolk Solar (the proposed project).-

We have reviewed the Environmental Impact Assessment (EIA) Scoping Report dated January 2026, and associated appendices, insofar as they relate to our remit, and would like to make the following comments.

Key points are summarised below, and our detailed comments are provided in Appendix 1. Informatives for the applicant are provided in Appendix 2.

1. Biodiversity and Ecology

We are in general agreement with the matters discussed in Chapter 7.2. Please consider our detailed comments.

2. Surface water hydromorphology

We are satisfied that this topic is scoped in.

3. Water Resources

We are satisfied that surface water quantity and ground water quantity are scoped in. The Preliminary Environmental Information Report should include a strategy for water supply which includes estimates of water demands and an appraisal of sources of supply.

4. Flood Risk

We are satisfied that flood risk is scoped in. We strongly recommend that the applicant seeks early engagement with the Environment Agency in developing the scope and identifying any modelling requirements for the Flood Risk Assessment.

5. Ground contamination

We are not satisfied that a detailed assessment of ground conditions is scoped out.

The Preliminary Risk Assessment (PRA) concludes that the potential for significant contamination is low but recommends additional ground investigation. However, the Scoping Report recommends that Ground Conditions is scoped out of further

assessment. It is therefore not clear what mechanism will be used to secure the implementation of the recommended land contamination investigation works (and any subsequent risk assessment and remediation); nor how any identified mitigation measures will be agreed.

6. Water Quality and Water Framework Directive Assessment (WFD)

We are satisfied that surface water quality and ground water quality are scoped in. The impact of heat to groundwater should be included in the PEIR.

We are satisfied with the intention to provide a preliminary Water Environment Regulations (WER) assessment with the Preliminary Environmental Information Report (PEIR). We welcome the intention to agree the scope of this assessment with key stakeholders including the EA.

There is a risk of pollution to sensitive surface waters and groundwaters. The risks posed by this development can be managed through the provision of detailed outline Construction, Operation and Decommissioning Management Plans, supported by detailed topic-specific plans, secured as commitments and delivered through Requirements in consultation with the Environment Agency as a named consultee.

Yours faithfully

██████████

Planning Specialist – National Infrastructure Team

Direct dial ██████████

Direct e-mail ██████████@environment-agency.gov.uk

Appendix 1 – Detailed comments

Appendix 2 – Informatives

Appendix 1 – Detailed comments

1. Biodiversity and Ecology (including Fisheries)

Ecol 01 – Mammal entrapment

Document Reference: EIA Scoping Report, Chapter 3 - The Proposed Development	
Section Reference: Section 3.3.2 & 3,3,5	
Issue	The scheme involves the installation of interconnecting cables via trenching methods.
Impact	Compounds and trenches associated with cable installation present a risk of entrapment of mammals such as otters.
Solution	Provide a commitment to cover-over open trenches to prevent wildlife from falling in and place a ramp to enable wildlife to escape. Securely fence compounds and trenches during construction.

Ecol 02 Pre-construction surveys

Document Reference: EIA Scoping Report, Chapter 3 - The Proposed Development	
Section Reference: Section 3.5.2	
Issue	Construction is estimated to begin in 2028 and finish in 2030, yet there appears to be no mention of repeat surveys prior to construction. CIEEM's Advice Note 'On the lifespan of ecological reports & surveys' states that species survey data may be out of date around 12-18 months following a survey.
Impact	Changes in the baseline of species presence and distribution. For example, otters are highly transitory species, therefore an otter could construct a holt prior to construction in 2028. This may result damage or destruction of holts or disturbance during construction, which are offences under the Conservation of Habitats and Species Regulations 2017 (as amended).
Solution	Provide a commitment for pre-construction checks/surveys should be conducted prior to construction, to determine any changes in presence or distribution of species.

Ecol 03 Culverts

Document Reference: EIA Scoping Report, Chapter 3 - The Proposed Development	
Section Reference: Section 3.6.2	
Issue	Site preparation mentions the possibility of installing culverts during the construction phase, to facilitate access over watercourses.
Impact	Culverts have the potential to fragment habitats and reduces connectivity, making dispersal and commuting for some species difficult. Culverts also put an added pressure on otters during periods of high water-levels, as culverts offer little room for conveyance and put otters at risk of being killed when crossing roads.
Solution	Should any access tracks cross watercourses or ditches be required, we would expect to see open-span bridge design. Consider opportunities for existing watercourse crossing points to be improved for ecology. For example, removal of a culvert and replacing with an open span bridge.

	However, for the purpose of practicality, we may agree to the culverting of ditches that are proven to be of poor ecological quality (e.g. ditches are dry for the majority of the year).
--	---

Ecol 04 EA Ecology and Fish Data

Document Reference: EIA Scoping Report, Chapter 7 - Topics scoped into the EIA,	
Section Reference: Section 7.2 Biodiversity and Ecology	
Issue	The applicant has not considered the EA Ecology and Fish Data explorer set.
Impact	Risk of incomplete assessment of baseline ecology, thereby potentially missing out on legally pertinent species records (e.g. protected species, INNS, etc.).
Solution	Refer to the EA Ecology and Fish Data explorer as part of their desk study assessment into the baseline ecology of the scoping boundary. This data service platform holds data collected during routine samples by the EA, including protected, priority/notable and INNS species.

Ecol 05 INNS Management Plan

Document Reference: EIA Scoping Report, Chapter 7 - Topics scoped into the EIA,	
Section Reference: Section 7.2 Biodiversity and Ecology	
Issue	The “suite of environmental and ecological management plans” does not include an INNS management plan or a biosecurity plan.
Impact	Lack of biosecurity planning can lead to the accidental spread of INNS and the risk of inappropriate management of INNS should they be discovered during construction. Accidental spread is an offence under the Wildlife and Countryside Act 1981.
Solution	Provide a commitment to produce an INNS or biosecurity management plan as a supporting document to the Environment Statement. This should include a pathway-specific risk assessment identifying any pathways for spread during construction, operation and decommissioning.
Additional commentary: Where the presence of INNS has been identified, a species-specific method statement for the locations within which they are present could be produced, along with specific measures to be implemented during construction works and/or vegetation and soil removal to ensure that there is no spread of INNS. Eg Known locations of INNS could be marked on the site and vehicle movements restricted in the vicinity of these locations until the INNS have been appropriately removed or treated.	

Ecol 06 Trenched watercourse crossings

Document Reference: EIA Scoping Report, Chapter 7 - Topics scoped into the EIA,	
Section Reference: Section 7.2 Biodiversity and Ecology	
Issue	Watercourses that are not main rivers, nor ordinary watercourses of moderate to very high value will be crossed via open-cut trenches.
Impact	Open cut methods for cabling can have significant negative impacts on watercourses, including the destruction of habitats utilised by protected species such as the water vole. Installation of cables can also prevent free movement of mammals along the river corridor.

Solution	Provide a commitment that supporting management plans will include detailed measures to mitigate the impacts of trenched watercourse crossings.
-----------------	---

Ecol 07 Habitat enhancement

Document Reference: EIA Scoping Report, Chapter 7 - Topics scoped into the EIA,	
Section Reference: Section 7.2 Biodiversity and Ecology	
Issue	Habitat creation and enhancement does not reference any intention to improve watercourses, or to create wetland habitats within the DCO boundary.
Impact	Limited habitat improvement to watercourses or wetland habitats within the DCO boundary.
Solution	Consider how in-channel and riparian enhancements for watercourses and wetland habitat creation could be provided

Ecol 08 Biodiversity Net Gain (BNG)

Document Reference: EIA Scoping Report, Appendix C.2 - Biodiversity and ecology legislation, policy and guidance	
Section Reference: Table C-11	
Issue	Environmental legislation does not list legislation pertaining to BNG.
Impact	Risk of not considering environmental definitions in legislation in respect of BNG, such as 'irreplaceable habitat', along with related offences to said habitats.
Solution	Include the following legislation, policy and guidance: Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024.

Ecol 09 Fish survey data

Document Reference: 7, 7.2 Baseline Conditions	
Issue	The desk study omits EA fish survey data for the River Dove, which flows through the draft Order Limits and there is a proposed cable corridor connecting Area 2 and Area 4.
Impact	The River Dove has a notable fish population including records of European eel. Impacts on fish can only be assessed when there is comprehensive understanding of the baseline.
Solution	Include freely available EA fish survey data in the desk study, available here EA Ecology & Fish Data Explorer

Ecol 10 Fisheries legislation

Document reference: Appendix C.2	
Issue	The Salmon and Freshwater Fisheries Act 1975 has not been included in the list of legislation that is relevant to biodiversity. The legal responsibility on the developer pertaining to this fish specific legislation has not been considered.

Impact	This infers that the impacts on fish from the construction, operation and decommissioning have not been fully considered.
Solution	Include this legislation in the EIA.

2. Surface water hydromorphology

Document Reference: EIA Scoping Report, Chapter 7.10 - Topics scoped into the EIA,	
Section Reference: Embedded measures	
Issue	Box culverts are proposed for crossing low receptor value watercourses
Impact	Box culverts can interfere with sediment transport and have an impact on waterflow/conveyance. Determination of “low receptor values” should also be made clear.
Solution	Box culverts should only be used as a last resort; open bottom/arch culverts are preferred if open span crossings are unfeasible.
Additional comments:	
<p>The following are general guiding principles to consider when designing watercourse crossings to avoid negatively affecting geomorphology and natural processes:</p> <ul style="list-style-type: none"> • Avoid unnecessary interference with natural processes. For instance, encourage use of trenchless techniques such as Horizontal Directional Drilling (HDD) to minimise the likelihood of cables entering the water environment. • Ensure watercourse crossing design is informed by assessment of fluvial processes and geomorphology. For example, depth of HDD crossing should consider the likelihood of vertical channel change. • Position of HDD/trenchless crossing should also take into consideration lateral movement of the watercourse. Ideally trenchless crossings should be launched/received outside of the floodplain. • Avoid designs which present legacy risks to natural processes and geomorphology beyond the project lifespan. For example, infrastructure such as access tunnels which are left in-situ after decommissioning could be exposed by future river movement, becoming an impediment to natural processes. Decommissioning plans should therefore take these factors into consideration and consider removal of such infrastructure at decommissioning or at any time after. • Consider opportunities to deliver WFD mitigation measures, including Nature based Solutions (NbS), as part of the design. • Avoid preventing delivery of mitigation measures, e.g. avoid bringing cables/pipelines to surface level in floodplains earmarked for future river restoration (see note above re. launch/reception locations). 	
Notes:	
<ul style="list-style-type: none"> i. WFD applies to all surface waterbodies, not just those designated for monitoring purposes. ii. Small watercourses and WFD - watercourses with a catchment less than 10km² connected to a downstream WFD waterbody take the classification of that d/s waterbody. ii. BNG guidelines indicate that structures built within 10 m of the bank top of a watercourse qualify as encroachment, which may affect the uplift score calculated using the BNG Watercourse metric. 	
[We note the commitment to provide a 10m buffer to all watercourses, measured from top-of-bank.]	

- Any potential construction, operational, and decommissioning phase impacts that the proposed scheme may have on the river must be subject to a WER (WFD) Assessment to the satisfaction of the EA.
- Any infrastructural developments on river/floodplain environments should be designed and delivered to have a minimal impact on natural river dynamics (e.g. erosion, deposition, meander migration etc.) and should not place any significant limitations on future river restoration projects.
- Geomorphologically dynamic behaviour is deemed likely to intensify in the next decades in line with Flood Estimation Handbook (Flood Estimation Handbook (FEH) | UK Centre for Ecology & Hydrology (ceh.ac.uk)). Therefore, any infrastructure developments should also take some account of the likelihood for increased lateral and vertical river dynamics anticipated to result from continued hydro-climatic intensification (e.g. ‘a flood-rich epoch’) over the remainder of the 21st century (i.e., future proofed designs that are not just based on present-day baseline geomorphological configuration/behaviour).
- If river crossings (bridges, culverts, and buried cables) are required as part of the development, we would expect to see geomorphologically robust designs that will cause minimal impacts on natural fluvial processes operating in the river/floodplain environment over the course of the 21st century.

Further guidance in regard to river crossings can be found in the following document: SEPA, 2010. Engineering in the water environment: good practice guide River crossings Second edition. SEPA

Water course sensitivity

- Care should be taken by applicants when determining watercourse sensitivity, especially the use of Q95 scores. Rivers with a higher Q95 flow are not more sensitive than rivers with a lower Q95. In the case of water quality, the reverse of this is true, with less dilution meaning a higher sensitivity to change. Some watercourses with low Q95 may also be winterbournes, and therefore cannot accommodate change easily, as they would be dry for most of the year.
- WFD designation is a method of monitoring and classifying the ecological health of the water environment and not an indication of greater or lesser sensitivity to change. Therefore, watercourses with a WFD designation are no more sensitive than those which have not been designated.
- Sensitivity to change cannot be determined from a desk study alone. When determining the sensitivity of a watercourse, the applicant should ensure that professional judgement and the results of any surveys are also incorporated into the assessment.

3. Water Resources

WR 01 Consumptive water demands

Document Reference(s): 7.10 Water Resources and Flood Risk	
Issue	Consumptive water demands have not been evaluated in the Water Environment chapter. The Environment agency seeks confidence that a sustainable and practical water supply has been evaluated by the applicant to meet consumptive water demands particularly during construction. These can include (but are not limited to:

	<ul style="list-style-type: none"> • Potable supply to welfare stations; • Dust suppression; • Wheel/concrete wash; • Concrete batching; • Drilling fluids for Horizontal directional drilling methods.
Impact	<p>Sources of water supply available to the project cannot be appraised without estimating potential demands:</p> <ul style="list-style-type: none"> • Non-domestic water company supply is not guaranteed in this supply zone (see also WR informative). Rural locations can also be hard to supply; • 3rd party tankering should be factored into the evaluation of vehicle numbers which is referenced in chapter 4.2 Traffic and Transport; • Surface water or Groundwater abstraction will mean that the project will be subject to the licensing restrictions relevant to the policy for the catchment;
Solution	<p>The Water Environment chapter should provide a strategy for water supply which includes estimates of water demands, an options appraisal of sources of supply and demonstrate awareness of the limitations and potential obstacles and possible mitigations associated with each.</p>
<p>Additional narrative/ explanation (if necessary) NPS EN-1 (Energy infrastructure) section 5.16.7 states: <i>“The Environmental statement should in particular describe existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Abstraction Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance.”</i></p> <p>Operational water demand is expected to be negligible and water supply during construction is understood to be considered by contractors at detailed design stages. Most water related construction activities, including dewatering and dust suppression are licensable activities if they abstract more than 20 m³ a day and as such, early consideration should be given to where the water can be sourced from if the water company isn't the provider. New consumptive groundwater licences are not available and surface water is restricted to high flows only. The Environment agency wishes to avoid projects underestimating water availability resulting in problems with viability.</p> <p>The project is in proximity to Burgate wood SSSI whose operations requiring consent include abstraction or changes to surface water an groundwater levels. Any proposed abstraction may require a Habitats Risk Assessment (HRA) to be undertaken as part of the determination of the licence required.</p>	

WR 02 Abstraction licences

Document Reference(s): 7.10 Water Resources and Flood Risk

Issue	A number of abstraction licences are in proximity to the site and within the red line boundary. Potential impacts and pathways to these sensitive receptors have not been evaluated.
Impact	The project should not derogate lawful water users and should consider suitable mitigations to address any risk. Private water abstraction (outside of regulation) can also include potable water supply posing risks to health.
Solution	The Water Environment chapter should appraise any risks posed by the scheme to existing lawful water users (licensed abstractions and unlicensed private water abstractions.) Water quality and water quantity impacts should be evaluated.
Additional narrative/ explanation (if necessary) Licensed water abstraction data can be obtained from the Environment agency and private water supply data can be requested to the local authority.	

WR 03 – Dewatering requirements

Document Reference(s): General	
Issue	There is no reference to dewatering requirements in the scoping report. If dewatering is required, it will require an abstraction licence if it doesn't meet the criteria for exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works . It may also require a discharge permit if it falls outside of the regulatory position statement for de-watering discharges .
Impact	Consumptive abstraction from Groundwater is not available, shallow pumping (from superficial aquifers) can be restricted by surface water protections, more details can be found in the Abstraction Licensing Strategy for the catchment.
Solution	The Water Environment chapter should evaluate the potential need to dewater for below ground excavation and HDD. If dewatering activity can be demonstrated to be discharged to the same source of supply without intervening use (i.e. non-consumptive), this would increase the likelihood of a licence being granted.
Additional narrative/ explanation (if necessary) The project is in proximity to Burgate wood SSSI whose operations requiring consent include abstraction or changes to surface water an groundwater levels. Any proposed abstraction may require a Habitats Risk Assessment (HRA) to be undertaken as part of the determination of the licence required.	

4. Flood Risk

FR 01 –Flood defence buffer

Document & chapter: Scoping Report, chapter 7.10	
Issue	Within the report the applicant has suggested a 10m buffer from bank top of all watercourses. This does not take flood defences in to consideration
Impact	Flood defence may be adversely affected and this cause failure.

Solution	The applicant needs to provide a buffer of 8m minimum from the landward toe of all flood defences.
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FR 02 - Culverts

Document & chapter: Scoping Report, chapter 7.10	
Issue	Within the report the applicant references that there may be a need for new crossings to be implemented. It is suggested this may be a bridge or culvert. No main river should be culverted.
Impact	Culverting will have an adverse effect on the watercourse and flood risk
Solution	The applicant should look to implement a minimal amount of new crossings as possible. Additionally, all new crossings should be bridges which are as clear span as possible. It is best practice to follow the following requirements : <ul style="list-style-type: none"> • Soffit height of the bridge must be a minimum of 600mm above the 1 in 100yrs + Climate change allowance flood level • All abutments must be set back a minimum 1m from the top of bank and as minimal as possible • Any loss of floodplain due to abutments and ramps will need to be compensated for. • All parapets and railings need to be permeable and open as possible with a minimum 100mm spacing.

5. Groundwater and Contaminated Land

GWCL 01 Heat as a pollutant

Document & chapter: Scoping Report, chapter 3, 3.3.2	
Issue	High voltage cables may be included in the proposed scheme. These have the potential to transfer heat into the groundwater environment.
Impact	Pollution of groundwater by heat
Solution	Consider the risk of heat pollution to groundwater from buried high voltage cables.
<p>Additional dialogue / commentary:</p> <p>Grid Connection Cables (400 kV) which will connect the Main Substation to the National Grid Substation. These cables will be up to 1 km in length and be located within the Area 5 Thrandeston and Mellis to Area 1 Stuston Cable Corridor.</p> <p>Heat as a groundwater pollutant was introduced in 2023 via the Environmental Permitting (England and Wales) (Amendment) (England) Regulations 2023 SI No.2023/651:</p> <p>We are mindful that work is being carried out in this area in relation to heating of groundwater from ground source heating and cooling systems but there is currently no guidance relating to the potential thermal implications of high voltage buried electricity cables.</p> <p>At this stage we require the potential thermal implications of buried cables, in relation to risks to groundwater, to be considered further via desk-based assessment.</p>	

GWCL 02 Environmental context

Document & chapter: Scoping Report, chapter 2.4 Environmental context. 2.4.13	
Issue	The environmental context does not mention the presence of SPZ 1 and 2 within the proposed scheme boundary. They are mentioned in later sections.
Impact	Contradictory information can lead to ambiguity in the assessments
Solution	Ensure reporting consistency in subsequent PEIR.

GWCL 03 - BESS drainage

Document & chapter: 3.2.1 & Table 3-1, 7.10	
Issue	BESS will be included in the scheme and may be located at one or more areas across the site. The report details the anticipated drainage measures for the substation and BESS. This will need to be considered further once the location of these elements of the scheme is finalised. That is, once the sensitivity of the underlying groundwater receptors is known.
Impact	It is difficult to assess full impacts until locations are better known. Insufficient controls on firewater drainage could impact controlled water receptors.
Solution	Once the site BESS has been designed assess the risks and mitigation measures that will be implemented. Follow best practice guidance for designing drainage at BESS and substation sites, based on a conceptual site model, to ensure that it does not present a risk to controlled waters.

Additional dialogue / commentary:

We will expect the drainage design to be produced following an adequate assessment of risks to groundwater, including a conceptual site model, and to include suitable provisions to contain water in the event of a fire. The capacity for such systems should be determined by the applicant in liaison with the fire service.

BESS sites have fully sealed drainage systems, with penstock valves which activate automatically when a fire breaks out.

Where BESS sites are designed with fire extinguishing systems that do not rely on water, fire crews may still use water for boundary cooling, and this can contain pollutants from the burning units, including any associated chemical leakage, and dust and ash from the air. As such, we expect firewater capture to be included in any design. Operation and activation of penstocks should be included within any maintenance schedule. Firewater must be tested for relevant contaminants to determine if it can be released, or if it needs to be removed from the site for disposal elsewhere.

The National Fire Chief's Council has published detailed guidance on recommended fire protection measures for BESS sites. We recommend the applicant refers to this when designing the scheme: [Grid Scale Battery Energy Storage System planning – Guidance for FRS \(nfcc.org.uk\)](https://www.nfcc.org.uk)

GWCL 04 – Spent batteries

Document & chapter: 3.12.4	
Issue	BESS units may require replacement during the lifetime of the scheme. These spent units have the potential for contaminant leakage prior to off-site disposal.
Impact	Risk to land and controlled waters.
Solution	The Applicant should ensure that spent and/or damaged BESS batteries are stored and managed such that they do not pose a contamination risk. For example, this could be due to chemical leakage, or fire water runoff in the event of extinguishing a waste battery fire.

GWCL 05 – Cabling left in situ

Document & chapter: 3.13.5 to 3.13.7 Decommissioning	
Issue	The report states that it is expected that any below ground cabling will be left in situ as this avoids disturbance to overlying land and habitats and further states that decommissioning will be undertaken safely and with regard to the environmental legislation at the time of decommissioning, including relevant waste legislation.
Impact	Cables left in situ can lead to deterioration of plastic and metal over extended time periods, and the release of these materials into soil and groundwater.
Solution	Provide commitment in oDEMP to follow best practice and guidance at the time of decommissioning to determine whether leaving cabling in situ is the best option in relation to risks to controlled waters.
Additional dialogue / commentary: <p>The applicant has proposed that some or all buried cables may be left in situ indefinitely at decommissioning. We do not currently have specific guidance or a regulatory position about this in the context of groundwater and land contamination. However, we recommend that cables are removed entirely at the end of the project's functional lifespan. Consideration should be given to the potential effects of cables being left in situ, such as deterioration of plastic and metal over extended time periods, and the release of these materials into soil and groundwater.</p> <p>The applicant should refer to regulatory guidance and general best practice at the time of decommissioning. Whilst the current intention may be for these to be left in the ground, we strongly recommend that the applicant considers full cable removal in their designs. Allowance should be made at this stage for cable removal should it be later deemed necessary, so that the method of installation does not mean this cannot be reasonably achieved.</p> <p>It is important to consider that use of plastic ducting to facilitate easy removal of cables may have its own impacts. This ducting could degrade over time in a similar manner to plastic cable housing, with some residual risk to sensitive receptors.</p>	

GWCL 06 – Groundwater protection guidance

Document & chapter: 7.10 water resources and flood risk & app F.2	
Issue	The guidance section does not include Environment Agency 2018, The Environment Agency’s approach to groundwater protection.
Impact	This document details our approach to groundwater protection and explains what activities can and cannot take place on Principal and Secondary aquifers, as well as within Source Protection Zones.
Solution	Follow the Environment Agency’s approach to groundwater protection, Groundwater protection - GOV.UK (www.gov.uk) ; The Environment Agency’s approach to groundwater protection (publishing.service.gov.uk) to ensure sufficient mitigation to pollution is incorporated into the design.

GWCL 07 – Ground conditions

Document & chapter: 8.5 Ground Conditions –	
Issue	The Preliminary Risk Assessment (PRA) concludes that the potential for significant contamination is low but recommends additional ground investigation.
Impact	The Scoping Report recommends that Ground Conditions is scoped out of further assessment. It is therefore not clear what mechanism will be used to secure the implementation of the recommended intrusive ground investigation and any further works, for instance, risk assessment and remediation, and how any identified mitigation measures will be agreed.
Solution	Provide a commitment to complete the additional land contamination investigation works, demonstrate how this will be secured and confirm whether Ground Conditions are scoped out.

GWCL 08 – Assessment of groundwater receptors

Document & chapter: Appendix F, Table F-33 Environmental Importance of Receptors	
Issue	Source Protection Zones (SPZs) have not been included in the assessment of the importance of groundwater as a receptor.
Impact	Source Protection Zones are areas around abstractions that signify the level of risk to the source from contamination. They are useful in assessing risk
Solution	Include SPZs as receptors

6. Water Quality

WQ 01 – Water Framework Directive (WFD) impacts and compliance

Document references: 7.10 Water Resources and Flood Risk	
Issue	The site drains to multiple sensitive WFD headwater tributaries including Chickering Beck, Dickleburgh Stream, Frenze Beck and Dove/Waveney tributaries.
Impact	There is a high risk of sedimentation, turbidity and nutrient mobilisation during construction and operation, leading to potential WFD deterioration.

Solution	Provide a WFD assessment to demonstrate WFD compliance and assess the deterioration risk for surface waters (River Dove/Waveney catchment) and the Broadland Rivers Chalk & Crag groundwater body—particularly from construction and operational activities. Include details of mitigations introduced to achieve this objective (e.g. provide topic-specific outline management plans to support the outline CEMP and outline OEMP; buffer zones, phased soil stripping, SuDS etc).
<p>Additional Comments:</p> <p>WER (WFD) Assessment should :</p> <ul style="list-style-type: none"> • Identify all the relevant surface water bodies (names, IDs, baseline status and objectives); • Screen and scope all construction/operation/decommissioning pressures; • Assesses deterioration risk (all elements) and risk of preventing objectives; • Assesses hydromorphological changes at crossings/culverts/realignments (if any); • Identify and justify mitigation; and • Present a clear compliance statement <p>Nationally Significant Infrastructure Projects: Advice on the Water Framework Directive - GOV.UK</p> <p>Construction-phase impacts may include:</p> <ul style="list-style-type: none"> • Sediment mobilisation and turbidity from earthworks, cable trenching, crossings and compounds; include worst-case rainfall scenarios and contingency for prolonged wet periods. (covered in a Pollution Prevention Management Plan) • HDD risks (frac-out/bentonite breakout), drilling fluids management, interception and recovery plan at each crossing. (Covered in a Bentonite Breakout Management Plan) • Spill pathways (fuel, oils, concrete washout) and BESS construction activities—source-pathway-receptor analysis. (Covered in a Pollution Prevention Management Plan). • Temporary dewatering discharges: quality (suspended solids), rates, duration, receiving water low-flow (Q95) context, and permitting route or RPS applicability. Discharges to surface water and groundwater: environmental permits - GOV.UK Environmental permits: regulatory position statements - GOV.UK Groundwater protection position statements - GOV.UK <p>Operational phase impacts:</p> <ul style="list-style-type: none"> • Drainage strategy: demonstrate greenfield runoff control, source-control SuDS and pollution interception where appropriate; show compliance points, exceedance routing and safeguarding of watercourses with the applicant’s embedded ≥10 m watercourse standoff. (Covered in a Surface Water Drainage Strategy). • BESS incident water: confirm source of firewater supply, define containment volume, isolation valves, no uncontrolled release to water, and regulated off-site disposal arrangements. (Covered in a BESS Fire Safety Management Plan). 	

WQ 02 – Hydrogeological Risk Assessment

Document references: 7.10 Water Resources and Flood Risk

Issue	<p>The site intersects the Broadland Rivers Chalk and Crag , and the Cam and Ely Ouse Chalk WFD Groundwater Bodies. each of which requires stringent protection from diffuse pollution and chemical deterioration.</p> <p>The entire development footprint overlies a Principal Chalk Aquifer with mapped Source Protection Zones (SPZ) I, II and III. This includes zones where groundwater travel times to potable abstractions are rapid. As a result, even minor pollutant releases—such as fuels, oils or alkaline construction waters—may reach abstraction points quickly, creating a risk of irreversible deterioration of groundwater quality.</p> <p>Within SPZ3 and across the wider Chalk aquifer system, the hydrogeological setting exhibits:</p> <ul style="list-style-type: none"> • high permeability, • strong storage and flow capacity, and • hydraulic connectivity between superficial deposits and the underlying Chalk. <p>This means that contaminants entering superficial strata during intrusive works (e.g., trenching, piling, HDD) may migrate downward into the aquifer.</p> <p>Licensed and private water supplies within or near the site are vulnerable to contamination.</p>
Impact	Risk of contamination of groundwater aquifer.
Solution	Provide a commitment to producing a robust hydrogeological risk assessment informed by a Conceptual Site Model (CSM) describing potential vertical pathways from piling, driven posts, and HDD pilot/ream stages.
<p>Additional Comments:</p> <ul style="list-style-type: none"> • Hydrogeological Risk Assessment aligned to EA Groundwater Protection positions (pollution prevention, piling/HDD fluids, storage/refuelling controls, chemical selection). Groundwater protection position statements - GOV.UK • Dewatering: assess drawdown effects (if any), discharge quality, route and compliance. Clarify if any discharges to ground are proposed (these are groundwater activities under EPR and are outside the RPS). • Discharges to surface water and groundwater: environmental permits - GOV.UK Environmental permits: regulatory position statements - GOV.UK • Consider mobilisation risk from historic land use/contaminants during intrusive works; controls during wet-weather periods; reinstatement to break preferential pathways. 	

WQ 03 - Pollution Sources and Hazardous Materials

Document reference: 7.10 Water Resources and Flood Risk	
Issue	Both construction and operation present a direct pollution risk to surface waters via drains and overland flow and to groundwater (including the aquifer and Source Protection Zones) through

	<p>infiltration. Potential pollutants that may be introduced or mobilised include:</p> <ul style="list-style-type: none"> • Sediments and suspended solids. • Nutrients • Pesticides • Hydrocarbons, oils and lubricants • Concrete washout, grout • Chemicals used or stored on site • BESS coolant fluid • Firewater and contaminated runoff (BESS & Transformer) • Flood-related mobilisation of pollutants via mapped pluvial and fluvial pathways. • Mobilisation of legacy agricultural nutrients and pesticides and/or other pollution hotspots noting the airport proximity as an additional risk. • Bentonite and drilling fluids
<p>Impact</p>	<p>Risk of pollution to surface waters and groundwater.</p>
<p>Solution</p>	<p>As outlined in WQ 01, provide topic-specific outline management plans to support the outline CEMP and outline OEMP. Demonstrate a clear understanding of all pollution risks associated with onsite activities. This should cover substances introduced during the works and pre-existing contaminants that may be mobilised during the works. Provide a strategy for dealing with unexpected contamination.</p>
<p>Additional Comments:</p> <p>Example details for inclusion in topic-specific management plans:</p> <ul style="list-style-type: none"> • BESS Design standard: Lined system with automatic shutoff, dedicated containment volume sized to agreed fire scenarios + concurrent rainfall; mapped isolation of all pathways (drainage and exceedance) to avoid uncontrolled discharge. Definition of roles; provision of alarms and telemetry; backup power/failsafe; post incident inspection, testing and cleandown of gravels before reopening the valve. • Cementitious effluent: concrete pours, washout, grout, stabilisation utilising concrete resulting in runoff should be prevented from entering site drainage. <ul style="list-style-type: none"> ○ **RPS 235 does not apply** <p>Treating and using water containing suspended solids at construction sites: RPS 235 - GOV.UK</p> • In addition to the alkalinity risk, concrete/cement contains hexavalent chromium. <ul style="list-style-type: none"> ○ This is classified as a hazardous substance in relation to groundwater and must be prevented from entering groundwater. https://www.gov.uk/government/publications/protect-groundwater-and-prevent-groundwater-pollution/protect-groundwater-and-prevent-groundwater-pollution#hazardous-substances ○ Classified as a specific pollutant in relation to surface water it has an annual average Environmental Quality Standard of 3.4 micrograms per litre. 	

https://assets.publishing.service.gov.uk/media/611299b08fa8f506a5bf13ca/Freshwaters_specific_pollutants_and_operational_environmental_quality_standards.ods

- Management of wheel-wash water
- Silt and runoff control to CIRIA C648 (linear projects)—detailing sequencing, buffer zones, settlement/filtration systems, treatment triggers, meteorological monitoring and stop-work thresholds.
- Early consideration of permitting requirements: setting out likely EPR and FRAP needs and ordinary watercourse consents helps to de-risk the construction programme. Permit applications will need to be submitted to the National Permitting Service at the Environment Agency.

Appendix 2 – Informatives

Modelling Flood Risk

The applicant may be able to gain hydraulic modelling from the EA. It is important to note that some of our model data is old and may present limitations. Even the data which is more recent may not be suitable for the purposes you wish to use it for and should modelling work be required in connection with the activities, it will be necessary to check that the data used represents current risk, uses the latest available datasets, complies with current modelling standards, is at a scale suitable for the assessment you're undertaking, captures the detail required for a site-specific assessment, makes use of current climate change allowances. This is emphasised within the guidance on Using Modelling for Flood Risk Assessments (December 2023) available online at Using modelling for flood risk assessments - GOV.UK (www.gov.uk).

Use of PFAS

We strongly recommend that all solar panels are Per- and polyfluoroalkyl substances (PFAS) free. Some solar panels are treated with a PFAS coating. PFAS is not mentioned in the EIA Scoping report. If panels containing PFAS are used, we suggest that there is consideration of this in the Operational Environmental Management Plan (OEMP) and Decommissioning Environmental Management Plan (DEMP). For example, if PFAS coating is damaged there is a risk of persistent chemicals entering the natural environment during heavy rainfall, washing, maintenance, and removal. The OEMP should also incorporate measures to minimise the risk of panel coatings becoming damaged via 'thermal shock' such as if cleaned whilst at a high temperature due to prolonged exposure to sunlight.

The applicant should ensure that any bentonite used for trenchless drilling, or elsewhere in the scheme, has not been treated with chemicals containing PFAS. Fuel, oils and other chemicals, such as cleaning agents and decontaminants, should be PFAS-free wherever possible.

Water Resources

The location of this development is in an area of serious water stress (as identified in our report Water stressed areas – 2021 classification

<https://www.gov.uk/government/publications/water-stressed-areas-2021-classification>).

Developments have the potential to increase demand for water and result in increased abstraction from groundwater sources. All growth from new developments must be able to be supplied with water from sustainable abstractions and water companies may need to put new strategic plans in place to accommodate further growth.

Essex Suffolk Water (ESW), who supply the region of this development, is subject to licence reductions (caps) on its groundwater licences to manage the risk of deterioration of the associated water bodies, according to the principles set out in the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (WFD Regulations). The company's 2024 water resources management plan (WRMP24) has set out that it will be reliant on seeking to defer some licence reductions until new strategic supplies can be developed (e.g. via strategic schemes).

The development lies within the Hartismere Water Resource Zone (WRZ), within which Regulation 19 applications have been received to defer licence changes and risk deterioration.

We recommend that the utilities statements explicitly consider the difference between ability to physically supply and whether that supply can be made using sustainable sources of water. ESW's WRMP sets out that the company may not be able to supply all new non-domestic demands until new supplies are developed.

ESW is heavily reliant on the success of demand management measures to maintain customer supplies until new strategic sustainable supplies of water can be developed. Projects should seek to achieve greater water efficiency and re-use in their designs wherever possible to help the companies meet their water efficiency targets. Grey water recycling and rainwater harvesting should be carefully investigated however dry weather should be considered, i.e. there is little rainfall in the times of high dust suppression demand.

Environmental permits

If dewatering is required, it will require an abstraction licence if it doesn't meet the criteria for exemption in [The Water Abstraction and Impounding \(Exemptions\) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works](#). It may also require a discharge permit if it falls outside of our [regulatory position statement for de-watering discharges](#).

If the applicant does not meet the exemption and requires a full abstraction licence, applicants should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found on GOV.UK: [Abstraction licensing strategies \(CAMS process\)](#) and [Apply for a water abstraction or impounding licence](#).

If the dewatering activity can be demonstrated to be discharged to the same source of supply without intervening use (i.e. non-consumptive), this will increase the likelihood of a licence being granted.

Please note that the typical timescale to process a licence application is 9-12 months. The applicant may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.

Temporary dewatering of wholly or mainly rainwater that has accumulated in an excavation may be exempt from an Environmental Permit for a Water Discharge Activity. More information can be found on our website: [Temporary dewatering from excavations to surface water: RPS 261](#). Note that this does not permit discharge of groundwater from a passive or active dewatering activity or permit the abstraction of groundwater.

The applicant may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found on our website: [Discharges to surface water and groundwater: environmental permits](#).

The use of drilling muds for the directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.

Waste on site

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether excavated material arising from site during remediation or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to:

- [CL:AIRE Definition of Waste: Code of Practice](#)
- [EA Regulatory Position Statement 215: Treating small volumes of contaminated soil and groundwater](#)

Waste to be taken off site

Contaminated soil that is, or must be, disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2010
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan'. The permitting status of any proposed treatment or disposal activity should be clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to [our website](#) for more information.

Sustainable drainage systems

The Environment Agency supports the Government's expectation that sustainable drainage systems (SuDS) will be provided in new developments wherever appropriate.

Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should:

- be suitably designed

- meet Governments non-statutory technical standards for sustainable drainage systems
 - these standards should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance
- use a SuDS management treatment train – that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater

Where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply.

See the Environment Agency’s approach to groundwater protection, position statement G13: [Groundwater protection position statements](#).

BESS Site Design

We strongly recommend that all BESS sites have fully sealed drainage systems, with penstock valves which activate automatically when a fire breaks out.

Where BESS sites are designed with fire extinguishing systems that do not rely on water, fire crews might still use water for boundary cooling, and this can contain pollutants from the burning units, including any associated chemical leakage, and dust and ash from the air. As such, we expect firewater capture to be included in any design. Operation and activation of penstocks should be included within any maintenance schedule. Firewater must be tested for relevant contaminants to determine the appropriate route for disposal.

Where gravel or soil is proposed to be used within an impermeable drainage basin, the operator must demonstrate how they will manage accumulation of silt and pollutants within the base of the gravel. Contaminants from a fire event may accumulate in the gravel even if firewater runoff is identified as being suitable for release.

The National Fire Chief’s Council has published detailed guidance on recommended fire protection measures for BESS sites. [Grid Scale Battery Energy Storage System planning – Guidance for FRS \(nfcc.org.uk\)](#)

Policy and legislation

The policy and guidance relevant to the assessment of flood risk and drainage impacts are given as Table 5.1. An equivalent table for the assessment of potential land contamination and protection of groundwater should be provided and for example include:

- Part IIA, Environmental Protection Act 1990
- The Environmental Permitting Regulations (England & Wales) 2016 (as amended))
- Overarching NPPS Electricity Networks Infrastructure (NPS EN-5) (January 2024)
- The Water Supply (Water Quality) (Amendment) Regulations 2018
- Environmental Damage (Prevention and Remediation) (England) (Amendment) Regulations 2019

- Groundwater (England and Wales) Regulations 2009

The applicant has referred to Environment Agency Land Contamination Risk Management (LCRM) guidance, which does include most relevant guidance discussed within LCRM. Relevant guidance should be referenced in the relevant reports. For example, when outlining proposed site investigation works, we expect the applicant to demonstrate what guidance will be used to determine the scope and carry out the works.

EYE TOWN COUNCIL

Pre-Application Response to EcoPower Suffolk Solar Farm Proposals (Scoping and Emerging Scheme Design)

Date: 20/02/2026

1. Introduction

Eye Town Council (“the Council”) submits this response in relation to the emerging proposals by EcoPower Suffolk for a large-scale solar farm development.

The Council recognises the national need for renewable energy infrastructure and the role solar generation can play in meeting decarbonisation objectives. However, the Council’s responsibility at pre-application stage is to ensure that:

- Consultation fulfils its statutory purpose;
- Sensitive receptors are properly identified and Heritage and historic assets are protected;
- The environmental assessment is appropriately scoped;
- The evidence base is robust and proportionate;
- Socio-economics of the town and the villages within the parish are not negatively impacted;
- Any future Development Consent Order (DCO) contains clear and enforceable controls.

At present, the Council considers that significant information gaps and unresolved impacts remain.

2. Adequacy of Consultation and Information

The purpose of pre-application consultation under the Planning Act 2008 is to enable meaningful influence over the development prior to submission.

The Council wishes to record that the standard of consultation has shown no real improvement from its poor start where the town of Eye discovered the plan via BBC Look East. The perfunctory liaison group meetings remain too large for specific local items to be addressed and there has been no attempt to engage with the council regarding our objection from April 2025. The Council’s concern is that scoping exercises such as this, or a future similar one, will be used to avoid full engagement with such matters as residents’ mental health and traffic management raised in our objection. This would be vigorously opposed. Despite requests, the Council has received no information on whether EcoPower Suffolk will sign up to the Suffolk County Council’s Planning Performance Agreement (best practice guide).

The Council has the following concerns:

- The town of Eye, despite being the largest parish in the proposed area and the most impacted by having designated land on three sides, never had a consultation in/for the town despite our requests for one.
- The configuration of land parcels appears substantially fixed prior to consultation.
- Site selection methodology and alternatives have not been transparently explained.
- The extent of design flexibility (particularly in relation to Battery Energy Storage Systems (BESS)) remains unclear.
- Consultation documentation does not consistently identify all sensitive receptors.
- Cable connectivity appears to be very vague and potentially destructive.

The Council expects the forthcoming Consultation Report to clearly demonstrate how consultation feedback has influenced scheme evolution, including amendments to layout, infrastructure siting, and construction strategy. The Council also requests that any public consultations held by EcoPower Suffolk in the future include meetings in Eye.

3. Identification of Sensitive Receptors

3.1 Oakland Lodge Nursery and Eye Community Hub

The Council notes that Oakland Lodge Nursery (formally Mulberry Bush), located off the B1077 opposite Brome Avenue, and the Eye Family Hub across from the Primary School on Church Street do not appear to be identified as sensitive receptors within the Scoping documentation.

The nursery accommodates a significant number of children and lies in proximity to potential HGV routes. The Hub lies within a potential cable corridor area and is thus subject to disruption.

These omissions must be rectified. Educational receptors must be:

- Clearly mapped;
- Listed in relevant tables; and
- Assessed within transport, air quality, noise and lighting chapters.

Failure to identify such receptors undermines confidence in the robustness of the baseline.

3.2 Residential Receptors Adjacent to Draft Order Limits

Residential properties immediately adjacent to the draft Order Limits must be explicitly identified as sensitive receptors within the Human Health, Noise, Air Quality, Landscape and Heritage assessments. These include numerous listed buildings with narrow or no pathways on proposed traffic routes.

4. Transport and Construction Logistics

The constraints of the local highway network, including town centre geometry and single-track rural roads, require detailed modelling. Eye currently has around 11,000 vehicles per day traversing the conservation area and route to the Occold site. An average of almost 200 of the movements are by HGVs. Eye's roads are narrow with dangerous sight lines and widths less than 4 metres (with no parked cars) in places along the route. This leads to blockages and conflict between HGVs, other large vehicles and cars at the best of times. EcoPower Suffolk estimates 200 extra HGV movements per day on this route. This is unacceptable.

The Council requires:

- A fully modelled Construction Traffic Management Plan (CTMP) perhaps marking a one way system - in from the south (Debenham and Thorndon) and out via Eye;
- Clear identification of permitted and prohibited HGV routes;
- Quantified peak HGV movement forecasts;
- Assessment of cumulative impacts alongside other major infrastructure projects (Essex Water and Persimmon Phase III);
- Explicit avoidance, where practicable, of single-track roads lacking pedestrian protection.

Any routing assurances previously provided verbally must be formally reflected within the Environmental Statement and secured through the DCO.

5. Air Quality (Construction Phase)

The Scoping documentation indicates that air quality effects are currently scoped out.

Given the likely scale of HGV movements and potential use of farm tracks, a construction-phase air quality assessment should be scoped in, including:

- Dust risk assessment and modelling;
- PM10 and PM2.5 assessment;

- Defined mitigation measures; and
- Monitoring protocols.

Air quality should not be excluded prior to confirmation of final routing and construction methodology. Due to the sheer volume of traffic through Eye, the air quality is already noticeably pungent on certain days.

6. Noise and Vibration

Construction noise and vibration, particularly from piling works (including deeper pile depths associated with tracker systems), require robust assessment.

The assessment methodology, including buffer distances used to identify affected receptors, must be clearly justified. Noise effects should be assessed in relation to Human Health, not solely within the construction chapter.

The Council has yet to receive any information regarding manufacturers and models of equipment which can affect noise and vibration. We are unaware of whether central or string inverters will be used and unaware if there are any plans for acoustic enclosures. All this information is necessary when attempting to mitigate obtrusive noise near the housing close by and vibration effects on wildlife.

7. Construction Lighting

The Scoping documentation refers to construction lighting.

The Council will expect:

- Defined working hours;
- Lux level thresholds;
- Directional shielding;
- Avoidance of light spill to residential receptors and ecological habitats;
- Controls secured through the DCO.

8. Battery Energy Storage Systems (BESS)

The Scoping documentation suggests BESS may be centralised or decentralised across the Principal Area.

This degree of flexibility creates uncertainty regarding potential impacts.

The Council requires:

- Confirmation of the maximum number and siting of BESS installations;
- Defined location envelopes;
- Noise contour modelling;
- Operational lighting strategy;
- Fire safety and emergency response strategy;
- Defined separation distances from residential receptors.

Design flexibility must not enable material intensification beyond assessed parameters.

9. Landscape, Visual Impact and Biodiversity

Eye and its surrounding villages are predominantly a rural community and the loss of a huge amount of (BMV) Best and Most Versatile Agricultural land and agricultural jobs to this huge solar farm will have a severe affect on this

community. Cross referencing Natural England's map identifying the BMV land with EcoPower Suffolk's map indicates that at least half the land they intend to use for the solar farm is the better quality land.

The Landscape and Visual Impact Assessment (LVIA) must:

- Biodiversity and wildlife is more fully addressed in appendix A and the Occold Parish Council response.
- Include elevated and publicly accessible PRow viewpoints identified in consultation with the Local Planning Authority and relevant stakeholders;
- Provide verified photomontages;
- Assess cumulative landscape effects;
- Assess effectiveness of mitigation planting at appropriate intervals beyond Year 1 and Year 15 where necessary.
- Take into consideration that part of the Occold site (site 4) is visible from higher levels in Eye and should be appropriately screened.

10. Heritage Assets

Preliminary observations by the Senior Heritage Officer for Babergh and Mid Suffolk District Councils have identified potential harm to listed buildings in proximity to the draft Order Limits.

The Environmental Statement must:

- Include a comprehensive Heritage Statement particularly concerning the Scheduled Ancient Monuments as listed on p.48 of the scoping document, some of which fall within proposed cable corridors;
- Assess setting impacts in accordance with statutory duties;
- Clearly articulate harm and public benefit balancing;
- Consider omission or modification of the most sensitive land parcels where harm is significant.

11. Glint and Glare

A standalone glint and glare assessment should be scoped in and included within the Environmental Statement. This is particularly concerning on the Occold site (site 4) when driving in from the south.

Assessment must consider:

- Residential receptors;
- PRow users;
- Road users; and
- Seasonal variation.

Mitigation assumptions should not be relied upon without modelling evidence.

12. Public Rights of Way and Amenity

Potential temporary or permanent closure or diversion of Public Rights of Way should be fully assessed.

There is a long distance Mid-Suffolk Footpath which runs through Eye and adjacent to fields where solar panel are proposed: this popular footpath, well-used by both residents, community groups, visitors and holiday makers, currently offers uninterrupted views of attractive farmland period. The proposed Solar Farms at Brome Avenue and Occold (site 4), will change that visual amenity into an oppressive, industrialised landscape with security fencing and CCTV.

The socio-economic and human health chapters should include a cumulative amenity assessment addressing:

- Construction noise;
- Visual change;
- Lighting;
- Duration of construction;
- Changes to rural character.

Amenity effects should be assessed holistically rather than fragmented across chapters.

13. Socio-economic impact

Eye has its own particular identity and this solar project threatens a number of issues that will affect both the town economically as well as the wider Parish community.

Eye town has a unique character and offers tourists and visitors a charming blend of medieval history, impressive architecture, rural scenery and a variety of footpaths. It has a rich cultural heritage with 166 listed building in the town and civil parish including three Grade I Listed buildings, the Guildhall, St Peter and St Paul Church and the Castle with panoramic views of the surrounding countryside. The area is also a popular treasure trail destination.

Eye parish has many holiday lets, prosperous cafes and pubs as well as individual shops. Day visitors and tourists, particularly during Open Garden Week and the sculptural trail, come in large numbers to the parish. The open fields bring many walkers and cyclists to the parish who will no longer be interested once the countryside has been covered in solar panels. This obviously will negatively impact the forementioned businesses.

The cumulative effect of the hundreds of acres of solar panels across the district, the increased traffic during the two year construction phase together with an influx of construction workers which will put pressure both on parking in the town, already at breaking point, and on local accommodation will undoubtedly have a detrimental affect on the tourism and character of the town and its surroundings. Local businesses rely on the tourists and visitors during the summer months and if there is disruption or parking issues they will go elsewhere.

There is also the long distance Mid-Suffolk Footpath which runs through Eye and adjacent to fields where solar panel are proposed: this popular footpath, well-used by both residents, community groups, visitors and holiday makers, currently offers uninterrupted views of attractive farmland but with this Solar Farm, is set to have some of that visual amenity changed into an oppressive industrialised landscape with security fencing and CCTV.

14. Decommissioning, Monitoring and Adaptive Management

The Council requires:

- A secured decommissioning and restoration requirement to include possible footing/pile removal from arable land;
- A financial security mechanism;
- Post-consent monitoring of traffic, noise and air quality;
- Trigger thresholds requiring remedial action where forecasts are exceeded.

Forecast uncertainty must be managed through enforceable adaptive mechanisms within the DCO.

15. Conclusion

While the Council supports renewable energy in principle, the current proposals present:

- Inefficient consultation for the concerns of residents of Eye Town;

- Incomplete scoping;
- Sensitive receptor omissions;
- No tangible benefits or energy permission for local communities;
- Insufficient clarity regarding BESS configuration;
- Under-scoped air quality and glint and glare;
- Significant unresolved transport and heritage concerns.

The cumulative effect of the hundreds of acres of solar panels across the district, the increased traffic during the two year construction phase together with an influx of construction workers which will put pressure both on parking in the town, already at breaking point, and on local accommodation will undoubtedly have a detrimental affect on the tourism and character of the town and its surroundings. Local businesses rely on the tourists and visitors during the summer months and if there is disruption or parking issues they will go elsewhere.

Substantial further evidence, refinement and clarity will be required before the Council can reconsider its position.

The Council remains willing to engage constructively at pre-application stage to secure meaningful improvements to the scheme prior to submission.

[Redacted Signature]

~~Chair~~ / Mayor

Town Clerk [Redacted Signature]

Date: 20/21/2026

Attached: Appendix A: Brome Avenue Residents' Group (BARG) response.

BROME AVENUE RESIDENTS GROUP FEEDBACK HIGHLIGHTING ISSUES & CONCERNS REGARDING ECOPOWER SUFFOLK SCOPING REPORT

*Please note: all page numbers quoted throughout this document refer to the page number **on the bottom of each page of the Scoping Report itself** – not the page number in the top title bar of the screen.

OMISSION OF NURSERY SCHOOL ON B1077 ON ANY MAPS

Schools and other pre-schools are identified as 'environmental' and/or 'sensitive' receptors – they are named, listed and plotted on EcoPower maps, but there is no mention anywhere of Oakland Lodge Nursery (previously Mulberry Bush Nursery), which is registered to look after 58 children with 94 children on roll (according to OFSTED 2023) and is situated just off the B1077 and opposite Brome Avenue – it is not identified in Figure 2.2, Report 1 Pg 11 2.4.24.

Pg 19 Section 3.8 of the Scoping report states **“Where practicable, access points will seek to avoid routing construction traffic through or near sensitive areas such as local schools...”** but there is no identification and siting of the Nursery School on any EcoPower maps and reports, so it is essential for the identification and exact location of the nursery school to be added to maps, tables etc.. within EcoPower reports.

P58 'Sensitive Receptors' lists schools but not Oakland Lodge Nursery which is particularly sensitive due to its extremely close proximity to Brome Avenue and the B1077 where HGVs for the project will be travelling.

SCOPING REPORT REPEATEDLY STATES POSSIBLE USE OF BROME AVENUE FOR ACCESS AND FOR 'HGV MOVEMENTS':-

Residents were assured by EcoPower that Brome Avenue would **not** be used, however according to the Scoping Report Pg 12 Section 2.4.29:-

“Local roads that may be used for access within the vicinity of the Site include: Mellis Road, Mill Street, Burgate Road, Furze Way, Green Lane, Old Bury Road, New Road, Nick's Lane, **Brome Avenue**, Hoxne Road, and Church Lane”.

Pg 18 Section 3.4.7 additionally adds:-

“heavy goods vehicle (HGV) route options will avoid sensitive receptors such as those along Brome Avenue ... where feasible”

And again, Pg 83 'within Traffic and access scope and methodology' under 'Embedded Measures':
“restriction of HGV movements and large loads to designated routes, with routes along Brome Avenue ... to be avoided, where possible.”

Brome Avenue is a just single-track no-through road (gated/locked where it meets Brome Hall Lane) lined on either side with large historic oak trees with no passing places. There are no pavements either side, it purely serves as the Mid Suffolk footpath which utilises the single track road itself, and additionally provides vehicular access to Brome Avenue residents' properties. It needs to be noted that pedestrians using Brome Avenue would have no pavement to afford them protection/distance from HGVs or construction traffic – it should **not** be used as a route for any HGV or construction vehicles.

A large sign stating 'NO ENTRY FOR CONSTRUCTION TRAFFIC' should be installed where Brome Avenue meets B1077.

URGENT CLARIFICATION REQUIRED REGARDING BESS LOCATIONS:-

In the last CLG meeting, EcoPower said there would be either one or possibly two BESS. However, Pg13 (3.13) states:-

“At this stage flexibility is required in the design..... Options have been considered to allow design flexibility when EIA carried out..... **arrangement of the BESS which could be centrally located within Area 5 Thrandeston and Mellis and / or decentralised at locations throughout the Principal Area;**

And then, Pg 14 Table 3.1 states two options being considered for BESS, one being

“**Decentralised DC-coupled BESS spread across the Principal Area at multiple locations, alongside centralised inverters installed in containers up to 3.5 m in height.**”

If BESS is to be “**decentralised at locations throughout the Principal Area**” we need to know what those possible locations might be – there is concern that if these are located near residences, the associated noise levels could be unacceptable as online research demonstrates. Moreover, Pg 15 says:-

“**Operational lighting limited to where required for security purposes e.g. around electrical infrastructure..... including around BESS location(s)**”

This associated operational lighting could be a night time disturbance for residents.

LIGHTING – USE OF LIGHTING DURING CONSTRUCTION

EcoPower have repeatedly assured various residents of Brome Avenue - both in verbal and written exchanges - that there will be no lighting used for construction – [REDACTED] Senior Planning Manager advised this would be ‘because construction workers are not allowed to work outside daylight hours’.

However, we now see construction lighting repeatedly referred to throughout the Scoping Report:-

Pg 13, under the sub-heading of ‘Associated Development’, section 3.2.1 mentions use of lighting

Pg 18, under sub-heading of ‘During the construction phase’, section 3.4.7 states

“**any use of artificial lighting will be appropriately controlled**”

Pg 20 Section 3.9.2 mentions use of “**construction lighting**”

Pg 41 “Potential impacts on specific ecological receptors – **construction lighting on bats**”

Pg 69, As part of ‘Landscape and visual amenity scope and methodology’ it states

“**Impacts to visual amenity resulting from the introduction of lighting during construction, Night-time lighting effects will be considered for residential visual receptors**”

Construction floodlights will be a huge disturbance to residents of Brome Avenue and the close vicinity.

POSSIBLE GDPR INFRINGEMENTS WITH USE OF CCTV

Pg 15 ‘Proposed Development’ Table 3.1 Section ‘Fencing, boundary treatments, security measures and lighting’ states:-

"Pole mounted closed circuit television (CCTV) systems mounted on lamp poles up to 2.5 m to be installed at operational areas."

Detailed controls must be insisted upon so the general public are not filmed without their knowledge and agreement. Residents were told by EcoPower that lighting would only be around BESS facilities and ideally infrared and motion sensors.

However, as we have highlighted in section 'URGENT CLARIFICATION REQUIRED REGARDING BESS LOCATIONS', EcoPower are advising that BESS could be **"decentralised at locations throughout the Principal Area"** which would necessitate even more need for detailed controls being insisted upon regarding CCTV images being captured of the general public in their gardens, on ProW or roads as there could be infringements of GDPR (refer 'Use of CCTV on Private Land' in Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR).

PILING WORKS & DEPTHS OF PILES

Pg 14 Table 3.1 states 'single axis tracker' solar panels will be "likely main type used" and then goes on to state:-

"Tracker module systems require deeper pile depths between 3m and 5m."

The extra depth for piling necessary for tracker module systems will mean increased **time and noise** of piling works and the deeper the pile, the harder the substrate.

CLARIFICATION REQUIRED FOR TERM "APPROPRIATE SETBACKS"

Pg 17 Section 3.4.5: **"Appropriate setbacks will also be applied, on a case-by-case basis, to residential properties, roads (5m setback), PRoW and designated heritage ... assets to avoid physical disturbance or nuisance."**

What is the definition of the word 'appropriate' here – who will gauge, define and independently vet that the setbacks will indeed be 'appropriate'?

CONSTRUCTION PROGRAMME TIMELINE NEEDS TO BE POLICED

Pg 18 'Construction programme' Sections 3.5.1 and 3.5.2:- Project duration is estimated to be 6 years from launch to completion including 2 years construction. Timelines must be policed to ensure no further delay as residents' lives are already on hold and are at threat of being on hold for 6 years (at least). This is excessive and there has already been a 12 month delay. EcoPower say efforts will be made to account for the two other projects likely to cause further residents upheaval, Suffolk Water recycling and Norwich to Tilbury Grid upgrade.

CLARIFICATION REQUIRED REGARDING "OUT OF HOURS WORK"

Pg 19 Section 3.7.1: **"there may be some out of hours work required for certain construction activities"** Brome Avenue residents were assured by [REDACTED] of EcoPower that construction work would **not** happen outside hours of daylight as construction workers not allowed to work in darkness, so clarification is needed on what is meant by "out of hours work".

UTILITIES DIVERSIONS

Pg 20 Section 3.9.2: **"The OCEMP will include measures to reduce impacts during construction in relation to ... utilities diversions, if required"**

Does 'utilities' here involve water, electricity, gas? And if so, is there a likelihood residents will be affected as possible diversions of utilities has never been mentioned by EcoPower to date.

SOCIO-ECONOMICS DURING OPERATION SHOULD BE SCOPED IN

Pg 30 Table 6-1: Socio-Economic implications during operation should be scoped in as there will be direct and indirect effects on residents during operation as well as construction so mitigation plans and mitigation assessment plans should be made clear.

STRUCTURE AND CONTENT OF THE ENVIRONMENTAL STATEMENT – DETAILS NEEDED WITHIN SCOPING REPORT

Pg 31 mentions:-

- consideration of alternatives
- summary of consultation responses and how these have been addressed;
- cumulative effects and interactions

EcoPower state these topics are to form part of the Environmental Statement (due autumn/winter 2026) but residents question why these matters are not addressed in the Scoping Report?

LOSS OF HABITAT FOR BROWN HARE DURING OPERATION SHOULD NOT BE SCOPED OUT

The scoping table for Biodiversity and Ecology Pg 42-45 scopes in the brown hare for construction and decommissioning, but scopes it out for the operational phase of the Project. The table above states (within 'other mammals' section) that the brown hare has been observed to **"utilise all land parcels"** within the draft Order limits and admits **"potential ... loss of habitat ... and direct mortality"** during construction and decommissioning and so is scoped in for these two phases. But, once operational with security fencing all around, the brown hare will be suffering a huge loss of habitat, and with this huge loss of habitat, will their numbers ever recover? Therefore, "potential for effects" needs to be scoped **in** for the Operation phase.

OTHER BIODIVERSITY AND ECOLOGY ELEMENTS WHICH NEED TO BE SCOPED IN

The scoping table for Biodiversity and Ecology Pg 42-45 scopes out most elements/animals for the 'Operation' section, with sub-section 'other mammals' which includes deer and their habitat corridors. As priority habitats, fragmentation, disturbance and habitat degradation are included in the scope and methodology of the operation section for other mammals, these effects should be scoped into the operation section particularly as EcoPower plan to erect **"Security fencing approximately between 1.8m and 2.5m in height, to enclose operational areas. Expected to be a deer fence around the majority of the perimeter and include mammal crossing points as appropriate"** (Pg 15). Clearly, for deer, it is vital to have many substantial crossing points in habitually established locations to avoid their being driven onto roads and potentially causing accidents.

ZONE OF THEORETICAL VISIBILITY MISSING IMPORTANT VIEWPOINTS

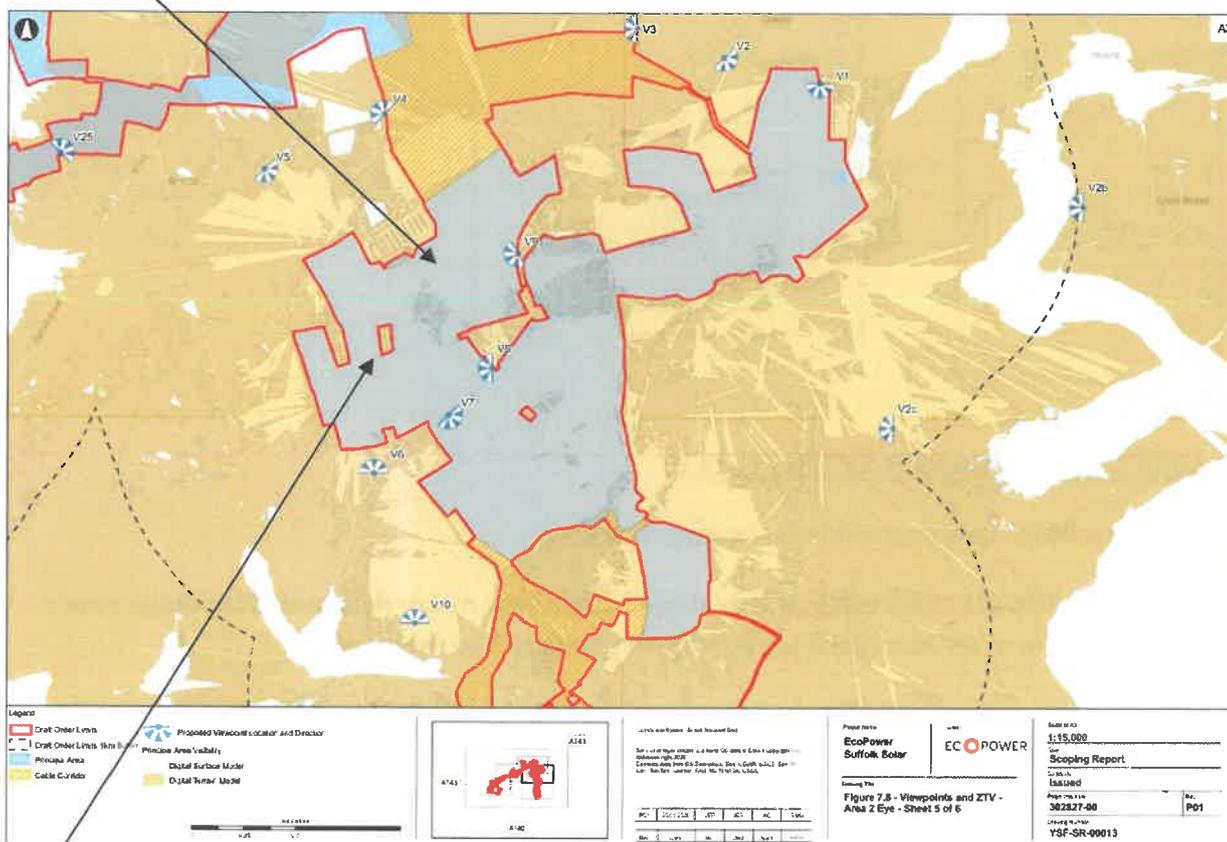
None of the "representative viewpoints" shown in Figure 7.8 (below), are from an elevated locations. An important viewpoint at an elevated location is on a popular PRoW (running from Brome Avenue to Nicks Lane used regularly by dog walkers and runners etc. in Brome and Eye). This is at top of the hill close to reservoir/Chicken units which will have a 270 degree view of solar panels in the immediately adjacent and more distant fields.

A viewpoint also needs to be added on ProW travelling north from Mustard Pot Barn to Nicks Lane as this will have prominent views of solar panels.

In general, viewpoints need to be not just on the borders of the draft Order Limits but also from points on PROWs within the boundaries of the draft Order limits. The 'Viewpoints' Section Pg 66 states that **“These viewpoints have been provisionally discussed with relevant officers at SCC but they should be identified by SCC in conjunction with local residents who regularly use these ProW and are familiar with the views from them.**

(See Figure 7.8)

Viewpoint needs to be added here at top of hill on ProW as there will be elevated views of proposed Solar Panels looking West, South and East



Viewpoint needs to be added here on PROW as there will be 180degree views of proposed Solar Panels looking North and West

‘SENSITIVE RECEPTOR’ DESCRIPTION INCORRECT, PLUS MISLEADING DESCRIPTION OF ‘BARN WITHIN 50M’

Pg 48 ‘Cultural heritage scope and methodology’ section identifies and names individual listed buildings in the vicinity of the draft Order limits, Park Farm Barn is included but not named and only described as **“barn south of Brome Park Farmhouse”** giving the misleading impression it is just a barn next to the farm and not an inhabited residence.

Other properties are listed as being **“within 20m of the draft Order limits”** such as Conifer Cottage on Brome Avenue, but states the same **“barn south of Brome Park Farmhouse”** is **“within 50m of the draft Order limits”**, whereas the ‘Groundsure’ map - Appendix J (see below) shows the draft order limits red outline right up against the boundary of the garden of the barn, so once again, misleading information

presented, as Park Farm Barn should be in the list of buildings identified within **20m** or, more precisely, within **1m** of the draft Order Limits:- 6

Red outline of draft Order limits depicted as touching boundary of Park Farm Barn:-



HERITAGE ASSETS' INCREASED SENSITIVITY

Pg 48 'Cultural heritage scope and methodology' section states:-

“It is not possible to confidently determine at this stage which/how many designated heritage assets scoped in for assessment have an increased sensitivity to change(s) to their setting.”

It needs to be noted that last spring 2025, [REDACTED] Senior Heritage Officer for Babergh and Mid Suffolk District Councils made a site visit to the listed buildings in the vicinity of and next to the boundary of the draft Order limits and produced a report of his findings for the council. He provided a brief summary for Brome Avenue residents (*refer email from [REDACTED] dated 9 April 2025*) to let them know of his findings in relation to the listed buildings along Brome Avenue and around in which he stated:

“my full comments will be published in due course as part of Babergh Mid Suffolk District Councils' overall comments, but that may not be in time for you to then comment at this stage, so I am happy to provide a brief summary now in relation to the listed buildings along Brome Avenue:

I have identified harm, based upon the currently available information, to *Conifer Cottage, Mustardpot Barn, Park Farm Barn, Beaver Cottage* (listed as 'The Granary Approximately 50 Metres North of Iron Gates and Lavendar Cottage'), and *Iron Gates and Lavendar Cottage*. This is partly on the assumption/scenario that the entire identified area would be developed with solar panels. The harm would be from a combination of erosion of their rural, agricultural settings with non-traditional development as well as the panels' likely prominence in/intrusion into views to and from these listed buildings, which includes both public and private views.

- I have considered that the harm would be greater to Conifer Cottage, Mustardpot Barn and Park Farm Barn (about the same for each), as the site more considerably surrounds and is closer to these listed buildings than the other listed buildings.
- More generally, I have indicated a number of parts of the proposal site that I would most push to be omitted - this includes the fields directly north of Brome Avenue and west of Park Farm Barn, though I have highlighted that the parts of the site to the south east and north of Park Farm Barn would also likely cause some harm.
- I have also indicated that should omission of this land to any extent not be considered an option, I would at least seek new or strengthened planting buffers in appropriate locations (though I've not looked at exactly where yet).
- I have also highlighted that a Heritage Statement should be submitted at formal consultation stage, that should consider the contribution the proposal sites make to the significance of all relevant heritage assets."

RESIDENTS LIVING NEAR DRAFT ORDER LIMITS NEED TO BE ADDED TO LIST OF SENSITIVE RECEPTORS WITHIN HUMAN HEALTH SCOPE

Pg58 'Sensitive receptors' – religious buildings and ProW which are used on a transient basis are listed, but residents who will spend every day living in close proximity to the draft Order limits are not listed under 'Sensitive Receptors'.

AIR QUALITY SHOULD BE SCOPED IN FOR (1) HUMAN HEALTH SCOPE AND (2) AIR QUALITY SCOPE

Pg 59 – Air quality in relation to Human Health shown as scoped out – there are existing farm tracks which EcoPower state in the Scoping report may be used for construction traffic including HGVs. Some of these farm tracks run in close proximity to residents' homes, and residents already experience dust pollution (large heavy clouds of dust blowing into their homes and gardens) resulting from farm traffic, so the effect of many additional construction vehicles will only multiply the amount of dust clouds and magnify the effect on residents' respiratory health. As such, air quality needs to be scoped in until EcoPower have identified exactly what routes their construction vehicles will be taking.

Pg 101 – And again, within 'Air Quality' Scoping, it is scoped out: **"A detailed assessment of air quality effects will be scoped out of the ES."** A detailed assessment of air quality effects should be commissioned in order to safeguard the adverse effects on the health of nearby residents and receptors using ProW.

NOISE AND VIBRATION SHOULD BE SCOPED IN FOR HUMAN HEALTH SCOPE

Pg 60 – Given that a comprehensive Amenity Assessment has not been carried out, the effect of noise and vibration on Human Health specifically has not been addressed. Due to the very significant and considerable effect of the noise created by works such as pile driving on residents during the months/years of construction this should be given specific attention under this topic of Human Health and not just relegated to sit within the Scope for 'Construction' (under 'Construction Traffic Noise') without considering noise in relation to its effect on human health.

The report says **"Construction noise impacts will be localised, with the potential to affect individual sensitive receptors within 50 m of construction works and affected roads. Residential receptors in proximity to the Proposed Development may be affected during all phases of the Proposed Development"** - 50m is a completely and unrealistically short distance.

LANDSCAPE AND VISUAL AMENITY MITIGATION REQUIREMENTS

Pg 63 shows all sub-topics within this category scoped in. EcoPower states (Pg E-23 Section E.7.1.6) that **"It will take time for planting proposed to reinstatement vegetation lost as a consequence of construction or provided to mitigate other effects of the Proposed Development, for example for visual screening ... Therefore, landscape and visual effects will be assessed at year 1 and year 15 or[sic] operation"**. Assessments at 1 and 15 years, however, are inadequate and should additionally be as near to immediate as possible post-construction, one year post-construction and then at three year intervals up to 15 years to ensure/oversee the continued establishment and thriving of planted mitigating greenery. This is vital to reassure residents affected by the change to Landscape and Visual Amenity that the mental health impact/lives on hold (already endured by them for 1 year at the time of writing this), and expected to continue for a further 3 before construction is complete, will be effectively mitigated.

SOCIO-ECONOMICS SCOPE AND METHODOLOGY: POTENTIAL CLOSURE OR DIVERSIONS OF PRoW AND RECREATIONAL ROUTES SHOULD BE SCOPED IN

Pg 78 - Section 'Potential closure or diversions of PRoW and recreational routes'

is scoped out and inadequately dealt with in section 7.9 (Pg 81) under 'Transport and access' where EcoPower only say "PRoW intersect or border many parcels, requiring careful management to maintain connectivity". This should be scoped in under Socio-economics scope.

SOCIO-ECONOMICS SCOPE AND METHODOLOGY: POTENTIAL IMPACTS ON SENSITIVE RECEPTORS INCLUDING RESIDENTIAL, COMMERCIAL AND COMMUNITY RECEPTORS SHOULD BE SCOPED IN

Pg 78 – This sub-topic needs to be scoped in for both operation and decommissioning phases. EcoPower say **"There will be no direct effects during operation on receptors, including residential, community and commercial receptors. Any indirect effects during operation (such as noise) will be assessed and mitigated as necessary by the specific topic chapter. Therefore, effects on these receptors are scoped out of the operational stage assessment."** This is not accurate – residents living adjacent/close to the draft Order limits will be aware of the adverse effect of this change to their environment on a daily basis, as will users of the PRoW.

SOCIO-ECONOMICS SCOPE AND METHODOLOGY: POTENTIAL AMENITY IMPACTS SHOULD BE SCOPED IN

Pg 78 - Under section 'Potential temporary and/or permanent adverse amenity impacts' it states:- **"It is not considered necessary to undertake a specific amenity assessment as part of the socio-economic assessment; therefore, potential amenity effects are scoped out"** and further states these impacts are intended to be dealt with under section 7.5 Human Health: Community, identity, culture, resilience and influence but inadequately references mental health.

Evidence of EcoPower's project's negative impact on residents' mental health and wellbeing first surfaced at the early stages of the Non-Statutory Consultation when EcoPower issued a feedback form for the public to respond to their intended project: of the 244 feedback forms received back by EcoPower, 96% of respondents were residents of the "local area".

In response to EcoPower's questions, only 4% of respondents were supportive of developing solar farms in Suffolk without any concerns, and only 4% were supportive of EcoPower's Project plans without any concerns (with an extra 14% being supportive but with concerns). According to EcoPower, respondents

(again, 96% of them being local residents) had concerns regarding “impact on community health and wellbeing”, “property values and ability to sell.”

As more project details have emerged over the last twelve months such as construction noise, lighting, air quality, amount of HGVs and their impact on local road networks and farm tracks, possible temporary suspensions of existing PRoW, etc., residents’ concerns have understandably increased and will continue to do so. The cumulative impact being a considerable negative effect upon residents’ mental health and wellbeing.

Bearing the above in mind, all the various aspects of the adverse amenity impacts such as glint and glare, noise and vibration, loss of landscape amenity and impacts on human health etc.. should be covered by **one specific Amenity Assessment** so that the overall impact of the areas mentioned above can be assessed as a whole and as a cumulative effect. This Amenity Assessment can then be used to inform the disparate areas of concern mentioned above.

TRANSPORT AND ACCESS CONCERNS

Pg 85 - Transport and Access scope and Methodology: sub-topic ‘NMU amenity’ states **"Potential for effects during all phases of the Proposed Development due to alterations to footways, cycleways, equestrian routes, and PRoW which may alter the experience for users and change the accessibility of the area for cyclists, walkers, wheelchair users, and horse riders is scoped in."** Whilst residents appreciate that this area has been scoped in, there are concerns regarding what changes are being envisaged (for instance the only access to residents’ homes is via single track PRoW Brome Avenue) and EcoPower need to clarify at the earliest opportunity.

GLINT & GLARE NEEDS TO BE SCOPED IN

Pg 109 – Glint and glare needs to be scoped in so that following the stand-alone glint and glare assessment, the effects can be properly mitigated in the ES rather than just being included an ‘add-on’ to the ES appendix which is what EcoPower are stating they intend to do.

In sub-section ‘Discomfort or nuisance to ground based receptors (residential dwellings)’ EcoPower say **"Arrangement of solar PV arrays within the Principal Area will follow appropriate setbacks, orientation and mounting principles (noting the three mounting structure options being considered, described in Section 3.2) to limit glint and glare at surrounding ground-based receptors. Boundary treatments to reinforce and enhance existing hedges and planting will also provide screening to prevent intervisibility between ground-based receptors and solar PV arrays. As such, an assessment is *scoped out.*"** An assessment to establish the degree to which EcoPower will be successful in limiting discomfort or nuisance (by the implementation of enhanced hedging etc..) must be scoped in.

OMISSIONS

Pg E-7 Table E-17 ‘Visual receptors’: ‘Receptor type Receptor or receptor group (and distance to draft Order Limits)’ for Area 2 Eye:-

- 1) Brome Avenue residents not specifically included within ‘Local community/residents’.
- 2) Brome Hall Lane mentioned in ‘Transport Users’ section but Brome Avenue which runs between the B1077 and Brome Hall Lane not mentioned in ‘Transport Users’ section:-

GENERAL POINTS REGARDING SCOPING REPORT:-

Risk/Impact identification

Residents have concerns regarding EcoPower's use of the terms 'high' and 'low' that

that identify risks or impacts as being at a high or low level. For example, the HGV traffic volumes as described are considered Low Impact but may be experienced as High Impact if a resident lives close to the construction site, especially as there are no wide roads going through all the surrounding villages and Eye Town Centre currently becomes congested very quickly when there are wide farm vehicles going through.

Cumulative impact on road network and residents of local development projects plus three NSIPs (EcoPower, Suffolk Water Recycling Project, National Grid Norwich to Tilbury upgrade) happening concurrently or overlapping

Again, a point which has been regularly made by residents is that one project may be easy for Highways to handle, but all the different projects that will hit this area more or less at the same time will have a major impact on travel and access.

Redress for incorrect forecasts and assessments

If any of EcoPower's forecasts, projections, assessments are incorrect and they have underestimated the impact of the construction phase in particular, what redress do the general public/residents have? A number of the areas of concern can only be assessed properly with actual data from the impact during the construction phase and for some areas (e.g. lighting) for the duration of operational phase.

From: [REDACTED]
To: [Eco Power Suffolk Solar](#)
Subject: Eco Power Suffolk EIA Scoping Consultation - EN0110019
Date: 20 February 2026 16:45:26
Attachments: [image001.jpg](#)

You don't often get email from [REDACTED]@forestrycommission.gov.uk. [Learn why this is important](#)

Thank you for consulting the Forestry Commission on this proposal.

As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland.

We note there are no ancient woodlands within the proposed order limits, there are however several fragmented mixed deciduous woodlands both within and directly adjacent to the site.

Mixed deciduous woodland – Priority Habitat:

Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England).

They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".

Section 5.11.27 of EN-1 of the Overarching National Policy Statement for Energy states:

"Existing trees and woodlands should be retained wherever possible.....The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long term management and maintenance of newly planted trees should be secured"

Fragmentation is one of the greatest threats to mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through loss of connectivity, damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic or dust, particularly during the construction phase of a development.

For any woodland within the development boundary, land required for temporary use or land where rights are required for the diversion of utilities, the Root Protection Zone must be taken into consideration. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy.

Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel

or chemicals) and fencing off these areas to prevent unintended incursions into the root protection zone as well as dust prevention measures to reduce any potential impact of dust pollution.

Net Deforestation and Tree Planting:

It is expected that there will be thorough assessment of all trees within the project boundary to identify any ancient or veteran trees in line with good arboricultural practice (BS 5837), also to assess any net loss of trees and the development of mitigation measures to minimise any risk of net deforestation because of the scheme. A scheme that bisects any woodland, will not only result in a significant loss of woodland cover, but will also reduce the ecological value and natural heritage impacts due to habitat fragmentation which will have a negative impact on it's ability to respond to the impacts of climate change.

Hedgerows, individual trees and woodlands within a development site should also be considered in terms of their overall connectivity between woodlands affected by the development.

Where woodland loss is unavoidable, we would expect to see significant compensation and the use of buffer zones to enhance the resilience of neighbouring woodlands. These zones should include further tree planting or a mosaic of semi-natural habitats.

Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees between existing woodland blocks, to link them and ensure maximum gains to increase habitat connectivity, making woodlands more resilient and to benefit biodiversity across the whole site. Ideally we would like to see woodland creation to be carried out in 5ha blocks or that connecting planting with existing woodlands, should create blocks of at least 5ha.

With the Government aspiration to increase tree and canopy cover to 16.5% of land area in England by 2050, The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss. However, there are a number of issues that need to be considered when proposing significant planting schemes:

The species and provenance of new trees and woodland needs to be considered to ensure a resilient treescape which can cope with the full implications of a changing climate. The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases, particularly in areas near ancient woodlands.

Use of the Forestry Commission Ecological Site Classification Tool (ESC) can assist with selection of tree species that are ecologically suited to particular sites and includes climate change predictions to allow for future suitability and woodland resilience.

Plans should also be in place to ensure the long term management and maintenance of new and existing woodland. We would recommend the creation of a UK Forestry Standard compliant management plan for all new and existing woodland on site, including deer and squirrel control. Access also needs to be considered for future management.

Avoiding impacts and good landscape design

To meet planning policy and Government guidance, we advise that the EIA scoping and future environmental assessments for this project should include the following:

- A thorough assessment of all trees within the project boundary to identify any ancient or veteran trees in line with good arboricultural practice (BS 5837), to assess any net loss of trees and the development of mitigation measures to minimise any risk of net deforestation because of the scheme.
- Hedgerows, individual trees and woodlands within a development site should be considered in terms of their overall connectivity between woodlands affected by the development.
- Utilise biodiversity gains as part of avoiding woodland and tree impacts (especially ancient/veteran) which can also maximise biodiversity benefits by embracing irreplaceable and high priority habitats – for example focussing on ecological enhancements/creation of woodland edges.
- Woodland creation and improvements to ecological connectivity. For example, there are potential opportunities to link fragmented woodland habitats, which will increase habitat connectivity, making woodlands more resilient and benefitting biodiversity across the project area.
- Overall increase in the tree canopy cover to contribute to the Government’s target to increase tree and canopy cover to 16.5% of land area in England by 2050.

We hope these comments have been useful to you. If you require any further information, particularly on buffer zones for ancient woodland or veteran trees, or tree planting, please don’t hesitate to contact me.

Best wishes

Sandra

[Redacted]

**Local Partnership Advisor
East & East Midlands**

Tel: [Redacted]
[Redacted] [@forestrycommission.gov.uk](mailto:[Redacted]@forestrycommission.gov.uk)



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This email has been scanned for viruses and malware.

From: [FPL - Conx Request](#)
To: [Eco Power Suffolk Solar](#)
Subject: RE: EN0110019 EcoPower Suffolk Solar Project EIA Scoping Notification
Date: 26 January 2026 16:51:59
Attachments: [~WRD2969.jpg](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image719975.jpg](#)
[Letter to stat cons - Scoping & Reg 11 Notification.pdf](#)

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Hi,

We can confirm Fulcrum Pipelines Limited do not have any existing pipes or equipment on or around the above site address.

Please note that other gas transporters may have plant in the area which could be affected by your proposed works.

We will always make every effort to help you where we can, but Fulcrum Pipelines Limited will not be held responsible for any incident or accident arising from the use of the information associated with this search. The details provided are given in good faith, but no liability whatsoever can be accepted in respect thereof.

If you need any help or information simply contact Fulcrum on 03330 146 455.

In case of an emergency please phone 0800 111 999.

Kind regards,



FPL - Conx Request

e: ConnectionRequest@fulcrum.co.uk | w: www.fulcrum.co.uk

a: Fulcrum, 4 Europa Court, Sheffield Business Park, Sheffield, S9 1XE, T: 03330 146 466

Tell us how we're doing:

We'd really appreciate feedback on your experience with us today. So, please tell us how we're doing by emailing feedback@fulcrum.co.uk

From: Eco Power Suffolk Solar <EcoPowerSuffolkSolar@planninginspectorate.gov.uk>

Sent: 26 January 2026 11:12

Subject: EN0110019 EcoPower Suffolk Solar Project EIA Scoping Notification

THIS IS AN EXTERNAL MESSAGE - PLEASE EXERCISE CAUTION

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Sir/Madam

Please see attached correspondence on the proposed EcoPower Suffolk Solar project.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **23 February 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

Joseph Jones



Joseph Jones
Environmental Advisor
The Planning Inspectorate



@PINSgov



The Planning Inspectorate



planninginspectorate.gov.uk

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DPC:76616c646f72





Historic England

Ms Deb Glassop
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Direct Dial: [REDACTED]

Our ref: PL00798587

12 February 2026

Dear Ms Glassop

EN0110019 EcoPower Suffolk Solar Project

EIA Scoping Notification

Thank you for consulting us about the above EIA Scoping request. This development could, potentially, have an impact on designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect an Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

Our initial assessment shows there are a number of designated heritage assets within the wider setting of the proposed development. We would draw your attention, in particular, to the following which could be affected by the development and are within the remit of Historic England to advise:

The church of All Saints, Stuston, (listed at grade II*, NHLE 1032524), St Mary's church at Brome (listed at grade II*, NHS 1352379), the associated moated site to the east (a scheduled monument, NHLE 1019674) and Park Farmhouse (listed at grade II*, NHLE 1032524).

Eye conservation area which includes the parish church of Sts Peter and Paul (listed at grade I, NHS 1316617) and Eye Castle (a scheduled monument, NHLE 1019669). The site of Eye Priory (a scheduled monument, NHLE 1020177), Cookley Farm House (listed at grade II*, NHL1316625), Red House Farm House (listed at grade II*, NHLE 1374915) and the parish church of St Nicholas at Oakley (listed at grade II*, NHLE 118162).



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Mellis conservation area, the parish church of St Mary at Burgate (listed at grade II*, NHLE 1032797), Hall Farm house (listed at grade II*, NHLE 1352234), the moated site at Burgate Hall (a scheduled monument, NHLE 1017331), the mediaeval ring work in Burgate Wood (also scheduled, NHLE 1016699), Stubbings Entry moated site (a scheduled monument, NHLE 1016700), Ivy Farm House in Gislingham (grade II* listed, NHLE 1180703) and St Mary's church (grade I listed, NHLE 1033123).

St Michael at Occold (listed at grade II*, NHLE 1352447), the moated site northeast of Occold Hall (a scheduled monument, NHLE 1005991), moated sites at Gate Farm (a scheduled monument, NHLE 1019671) and King's Farm (also scheduled, NHLE 1019672), Cranley Hall (listed at grade II*, NHLE 1316627) and the associated moated site (scheduled monument, NHLE 1019670) and

Elm Tree Farmhouse (listed at grades II*, NHLE 1181795), Yaxley Manor house (listed at grade II*, NHLE 1352106), the conservation area of Thrandeston village including the Manor House (listed at grade II*, NHLE 1182711), the church of St Margaret (listed at Grade I, NHLE 1032763), the Scheduled and grade I listed house at Priory site, Horsham St Faith, the grade I listed parish church of St Faith at Horsham St Faith and the grade I listed parish church of St Peter at Crostwick.

We would also expect the Environmental Statement to consider the potential impacts on any grade II listed buildings and non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) and relevant local authority staff.

We would strongly recommend that you involve the Conservation Officer of the local planning authority and the archaeological staff at the County Council in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Given the nature of the proposed use and the surrounding landscape character this development could have potential to be visible across a large area and could, as a result, affect the significance of heritage assets at some distance from this site itself. We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed. It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.



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Telephone 01223 58 2749 HistoricEngland.org.uk

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The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits and can also lead to subsidence of buildings and monuments.

Given the number and proximity of highly graded designated heritage assets within the remit of Historic England in the area we do not consider there is likely to be a significant impact from the development on them. We are therefore unlikely to have substantive comments to make but would the chance to comment on any assessment carried out and further details of the proposals.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,

██████████
Inspector of Historic Buildings and Areas
██████████@HistoricEngland.org.uk



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

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Environmental Services
Infrastructure Decisions and Applications
Service Planning Inspectorate
69 Buckingham Avenue
Slough SL1 4PN
ecopowersuffolksolar@planninginspectorate.gov.uk

CEMHD - Land Use Planning,
NSIP Consultations,
Building 1.2, Redgrave Court
Merton Road, Bootle,
Merseyside L20 7HS.
NSIP.applications@hse.gov.uk

Date: 13/02/2026

Dear Sir/Madam,

**PROPOSED ECOPOWER SUFFOLK SOLAR PROJECT
PROPOSAL ECOPOWER SUFFOLK LIMITED
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2017 (AS AMENDED) REGULATIONS 10 AND 11**

Thank you for your e-mail of dated 26/01/2026 regarding the information to be provided in an environmental statement relating to the above project.

HSE's land use planning advice:

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records, the proposed application boundary for this Nationally Significant Infrastructure Project is not within the consultation zone of any major accident hazard sites ['MAHS'] and is within the consultation zones of a major accident hazard pipelines ['MAHP']. This is based on the "Site Boundary" in drawing Figure 1 in the Environmental Impact Assessment [[EIA](#)] Scoping Report Reference: 302827-00/EIASR Issue P01 | 23 January 2026 [EN0110019-000008-EcoPower Suffolk Solar EIA Scoping Report Part 1 - Main Report and Appendices A to J.pdf](#) and the GIS Files supplied in "EcoPower Suffolk Solar Draft Order Limits.zip" on 03/02/26.

The Major Accident Hazard Pipelines is operated by National Gas. The major accident hazard pipelines is:

- 5 Feeder Yelverton / Diss Comp Tee; HSE ref 7447; Transco ref 1706

The Applicant should make contact with the above operators to verify their presence and to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident. There are three particular reasons for this:

- i. The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.
- ii. The standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.
- iii. To establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

HSE's Land Use Planning advice [[HSE: Land use planning - HSE's land use planning methodology](#)] is dependent on the location of areas where people may be present and their type within HSE's land-use planning zones. Based on the information in the EIA Scoping Report, January 2026 it is unlikely that HSE would advise against the development. Please note that the advice is based on HSE's existing policy for providing land-use planning advice and the information which has been provided. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.

Would Hazardous Substances Consent be needed?

Based on the EIA [Scoping Report January 2026](#) it is not clear whether the applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. This may be because there are no relevant hazardous substances.

Hazard classification is relevant to the potential for accidents. For example, hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of [The Planning \(Hazardous Substances\) Regulations 2015](#) as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an 'addition rule' in Part 4 of Schedule 1 for below-threshold substances. If hazardous substances planning consent is required, please consult the relevant Hazardous Substance Authority (usually the Local Planning Authority) on the application.

Consideration of Risk Assessments:

[Regulation 5\(4\)](#) of the [Infrastructure Planning \(Environmental Impact Assessment\) Regulations 2017](#) requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role in NSIPs is summarised in Advice Note 11 'working with public bodies in the infrastructure planning process' Annex G on the Planning Inspectorate's website [Nationally Significant Infrastructure Projects - Advice on working with public bodies in the infrastructure planning process, Annex G: The Health and Safety Executive - GOV.UK \(www.gov.uk\)](#). This document includes the consideration of risk assessments under the heading "Risk assessments".

In Chapter 8.6 of the EIA [EN0110019-000008-EcoPower Suffolk Solar EIA Scoping Report Part 1 - Main Report and Appendices A to J.pdf](#), provides some possible major accidents and disasters, including gas transmission networks. [We would advise this is considered further in line with Advice Note 11 Annex G taking account of the following: "it may be beneficial for applicants to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation as design of the Proposed Development progresses."](#) Note, that there are no requirements for any risk assessments submitted to and approved by the relevant planning authority to also be considered by HSE.

Explosives Sites:

The area defined as the boundary for the Draft Order Limits passes alongside the boundary of the explosive site and through all three safeguarding zones. In particular "Eye Principal Area" fall within the safeguarding zones of the explosive site. The proposed solar arrays are not protected places as defined in ER2014.

The location of any BESS on the Eye Principal Area has not been identified. While, a BESS would also not be considered a protected place as define in ER2014 there is a theoretical risk posed to the explosive site should a BESS be located very close by and potentially to the BESS from the explosive site.

Adequate separation should be provided between the two locations and this should meet at least the Class D separation distance. Should a BESS be located within CClass D, HSE would need to review the explosive licence for the site.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk. We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely

CEMHD NSIP Consultation Team

Our ref:

Your ref: EN0110019

Please ask for: [REDACTED]

Email: [REDACTED]@[ipswich.gov.uk](mailto:[REDACTED]@ipswich.gov.uk)

Direct dial: [REDACTED]



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BOROUGH COUNCIL

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24 February 2026

Dear Ms Glassop,

RE: EN0110019 EcoPower Suffolk Solar Limited (proposed development)

Thank you for your letter dated 26 January 2026 regarding the application for an Order granting Development Consent for the EcoPower Suffolk Solar project.

We have no specific comments to make on the proposed EIA scoping consultation at this stage.

Yours sincerely,

[REDACTED]

[REDACTED] MRTPI
Planning Policy Team Leader
Ipswich Borough Council

██████████
Lead Development Liaison Officer
██████████@nationalgrid.com
██████████

██████████
Development Liaison Support Officer
██████████@nationalgrid.com
██████████

Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)
National Grid Electricity Transmission (NGET)
www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
EcoPowerSuffolkSolar@planninginspectorate.gov.uk

23 February 2026

Dear Sir/Madam

RE: APPLICATION BY EcoPower Suffolk Limited (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE EcoPower Suffolk Solar (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

We refer to your letter dated 26th January 2026 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

Having reviewed the scoping report, I would like to make the following comments regarding NGET existing or future infrastructure in close proximity to the current red line boundary.

NGET has high voltage electricity substations and overhead transmission lines within close proximity the scoping area. The overhead lines form an essential part of the electricity transmission network in England and Wales.

Existing Infrastructure

Substation

- Yaxley 400kV Substation

Associated overhead and underground apparatus including cables

Overhead Lines

4YM ROUTE 400 kV OHL BRAMFORD - NORWICH MAIN 1
 BRAMFORD - NORWICH MAIN 2

We enclose plans showing the location of NGET's apparatus in the scoping area.

In addition, GIS shapefiles of approximate locations of our national electricity transmission network are freely available from here: <https://www.nationalgrid.com/electricity-transmission/network-and->

infrastructure/network-route-maps. You can also check if your works will affect our transmission network by using the Line search website: <https://lsbud.co.uk/>.

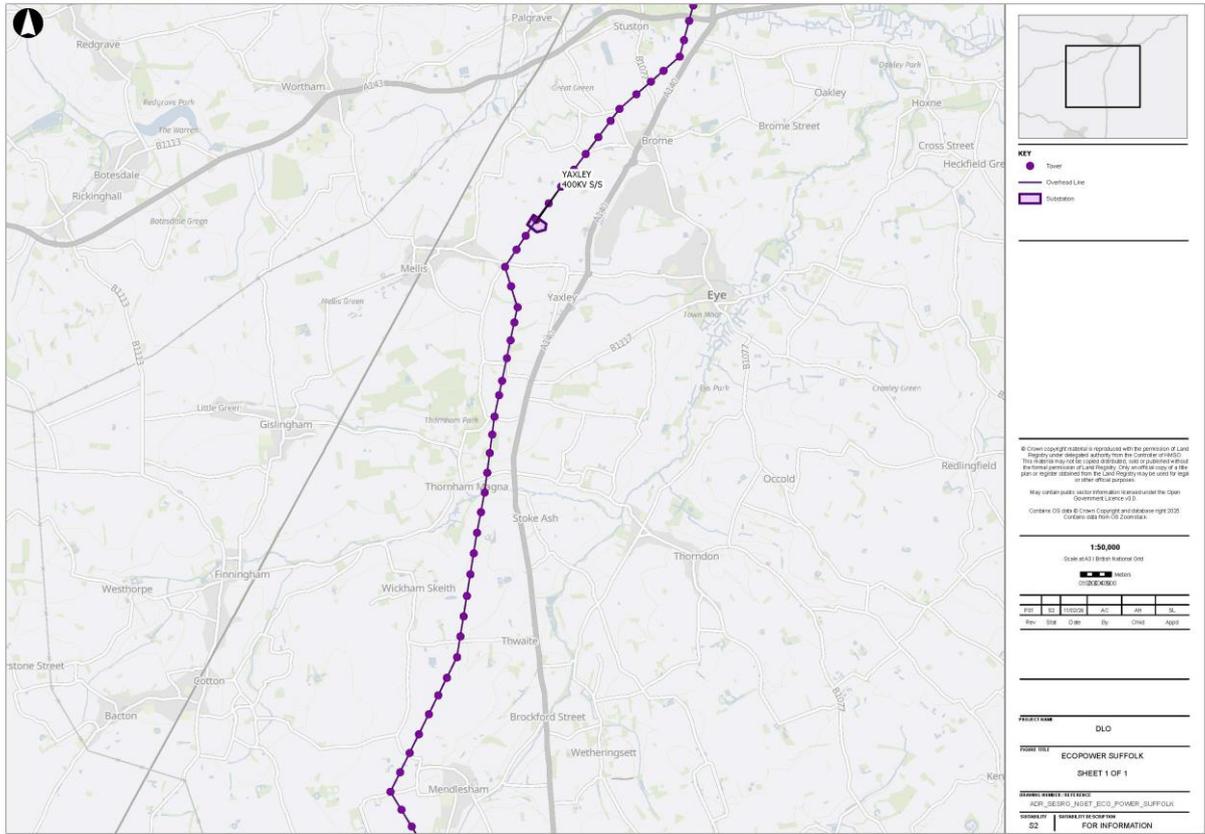


Figure 1: NGET Assets in proposed development area

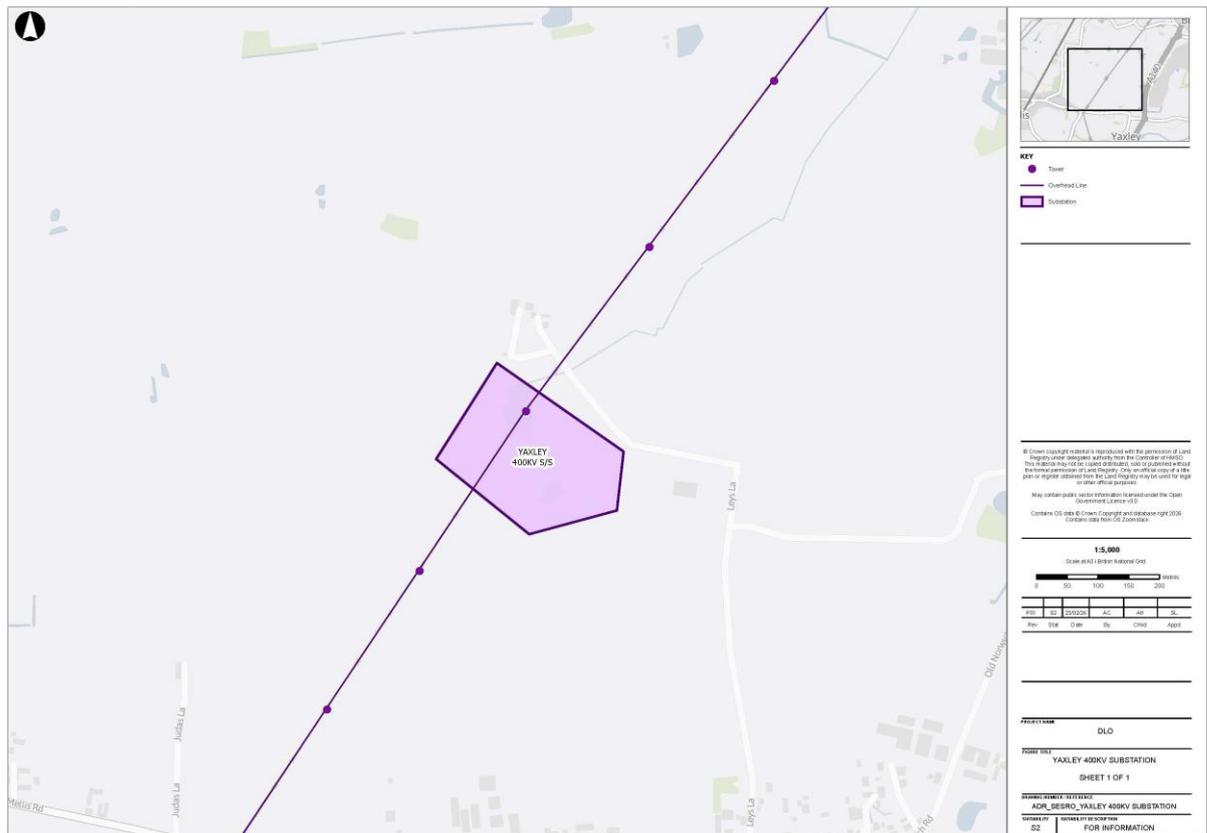


Figure 2: Yaxley 400kV Substation

New infrastructure

The National Energy System Operator (NESO) took over the electricity network planning responsibility from National Grid Electricity System Operator Limited (NGESO) on the 1st October 2024. Please consult with NESO separately from NGET where further information on the strategic need or capacity is sought.

Please refer to the Holistic Network Design (HND) and the NESO website to view the strategic vision for the UK's ever growing electricity transmission network: <https://www.neso.energy/publications/beyond-2030/holistic-network-design-offshore-wind>; and <https://www.neso.energy/publications/beyond-2030>

Yaxley Substation:

National Grid have an existing substation at Yaxley. There are a number of customers seeking connection in local area and the existing substation is unlikely to have sufficient capacity for new customer connections. National Grid is therefore undertaking optioneering in the area to connect new customers which could include a new site or extension to the existing substation.

NGET wish to lodge a holding objection to this proposed application and NGET should be engaged to fully explore the feasibility of this option without comprise to proposed NGET works.

Onshore Infrastructure

Norwich to Tilbury

Norwich to Tilbury is a proposal to build a new 400 kilovolt (kV) electricity transmission connection for approximately 180 kilometres from the Norwich Main substation via Bramford substation, a new East Anglia Connection Node (EACN) Substation and a new Tilbury North Substation. Please find out more about this

project on our website: <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/norwich-to-tilbury>

It should be noted that there may be further interactions with additional new strategic infrastructure where the projects are in their early development.

NGET requests that all existing and future assets are given due consideration given their criticality to the high-voltage transmission of electricity across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.

The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects>. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.

These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.

The following points should be taken into consideration.

Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 5 (2019)”.
- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 “Avoidance of Danger from Overhead Electric Lines” and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors. When those conductors are under their worst conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations

always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.

- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.
- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

Further Advice

NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com

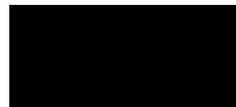
We hope the above information is useful. If you require any further information, please do not hesitate to contact the Land Development Liaison team. In the meantime, we look forward to receipt of further information and consultation relating to potential impacts on our assets.

The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully,




Lead Development Liaison Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)




Development Liaison Support Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)



NH ref: NH/26/14731

Your Ref: EN0110019

Environmental Services (FAO Deb Glassop)
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Operations (East)
National Highways
Woodlands
Manton Lane
Bedford MK41 7LW

20 February 2026

Email:

EcoPowerSuffolkSolar@planninginspectorate.gov.uk

Dear Deb,

EcoPower Suffolk

Proposal: The Proposed Development comprises the construction, operation, maintenance and decommissioning of a new solar farm with a generating capacity over 100 MW, BESS and Associated Development, along with underground cabling and grid connection infrastructure to connect to a new National Grid Substation at Yaxley

Location: Land near to Yaxley, Brome, Eye, Gislingham, Mellis and Occuld

Thank you for consulting National Highways (NH) as per your letter dated 26th January 2026 in relation to the EIA Scoping Consultation in support of proposals for the EcoPower solar project in Suffolk.

NH has a vested interest in managing the Strategic Road Network (SRN), which in this case comprises the A11 which runs broadly north east-south west, approximately 20km to the east of the proposed order limits. The A14 is at a similar distance to the south and A47 to the north. When considering the impact of the proposals on the SRN,

our interest focuses on the assessment of the junctions and links that include a series of junctions and links connecting with the local road network. This includes the junctions on the route of the A11 between Snetterton and Thetford, the A47 to the north and the A14 to the south which should be considered in terms of potential traffic impacts.

We have undertaken a high-level review of the project documentation comprising the EIA Scoping Report.

This response intends to provide sufficient details of NH's requirements to enable the applicant to consider SRN impacts in further documentation for the Development Consent Order (DCO) for the project.

This response includes further recommendations we envisage to see and the applicant to consider as part of further work.

We welcome that a detailed plan for consultation as the project evolves has been set out, and that we have been included at an early stage in the process.

The Proposed Development

It is understood that the proposal comprises:

- A solar photovoltaic (PV) generating station exceeding 100 MW.
- A Battery Energy Storage System (BESS) (centralised or decentralised options).
- Approximately 1,175 ha within the draft Order Limits:
 - 900 ha – Principal Area (solar arrays, BESS, substations, ecological areas)
 - 275 ha – Cable Corridors (interconnecting cables + grid connection)
- Underground connection to the new National Grid Substation at Yaxley.
- Located near Yaxley, Brome, Eye, Gislingham, Mellis and Occold.

The project includes 40 years of operation, followed by a decommissioning phase. Construction is expected to begin in late 2028, lasting approximately 24 months.

EIA Approach and requirements

The study area refers to a series of local roads including A and B roads, and it is welcomed that the final agreement of the study area is to be discussed with NH as well as SCC. We note that the study area as discussed does not include reference to the A11, A14 or A47. Although these two routes are at some distance, we consider that much of the construction traffic for the proposed project will be strategic in nature and will make use of one or both of these routes.

Potential effects on the wider SRN could be experienced in relation to construction traffic activity, even in cases where the works site might be at significant distance from the SRN. We will expect to see traffic flow forecasts for construction traffic flows and distribution, in order to identify any peak hour impacts on junctions on routes. It is also recommended that the applicant seeks to engage with NH regarding any proposals for Abnormal and Indivisible Loads (AIL) as part of the project as and when such information comes available for consultation.

In relation to Section 7.9 Traffic and access, we are in agreement regarding the methodology for gathering baseline information, which includes the use of WebTRIS data. We welcome that a Traffic and access chapter would be prepared, and that a Transport Assessment would be prepared which will inform the chapter. The proposed management plans for the construction and operational phases are welcomed and we would wish to be engaged in the review of measures within these documents.

We welcome the proposed use of the IEMA 2023 guidance as the appropriate basis for assessing highways impacts. We also recommend that reference should also be made to guidance and standards in the DMRB in terms of highways assessments. We recommend that reference is made to the DfT Circular 01/2022, which provides guidance regarding how the impact of the proposed development on the SRN should be assessed together with 'The strategic road network and the delivery of sustainable development (National Highways and the strategic road network)'.

DfT Circular 01/2022 recommends in Paragraph 50 that an opening year assessment is carried out, which is likely to be different to the typical scenarios including peak operation. It is also recommended that engagement takes place in order to reach agreement with local authorities regarding traffic growth and committed development.

We note that it is suggested within the Traffic and access scope and methodology that the assessment would scope in driver delay for the construction and decommissioning phases and scope out for the operational phase. However we recommend that traffic flow information is provided for all of these phases is provided in order to inform scoping in or out on a numerical basis.

We would wish to see a methodology and outputs for distribution and for traffic flows to be demonstrated on the local and SRN for all scenarios. This will provide us with an indication on any junction assessments that could be expected to be carried out. These assessments will be important in terms of establishing the extent of the requirement for traffic mitigation measures.

With regard to the potential for traffic surveys, any requirement in relation to the SRN is dependent upon the route assignment for trips, and so this would be subject to further discussion once SRN access points are established. Traffic data is available through WebTRIS although flows for minor arms on the local road network would be

needed for a potential assessment. If any surveys are proposed on the SRN, this would require agreement from the NH Network Management Team in order to agree access.

We recommend that the applicant's consultant obtains the PIA data from the local highway authority based on the study area which should be agreed beforehand and include the relevant junctions linking to the SRN. The data should be inclusive of the full STATS-19 dataset including locations, timings and causation, and it is important to note that the period from March 2020 until August 2021 (inclusive) will not be accepted due to the COVID-19 pandemic and therefore a longer period should be included.

We welcome that a Construction Traffic Management Plan (CTMP) is proposed as part of the application documentation. Significant focus should be placed on the CTMP which will be a key mitigation measure in terms of potential effects on the SRN. Similarly, the Abnormal Indivisible Load (AIL) Study should be informed by engagement between the applicant and NH Network Management on this area of work.

I hope that the above is clear and will allow you to proceed, if you need anything further, please do not hesitate to contact me.

Yours sincerely


Spatial Planner
National Highways
Operations (East)

From: [NATS Safeguarding](#)
To: [Eco Power Suffolk Solar](#)
Subject: RE: EN0110019 EcoPower Suffolk Solar Project EIA Scoping Notification [SG40858]
Date: 27 January 2026 09:14:02
Attachments: [~WRD0000.jpg](#)
[image006.png](#)
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[image015.png](#)
[image016.png](#)

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Our Ref: SG40858

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully



NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Internal

From: Eco Power Suffolk Solar <EcoPowerSuffolkSolar@planninginspectorate.gov.uk>

Sent: 26 January 2026 11:12

Subject: EN0110019 EcoPower Suffolk Solar Project EIA Scoping Notification

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Sir/Madam

Please see attached correspondence on the proposed EcoPower Suffolk Solar project.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **23 February 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

Joseph Jones



Joseph Jones
Environmental Advisor
The Planning Inspectorate

 @PINSgov  The Planning Inspectorate  planninginspectorate.gov.uk

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Date: 20 February 2026
Our ref: 539536
Your ref: EN0110019



EcoPowerSuffolkSolar@planninginspectorate.gov.uk

BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Deb Glassop

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: EcoPower Suffolk Solar

Location: Covering 1,175ha across five areas - Yaxley, Brome, eye, Gislingham, Mellis and Occold

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 26 January 2026, received on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

For this development, in particular, Natural England highlights that the following issues require consideration within the EIA:

- Impacts of the proposed development on: Redgrave and South Lopham Fens Ramsar, Waveney and Little Ouse Valley Fens, Special Area of Conservation (SAC), Hoxne Brick Pit Site of Special Scientific Interest (SSSI), Gypsy Camp Meadows, Thrandeston SSSI, Burgate Wood SSSI, Major Farm Braiseworth SSSI, Weston Fen Suffolk SSSI, Hopton Fen SSSI, Bugg's Hole Fen Thelnetham SSSI, Blo Norton and Thelnetham Fens SSSI, Redgrave and Lopham Fens SSSI, Wortham Ling SSSI, Shelfanger Meadows SSSI, Mickfield Meadow SSSI, Gipping Great Wood SSSI, The Gardens Great Ashfield SSSI, Stanton Woods SSSI, Westhall Wood and Meadow SSSI (See sections 5 and 6 of Annex A for more detailed advice).
- Impacts of air pollution from construction traffic and dust on designated sites (see section 16 of Annex A).
- Impacts of the proposed development on best and most versatile soil (see section 15

of Annex A).

- Impacts of the proposed development on Ancient Woodland: Thornham Estate, Woods, Duchess Wood, Burgate Wood, Stubbings Wood, Gitin Wood, Great Wood, Bricklin Farm Wood, Thorpe Wood, Highfield Wood, West Hall Wood, Coldham Wood, Hoxne Wood, Little Wood.

To date, the Applicant has not engaged with Natural England through our discretionary advice service (DAS).

For any further advice on this consultation please contact the case officer [REDACTED] at [REDACTED] [\[REDACTED\]@naturalengland.org.uk](mailto:[REDACTED]@naturalengland.org.uk) and copy to consultations@naturalengland.org.uk.

Yours sincerely

[REDACTED]
Higher Officer, Sustainable Development, Norfolk and Suffolk

Annex A – Natural England’s Advice on EIA Scoping

1) General principles

1.1 Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided¹.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

1.2 Based on the EIA Scoping Report provided, it appears that these principles are likely to be met.

2) Cumulative and in-combination effects

2.1 The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

2.2 An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects
- b. approved but uncompleted projects

¹ National Infrastructure Planning [Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements](#) (see Insert 2 – information to be provided with a scoping request)

- c. ongoing activities
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Table 1: Plans or projects that Natural England is aware of that might need to be considered in the ES	
Project/Plan	Status
High Grove Solar Farm	Pre – Application
National Grid Norwich to Tilbury scheme	Examination
The Drovers Solar Farm	Pre-Examination
East Pye Solar Limited	Pre-Application
Tasway Energy Park	Pre-Application

3) Environmental data

3.1 Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

3.2 Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.

3.3 Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

3.4 Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local Wildlife Trust, local geo-conservation group or other recording society.

4) Biodiversity and geodiversity

4.1 The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.

4.2 Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) and an [EclA checklist](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

5) Designated nature conservation sites

5.1 International and European sites

The development site is within or may impact on the following **European/internationally designated nature conservation site(s)**: Redgrave and South Lopham Fens Ramsar, Waveney and Little Ouse Valley Fens, (SAC)

5.2 The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA.

5.3 Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

5.4 Natural England always advise that our SSSI Impact Risk Zones are used to inform the scoping of potential impacts to SSSIs from development, as well as professional judgement. In addition, we would advise that application of standard threshold distances for assessment may not be suitable, especially when sites support mobile/migratory bird species and/or may be impacted via a pathway originating further than the threshold used.

5.5 For the purposes of the Scoping exercise, we have provided below a table of the relevant internationally designated sites that we consider should be scoped in for further assessment in the ES (Table 2). There is a similar table in the following section, 'Nationally Designated Sites', (Table 3).

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites

Site name with link to conservation objective	Features which the ES will need to consider	Potential impact pathways where further information/assessment is required
Redgrave and South Lopham Fens Ramsar	<p>All habitats and species noted on the Ramsar citation.</p>	<p>Redgrave and South Lopham Fens Ramsar is located 6km Northwest. It is noted in Table 5 of Appendix J – Preliminary Risk Assessment (23 January 2026) that, <i>“there are numerous unnamed ditches and tributaries of the River Dove and River Waveney on-site... There is the potential for lateral migration of contaminants via the superficial aquifers, via surface runoff or via drainage network to the on-site tributaries and off-site adjacent River Dove and River Waveney.”</i> Therefore, Natural England advise impacts on water quality will need to be assessed as the proposed development may impact the Ramsar.</p> <p>Consideration should be given to any possible effects of the cable works upon watercourses linked to the Ramsar (e.g. methodology used for watercourse crossings). It is noted that such crossings will be ‘avoided’, <i>“with a preference to reuse existing crossing point”</i> (paragraph 3.4.6, EIA Scoping Report, dated 23 January 2026).</p>
Waveney & Little Ouse Valley Fens SAC	<p>All habitats and species noted on the SAC citation.</p>	<p>Waveney and Little Ouse Valley Fens Special Area of Conservation (SAC), located approximately 6 km north-west of Area 3 Gillingham. The EIA Scoping Report identifies that there is the potential for lateral migration of contaminants via the superficial aquifers, via surface runoff or via drainage network to the on-site tributaries and off-site adjacent River Dove and River Waveney. Therefore, Natural England advise impacts on water quality will need to be assessed as the proposed development may be impact the SAC.</p> <p>Consideration should be given to any possible effects of the cable works upon watercourses linked to the SAC (e.g. methodology used for watercourse crossings). It is noted that such crossings will be ‘avoided’, <i>“with a preference to reuse existing crossing points”</i>. (paragraph 3.4.6, EIA Scoping Report, dated 23 January 2026).</p>

6) Nationally designated sites

Sites of Special Scientific Interest

6.1 The EIA Scoping Report has identified several SSSIs within 2km of the draft order limits. Natural England advise that the development site is within or may impact on the following **Sites of Special Scientific Interest:**

- Hoxne Brick Pit Site of Special Scientific SSSI
- Gypsy Camp Meadows, Thrandeston SSSI
- Burgate Wood SSSI
- Major Farm Braiseworth SSSI
- Weston Fen Suffolk SSSI
- Hopton Fen SSSI
- Bugg's Hole Fen Thelnetham SSSI
- Blo Norton and Thelnetham Fens SSSI
- Redgrave and Lopham Fens SSSI
- Wortham Ling SSSI
- Shelfanger Meadows SSSI
- Mickfield Meadow SSSI
- Gipping Great Wood SSSI
- The Gardens Great Ashfield SSSI
- Stanton Woods SSSI
- Westhall Wood and Meadow SSSI

6.2 The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within any nearby SSSI's and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects.

6.3 Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

6.4 Additional advice on impacts to air quality and water quality have been provided in sections 16 and 17 of this annex, respectively. This advice may cause additional SSSIs to be scoped into the EIA.

Site name with link to citation	Features which the ES will need to consider	Potential impact pathways where further information/assessment is required
Hoxney Brick Pit SSSI		Natural England does not consider that there are any impact pathways that would impact the site.
Gypsy Camp Meadows Thrandeston SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in water quality. An assessment of a hydrological connection should be scoped into the ES.
Burgate Wood SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in air quality and water

Table 3: Potential risks to nationally designated sites: the development is within or may impact on the following sites

Site name with link to citation	Features which the ES will need to consider	Potential impact pathways where further information/assessment is required
		quality. An assessment of air quality impacts from construction traffic and dust and an assessment of a hydrological connection should be scoped into the ES.
Major Farm, Braiseworth SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in water quality. An assessment of a hydrological connection should be scoped into the ES.
Weston Fen Suffolk SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in water quality. An assessment of a hydrological connection should be scoped into the ES.
Hopton Fen Thelnetham SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in water quality. An assessment of a hydrological connection should be scoped into the ES.
Bugg's Hole Fen SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in water quality. An assessment of a hydrological connection should be scoped into the ES.
Blo Norton and Thelnetham Fens SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in water quality. An assessment of a hydrological connection should be scoped into the ES.
Redgrave and Lopham SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in water quality. An assessment of a hydrological connection should be scoped into the ES.
Wortham Ling SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in air quality and water quality. An assessment of air quality impacts from construction traffic and dust and an assessment of a hydrological connection should be scoped into the ES.
Shelfanger Meadows SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in water quality. An assessment of a hydrological connection should be scoped into the ES.
Mickfield Meadow SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in air quality and water

Table 3: Potential risks to nationally designated sites: the development is within or may impact on the following sites		
Site name with link to citation	Features which the ES will need to consider	Potential impact pathways where further information/assessment is required
		quality. An assessment of air quality impacts from construction traffic and dust and an assessment of a hydrological connection should be scoped into the ES.
Gipping Great Wood SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in water quality. An assessment of a hydrological connection should be scoped into the ES.
The Gardens, Great Ashfield SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in water quality. An assessment of a hydrological connection should be scoped into the ES.
Stanton Woods SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in air quality and water quality. An assessment of air quality impacts from construction traffic and dust and an assessment of a hydrological connection should be scoped into the ES.
Westhall Wood and Meadow SSSI	All habitats and species for which the site has been notified.	The notified habitats at this site and the notified species they support may be sensitive to changes in air quality and water quality. An assessment of air quality impacts from construction traffic and dust and an assessment of a hydrological connection should be scoped into the ES.

7) Regionally and Locally Important Sites

7.1 The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geo-conservation group or other local group and protected under the NPPF (paragraph 192 a). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. We advise the Applicant to contact the relevant local body for further information.

8) Protected species

8.1 The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

8.2 The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

8.3 Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required. Applicants should check to see if a mitigation licence is required using Natural England guidance on licensing [Natural England wildlife licences](#).

8.4 Where licence need is identified, applicants should make use of Natural England's [Pre Submission Screening Service](#) for a review of a draft wildlife licence application. Through this service Natural England will review a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the Development Consent Order (DCO) be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. [Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning](#) for details of the LONI process.

9) Priority Habitats and Species

9.1 Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

9.2 Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

9.3 An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

9.4 The ES should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

10) Ancient Woodland, ancient and veteran trees

10.1 Ancient Woodland is mapped in the proximity of the proposed development. This

includes:

- Thornham Estate Woods approximately 2.5 km west of Area 4 Occold and 3 km south-east of Area 5 Thrandeston and Mellis
- Great Wood, Bricklin Farm Wood, Thorpe Wood, Highfield Wood between 2 km and 3 km north-east of Area 1 Stuston
- Duchess Wood – 500 m south-west of Area 3 Gislingham and 3 km south of Area 5 Thrandeston and Mellis
- Burgate Wood, Gitin Wood and Stubbings Wood between 1 km and 2 km from Area 3 Gislingham
- Westhall Wood is approximately 3.2 km west of Area 3 Gislingham
- Coldham Wood, Hoxne Wood and Little Wood are approximately 3 km east of Area 2 Eye and Area 4 Occold.

10.2 The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

10.3 Dust has been scoped out of the assessment however there could be an impact to nearby ancient woodlands and therefore needs consideration.

10.4 Please refer to the Natural England and the Forestry Commission's [standing advice](#) on ancient woodland, ancient and veteran trees. We advise that 15 metres from the boundary of ancient woodland is considered a **minimum** distance. The standing advice provides further detail on when the buffer zones should be increased and what the buffer zone should/should not include.

10.5 Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 193 c of the National Planning Policy Framework (NPPF) sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

10.6 Natural England maintains the [Ancient Woodland Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [Ancient Tree Inventory - Woodland Trust](#) provides information on the location of ancient and veteran trees.

11. Biodiversity net gain BNG

11.1 The Environment Act 2021 includes NSIPs in the requirement for BNG, with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat.

11.2 The EIA Scoping Report states that The Proposed Development will seek to deliver at least 10% BNG in accordance with current and expected guidance (Section 7.2, page 45, EIA Scoping Report, dated 23 January 2026). This will be achieved through field boundary enhancement and planting of appropriate seed mixes (Table 3.2, page 15). Natural England would encourage the Applicant to commit to at least 10% Biodiversity Net Gain across habitat, river and hedgerow units, illustrated via the use of the statutory biodiversity metric.

11.3 In order to maximise nature recovery and target habitat enhancement where it will have the greatest local benefit it is recommended that locally identified opportunities should be acknowledged and incorporated into the design of BNG (both on and off-site). This should

include any locally mapped ecological networks and priority habitats identified within and close to the development site. Natural England also recommend consultation with the Norfolk Wildlife Trust, and any other local bodies, who may be able to provide invaluable local knowledge to help steer the mitigation and enhancement proposed by the project.

12) Local Nature Recovery Strategies (LNRS)

12.1 In addition to ensuring that adverse effects from the project proposals to the various ecological and landscape receptors are avoided, mitigated and/or compensated for in the short-medium term (i.e. throughout construction, operation and removal of temporary works), Natural England advises that a project of this scale should also commit to providing a positive long-term environmental legacy for Suffolk.

12.2 We advise that, EcoPower Suffolk Limited should commit to leaving a positive environmental legacy which provides ecological and landscape benefits to people and wildlife in the long-term. This approach should complement and expand on the commitment for the project to provide 10 % BNG when considered against the current baseline ecological value of the land within the red line boundaries of the project. Natural England would be keen to work with EcoPower Suffolk Limited to help realise such a legacy.

12.3 Projects of this scale can and should make a major contribution to local nature recovery in line with the Lawton principles of 'more, bigger, better and more joined up' habitats¹ in the area. We advise that habitats and species measures within the Landscape and Ecology Management Plan (LEMP), should be aligned with the published [Suffolk LNRS](#).

12.4 We consider that such an approach would, following completion of the project, provide significant opportunities for both socio-economic and environmental benefits through:

- Enabling wildlife to adapt to the challenges of the future including habitat fragmentation, climate change etc.
- Providing a wealth of natural capital benefits such as flood prevention, improved air and water quality, improved soils, increased carbon storage etc.
- Providing inspiration and enjoyment for people through regular access to a high-quality natural environment, improving community health and wellbeing (both mental and physical). This should include enhancement of public access where practical (i.e. where it would not compromise the biodiversity interest, for example) and could also involve local stewardship of any new habitat creation.

12.5 Such an approach would also be in line with:

- The Governments [25 Year Environment Plan](#)
- National Planning Policy Framework (NPPF), Policies: 125, 159, 162, 164, 187, 192, 193.
- Babergh and Mid Suffolk Joint Local Plan Part 1 November 2023 - SP09 Enhancement and Management of the Environment, LP16 Biodiversity and Geodiversity,

13) Landscape

13.1 The development site is not within, or within proximity to, any nationally designated landscapes.

Landscape and visual impacts

13.2 The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

13.3 Whilst Natural England will not usually make comments on local landscape impacts, the EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA) in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

13.4 A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 (3rd edition) produced by LI and IEMA. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

13.5 The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

13.6 To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

13.7 The National Infrastructure Commission has also produced [Design Principles for National Infrastructure](#), endorsed by Government in the National Infrastructure Strategy.

14) Connecting people with nature

14.1 There are a number of public rights of way PRoW that are located within the Site and wider countryside surrounding the Site (shown on Figures 7.6, EIA Scoping Report Figures, dated 23 January 2026) The PRoW have been scoped into the Landscape and Visual Impact Assessment (LVIA). There are no National Trails or National Cycle Routes in the site or study area.

14.2 The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 105 and there will be reference in the relevant National Policy Statement. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

14.3 Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

14.4 Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

15) Soils and agricultural land quality

15.1 Due to the scale of the project, there is potential for significant impacts to Soils and Best and Most Versatile Agricultural Land. Further detail is provided below.

15.2 Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

15.3 The survey data should inform the soil management plan for the site, including suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space). The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts. Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

15.4 The Agricultural Land Classification (ALC) survey should also be used to inform the final design of the project and inform micro-siting of infrastructure such as the Battery Energy Storage System (BESS) to avoid BMV land. The ES should then set out details of how any adverse impacts on BMV agricultural land have been minimised through site design/masterplan.

15.5 Results of the ALC survey should be presented to indicate the land take (including amount of BMV land) for each element of the proposals, i.e. Solar PV areas, cable routes, access tracks, battery energy storage system (BESS)/substation infrastructure and mitigation/enhancement areas. This should also include clarity regarding any agricultural land to be permanently lost, such as the substations.

15.6 The EIA Scoping Report suggests that the lifetime of the development will be up to 40 years. During the life of the proposed development, it is likely that there will be a reduction in potential agricultural production over the development area subject to the solar panel arrays and habitat enhancement. If not time limited, the areas subject to a change in land use or land management have the potential to lead to the permanent reduction in the land's potential agricultural production.

15.7 Natural England advise that a commitment should be made through the DCO to reinstate all Best and Most Versatile Land back to its former ALC grade, following decommissioning.

16. Air quality

16.1 The EIA Scoping Report has scoped out effects on air quality from further assessment. However, Natural England **does not concur** with this conclusion. Further review of traffic data will be required. Natural England, therefore, advises that impacts of increased air pollution from construction traffic on nationally and internationally designated sites cannot be scoped out.

16.2 Our advice is that any site within 200m of a road experiencing an increase of 1000AADT (or 200AADT for HDVs) is scoped in for consideration within the ES. For further advice on assessing the impacts of traffic on designated sites, we refer you to [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations – NEA001](#).

16.3 Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg)^[1]. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NOx and SO₂ against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

16.4 The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts of air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

16.5 Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scail.ceh.ac.uk/>
- Ammonia assessment for agricultural development <https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

^[1] [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

17) Water quality

17.1 The EIA Scoping Report has scoped in effects on water quality for further assessment. The ES should assess the potential of these watercourses being hydrologically linked to the Redgrave and South Lopham Fens Ramsar and Waveney and Little Ouse Valley Fens SAC and the relevant SSSI's referenced on page 7, 8 and 9. Natural England advise that construction methods used in watercourse crossings are assessed for their impact on water quality.

17.2 NSIPs can occur in areas where strategic solutions are being determined for water pollution issues, and they may not have been factored into the local planning system as they are delivered through National Policy Statements.

17.3 The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels.

18) Climate change

18.1 Climate change resilience and in combination impacts have been scoped out of the EIA. Natural England advises that the ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people.

18.2 Part 2 of EN-1 National Policy Statement for Energy, December 2025 covers the government's energy and climate change strategy, including policies for mitigating climate change. Section 4.10 sets out generic considerations that applicants and the Secretary of State should take into account to help ensure that energy infrastructure is safe and resilient to climate change. This section further advises that the resilience of the project to climate change should be assessed in the ES accompanying an application.

18.3 EN-1 sets out strong support for the use of Nature-based Solutions and nature inclusive design, for example:

- In preparing measures to support climate change adaptation applicants should take reasonable steps to maximise the use of Nature-based Solutions alongside other conventional techniques (4.10.5)
- In addition to avoiding further GHG emissions when compared with more traditional adaptation approaches, Nature-based Solutions can also result in biodiversity benefits and net gain, as well as increasing absorption of carbon dioxide from the atmosphere (4.10.7).
- Applicants should look for opportunities within the proposed development to embed nature-based or technological solutions to mitigate or offset the emissions of construction and decommissioning (5.3.6).
- Steps taken to minimise and offset emissions should be set out in a GHG Reduction

Strategy, secured under the Development Consent Order. The GHG Reduction Strategy should consider the creation and preservation of carbon stores and sinks including through woodland creation, hedgerow creation and restoration, peatland restoration and through other natural habitats (5.3.7).

- The design process should embed opportunities for nature inclusive design (4.7.6).
- Applicants should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store or sequester carbon (5.4.34).
- In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as:
 - reductions in GHG emissions
 - reduced flood risk
 - improvements to air or water quality
 - climate adaptation
 - landscape enhancement
 - increased access to natural greenspace, or
 - the enhancement, expansion or provision of trees and woodlands.

The scope of potential gains will be dependent on the type, scale, and location of specific projects. Applicants should look for a holistic approach to delivering wider environmental gains and benefits through the use of Nature-based Solutions and Green Infrastructure.

18.4 Key Natural England resources that you may find useful include:

- [Carbon storage and sequestration by habitat: a review of the evidence \(second edition\)](#)
- [Climate Change Adaptation Manual](#): Evidence to support nature conservation in a changing climate -This contains the Landscape Scale Climate Change Assessment Methodology
- [Nature Networks Evidence Handbook](#)

By email only: EcoPowerSuffolkSolar@planninginspectorate.gov.uk

17/02/2026

Applicant:

Dear Sir/Madam

**EcoSuffolk Solar Environmental Impact Assessment
Consultation February 2026**

Introduction

This letter is a response prepared by the Suffolk and North East Essex Integrated Care Board (the ICB) on behalf of the health partners of the Suffolk and North East Essex Integrated Care System (the ICS), in response on the Statutory Consultation for **EcoPower Suffolk Solar Environmental Impact Assessment Scoping Report**. The ICS is responding in the capacity of strategic health authority for part of the area (the areas within the local authority district of East Suffolk where the development is located). Partner organisations such as the East of England Ambulance Service (EEAST) have wider geographical responsibilities and may have additional points to make, perhaps in association with the other emergency services.

General Health Comments

As commissioners we have a statutory duty to respond to planning consultations and provide feedback for the support of health services. As an ICB we are working closer than ever with our planning colleagues in the LPA's and this will help us move forward for the benefit of our communities in Suffolk. Please find the Suffolk and North East Essex ICB comments to the **EcoPower Suffolk Solar Environmental Impact Assessment Scoping Report**.

The publication of the 10-year health plan issued on 3rd July 2025 provides a direction of travel to enable a greater shift in improving life expectancy, tackling health inequalities and focus on prevention. Though there are no identified timescales to move to a new model able to provide continuous, accessible and integrated care, work continues. The core components of a new care model will be through 3 main shifts in the models of care provided across the health service;

- Hospital to community
- Analogue to digital
- Sickness to prevention

The focus on prevention will mean that access to appropriate care will be;

- As local as it can
- Digitally enabled
- In a person's home/place of residence where possible
- In a neighbourhood health centre (NHC) when needed
- Only in hospital if necessary

This means that the focus on having GP practices located in new developments will be replaced with a more financially sustainable model ensuring a digital first approach and looking more holistically at community level, utilising our

community pharmacies to support the management of long-term conditions, linking them to digital patient records.

To ensure we have a joined-up neighbourhood health and care team model, we need an agreed 'core' estate where we can ensure that multiple support services can come together to provide a 'single front door' for our communities, ensuring easier access and support working towards enabling multidisciplinary teams to operate at least 12 hrs a day and 6 days a week. This will maximise best value and offer social value for the public sector through co-location and their neighbourhoods. This is key for the next phase of integrated neighbourhood and place team development.

For emergency ambulance services, the 10-Year NHS Plan commits to only conveying to hospital where necessary and increasing the volume of "Hear and Treat" which will mean more call handlers are required at regional Emergency Operations Centres (EOC) which EEASt aims to provide from 2 centres in Norwich and Chelmsford.

Consultation feedback:

Land Use, Agricultural Land & Food Security (Determinant of Health)

The Scoping Report outlines the methodology for assessing agricultural land loss, referencing food security policy (including the Written Ministerial Statement on solar and food security, 2024).

Potential health impacts:

- Reduced agricultural output may affect local food system resilience.
- Disruption to ecosystem services that support nutrition, soil health, and local livelihoods.
- Concern for the health and welfare of farmers and agricultural workers etc.

Environmental Determinants of Health: Air Quality

While the Scoping Report excerpt does not explicitly detail air quality assessment, related internal files—such as the [Air quality and respiratory health in SNEE ICP Board Aug 24 final](#)—highlight the established links between air pollution and morbidity across SNEE.

Potential health impacts:

- Construction phase emissions (dust, plant equipment) could temporarily worsen local air quality.
- Traffic movements associated with construction compounds may contribute to NOx/PM exposure.
- Long-term operational impacts expected to be low or neutral.

Soils & Contamination Pathways (Health Pathways via Soil)

The report references soil sensitivity, disturbance, handling, and its contribution to ecosystem services.

Potential health impacts:

- Soil disturbance can mobilise contaminants if any are present on site (e.g., former agricultural chemicals).
- Dust generation from exposed soils may affect respiratory health during construction.

Climate, Carbon Reduction & Health Co-Benefits

Large-scale renewable energy projects align with emissions reduction, which is linked to long-term improvements in:

- Respiratory and cardiovascular health
- Reduced health inequalities
- Mitigation of fuel poverty (wider system benefit)

Supporting evidence of these links appears in the [Air quality and respiratory health in SNEE ICP Board Aug 24 final](#).

Community Impacts & Health Inequalities

The impacts to health services is relatively small according to the report, but the wider determinants of health have to be considered and these are exacerbated in areas that already suffer health inequalities.

Potential health impacts:

- Construction disturbance (noise, traffic, severance, amenity loss) affecting wellbeing.
- Impacts on rural communities (e.g., Eye, Occold, Mid Suffolk villages) where resilience/transport access is already limited.
- Opportunities for community benefits through clean energy generation and potential local investment.
- Possible use of NSIP community benefit funding schemes in the local communities.
- The need for a **Health Impact Assessment (HIA)** aligned approach, covering environmental, social, and economic determinants.

Access, Transport & Safety

Although not explicitly detailed in the provided scoping excerpt, standard EIA practice indicates:

- Increased HGV movements could increase accident risk, noise exposure, and stress.
- Impacts on Public Rights of Way networks may affect physical activity levels—important for prevention and wellbeing.
- Any possible road diversions or closures during construction could impact patients and staff attending health facilities in the area.
- Need to consider mitigation of longer time for health visits, for community staff and primary care staff.

Cumulative & Interrelated Health Impacts

The Scoping Report references a broad set of environmental determinants (soil, land use, ecosystems), and cumulative issues should include:

- Interaction between noise, air quality, and stress.
- Landscape impacts influencing sense of place and mental wellbeing.
- Cumulative solar schemes in Suffolk potentially affecting health equity across rural areas.

Closing Summary

- The need for a **Health Impact Assessment (HIA)**—aligned approach, covering environmental, social, and economic determinants.
- Clear assessment of **construction-phase air quality, noise, dust, and traffic**.
- Consideration of **community wellbeing**, including amenity, access, severance, and rural equity.
- Recognition of long-term **health co-benefits** associated with decarbonisation.
- The importance of **food security and agricultural land as a health determinant**.
- The need to assess impacts on **Public Rights of Way**, active travel routes, and opportunities to **enhance health through green/blue infrastructure**.

Yours faithfully

[Redacted Signature]

[Redacted Name]

Estates Strategic Planning Manager
Suffolk and North East Essex Integrated Care Board

Norfolk County Council's Response to the:

Application by EcoPower Suffolk Limited (the applicant) for an Order granting Development Consent for the EcoPower Suffolk Solar project (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

3 February 2026

1. Introduction

- 1.1 The County Council welcomes the opportunity to comment on the above Scoping Opinion.
- 1.2 The officer-level comments below are made on a without prejudice basis; and the County Council reserves the right to make further comments at:
 - (a) Future consultation rounds – both statutory and non-statutory;
 - (b) The formal submission stage of the Development Consent Order (DCO); and make appropriate relevant representations; and
 - (b) Examination Stage – prepare a Local Impact Report (LIR) setting out the County Council's position.

2. Response to Scoping Opinion - Cross-boundary Considerations

- 2.1 The Environmental Statement (ES) will need to consider the following strategic cross-boundary matters:
 - 2.2 (a) **Environmental Matters** – given the proximity of the project close to the Norfolk border the ES will need to consider the impacts on the River Waveney Valley and any potential visual impacts from the Norfolk side of the Valley. In particular consideration needs to be made of what infrastructure is likely to be located in the Waveney Valley in terms of solar panels; their height; whether they are tracking or fixed; and whether any supporting infrastructure is planned in this area including: substations; converter stations; and/or Battery Storage facilities.
- 2.3 The ES will need to consider the zone of visual impact and what mitigation measures will be required to overcome any potential impacts in this sensitive River Valley area.

- 2.4 There will also need to be consideration in the ES of the cumulative visual impacts associated with the Norwich to Tilbury overhead power line (400 kV) project, which has a planned river crossing to the west of Diss. The landscape impact chapter of the ES will need to consider the above cumulative issues.
- 2.5 (b) **Socio-Economic Matters** – the ES will need to consider the wider employment and skills implications; along with supply chain matters. The cumulative impacts of the project will need to be taken in to account, having regard to: (a) the Norwich to Tilbury transmission project; and (b) other nationally significant Solar Farm Projects being proposed in Norfolk, particularly the East Pye Solar Farm located in neighbouring South Norfolk around Long Stratton. These other nationally significant infrastructure projects will place pressures on both the local labour market and local supply chains.
- 2.6 These matters will need to be taken forward in the DCO application process and there will be a requirement for a Skills; Employment; and Supply Chain Strategy addressing cumulative and cross-boundary implications; as well as opportunities to create highly skilled jobs locally in both Norfolk and Suffolk.
- 2.7 (c) **Construction Traffic** – given the location of the project close to the Norfolk border the ES and any subsequent supporting documentation will need to assess transport routes bringing in equipment; and workforce traffic. The County Council would expect to see a Construction Traffic Management Plan (CTMP) prepared as part of the application process in discussion with the respective Highway Authorities in Norfolk and Suffolk. The respective authorities will want to see any outline CTMP as the project is taken forward.
- 2.8 The CTMP and any transport chapters in the ES will need to consider the cumulative impacts associated with other nationally significant projects cited above; as well as any local housing and employment growth in the respective County Council areas.

Should you have any queries with the above comments please contact [REDACTED]

[REDACTED] (Principal Planner) - [REDACTED] [@norfolk.gov.uk](mailto:[REDACTED]@norfolk.gov.uk)

EN0110019 EcoPower Suffolk Solar Project EIA Scoping Report

Occold Parish Council has the following comments on the EIA Scoping Report submitted by Ecopower Suffolk:

1) Section 6.9.1 states

In addition to an ES, a number of standalone assessments will be submitted with the Application, some of which will be appended to the ES and are likely to include:
.....

We believe that this wording is rather vague and allows the possibility of some not being completed or not being submitted with the ES. We believe that all of these studies are important and relevant, and should definitely be completed and reports submitted

Notwithstanding this the following topics are of particular concern and would be better addressed by being scoped in, rather than scoped out as proposed by Ecopower Suffolk:

- Glint and Glare
- Construction Dust Risk
- Electromagnetic Field Risk

2) Section 7.2 Biodiversity and Ecology.

With only a few exceptions, the impact on flora and fauna is proposed to be scoped out during the Operation phase of the project. This is largely justified in the report on the basis that it is scoped in during Construction and Decommissioning, and during Operation the impact is much less. This is not satisfactory as, although the impact may be smaller than during the other phases, there is some effect, and it will occur for 40 years of Operation. We believe these issues should be scoped in for Operation as well.

3) Section 7.2 Biodiversity and Ecology.

While many species are referred to specifically there is no mention at all of the various species of deer that are often observed within much of the Order Limits, of which Area 4 adjacent to Occold is a prime example. This is despite Ecopower Suffolk having been advised in many forums and documents that deer are likely to be significantly impacted by the development and that special consideration should be made during the design to allow them to safely follow established roaming pathways across the development areas. The impact on deer during all phases of the project should be scoped in, and be informed by appropriate survey work.

In addition, surveys for otter and water vole should specifically include reference to streams, not just selected ditches, and surveys should specifically include investigation into presence of reptiles and invertebrates.

4) Section 7.4 Greenhouse Gas

It is our view that the current baseline is relevant as crops can act as carbon sinks and this benefit will be removed for, potentially, more than 40 years.

Operational energy use and water use should both be scoped in (not least because of reference to washing panels and angling/cooling fans).

5) Section 7.5 Human Health

The Scoping Opinion suggests that the design principles will maintain access to PROWs and embed screening of above ground development. It is our view that proposals for screening from PROWs should be assessed both as to impact on loss of open views (presently a core attribute of most PROWs and certainly those in Area 4) and potential safety and security concerns of lone walkers or runners should PROWs become enclosed and screened.

Consideration of air quality during construction and impact of dust should be scoped in.

Consideration of impact of noise and vibration during operational period (particularly given lack of current information as to proposed battery energy storage systems structures and locations, models of proposed apparatus such as inverters, and any plans for acoustic enclosures) should be scoped in to this chapter and also into chapter 8.2 (Climate Change) given the potential increase in noise should fans and cooling apparatus be required to operate more as the climate warms.

6) Section 7.7 Noise and Vibration.

Ecopower Suffolk are proposing to scope out the impact of construction traffic vibration on people and buildings, due to minimal impact. In reality the vibration impact of large vehicles is already a significant concern in communities in close proximity to the Order Limits and any increase needs to be fully evaluated and considered. As such it should be scoped in.

7) Section 7.8 Socioeconomics.

Potential impacts on sensitive receptors including residential, commercial and community receptors is scoped out during Operation in the Scoping Report. It is our contention that the existence of the development adjacent to rural roadways and surrounding many PROWs makes the area less attractive for local residents and for tourists. There will be a loss of amenity for residents and a negative economic impact on businesses relying for at least some of their trade on tourism. Additionally, the impact on property values is of significant concern to many residents. We believe these concerns support the scoping in of these issues during Operation.

We note that the church of St Michael and All Angels, and Occold Primary School, are not listed as sensitive receptors and they should be.

8) Section 7.9 Transport and Access

Notwithstanding comments in section 3.8.1 that the project would seek to avoid routing traffic through or near sensitive areas such as schools and village centres, in this section there is reference to use of Redlingfield Road (a designated Quiet Lane) for access to Area 4. This would require access for traffic through the village centre. Although the document presently estimates very limited traffic during Operation, this does not appear to recognise the impact of construction work for replacement of solar panels and BESS. We require that potential for accidents and consideration of safety issues during operation be scoped in if this route of access will be considered for the operational phase.

9) Section 8.7 Materials and Waste

If 90% (or more) of waste generated during each "major replacement cycle" is to go to landfill then the impact should be scoped in, not out.



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c/o 2 Old School, Laxfield, Suffolk IP13 8DL | T: [REDACTED] [REDACTED]

Response to Non-statutory Consultation - EcoPower Proposals for solar farm and BESS (Battery Energy Storage System) with an anticipated capacity of around 250 megawatts (MW). This includes approximately 600 hectares / 1,500 acres of land located near the National Grid Yaxley 400kV Substation, near Eye, Suffolk.

From : Palgrave Parish Council, Suffolk

Date: 19 February 2026

Submission to the Planning Inspectorate

Re: EcoPower Suffolk Proposal

We write as a Parish Council bordering one of the directly affected Parish Councils in relation to the EcoPower Suffolk proposal. While our parish is not the host authority, the scale, proximity and cumulative effects of this and other major infrastructure projects mean that our residents will be materially and significantly affected. We therefore submit the following concerns.

1. Cumulative Impacts

Palgrave is already host to a substantial solar development currently under construction, designed to generate 48MW of electricity. This scheme occupies 220 acres (approximately 166 football pitches) worth of arable Grade 3a and 3b Best and Most Versatile (BMV) agricultural land and commenced construction in late 2025. It is scheduled for completion in October 2026 and has an operational lifespan of 40 years.

Construction activity has already resulted in significant disruption to residents, including heavy vehicle movements, landscape alteration, and impacts on amenity. We understand from project representatives that full commissioning may not occur until the following spring due to seasonal light conditions, raising legitimate questions about seasonal efficiency and output reliability in this location.

In addition, a second solar farm has received planning permission immediately adjacent to the first, separated only by a hedge along its western boundary. This development will generate a further 30MW and occupies approximately 123 acres of arable BMV Grade 3a and 3b land. Construction is anticipated to commence in 2027 with a 35-year operational period.

Beyond these two major energy developments, the proposed Norwich to Tilbury pylon scheme is planned to run through the first solar farm site, introducing further long-term construction and operational impacts affecting Palgrave, Wortham and surrounding villages.

The cumulative impact of these three substantial infrastructure schemes must be assessed holistically alongside the EcoPower Suffolk proposal. To date, projects have largely been considered in isolation. There has been insufficient strategic evaluation of the combined landscape, agricultural, ecological, social and economic effects of concentrating multiple large-scale energy and transmission schemes within a confined rural area.

National planning policy requires cumulative effects to be fully assessed. The aggregation of these developments represents a profound and long-term transformation of this part of north-eastern Suffolk. It is essential that the

Inspectorate considers not only the individual merits of EcoPower Suffolk but also its additive impact when layered upon existing and consented infrastructure.

2. Biodiversity and Habitat Displacement

The parish is already experiencing significant habitat disturbance arising from the ongoing solar farm construction. Wildlife displacement has been observed, with species moving eastward to escape sustained construction activity, including heavy machinery, vehicle movements and site clearance.

Species affected include deer, ground-nesting birds, owls, bats, hares and newts. Traditional wildlife corridors are already being fragmented or blocked. The cumulative loss and disturbance of habitat across multiple adjacent sites raises serious concerns about long-term ecological resilience.

While mitigation measures may be proposed on paper, the reality on the ground demonstrates substantial and immediate ecological change. The capacity of surrounding land to absorb displaced species is limited. The combined impact of further development risks creating ecological pressure that cannot be adequately mitigated within the locality.

3. Encirclement of Palgrave and Community Impact

Palgrave is effectively becoming encircled by large-scale energy infrastructure. The visual and physical character of the surrounding landscape is undergoing permanent alteration.

The village faces long-term change to:

- Landscape character and rural setting
- Public rights of way access and enjoyment
- Residential amenity
- Perceived and actual property values
- The attractiveness of the area for visitors and tourism

The proposed concentration of infrastructure in this locality will affect generations of residents. The scale and duration of operational periods (35–40 years) mean this is not temporary change but an enduring redefinition of land use.

The cumulative social impact, including anxiety and distress experienced by residents during prolonged construction phases and future operational periods, is considerable. These human impacts must be given appropriate weight in decision-making.

Conclusion

We respectfully submit that the cumulative agricultural loss of Best and Most Versatile land, ecological disturbance, landscape transformation and community impact have not been adequately assessed in combination with the EcoPower Suffolk proposal.

For the reasons set out above, we urge the Planning Inspectorate to give full and proper consideration to cumulative impacts and to refuse consent for this project.

From: [REDACTED]
To: [Eco Power Suffolk Solar](#)
Cc: [REDACTED]@royalmail.com; [REDACTED]
Subject: RE: [EXTERNAL] EN0110019 EcoPower Suffolk Solar Project EIA Scoping Notification
Date: 23 February 2026 17:08:46
Attachments: [~WRD0000.jpg](#)
[image006.jpg](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)

Hi [REDACTED],

This scheme's EIA scoping deadline is today, however I can confirm that there is no need of any action by RM. On brief review of the project documents it is clear CAT 4 Assumed No Risk solar farm in a rural location and without extensive off site grid connection.

Tracker updated accordingly.

[REDACTED]

[REDACTED] BSc MRICS
Director
Cirencester Planning & Development
Strutt & Parker

[REDACTED]@realestate.bnpparibas

[REDACTED]



From: Eco Power Suffolk Solar <EcoPowerSuffolkSolar@planninginspectorate.gov.uk>
Sent: 26 January 2026 11:39
To: [REDACTED]@realestate.bnpparibas.com>
Cc: [REDACTED]@royalmail.com; [REDACTED]@struttandparker.com>
Subject: [EXTERNAL] EN0110019 EcoPower Suffolk Solar Project EIA Scoping Notification

EXTERNAL SENDER - EMETTEUR EXTERNE

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Dear Sir/Madam

Please see attached correspondence on the proposed EcoPower Suffolk Solar project.

The Applicant for the Proposed Development intends to make an application for

Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **23 February 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards,

Joseph Jones



Joseph Jones
Environmental Advisor
The Planning Inspectorate
T [REDACTED]



@PINSgov



The Planning Inspectorate



planninginspectorate.gov.uk

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EcoPower Suffolk

EN0110019

EIA Scoping Consultation

Suffolk County Council

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Glossary of Acronyms

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

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

Purpose of this Document

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

1 Introduction

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

2 Cumulative Impacts

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

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

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

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

Impacts by Service Area

3 Archaeology

- 3.1 The entire proposal area has very high archaeological potential, with numerous archaeological sites recorded on the County Historic Environment Record both within and immediately adjacent to all parts of the draft order limits. However, no part of the proposed scheme has previously been subject to systematic archaeological investigation. As such, there is high potential for additional, extensive and as yet unknown archaeological remains to survive across large parts of all areas of the scheme, some of which may be of national significance, and full archaeological field assessment is required at the earliest opportunity.
- 3.2 Archaeological fieldwork, including trial trenched evaluation, is essential in order to enable the nature, significance and extent of archaeological remains across all parts of the scheme to be understood, and thereby the archaeological impacts of proposals to be properly considered, to facilitate informed planning decisions. We therefore advise that the proposed solar development cannot be assessed or have permission granted until a full programme of archaeological evaluation has been undertaken; this is in accordance with NPS EN-1 (5.9.9 – 5.9.15) and EN-3 (3.10.105). Completing archaeological assessment work in a timely manner will allow a suitable archaeological mitigation strategy to be developed, alongside enabling informed design and routing decisions to be made, including giving proper thought to preservation in situ, and will also be essential for effective risk management, project management, programme scheduling and budget management.

Baseline data

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

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

- 3.5 As well as the known archaeological record, there is high potential for additional heritage assets of archaeological significance to survive across all areas of the scheme. This is demonstrated by archaeological surveys recently undertaken for other major infrastructure projects, in similar landscape locations and with equivalent initial archaeological baseline data, which have identified a significant number of additional archaeological sites which were not previously recorded on the County HER, or where recorded, were previously only areas of undefined potential based upon finds scatter or cropmark evidence. Some as yet unknown sites may be of national significance and worthy of preservation in situ. As such, without further archaeological assessment to fully characterise the heritage resource, the impacts of the development upon above and below ground heritage assets cannot be fully understood.
- 3.6 Where cable routes cross watercourses and areas of floodplain, there is potential for well-preserved stratified sites, as well as palaeo-environmental remains and survival of important and rare organic remains. Valley sides, overlooking watercourses have high archaeological potential, and sites can be stratified and well-preserved in colluvial sediments.
- 3.7 There should not be an assumption that data within the Historic Environment Record (HER) is of local significance. The Historic Environment Record includes non-designated assets of national importance and regionally significant assets, applicable to a number of sites listed below which are recorded within the order limits and for which preservation in situ can already be identified as likely to be the most appropriate mitigation.
- OKY 030 Hengiform prehistoric monument- potential to be worthy of Scheduling
 - EYE 068 Potential Anglo-Saxon cemetery site indicated by finds scatters (could be of regional if not national significance)
 - EYE 003 Anglo-Saxon cremation cemetery site, part excavated in antiquity, but with potential for further cremations to survive (of regional if not national significance)
 - YAX 018 Potential Anglo-Saxon cemetery site indicated by finds scatters (could be of regional if not national significance)
 - GSG 081 Potential Anglo-Saxon cemetery site indicated by finds scatters (could be of regional if not national significance)

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

Further assessment required

- 3.11 To inform the final scheme design and routing of the cable corridor, a thorough desk-based assessment and field evaluation is needed prior to/at EIA stage. This should be undertaken at the earliest opportunity, to allow the archaeological potential of the different parts of the study area to be fully assessed and therefore the likely impacts of the proposed development on designated and non-designated heritage assets and sites of archaeological potential to be defined. Evaluation will provide sufficient baseline information to enable design decisions to be made and to inform planning decisions.
- 3.12 A desk-based assessment would be appropriate in the first instance. This should include a full and up to date HER search, historic map regression, a study of aerial photography, an assessment of LIDAR data, and predictive modelling of potential based upon topographic and geological evidence. Datasets held by the County Records office and other archive sources may also need to be consulted where features merit more detailed research.
- 3.13 A settings impact assessment for above ground and designated heritage assets will also need to be undertaken, following guidance by Historic England and the Conservation Officer.
- 3.14 The impact of the proposals upon historic hedgerows, boundaries and other historic landscape elements should also be considered through the use of historic mapping and Historic Landscape Characterisation data. Landscape should be

considered for assessment as an aspect of the historic environment. Interrelationships between archaeology, the historic landscape and the built environment should be addressed in the assessment. The lack of a holistic approach to assessing the impact on landscape has given rise to omissions in other recent DCO applications.

- 3.15 All areas which will be impacted by the different elements of the scheme should be subject to archaeological field assessment at this stage (including preferred cable corridor routes) to allow for preservation in situ where appropriate of any sites of importance that might be defined (and which are currently unknown).
- 3.16 Geophysical survey should form a first phase of field evaluation. The results of this survey should be used to inform a programme of trial trenched evaluation, combined with metal detecting, in order to ground truth the geophysics results, alongside palaeo-environmental assessment in river valley areas as appropriate.
- 3.17 We advise that all areas which will be impacted on by any element of the scheme (including solar PV array sites and associated development, substations, BESS, ecological mitigation sites, cable corridors, haul routes, works compounds etc), should be subject to a full suite of archaeological assessment (desk-based, geophysical and trial trenched evaluation) prior to/at EIA stage, with the results of these investigations used to inform final site design/routing. Undertaking full archaeological evaluation at this stage will enable the results of the surveys to be used to assist with project programming and to contribute to risk management. Upfront work will ensure all options can be properly considered and the scope of mitigation defined (including giving proper thought to preservation in situ and alternative construction solutions), thereby avoiding unexpected costs and delays post-consent. Evaluation at this stage will test the suitability of different site areas for development. This is particularly important given the reduced flexibility for mitigation through design once locations for fixed elements of the scheme have been determined and for aspects of the scheme where removing ground disturbance is not possible.
- 3.18 Any unevaluated areas of the scheme will represent a high degree of risk for the development. Failure to adequately evaluate the site at an early stage could lead to unnecessary destruction of heritage assets, potential programme delays and excessive cost increases that could otherwise be avoided, and which have the potential to leave a scheme which is undeliverable. Any areas that are not subject to trenched archaeological evaluation prior to the determination of this application would carry a high level of risk which will need to be accommodated by incorporating substantial flexibility in the design, work schedule and budget. Therefore, it is strongly recommended that sufficient trenched archaeological evaluation is undertaken across the full redline area to provide essential baseline information on the archaeological resource, in order to inform and design an

appropriate mitigation strategy. Any parts of the proposal area which are scheme critical, or where limited design flexibility will be possible, are a particular priority for early assessment.

- 3.19 It is important to note that there exists a potential conflict for some parcels of land with another large NSIP, Norwich to Tilbury. This particularly relates to the areas north of Gislegham. These conflicts may impact flexibility of design and timescales, both for construction and for the necessary archaeological assessments, therefore, it is vital that robust and effective channels of communication are established between the two projects.
- 3.20 The combined results of the above assessments should be used to develop a comprehensive mitigation strategy. Some archaeological remains (including those as yet unidentified) may require localised preservation in situ, either because their significance warrants this or to avoid alternative mitigation. For below ground archaeological heritage assets, where (1) development impacts are proposed that will damage or destroy those remains and (2) where mitigation through investigation and recording is considered acceptable, and is preferred to the use of design solutions to achieve preservation in situ, the mitigation identified should include proposals to record and advance understanding of the significance of heritage assets before they are damaged or destroyed. Appropriate mitigation techniques, such as excavation prior to development, will be based upon the results of the suite of evaluation and assessment work undertaken.
- 3.21 All phases of archaeological evaluation and mitigation must be led by a brief produced by SCCAS and subject to detailed Written Scheme of Investigations, which must be agreed with SCCAS. All stages of the work will be monitored by SCCAS on behalf of the Local Planning Authority and Planning Inspectorate to ensure the written schemes are satisfactorily fulfilled.
- 3.22 Archaeological remains that have been preserved in situ as part of archaeological mitigation strategies must be protected from damage during site operation and decommissioning. If any areas of archaeology are to be preserved in situ, then a strategy for ongoing protection of these remains throughout construction, operation and in perpetuity must be agreed and included within the mitigation strategy for the development, and provision must be made for a detailed Historic Environment Management Plan (HEMP) to secure the appropriate management of these areas within the development going forward.
- 3.23 As has been shown by other Nationally Significant Infrastructure Projects in the region, time will be a critical factor. Archaeological and heritage assessments and resultant archaeological mitigation phases should be programmed into the project at the earliest opportunity. Sufficient time must be allowed to enable evaluations to be undertaken, taking into account agricultural cycles and time required for landowner negotiations (which should commence at the earliest opportunity) and

also all fieldwork to be completed prior to the start of construction works, so as to avoid any delays to the development schedule. We would advise that an archaeological consultant is bought on board early on, and an archaeological clerk of works (ACoW) employed to manage interactions between the archaeological, ecological, and engineering teams.

- 3.24 As numerous other large development projects are currently being undertaken in the county at present, this may put pressure on available archaeological work forces which is something to be aware of.

Specific comments on EIA scoping report

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

of Investigations (with the production of an OWSI at application stage setting out the overall strategy for ongoing archaeological assessment and mitigation work for the project), which must be agreed with SCCAS. All stages of the work will be monitored by SCCAS on behalf of the Local Planning Authority and Planning Inspectorate to ensure the written schemes are satisfactorily fulfilled.

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

4 Ecology and Biodiversity

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

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

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

5 Economy, Skills, and Tourism

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

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

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

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

6 Fire and Rescue Services

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

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

7 Highways

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

Cable Crossings of Public Highways

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

Construction Access

- 7.3 No consideration of access routes, site accesses or haul road crossing. Understanding of the location of these and quantum of use is vital to assess impacts. Many of the local roads away from the A140 are not suitable for HGVs access, including Eye which has HGV restrictions. It is noted that this project may be delivered at the same time as other energy projects so cumulative transport impacts will need to be considered. With such a rural dispersed site it will be difficult to provide sustainable access for workers and the additional vehicle movements this generates should be reflected in any assessment.

Pre-commencement Access

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

Grid Connection Site (Yaxley Sub Station)

- 7.5 The Yaxley Substation is very poorly served in terms of highway access. Leys Lane is a narrow rural lane unsuitable for anything other than occasional light traffic. Recent projects have accessed this site via temporary haul roads from the A140. This is not an acceptable permanent solution as there will be no practical access for emergency vehicle or even occasional HGVs or AILs during the operational phase.

Abnormal Load Access

- 7.6 SCC is aware of restrictions on the A140 north and south of the site. Whilst temporary overbridging has been used on the A140 at Brockford Street this causes significant disruption to traffic and will not be considered acceptable if temporary bridging needs to be installed on a regular basis.

Transport Assessment and a Construction Traffic Management Plan

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

Comments on the Environmental Impact Assessment Scoping Report

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

- 7.17 Table 6-1- The potential impacts of glint and glare on highway users should be scoped into the assessment, as should air quality if any haul routes pass through Air Quality Management Areas.
- 7.18 6.9.1 - SCC would expect to see a transport assessment covering for example road safety, junction modelling / delay.

Table 7.9

- 7.19 Whilst use of existing accesses is supported, care should be taken that they are suitable for the quantity and types of traffic that will use them.
- 7.20 Note that consideration needs to be given to structural and environmental weight limits in the area (e.g. Eye).
- 7.21 Any impacts of pre-commencement work need to be assessed and where necessary controlled. For example, SCC would not accept use of field accesses for significant volumes of vehicles.
- 7.22 SCC does not agree that large loads are scoped out of operational stage.

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

- 7.23 1 – States the SWRTS intersects Areas 1 and 2, however this project will also intersect Area 4 (Occold)
- 7.24 43 - States that the Norwich to Tilbury project is 2.3km west of Areas 1 & 2, however as shown in Figure 6.1 the N2T scheme directly crosses Area 5 (Gislingham) and the cable corridor between Gislingham and Mellis
- 7.25 **Notes:** Any works within the public highway will be dealt with under a 278 agreement. Please note: It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

8 Landscape

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

The Scheme

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

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

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

Area 1 Stuston

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

Area 2 Eye

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

Area 3 Gislingham

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

Area 4 Occold

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

Area 5 Thrandeston and Mellis

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

SCC comments on Cable corridors as shown on Figure 1.1

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

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

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

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

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

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

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

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

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

The importance of Good Design

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

The Assessment

Study Area and ZTV

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

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

Scoping

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

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

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

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

Relevant legislation, policy and guidance summary

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

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

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

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

Additional data sets

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

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

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

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

LVIA Methodology E.6

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

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

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

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

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

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

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

Landscape Character Areas

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

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

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

Impacts on the fabric of the landscape

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

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

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

Viewpoints

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

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

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

Views and visual amenity

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

Visual receptor groups

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

Visualisations

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

Design, mitigation and enhancement measures (E.7)

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

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

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

Biodiversity Net Gain (BNG)

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

Design measures

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

Control measures

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

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

Aftercare, Monitoring and Management

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

9 Lead Local Flood Authority

- 9.1 The LLFA have reviewed the attached and can advise that the applicant should undertake a site-specific flood risk assessments for each area of proposed development in accordance with the national guidance. The applicant shall also produce a strategy for the disposal of surface water in accordance with the national policy and guidance, LLFA latest SuDS Guidance and Standing Advice – Solar Panels (PV) and Solar Farms, [Guidance on development and flood risk - Suffolk County Council](#).
- 9.2 This area of Suffolk has poor drainage to agricultural land and is water scarce ([Hartismere Water Resources Zone](#)). Therefore, any measures to retain and re-use water for local use/firefighting should be explored.

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

10 Planning

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

11 Property

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

12 Public Health

SCC Public Health & Communities make the following observations:

Methodology

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

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

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

Baseline data

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

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

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

Scoping

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

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

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

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

⁴ <https://fingertips.phe.org.uk/>

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

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

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

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

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

Study area

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

Mental Health

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

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

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

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

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

Consultation and community engagement

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

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

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

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

Radiation / Electro-magnetic Fields (EMF)

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

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

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

Air Quality

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

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

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

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

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

13 Public Rights of Way (PRoW)

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

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

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

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

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

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

Planning Policy

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

Local Planning Policy

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

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

Methodology

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

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

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

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

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

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

Cumulative Impact

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

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

Pre-commencement works

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

PRoW Agreements & Decision Making

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

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

The site and surrounding area

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

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

The proposed Development

- 13.24 3.4.5 Environmental design principles. Public Rights of Way require setbacks to be applied. Our PRow position statement states: All PRow must be protected on their legally recorded alignment both within and around the site and must be accommodated within wide green corridors. Any new planting proposed as screening should be of mixed native species and a minimum of 10m from the edge of the PRow. This is to ensure routes remain well-lit and ventilated and do not create a corridor effect. The length of time it will take for new planting to mature and the impact on the user experience during that time must be considered. Planting should not be allowed to grow any taller than 1.8m. Future cutting and maintenance of hedges, trees and the corridor strip also needs to be taken into account from both a financial and access perspective. Any ploughed field edges should be levelled to enable to form a level surface for all user types. We may seek a financial contribution for the maintenance of green corridors unless an alternative agreement is in place. The siting of access tracks outside the fencing could be considered.
- 13.25 3.4.6 Environmental design principles. Access to PRow will be maintained during the construction phase or otherwise signed temporary diversion routes to be provided, if required. Suitable diversions where there could be temporary or permanent disruption to PRow & recreational routes should be agreed with the Highway Authority. This should include the management of these routes covering alternative routes and communication to third parties. Please refer to Appendix 1.

Traffic and Transport

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

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

Noise and Vibration

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

Landscape and visual amenity scope and methodology

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

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

Appendix 1

Principles for working with Public Rights of Way

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

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

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

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

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

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

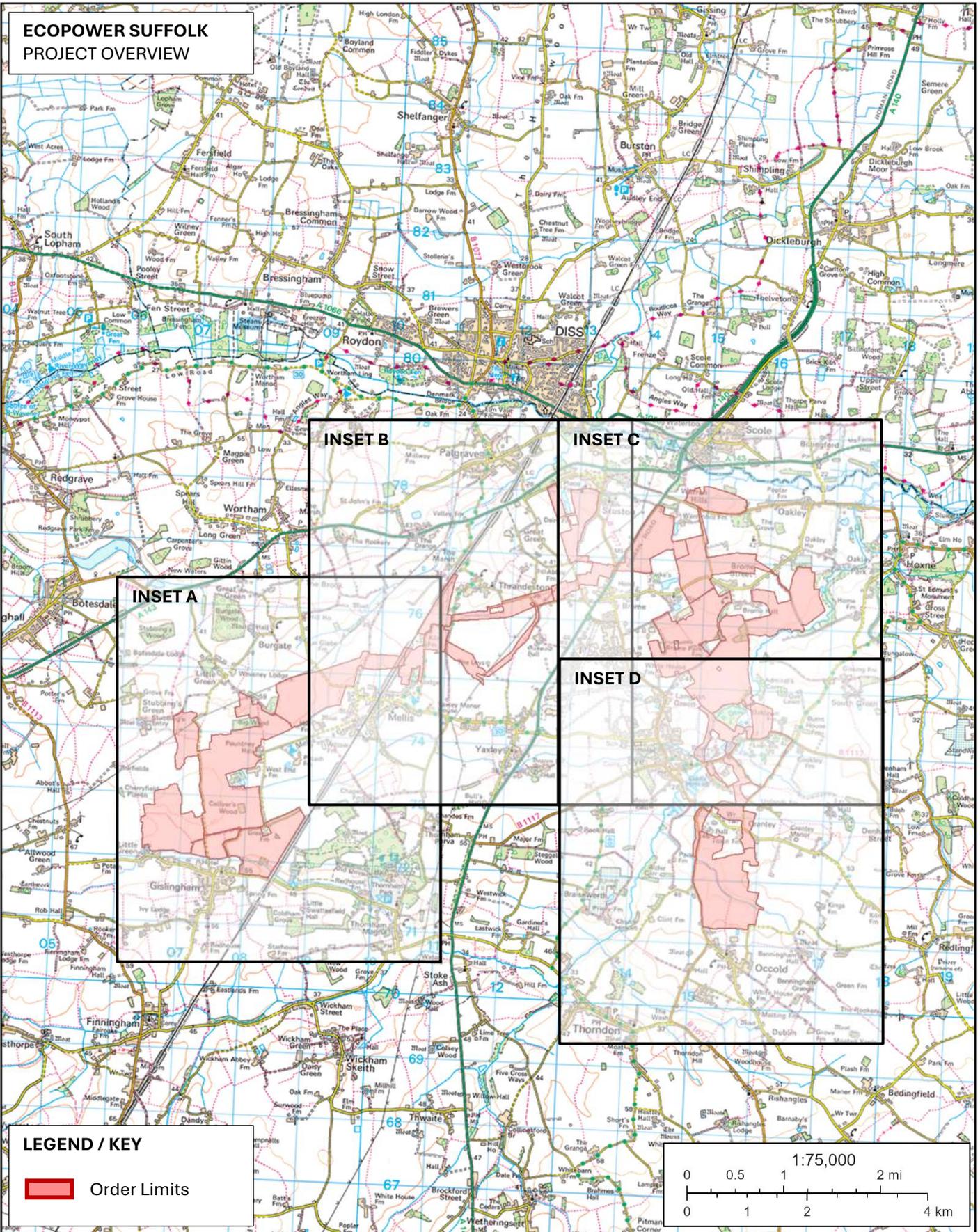
- 13.35 Where impacted by the works, any PROW will be restored to at least their original condition or to a condition agreed with SCC - where there are existing defects, the applicant should agree restoration measures with the County Council.
- 13.36 Where PROW cross the cable corridor, haul road, access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

EcoPower Suffolk

Appendix A – Order Limits Mapping

Suffolk County Council

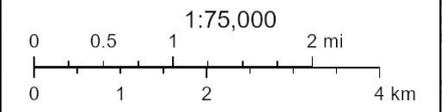
**ECOPOWER SUFFOLK
PROJECT OVERVIEW**



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LEGEND / KEY

 Order Limits

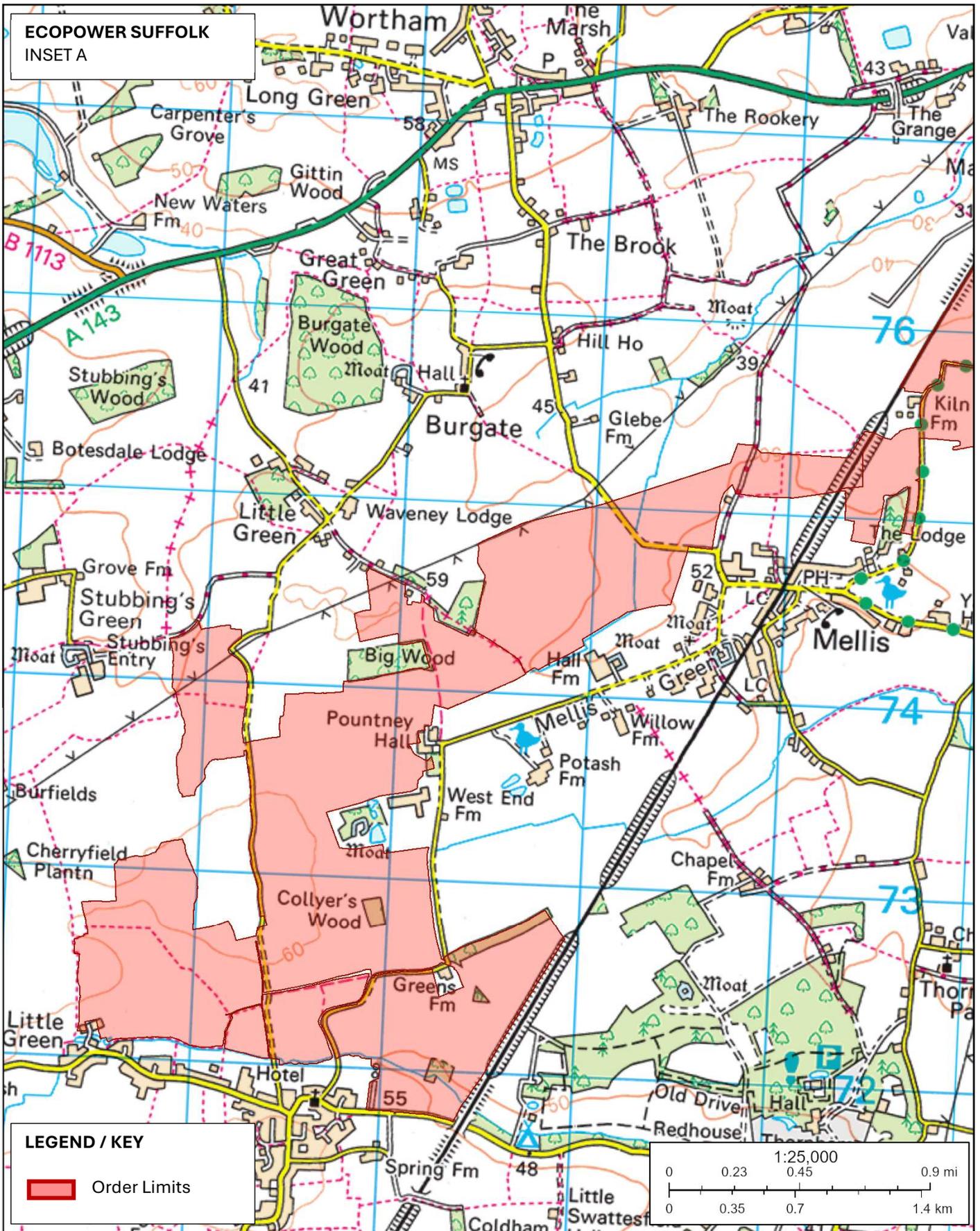


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& Infrastructure**
Endeavour House
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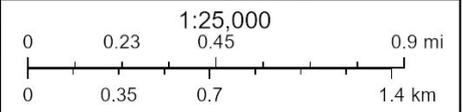
ECOPOWER SUFFOLK
Nationally Significant Infrastructure Project (NSIP)
Solar Photovoltaic (PV) and Battery Energy
Storage System (BESS)



ECOPOWER SUFFOLK
INSET A



LEGEND / KEY
 Order Limits



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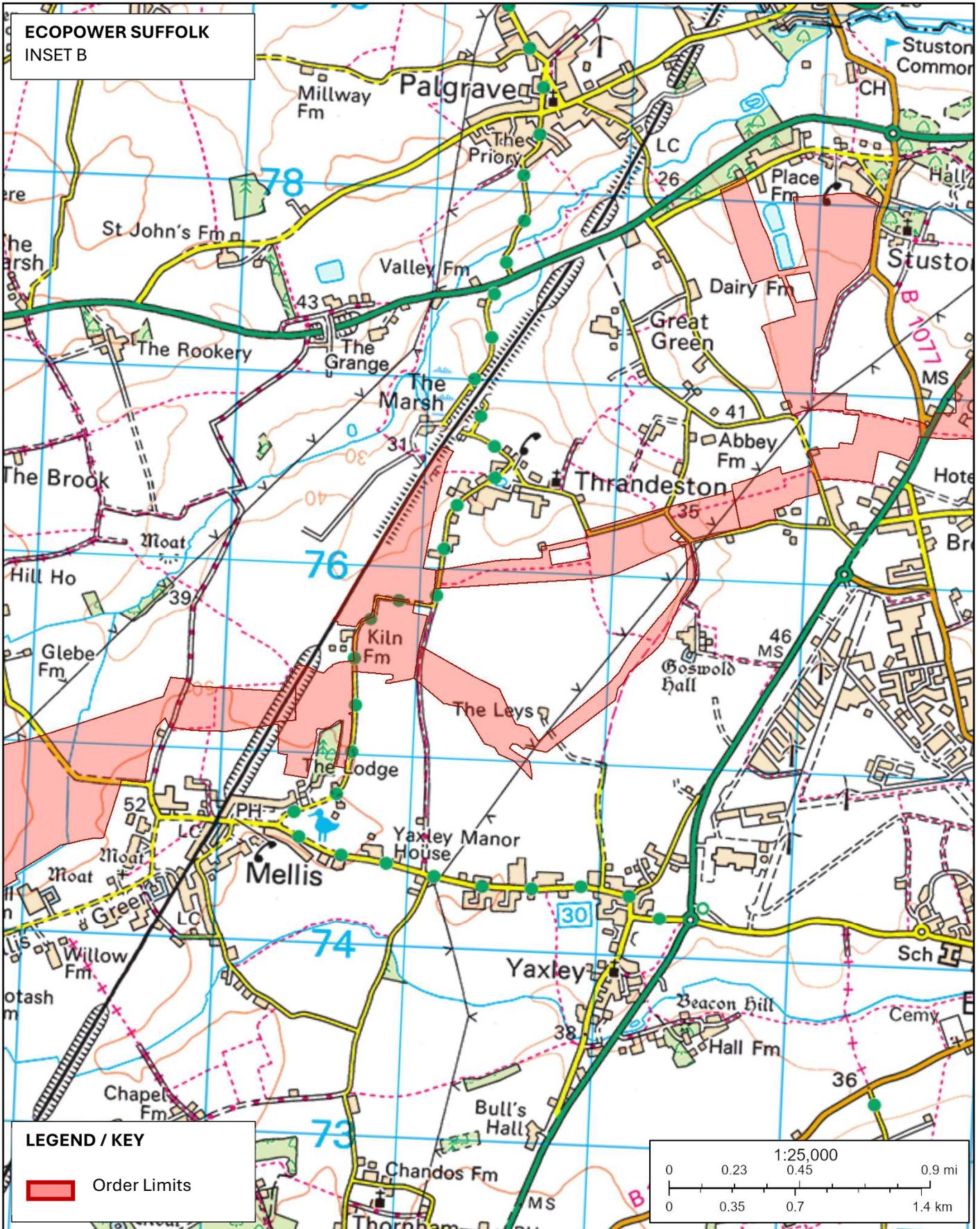


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ECOPOWER SUFFOLK
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 Solar Photovoltaic (PV) and Battery Energy
 Storage System (BESS)

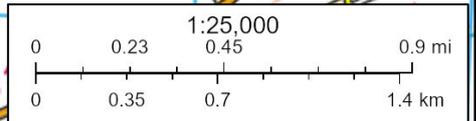


ECOPOWER SUFFOLK
INSET B



LEGEND / KEY

 Order Limits



**Growth, Highways,
& Infrastructure**
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

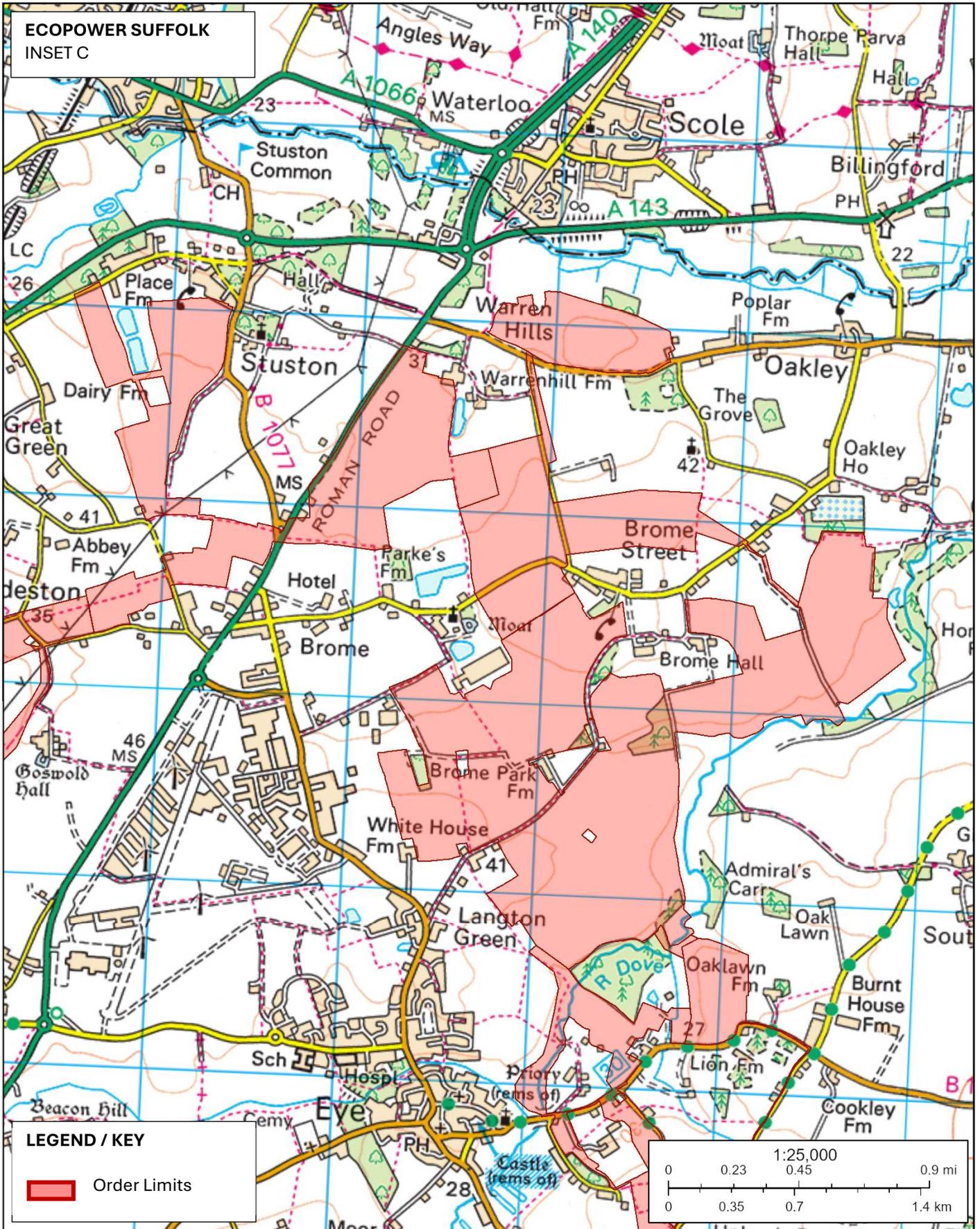
ECOPOWER SUFFOLK

Nationally Significant Infrastructure Project (NSIP)

Solar Photovoltaic (PV) and Battery Energy
Storage System (BESS)

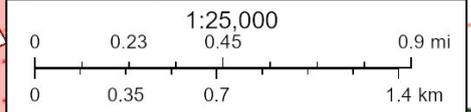


ECOPOWER SUFFOLK
INSET C



LEGEND / KEY

Order Limits

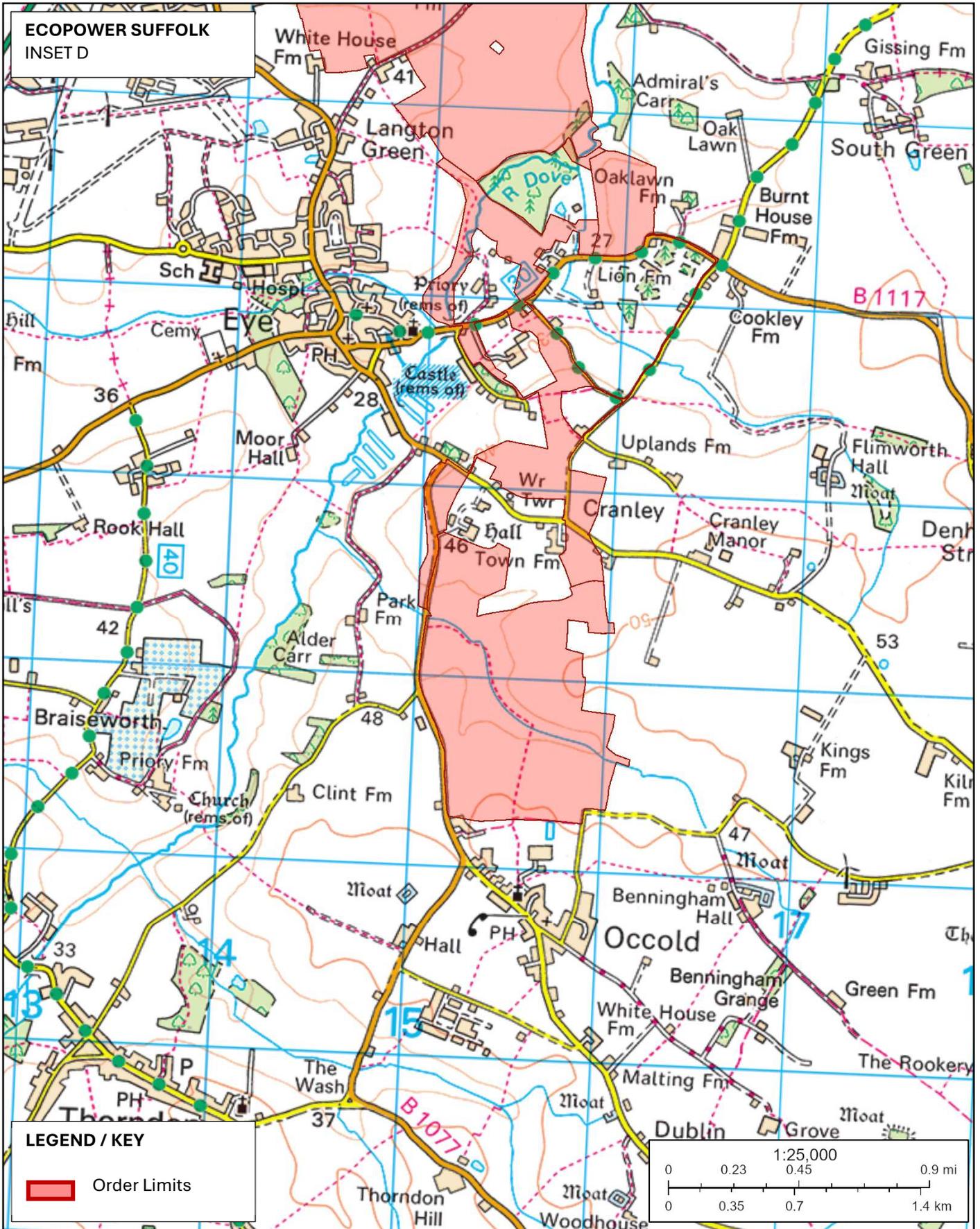


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& Infrastructure**
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ECOPOWER SUFFOLK
Nationally Significant Infrastructure Project (NSIP)
Solar Photovoltaic (PV) and Battery Energy
Storage System (BESS)

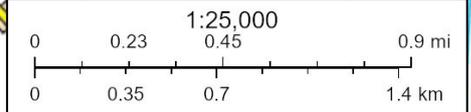


ECOPOWER SUFFOLK
INSET D



LEGEND / KEY

 Order Limits



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& Infrastructure**
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Ipswich
Suffolk
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ECOPOWER SUFFOLK

Nationally Significant Infrastructure Project (NSIP)

Solar Photovoltaic (PV) and Battery Energy
Storage System (BESS)



Thrandeston Parish Council

Response to EIA Scoping Report

February 2026

EcoPower Suffolk Solar Environmental Impact Assessment Scoping Report		
Reference	Section/Page Number	Comments
1.1.2	Background	Thrandeston is omitted from the list of settlements. This is a recurring theme throughout the Report where, in a number of places in the text and on the figures, Thrandeston is not mentioned or clearly identified as a settlement.
2.1.1	Overview	See above- Thrandeston is again omitted from the list of settlements
2.1.2		Some comments in this submission apply to land south of Stuston to the east of the A140. Area 1 is adjacent to, and includes land within Great Green, Thrandeston.
2.4.7	Environmental context	Thrandeston Conservation Area is only 900m from Area 1 (which overlaps Thrandeston Great Green and Stuston).
2.4.11		St Margaret of Antioch Thrandeston is not shown on Figure 7.4 nor on Figure 2.2.
2.4.16	Water environment	It is not accepted that there is a low risk of flooding in Thrandeston and this should be scoped in. The growth of the Eye Airfield Industrial Estate on the A140 has contributed to flooding issues in Thrandeston. There is concern that further construction work will exacerbate this and accordingly this requires further investigation.

2.4.20	Ecology and Biodiversity	Insert County Wildlife Site Mid Suffolk 196: Broome Field, an 8-acre field adjacent to the A140 roundabout in Thrandeston Grid Reference TM131760
2.4.21	Human Receptors	Properties to the West of the A140 sit between Brome, Stuston and Thrandeston
2.4.31	Traffic and transport	Whilst there may be some limited public transport provision in some of the areas it is important to note that Thrandeston is not served by public transport
3.1.3	Introduction	This paragraph sets out areas where flexibility is required. These are key aspects of the Proposed Development- in particular arrangement of the BESS and alignment of underground cabling. The lack of clarity of plans makes it almost impossible to engage in constructive dialogue with EcoPower Suffolk. At this stage all options should be scoped in to ensure that all relevant environmental aspects are fully considered.
3.2	Substations Maintenance and welfare facilities Operational lighting	All of these items should be scoped in. There has been no previous indication of the need for new substations nor for maintenance and welfare facilities. As such residents have not had an opportunity to engage with EcoPower Suffolk on these topics and in particular on their location. Operational lighting is a key concern for the residents of Thrandeston where there are no street lights which is a key characteristic of the Village.
3.3.1	Cable corridors	There remains a lack of certainty as to the location of interconnecting cables and grid connection cables. Figure 4.1 appears to show a corridor in Thrandeston from Mellis Road connecting to Stuston across a Public Right of Way (PRoW). This PRoW is regularly used by walkers, dog walkers and runners. The loss of this amenity during the construction period is of particular concern and was raised at the Parish Council meeting to discuss the Report. Concerns were raised that the loss of the PRoW would have an impact on the mental health of residents, particularly those who are vulnerable. The appropriateness of this route should be fully considered in the Environmental Statement (ES).
3.3.2	3 rd bullet point-temporary haul roads	The ES should address the location of proposed access points for the Proposed Development. This should include a figure displaying the location of the existing agricultural access tracks and any new proposed access tracks. It is unclear from the Scoping Report how it is proposed to link to the route being constructed for The Norwich to Tilbury Great Grid Upgrade. In the absence of clear plans, it is difficult to say that residents, with the best knowledge of the local area, have been properly consulted.
3.3.5	Buffer zones	The question of buffer zones each side of the cable corridors should be properly addressed in the ES. The proposed routes should be fully researched and consulted upon at the earliest possible stage. The

		<p>uncertainty surrounding the buffer zones is unhelpful. The latest plans are particularly concerning for the residents of Home Farm, Malting Farm and Apple House Farm in Thrandeston Great Green. Reference has already been made to impact on the PRow off Mellis Road. The proximity of housing on Mellis Road should be noted.</p>
3.4.6	<p>Loss of woodland and hedgerow</p> <p>Access to businesses etc</p> <p>Temporary Diversion Routes for PWR</p>	<p>This should be fully addressed in the ES. It is not sufficient to say that loss will be kept to a minimum. The hedgerows are priority habitats and loss during the construction phase will cause irreparable harm.</p> <p>It is not clear how access will be maintained on single track lanes with limited passing places. This needs to be addressed fully in the ES, particularly in regards to emergency vehicles in the event of a fire or medical emergency.</p> <p>Given the nature of the ground with open views and no shielding it is unclear how this can be safely achieved. This needs to be addressed.</p>
3.4.7	3 rd bullet point-HGVs	<p>The statement that HGV route options will avoid Thrandeston “where feasible” needs clarification. The Village can be accessed from Mellis, from the A143 or from the A140. All routes are single track lanes with passing points. There are no pavements throughout the Village. The lanes are used by parents to access Mellis Primary School.</p> <p>When accidents occur on the A140 or the A143 traffic is diverted through the Village.</p> <p>Routing HGVs through Thrandeston would require HGVs to travel through the Conservation Area. The Village has 25 listed buildings, notably the Grade 2* listed Manor House on Mellis Road and the Grade 1 Listed Church on Church View. The Church is on the Heritage at Risk Register and is currently being monitored for movement. The impact of HGVs passing the Church is a particular concern and must be fully addressed in the ES.</p>
3.7.2	Construction staff travel to work	<p>There is no public transport to Thrandeston. A minibus service would be needed for workers to avoid significant congestion.</p>
3.8.1	Construction traffic	<p>See comments above under point 3.4.7. The sentence ‘Where practicable, access points will seek to avoid routing construction traffic through or near sensitive areas such as local schools and village centres’ needs clarification. At this stage it is unclear how construction traffic could approach the proposed BESS sites or the cable corridors off Mellis Road without going through Thrandeston Village or going in close proximity to Mellis Primary School. Leys Lane and Judas Lane are ancient green lanes.</p>

3.9.1	OCEMP	The Report states that a OCEMP will be submitted with the Application and sets out the measures to be addressed in the Plan. We would advocate that this Plan should be consulted upon at the earliest opportunity to allow the Parish Council, residents and interested parties to engage fully with EcoPower Suffolk to set out their concerns and suggest alternative options where appropriate.
3.10.1	OLEMP	See comments above. We would welcome the opportunity to engage with EcoPower Suffolk with regards to the contents of the OLEMP.
3.12.7	Sheep	Continuing agricultural use of land is to be welcomed but ongoing management of pasture and livestock is vital.
6.2.2	The Rochdale Envelope	Given the level of uncertainty around the detail of the proposed development it is vital that the EIA considers likely worst-case variations.
6.3.6	Study Areas	Each Study Area should be justified to ensure that all significant environmental effects are considered and that important factors are not missed
6.4.4 Table A-2 Figure 6.1, sheet 2	Cumulative Effects	<p>Thrandeston residents are deeply concerned about the cumulative effects of the number of projects being proposed within 10km. The long list reveals 7 references to BESS projects and 13 references to solar. This is a major issue for this rural area. Residents face years of uncertainty followed by construction over a number of years impacting on all facets of life.</p> <p>Of particular concern:</p> <ul style="list-style-type: none"> • Essex and Suffolk Water (A-2 no1), an NSIP presently scoping 17 sites in Thrandeston to build a service reservoir – probably a two-year build. The location is not yet clear but at least three sites overlap with EcoPower Suffolk interests. • Three BESS plants (A-2 – references at 3,13, 15, 22, 23 and 32) proposed within 1.5km of Thrandeston in addition to EcoPower Suffolk plans -one already with planning permission. Residents fear fire safety, noise during operation and construction traffic overload. • National Norwich to Tilbury pylons have been moved closer to Thrandeston. Appendix A-2 notes that the project is 2.3km west of Areas 1 and 2 but fails to note that the pylons are only 700m from Area 5. Pylon RG98 would be approximately 1km from one of the centralised BESS locations proposed by EcoPower Suffolk in Area 5 and Pylon RG 100 would be approximately 900m from second proposed EcoPower BESS.

		<ul style="list-style-type: none"> Grange Farm solar farm (A-2 no 37) in the neighbouring village of Palgrave is closer than suggested to the outer limits of Area 5. Construction has begun with floodlighting clearly visible from Thrandeston late at night.
6.7.1	Table of items to be scoped out	<p>We do not agree the list of items to be scoped out. Failing to address areas in the ES limits proper consultation with the Parish Council and residents and consideration of appropriate mitigations. Socio-economics should be scoped in during the operation period. Major accidents and disasters should be scoped in with particular reference to potential BESS fires and Road Traffic Accidents. Glint and glare should be scoped in at all stages. The Report makes no reference to lighting which should be scoped in.</p>
6.9	Standalone Assessments	All standalone assessments should be scoped in and should be available to Parish Councils, residents and interested parties at the earliest opportunity to allow for proper consultation.
7.1	Agricultural Land and Soils	<p>We note that the majority of land parcels, including the southern extent of Area 1 Stuston and Area 5 Thrandeston and Mellis and all the Cable Corridors are shown as very good Grade 2 agricultural land. The cable corridor and Thrandeston Main Substation are likely to be on top quality land. Even if soil quality were to deteriorate because of climate change, it is still likely to be good, BMV (Best/Most Versatile) soil.</p> <p>Suffolk County Council policy, in the interests of national food security, is that solar farms should not remove Suffolk's best quality farmland from food production and Thrandeston residents agree with this.</p>
7.2	Biodiversity and Ecology	<p>Consideration should be given to independent publicly accessible sources previously provided to EcoPower Suffolk by Our Thrandeston, a group of residents within the Village. These include:</p> <ul style="list-style-type: none"> Bat Report 2021, St Margarets Church, Thrandeston, Bat Licence 2024 Orchard Survey Results 2021 Our Thrandeston Records which include evidence of Turtle Doves, Water Voles, Great Crested Newts etc (Thrandeston residents have evidence of turtle doves in the village in at least 37 individual photographic and audio records ranging from 2025 to 2009. Most, but not all, have been uploaded to SBIS.) Our Thrandeston tree survey <p>Habitat loss and habitat change should include Schedule 1 birds such as turtle doves</p>
	Page 40	

	Page 42	<p>We would urge a considered and detailed approach to biodiversity and ecology in the ES and do not agree with the proposals as set out on page 42 and following of the Report.</p> <p>We do not agree that invertebrates should be scoped out as they are known to be affected by lighting. This in turn will impact connected ecology, notably bats.</p> <p>Impacts during operation should be scoped in. Monitoring and damage limitation during the operational period must be a factor to mitigate against long term damage to the ecosystem.</p> <p>Particular regard should be had to:</p> <ul style="list-style-type: none"> • Priority Habitats as listed under Section 21 of the Natural Environment and rural Communities (NERC) Act 2006 such as traditional orchards and hedges • Ancient and veteran trees which are considered as irreplaceable habitats. Guidance states that planning permission for development that results in the loss of irreplaceable habitats should only be granted in exceptional circumstances • Sites designated for their wildlife value. This includes SSSIs and Country Wildlife Sites. There is a Country Wildlife Site at Home Farm (Broome Field) • Protected species- such as great nested newts which are present throughout Thrandeston • Brown hares which are a priority species and which are acknowledged by EcoPower Suffolk to be present on proposed land parcels • Movements of mammals such as deer who will lose their usual routes and may be pushed on to the A roads • Disruption on BESS sites when lithium batteries are changed • Sediment and dust pollution
7.3	Cultural Heritage	<p>EcoPower Suffolk should justify the selection of the Study Area and clarify the exact extent of the Area.</p> <p>St Margaret of Antioch, which is Grade 1 listed and on the Heritage at Risk Register, is not marked on figure 7.4 nor are the Grade 2 listed Blakely Monuments which sit to the north of the Church. This is an important omission. As required by the Church of England a Quinquennial Inspection was carried out by the church architect in 2025. Following advice in the report cracks where the Nave abuts the Tower are currently being monitored and the bells are not being rung. A recent test ring under controlled conditions showed that the cracks opened and closed as the bells were rung. We would urge that particular consideration be given to the impact of HGVs, and other traffic passing through Thrandeston,</p>

	<p>Housing page 60</p> <p>Transport and access page 61</p>	<p>Housing should be scoped in for the operational period. Construction will necessarily be staggered over a number of years throughout which there will be a need for housing. The cumulative impact of other construction projects already outlined should also be taken into account.</p> <p>House owners in Area 5 have reported a lack of interest by potential buyers once they understand the proximity of the development. There is a clear link with Socio-Economic considerations set out at 7.8 and the ES must address these concerns.</p> <p>The Report accepts that <i>'there is a potential for traffic effects during all Phases of the Proposed Development'</i> so we do not understand why it has been scoped out for the operation period. Any increase in traffic will have an impact on health when set against such a low baseline for traffic in the Village.</p>
7.6	<p>Landscape and visual amenity</p> <p>Night-time lighting Page 69</p>	<p>We would welcome a detailed photo montage of the final proposed viewpoints including winter and summer views.</p> <p>It is not at all clear how the railway line will limit views of the proposed development from Thrandeston as is suggested on page 66 of the Report.</p> <p>Reference is made to visits undertaken in 2024 and 2025 but it is not clear whether any of these visits were conducted after dark. The Parish Council would suggest that such a visit would increase understanding of the issues highlighted in this response.</p> <p>Night-time lighting effects should be considered for PRow users. It is not accurate to say that PRow will not be used in the hours of darkness. In the winter, dog walkers frequently use PRow after twilight at, say, 4pm. Many residents appreciate the dark skies.</p>
7.7	Construction traffic vibration page72	<p>We welcome the fact that the Report recognises that the future baseline sound environment is expected to change due to the construction and operation of nearby local developments that include significant noise sources.</p> <p>Note the incorrect spelling of Thrandeston on page 71.</p> <p>It is impossible to scope this out given that access routes have not been finalised. Vibration from construction traffic passing through Little Green, Thrandeston, could have implications for the Grade 1</p>

	<p>Operational vibration page 73</p> <p>Operational road traffic noise and vibration page 73</p>	<p>listed church of St Margaret of Antioch and for other timber frame clay lump buildings in the Village. We ask that it be scoped in.</p> <p>As above. We ask that it be scoped in</p> <p>As above. We ask that it be scoped in. As previously indicated given the low baseline for traffic noise and vibration any increase in traffic will have a significant impact and should be considered in the ES.</p>
7.8	<p>Study Area</p> <p>Potential closure or diversion of PRow and recreational routes page 78</p> <p>Potential impacts on sensitive receptors including residential, commercial and community receptors page 78</p>	<p>The list of local settlements that fall within the Study Area set out on page 76 does not include Thrandeston. It is assumed that this is an error but this should be clarified as it is clear that the Village will be directly affected by the Proposed Development.</p> <p>Similarly, St Margaret of Antioch Thrandeston is not included as a sensitive receptor on page 77 of the Report nor is it shown on Figure 2.2. The Church is used for regular services, weddings, funerals, concerts etc and is a key focal point for the community. As such it should be listed as a sensitive receptor.</p> <p>This should be scoped in during the operational period. The impact on walkers, horse riders, cyclists and visitors to the Village will be considerable and will have socio-economic impacts on local businesses.</p> <p>This should be scoped in during the operational period. The Proposed Development will impact on the tourist establishments at Kiln Farm and Abbey Farm as visitors will be deterred by presence of solar panels or energy infrastructure such as more than one BESS and substations between Mellis and Thrandeston.</p> <p>Residential receptors will be impacted during operation and decommissioning and this should be scoped in. House values and the ability to attract purchasers will be an ongoing issue.</p>

	<p>Potential temporary and/or permanent adverse amenity impacts page 78</p>	<p>This should be scoped in. If the BESS is located on the current proposed site, close to Mellis Road, Judas Lane and other PRoW there will be an inevitable adverse impact.</p> <p>The reference on page 79 of the Report to ‘the number of businesses, individuals or groups of individuals these changes may effect’ is concerning. By its very nature the Village has a small population all of whom will be affected in some way by the Proposed Development. The fact that the number is small does not diminish the magnitude of the impact.</p>
7.9	<p>Transport and Access</p> <p>Existing public transport and active travel facilities Page 82</p> <p>NMU page 83</p>	<p>The Parish Council welcomes the recognition of visibility and safety concerns and the need for a detailed review. The single-track road which leads from the A140 to the A143 at Stuston is regularly used as a short cut with dangerous bends near Abbey Close. Mellis Road is used by parents taking children to Mellis Primary School. The list of local roads would not appear to be complete and as such does not accurately reflect the potential impacts for the Village.</p> <p>There is no public transport to Thrandeston. Many people cycle through the Village on their way to work, for example from the neighbouring towns of Eye to Diss. Some children cycle to school in neighbouring villages - to Mellis Primary, Palgrave Primary and Hartismere High Schools. There is a real risk of accidents for walkers, dog walkers, cyclists and horse riders.</p> <p>The proposed cable corridor off Mellis Road on a PRoW and is very close to residential properties. The proposed sites for the BESS sit very close to a popular bridleway.</p> <p>This area attracts a high number of recreational cyclists, and appears on several network routes. These are not marked on Figure 7.6. For example, Diss Cycleways leaflet recommends the route from Mellis to</p>

	<p>Severance page 84</p> <p>Driver delay page 85</p> <p>Fear and Intimidation Accidents and Safety page 85</p> <p>Large Loads page 85</p>	<p>Thrandeston as one of three popular excursions in the Waveney Valley and comments that it takes in the “picturesque villages and their commons that are a special feature of this area.”</p> <p>We do not agree with the items to be scoped out as set out on the table at page 84 and following. Effects during operation/maintenance should be scoped in also during operational periods on the grounds that the cumulative effects of construction work for Essex and Suffolk (ESW) reservoirs plus national grid Norwich to Tilbury plus various independent BESS and solar projects mean that this will be an ongoing issue.</p> <p>This should be scoped in even during the operational period, as above, because of the cumulative effects of other projects including NSIPs. Access to the A140 from the Village is problematic particularly from the junction at the north Area 5 adjacent to Area 1.</p> <p>This should be scoped in during the operational period as above, because of the cumulative effects of other projects. There are no pavements in Thrandeston, either in Area 5 or Area 1. Single-track rural roads depend on muddy and potholed passing places. Increased HGV traffic, even during operational period, will lead to increased fear among the community, which has a high proportion of elderly residents.</p> <p>This should be scoped in during the operational period as above, because of the cumulative effects of other projects. There are no pavements in Thrandeston, either in Area 5 or Area 1.</p>
8.1	<p>Air quality</p> <p>Accidental emissions from BESS fire</p>	<p>We believe that air quality during operation should be scoped in</p> <p>The Report states that there is a ‘low likelihood of fires to occur at the BESS’ but this does not address what would happen in the event that one did occur. For example, attempting to extinguish the fire with water would cause the release of hydrogen fluoride gas, and a deadly poisonous hydrofluoric acid as a by-product.</p>
8.3	<p>Electromagnetic fields</p>	<p>Given the possible siting of 2 BESS and associated developments near Thrandeston, including construction of a main substation and the cumulative effects of other developments clustering around Yaxley substation, this should be scoped in.</p>

	<p>Construction page 106</p> <p>Operation page 106</p>	<p>Even though the construction site will not be accessible to the public, one of the two BESS sites under consideration is adjacent to a well-used PRoW and the other is near Lake View, a tourism B&B establishment. This should be scoped in in case of accidental access.</p> <p>This should be scoped in. One of the two BESS sites under consideration is adjacent to a well-used PRoW/ Bridleway (Green Lane/Judas Lane) which will also likely be near the site of the main substation. In addition, three other BESS plants are planned nearby (Field Yaxley, Red House Farm, Yaxley BESS). The two centralized BESS plants proposed are near Lake View, a tourism B&B establishment with a fishing lake. Scoping it in would enable consideration to be given to the impact on aquatic ecology.</p>
8.4	<p>Glint and Glare</p> <p>Discomfort or nuisance to ground-based receptors (residential dwellings) page 109</p> <p>Distraction or disability glare (causing safety hazard) page 109</p>	<p>This should be scoped in. It cannot be scoped out at this stage given that the Applicant has not finalised the type of panels or exact locations. If the applicant acknowledges the need for a standalone Glint and Glare assessment, then it should clearly be scoped in to enable early consultation. This is a particular safety concern for horse riders, drivers, and cyclists.</p> <p>It is clear, for example, that even if set back, the panels at Great Green, Thrandeston (Area 1) behind Home Farm and also directly behind the self-catering tourism establishment at Abbey Farm will likely impact residents and customers at these and other nearby houses. Another self-catering cottage, The Granary, is located nearby.</p> <p>This should be scoped in. Area 1 is a popular route for horse riders and Rectory Farm, at Great Green, Thrandeston, is a professional equestrian business. Their livelihood could be impacted if glint and glare were found to be a problem on nearby single-track roads. Horse ownership in the Village is high and riders habitually use the following routes: single track roads around Thrandeston and Mellis; permissive tracks (e.g. around proposed site between Home Farm and Abbey Farm), and bridleways, e.g. Green Lane/Judas Lane.</p> <p>The single-track road (Abbey Close) carries an unusual amount of traffic as it is used as a shortcut between the A140 and A143.</p>

8.6	Major accidents and disasters	<p>We are very concerned at the proposal that major accidents and disasters be scoped out.</p> <p>Uncertainty remains as to the proposed sites for the BESS, but the current plans indicate that they could be in close proximity to residential homes including thatched and timber frame buildings, a self-catering holiday accommodation business, and the main railway line from London to Norwich. Early engagement is essential to ensure that all risks are properly considered. Occupants of these properties are concerned about their ability to secure home insurance which is already problematic for Grade 2 listed thatched properties.</p> <p>BESS fires would not be tackled by the local fire service but would instead be allowed to “burn out”.</p> <p>The following should be scoped in:</p> <ul style="list-style-type: none"> • Recommendations as contained in Grid Scale Battery Energy Storage System planning – Guidance for Fire and Rescue Service • Emission modelling should take account of foreseeable scenarios, including thermal runaways in single and multiple containers. • Means to retain and treat the large volume of water required to contain a thermal runaway should be secured • Degradation of water in the case of significant incidents in the case of a battery fire • Terrorist risk including conventional and cyber-attacks. There is an increased risk due to the cumulative effect of concentrating multiple BESS facilities, power stations, sub stations in the same location. <p>Greater separation distances may be appropriate from critical buildings and installations and to meet specified strategic spatial fire separation expectations. Scoping major accident scenarios in may inform design choice for BESS, e.g. decentralised model over centralisation.</p> <p>Accident and Disaster procedures should be scoped in to inform access routes for fire appliances to manoeuvre within the site (including turning circles). Leys Lane is not considered an appropriate route</p>
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	Very High Risks	as there are no turning circles or passing places. An alternative access point and approach route should be provided and maintained to enable appliances to approach from an up-wind direction.
	High Risks	The proposed concentration of infrastructure in the Yaxley – Thrandeston area may lead to increased risk and also attract greater terrorism risk.
	Medium Risks	There has been a series of accidents on the A140 in the vicinity of the Yaxley substation turning.
		Wildfires on agricultural fields in the area have been frequent in recent years. A high pressure feeder gas pipeline crosses the area The cabling route appears to cross the Norwich – London rail line which may pose additional risks during construction and operation. It is not clear if Network Rail have been consulted about this. UXO is possible around the area as there were several air crashes around Eye Airfield in World War II.
		While acknowledging that the Applicant proposes a standalone Outline Battery Fire Safety Management Plan (OBFSMP), the Parish Council fears that a fire at the BESS complex is a real risk which should be scoped in at this stage. This is particularly relevant given the uncertainty concerning location and decisions regarding centralised or decentralised options
		Part 7
Figure 2.2	Environmental Receptors	The Grade 1 Listed Church of St Margaret of Antioch does not appear on Figure 2.2. The Church is used for weddings, funerals, services concerts and serves as a key community amenity therefore should be included in this figure. Please Insert. The Grade 1 Listed Church of St Peter’s Palgrave, does not appear on Figure 2.2. Please Insert.
Figure 7.4		The Grade 1 Listed Church of St Margaret of Antioch is not visible on Figure 7.4. This may be due to the concentration of listed buildings in this area, but we recommend the plan is amended to show it.
Figure 7.6	Landscape Designations	Insert County Wildlife Site at Broome Field (Ref: Mid Suffolk 197) an 8-acre site adjacent to the A140 close to Area 1

Ecopower Suffolk Scoping Report

Key Messages

This is the response of Thrandeston Parish Council to the Scoping Report submitted by EcoPower Suffolk to the Planning Inspectorate. The Response has been drafted after liaison with the residents of Thrandeston at a Parish Council Meeting and with input from Our Thrandeston, a group set up within the Village to help to inform residents about the Proposed Development.

This document should be read in conjunction with the table of comments which expands on the points made here. We have also attached a description of the Village which aims to put our concerns into context.

The key points that we would like to highlight are these:

- The cumulative effect on the tranquil village of Thrandeston of the large number of infrastructure plans which impact on all aspects of the environment and Thrandeston and Mellis Conservation Areas
- The high degree of uncertainty regarding location and model of BESS (centralised/ decentralised) and failure adequately to consider the fire risks and to recommend separation of a distance of one mile from habitation
- Uncertainty regarding the location of the main substation
- The lack of clarity regarding access routes and haul roads
- The loss of PRow and bridleways during the construction phase
- Uncertainty regarding cable corridors and, in particular, buffer zones
- The need for proper recognition of the cultural and agricultural heritage and biodiversity and ecology of the Area
- Failure to scope in the effects on heritage fruit and nut orchards and associated ecosystems
- The failure to recognise the risks to St Margaret of Antioch Church – Grade 1 listed and on the Heritage at Risk Register
- The failure to consider the impact of traffic, noise and vibration on mental health
- The failure to scope in glint and glare
- The failure to consider construction lighting
- The failure to identify the village of Thrandeston at a number of points, and in some maps in the Report
- The failure to consider the proximity of the BESS to the main London to Norwich main railway line

- The failure to scope in the long term monitoring of the impact of the solar farm and associated infrastructure on the ecosystem and biodiversity of the area, with a view to taking corrective action where necessary

Introduction to Thrandeston

The Village of Thrandeston lies approximately three miles south of Diss in countryside on the Suffolk/Norfolk border. Access to the Village from the A140 and A143 is by three minor roads. The narrow lanes are shared by cars, cyclists, pedestrians horse riders, and farm vehicles. The Village is not served by public transport and has no streetlights or pavements.

Night skies are dark, allowing residents and visitors to enjoy the wonderful spectacle of stars and planets on clear nights. The wildlife is abundant and the scenery beautiful, with long unimpeded views across the Suffolk countryside.

The Village has an adult population of 129 and is popular with visitors who cycle through the lanes, walk the surrounding footpaths, enjoy horse rides on the bridleways, visit the 15th century church or sit and rest by the duck pond on Little Green. A number of cycle routes on the “Sustrans” National Cycle Network pass through the Village.

There are 25 listed buildings in the Village, half of which sit within the Conservation Area. The listed residential buildings are mostly timber framed and plastered with roofs of thatch or pantiles.

The main amenities in the Village are the Grade 1 Listed Church, the Village Hall and the footpaths and bridleways. The Church is on the Heritage at Risk Register and is subject to an ongoing programme of works. Of particular relevance is current ongoing monitoring of cracks at the point where the Tower abuts the Nave. The Parochial Church Council has been advised not to allow the bells to be rung during the period of monitoring.

Farming is the main ‘industry’ in the Village, including arable and livestock farming including pigs, beef, cattle and sheep. There are also 9 traditional heritage fruit and nut orchards containing 680 trees, which were recognised as UK priority habitat in 2007. The orchards are currently under consideration for National Plant collection status by Plant Heritage. There is an equestrian establishment, a number of Bed and Breakfasts/holiday lets, including one with a small fishing lake, and a wedding barn/conference centre.

Residents are made up of a mix of those who have lived in the area for their whole lives and those who have moved into the Village for peace and to enjoy the rural setting. To get out into the environment is part of daily life. The Village has a sense of community with monthly pub nights in the Village Hall, annual quiz, concerts, dog shows and other events organised by the Friends of the Church and the Village Hall Committee. The Village has an active Historical and Heritage Society.



UK Health
Security
Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
NOTTINGHAM
NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN0110019
Our Ref: CIRIS 94416

Ms Deb Glossop
Environmental Advisor
The Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
SLOUGH SL1 4PN

19 February 2026

Dear Ms Glossop

**Nationally Significant Infrastructure Project
EcoPower Suffolk Solar Project - PINS Reference: EN0110019
Scoping Consultation Stage**

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following comments:

Environmental Public Health

We recognise the promoter's proposal to include a health section. We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise

key information, risk assessments, proposed mitigation measures, conclusions and residual impacts relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an Environmental Statement (ES), we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹, setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Air Quality

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e. an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

It's noted that air quality hazards have been scoped-out of a risk assessment for all phases of the project, as have all major accidents and disasters, including a fire affecting local residents. With respect to the latter, it is acknowledged that an Outline Battery Fire Safety Management Plan (OBFSMP) is proposed which would consider potential fires and mitigation involving one or more Battery Energy Storage Systems (BESS). Nevertheless, we recommend that the air quality impacts of a fire involving one or more BESS should be included for further assessment. This should include consideration of the risk posed to human health from the products of combustion from a fire and other relevant pollutants such as HF, HCl, HCN (including any air dispersion modelling as appropriate). The promoter may wish to make reference to:

- the likely fire-fighting tactics recommended for different scenarios;

¹
<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>

- guidance from the National Fire Chiefs' Council's (NFCC's)^{2,3}; and
- any advice, guidance or recommendations from Suffolk Fire & Rescue Service.

Electric and Magnetic Fields (EMF)

It is noted that an EMF report will be prepared and submitted as an appendix to the ES. UKHSA expects the report to include an assessment of the possible health impacts of electric and magnetic fields associated with the project, in line with the code of practice, which defines the criteria for demonstrating compliance with the public exposure guidelines⁴:

As referenced above, more information regarding EMF is also available in the advice document produced by Public Health England, a UKHSA predecessor body¹.

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

² Battery Energy Storage Systems (BESS) Position Statement (2025), <https://nfcc.org.uk/our-services/position-statements/battery-energy-storage-systems/>

³ Grid scale energy storage system planning - Guidance for fire and rescue services (2025) <https://nfcc.org.uk/our-services/building-safety/grid-scale-energy-storage-system-planning-guidance-for-fire-and-rescue-services/>

⁴ <https://assets.publishing.service.gov.uk/media/5a796799ed915d07d35b5397/1256-code-practice-emf-publ...>

EcoPower Suffolk Solar case team
Planning Inspectorate

BY EMAIL ONLY

EcoPowerSuffolkSolar@planninginspectorate.gov.uk

23rd February 2026

Dear Eco Power Suffolk Solar case team,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by EcoPower Suffolk Limited (the applicant) for an Order granting Development Consent for the Eco Power Suffolk Solar project (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Thank you for your consultation on the above application.

We note that a part of the proposed development area overlaps with the Internal Drainage District (IDD) of the Waveney, Lower Yare and Lothingland Internal Drainage Board (IDB or The Board), as recognised in the Scoping Report. Therefore we would highlight that the Board's Byelaws, made under the Land Drainage Act 1991, are in force (see [Byelaws - Water Management Alliance : Water Management Alliance](#)) in the overlap area. Board consent could be required for project activities affecting watercourses within the IDD, including (but not limited to) construction of watercourse crossings, any development within 7m of arterial watercourses, and any discharge of water to watercourses within the IDD.

To avoid conflict between the planning process and the Board's regulatory regime, we request that the applicant makes contact with the Board via planning@wlma.org.uk to complete the necessary formalities.

Please see the supplementary information annexed for further detail on the Board's policy and consenting process.

The Board welcomes the developer's commitment to preparing a Flood Risk Assessment, including a Preliminary Surface Water Drainage Strategy for the development, both of which are to be secured by the Development Consent Order. The Board welcomes the proposal to include details of surface water management to prevent any increase in flood risk, within the Outline Drainage Strategy. The Board would expect to be consulted on, and/or involved in the development of, these documents, as set out in the Scoping Report.

Hamish Thomson-Carrie (Chairman)

Ben Blower (Vice Chairman)

Marcus Coleman (Chief Executive)

Constituted in 2006. Statutory Instrument 2006 No. 2140

www.wlma.org.uk

Further, the Board welcomes the proposed embedded measures to use Sustainable drainage systems (SuDS)-based surface water management. We support inclusion of the assessment of surface water quality and quantity, hydromorphology, and flood risk and drainage within the Environmental Impact Assessment, for construction, operation and decommission.

The Board would welcome direct engagement with the developer regarding the potential for any impacts on the Board's district / watercourses, and to discuss any land ownership / access considerations.

Yours faithfully,



National Infrastructure Officer
Water Management Alliance

How to Apply for Land Drainage Consent

To apply for Land Drainage Consent please complete an application form.

Application forms, application fees and 'Frequently Asked Questions' can be found on the 'Development & Consent' section of the Board's website, here: <https://wlma.org.uk/development-consent/>

For any additional help please call us on 01553 819600 or email planning@wlma.org.uk

Byelaws

A copy of the IDB Byelaws can be found via the following link:

<https://wlma.org.uk/development-consent/byelaws/>

Mapping

Mapping of the district can be viewed via the following link (choose 'dynamic map' for interactive maps)::

[Our Area - Water Management Alliance : Water Management Alliance](#)

Further Guidance

The Board's webpages seeks to provide:

- Guidance on how (and why) the Board will review and comment on planning applications.
- Information on the policies against which the Board will assess and determine applications.
- Guidance to riparian (waterside) landowners regarding watercourse maintenance.

Please see the Development and Consent pages on the Board's website via the following link:

<https://wlma.org.uk/development-consent/>

Arterial Watercourses

Maps on the Board's website show which watercourses are designated as Arterial Watercourses by the Board. You may also have heard these watercourses referred to as 'Main Drains' or 'Maintained Watercourses'. The designation is an acknowledgement by the Board that the watercourse is of arterial importance to the Internal Drainage District and as such will normally receive maintenance from the WMB using the Board's Permissive Powers. Although the Board opts to proactively maintain this arterial network, there is no change in the ownership or liability associated with the watercourse resulting from this designation.

Why we have commented on this plan:

By engaging with the planning process the Board is seeking to:

- Reduce flood risk to communities within the Internal Drainage District
- Promote sustainable development in sustainable locations by supporting sound planning decisions in accordance with the National Planning Policy Framework (especially [Paragraph 181](#)) and the [National standards for sustainable drainage systems \(SuDS\)](#)
- Reduce the potential for conflict between the planning process and the Board's regulatory process.

For further information please refer to the Board's webpages: <https://wlma.org.uk/development-consent/>

Response of Yaxley Parish Council, Suffolk, to Eco Power Suffolk PINS Scoping Consultation

From [REDACTED]@yahoo.co.uk>
Date Thu 2026-02-19 10:39
To Eco Power Suffolk Solar <EcoPowerSuffolkSolar@planninginspectorate.gov.uk>
Cc Clerk, Yaxley Parish Council [REDACTED]@btinternet.com>

You don't often get email from iluff@yahoo.co.uk. [Learn why this is important](#)

Dear PINS Team Member,

Please find below the response as passed and agreed by Yaxley Parish Council at a meeting on 18th February, 2026 for consideration by PINS during the scoping process.

I am submitting this as Chairman of Yaxley Parish Council since our Clerk is currently unwell. I anticipate his recovery very soon so please continue to address communications to him, [REDACTED], on [REDACTED]@btinternet.com

Please confirm receipt of this response.

Thank you.

Yours sincerely,

[REDACTED] (Chairman, Yaxley Parish Council)

Response of Yaxley Parish Council, Suffolk.

INTRODUCTION:

Yaxley Parish Council opposes this development and initially would stress that the period of time allowed for this unofficial consultation is totally inadequate.

Mitigation: Extend consultation periods with the Parish Council, local residents, and the wider community to allow time for it to be carried out fully.

The village will have both a solar farm and several battery storage facilities, disrupting the quiet rural community and harming local wildlife and the environment.

There is insufficient planning and coordination due to the imminent government-imposed deadlines. Power companies, often offshore entities, submit scattergun applications without central oversight or real regard for local concerns. For example, EcoPower Suffolk is owned by a foreign national living abroad.

Battery Storage: Danger to Human Life:

Battery storage poses fire risks, evidenced by a recent fire in Cirencester. With up to 5 BESS near Yaxley, including one next to a high-pressure gas pipeline on Eye Airfield, the danger is significant. Any company or Council approving such a development will be held accountable for any disasters.

- EcoPower Suffolk is planning to develop five sites, one of which is in Yaxley and connects to the substation there. This will be in addition to the solar farms in Palgrave and Thrandeston (although the one in Palgrave is not an EcoPower Suffolk projects) which had already been approved and a further one is going through a consultation exercise will add to the negative impact on this area of North Suffolk.
- Regener8 is planning battery storage and a substation at Red House Farm in Yaxley.
- There are significant concerns regarding the planned battery storage on Eye Airfield, with an application submitted by Field Yaxley. This application has been opposed by Yaxley Parish Council due to safety concerns, including its proximity to the high-pressure gas pipeline passing through Eye

Airfield. If one of the batteries catches fire, it will be left to burn out. There have been many instances of battery storage fires, such as in Merseyside and very recently in Cirencester. Although battery safety is claimed to be improving, it is a new system equipment and can still malfunction, and even a 1,000 to 1 probability remains unacceptable. The risk can be mitigated by relocating the batteries away from the pipeline. Furthermore, this application places battery storage near new housing and Hartismere High School. It appears that Field Yaxley has purchased an unsuitable site for development and is attempting to justify their mistake in the planning application.

Refer to the maps of this BESS Site which show more clearly the overlay with the gas transmission pipeline hazard zone.

- The battery storage sites will not be staffed, so any fire will need to be reported before the local Fire and Rescue Service can respond. The nearest station in Eye is staffed by retained fire officers. Evidence suggests that neither Suffolk Fire and Rescue Service nor Norfolk Fire and Rescue Service have the training, equipment, or staffing to effectively manage this threat.
- The Parish Council understands there are likely to be two additional applications for battery storage in or near Yaxley, increasing the village's exposure to potential risks associated with battery unit fires and the effect of the gases given off during combustion depending on wind direction.

Mitigation: Battery storage areas must be safe, and a system of fire control installed and no reliance on the local Fire and Rescue Service. The battery storage sites in and around Yaxley must be out of sight and fully screened.

Strategic Planning:

The Parish Council also wishes to highlight the piecemeal developments of solar farms and battery storage locally. A part of North Suffolk, which is an area of natural beauty, is in danger of being compromised by these developments. While supporting renewable energy in principle, Yaxley Parish Council advocates for a strategic plan that ensures orderly development. Currently, it seems any company can initiate plans for large solar farms and battery storage sites without oversight, due to the absence of a comprehensive strategic plan. There are also rumours of further applications.

These factors contribute to a sense of siege and neglect among Yaxley's residents.

Mitigation: Preparation of a strategic plan by local and national Government for solar farms and battery storage in North Suffolk.

Background:

- The Parish Council firmly believes in prioritizing 'roofs' over 'rural land'. It is difficult to comprehend why valuable agricultural lands would be used for solar panels and battery storage when the Yaxley sub-station is near an old USAF airfield at Eye.
- The proposed development area has high biodiversity levels and converting it into an industrial landscape will reduce biodiversity.
- Solar farms offer inefficient energy output, contributing between 11 to 15% of power to the grid.
- Solar farms negatively impact landscapes, altering countryside views, potentially harming heritage assets, and posing environmental hazards due to cadmium compounds, silicon tetrachloride, hexafluoroethane, and lead, which are mined using slave labour.
- Disposal of solar batteries and panels poses challenges at the end of their lifespan.
- It is uncertain if the land can revert to agriculture.
 - Solar farms should follow domestic housing and industrial facilities, and wave power (given the UK's island status) as priority developments.
 - The proposed development is likely to reduce property values, as highlighted in the document: 'The effect of Botley West Solar Farm on local house values' which is attached.

Mitigation: The company should fully compensate any reduction in local property values and provide free or subsidized electricity to local residents during the life of the solar farm. Parts of Eye Airfield should be used to for the location of solar panels.

ENVIRONMENTAL IMPACT AND WILDLIFE:

- The development will significantly impact the landscape and quality of life for Yaxley residents, altering the village's nature. North Suffolk should be protected from excessive proposals for solar farms, with strict limits applied via a strategic plan to prevent haphazard developments. Companies should not freely approach landowners to propose solar farms without considering agricultural prices' impact on their decisions.

Flora:

- The area around Yaxley has extensive flora. **Fauna:**

Loss of Wildlife Habitat:

- Protecting the land around Yaxley is crucial to prevent wildlife damage. Rare bird species (e.g., Golden Orioles, Turtle Doves), other birds (e.g., Buzzards, Red Kites, Sparrow Hawks, Kestrels, Tawny Owls, Little Owls, Barn Owls, Lesser Spotted Woodpeckers), bats (e.g., Pipistrelle Bats), mammals (e.g., Roe Deer, Brown Hares), reptiles (e.g., newts), and other wildlife will be affected. Proposed wildlife corridors are unnecessary if the developments do not proceed.
- The University of Bristol investigation reveals a decrease in Pipistrelle Bat activity near solar panel farms, affecting their insect detection and feeding, impacting surrounding hedgerows and ecosystems. Bats serve as major night-time insect predators and indicators of ecosystem health.
- The Parish Council objects to habitat loss and wildlife disruption.
- Solar panel developments pose serious issues for ground-nesting birds, and with the strategies focusing on increasing their numbers. The land in the Thrandeston/Yaxley area has been identified as habitat for the following ground nesting or foraging birds: Snipe, Lapwing, Grey Partridge, and (not far off) Stone Curlew. See on the attached maps.
- The potential wildlife corridors included in the plans will be irrelevant, as the damage to Yaxley's flora and fauna will be considerable.

Size and Location:

Inadequate Consultation Period:

- EcoPower Suffolk's ambiguous plans impede effective feedback preparation. Clarifications following non-statutory consultations are essential for the Parish Council and residents to provide meaningful comments.

Flood Risks:

- Existing water runoff issues from Eye Airfield will be exacerbated by this project. The Parish Council is involved with the local County Councillor in investigating the effect on the Yaxley area of the serious impact of water runoff from Eye Airfield and this proposal will greatly worsen this situation.

Mitigation: Implement schemes to prevent flooding from solar panels and battery storage runoff.

PRESERVATION OF HERITAGE AND VILLAGE CHARACTER

Aesthetic Impact

Visual Impact with Proximity to the Village/Housing:

- The people of Yaxley living in the properties which would be most affected by the development of a solar farm face the loss of visual amenity.
- The solar farm complex will be seen from the village, visually impacting all approach roads and causing irreparable damage to the rural heritage.
- Mitigation: The solar panels should be of a design which has the lowest possible height to reduce the visual impact.
- Wide buffer zones of at least 500 metres between the solar panels and properties in Yaxley will be necessary, making the proposed development of the area economically unfeasible.
- Although the exact nature of the proposal remains unclear, any work in this area will affect views from houses or their land. Among these properties, the Manor House is Grade 2* listed, and The Cottages are Grade 2.
- Mitigation: Establish major buffer zones and conduct early planting a long time before construction begins to reduce visual impact, selecting evergreen and fast-growing varieties. Working hours during construction must be regulated to avoid any work at weekends or on bank holidays.

Footpaths and Bridleways

No 'Tunnels'

- Rights-of-way in Yaxley and the surrounding area are at risk. The area is popular among horse riders, walkers, and cyclists.
- While cyclists mostly use roads, some go off-road using public rights of way.
- EcoPower Suffolk stated that rights-of-way will be fenced for local use, potentially creating a 'tunnel' effect.
- Judas Lane/Green Lane, an ancient track, should remain undamaged.
- People from Yaxley frequently walk or ride horses on footpaths and bridleways. Protecting rights-of-way must avoid negatively impacting their appearance and must avoid the use of gates and high fences.
- Mitigation: Avoid fencing rights-of-way to prevent the 'tunnel' effect and gates and high fences should not be used on them.

.Light at Night in Yaxley

Yaxley already suffers from light, odour, and noise pollution from Eye Airfield. It is crucial to strictly control noise, light, and other forms of pollution, especially during construction if the project proceeds.

Mitigation: Enforce strict controls on noise and light pollution.

Industrialisation of Yaxley

- This proposal will likely lead to the industrialization of the area. Construction will disrupt residents and tourists, affecting daily life through, noise levels, and general disruption. Strict controls on construction hours are necessary, with no work on weekends or bank holidays, which has happened in previous local construction projects.
- The plan will disrupt the quiet enjoyment of Yaxley for villagers and visitors, including horse riders, walkers, and cyclists. It may also remove species of wildlife and attractive views.
- Construction will significantly impact the privacy of residents.

Cable Corridors

- The width of the cable corridors will no doubt be reduced dramatically from those shown on the maps.
- Has EcoPower Suffolk negotiated access across land to link to the substation?
- The cables must be buried at a depth which will allow ploughing and subsoiling of land to be carried out so that farming can continue.
- The way that the cables are laid must be carefully managed not to damage or disrupt the land which they cross. E.g. foot paths and bridleways. They must avoid and not damage land drains
- The route for the cables must be carefully considered so that they do not have an adverse effect on the landscape.
- E.g. The proposed potential cable route area west of Yaxley includes on its eastern boundary the following:
 - Yaxley Village Hall playground
 - The Guildhall, the curtilage of a Grade 2* listed building.
 - Adjacent private property gardens to the north

The farmer in Yaxley most likely to be affected by cables coming across the Village has contacted the Parish Council and is unequivocally opposed to the use of his land for this purpose.

HEALTH AND SAFETY

Use of Local Roads

- All roads leading to the construction sites will probably pas through Yaxley and then go on to single track roads as they go towards Thrandeston. This will present challenges for the development and supply of materials to industrial sites. EcoPower Suffolk's presentation did not demonstrate an adequate understanding of these difficulties. The roads, which include single-track roads from the A140 and A143 connect to potential sites in the area. If the construction site were to be situated on the Mellis

Road in Thrandeston, delivery lorries would have to leave the A140 at the Yaxley/Eye roundabout, taking these vehicles through the village of Yaxley. This would lead to an immense increase in traffic through Yaxley.

- In addition to driving through Yaxley, there is a significant issue with transporting materials to the construction site from the A140 along the Mellis/Yaxley Road, which passes Mellis CEVC Primary School. This road is relatively narrow, and at the beginning and end of the school day, cars transporting children to the school are parked along the road, creating a hazard that extends for more than half a mile. In the morning, cars are parked there for half to three-quarters of an hour, and in the afternoon, they remain for up to one hour. This parking already poses a major problem, and the additional hundreds of lorries required to deliver materials to the construction site would exacerbate the situation, posing a danger to the lives of parents and children.
- The traffic impact on pedestrians on the Mellis Road is of concern to Yaxley Parish Council and the people of the village and this applies particularly to those sections without a footpath. Already there have been instances of lorries etc forcing pedestrians to jump back into the hedgerows and verges which is unacceptable. This also applies to cyclists and horse riders. There are already tens of thousands of vehicles using the road each month and the additional hundreds going to a construction site will only add to the dangers that local people face, in particular parents walking with their children to Mellis CEVC Primary School each day. Too many drivers do not take notice of pedestrians, cyclists and horse riders. Large vehicles are speeding on the straight sections and residents entering the road from driveways struggle with large vehicles using the road. Mellis Road is a B road and not built for large load traffic.
- Deliveries outside working hours would disturb residents, and nighttime deliveries are unacceptable due to noise.
- Any suggestion of making roads more suitable for deliveries will be resisted by the Parish Council to preserve the village's character.
- Mitigation: EcoPower Suffolk must prepare travel plans to maintain local road systems during construction. However, there is no viable solution to the traffic problem for materials to reach possible construction sites. The Company must prepare travel plans to maintain local road systems during construction, however, there is no viable solution to this traffic problem using the roads through Yaxley. There is no mitigation for the village other than a weight limit and therefore use of the off-road provision across the hard standing access from the A140 to construction sites is the only appropriate safe alternative.

ECONOMIC IMPACT:

Agriculture:

- The proposed development will result in the loss of productive arable land. Comparing golf courses to solar farms is irrelevant. Golf courses already exist, while solar farm plans utilize high-quality agricultural land, which is increasingly important amid the Russia-Ukraine conflict. Securing food supply for the nation is critical.

MENTAL HEALTH:

- While solar farms themselves may not directly cause mental health issues, the concerns and anxieties surrounding their development and impact can contribute to stress and mental distress for some individuals and communities.
- Potential mental health concerns include worry about property value declines, visual impact on the landscape, and anxieties about the broader societal and environmental implications of large-scale solar projects.

Mitigation: The funding of mental health support for local residents, must be provided by EcoPower Suffolk.

CONCLUSION:

Flood studies: An increase in flooding has been caused on land in Yaxley and also in Thrandeston by the industrial developments on Eye Airfield due to the increase in impermeable surfaces. There is no strategy for

development in the area around Yaxley and every increase in impermeable surfaces leads to more flooding. The local County Councillor has initiated a review which led to a Teams meeting to discuss the flood and water management issues around the Eye Airfield and including land in Yaxley: [REDACTED] Principal Planning Officer Babergh and Mid Suffolk District Council; [REDACTED], Head of Environment Strategy SCC; [REDACTED]. The purpose was very broadly to consider the issues raised and options for improving the water management regime in the relevant area. Actions from the meeting are as follows and need to be followed up by the relevant parties:

Action from Flood Meeting of 31st January 2025	
1. To investigate the possibility of commissioning a Surface Water Management Plan for Eye Airfield with Planning Policy colleagues	Bradly
2. To contact and arrange a meeting with Helen George (Natural Flood Management Project Manager, Environment Agency) to explore input	Jess/Tim
3. Subject to outcome of action 1, to support with advice from statutory flood agency.	Matt

This meeting with officers followed from a meeting in Thrandeston in January which included local landowners, [REDACTED], Catchment Resilience officer Waveney Valley Trust; local councillors and representatives from the Parish Council. Flooding and pollution incidents as well as possibilities for small scale flood mitigation measures were discussed.

A further meeting took place on 16 April 2025 which included representatives from the River Waveney Trust.

Mitigation: How will EcoPower Suffolk ensure that the proposals for a solar farm and battery storage do not exacerbate this problem?

Independent reports should be prepared into the suitability of this proposal and should include a detailed analysis of the benefits as previously requested and asks that EcoPower Suffolk provides a response to the points below:

1. A copy of your Grid Connection Agreement with National Grid (suitably redacted to remove any commercially sensitive terms).
2. A copy of National Grid's assessment of suitable grid connection points for your project.
3. A copy of the Agricultural Land Quality surveys which have been undertaken (by you or others) of all relevant land parcels.
4. Your alternative site assessment which led to the selection of the land parcels which you propose to use.
5. A copy of all the surveys undertaken to date referred to in your newsletter but not made public.
6. Proper plans of the project at a scale which allows for understanding and interrogation. Posted as A3 size to the Parish Clerk at 2 Mellis Road, Thrandeston, Diss, IP21 4BU as soon as possible.

MITIGATION OF A PROPOSAL FOR A SOLAR FARM:

If a solar farm application which includes battery storage is approved, these steps must be taken to mitigate the impact:

- Battery storage areas must be safe, and a system of fire control installed and no reliance on the local Fire and Rescue Service. The battery storage sites in and around Yaxley must be out of sight and fully screened.
- Extend consultation periods with the Parish Council, local residents, and the wider community.
- Preparation of a strategic plan by local and national Government for solar farms and battery storage in North Suffolk.
- Establish major buffer zones, around local houses.
- Minimize wildlife impact through local consultation.
- The solar panels should be of a design which has the lowest possible height to reduce the visual impact.
- Avoid fencing rights-of-way to prevent the 'tunnel' effect and gates and high fences should not be used on them.
- Parts of Eye Airfield should be used to for the location of solar panels.
- Provide free or subsidized electricity to local residents during the life of the solar farm.
- Fully compensate any reduction in local property values.

- The cables must be buried at a depth which will allow ploughing and subsoiling of land to be carried out so that farming can continue. They must not damage or disrupt the land they cross or have an adverse effect on the landscape.
- The Company must prepare travel plans to maintain local road systems during construction, however, there is no viable solution to this traffic problem using roads through Yaxley. There is no mitigation for the village other than a weight limit and therefore use of the off-road provision across the hard standing access from the A140 to construction sites is the only appropriate safe option.
- Planting should be completed a long time before construction begins to reduce visual impact, selecting evergreen and fast-growing varieties.
- The funding of mental health support for local residents, must be provided by EcoPower Suffolk.
- Substantial compensation packages over the solar farm's lifespan for the damage done to the village and the surrounding area.
- Enforce strict controls on noise and light pollution.
- Working hours during construction must be regulated to avoid any work at weekends or on bank holidays.
- Implement schemes to prevent flooding from solar panels and battery storage runoff.

END OF RESPONSE