

Dear Ms. Curtis,

Ref: DC/21/02958 - Request for formal Environmental Impact Assessment (EIA) Scoping Opinion - Proposed solar panel array and battery storage scheme

I am writing to you on behalf of CARE Suffolk regarding the above EIA Scoping Opinion for Greybarn Solar Energy Farm for a solar PV generation and battery storage facility in the Suffolk countryside villages of Bramford, Flowton, and Burstall.

We understand that this is not a full planning application, but an invite to highlight areas of concern to be assessed within the Environmental Statement should the applicant choose to proceed with a full planning application.

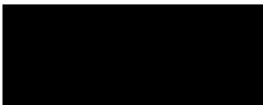
CARE Suffolk has been working with many of the local residents to discuss concerns and assess the limited information currently provided. We have looked through the virtual “village hall” created by the developer, and attended a small webinar hosted by the developer on 26th May 2021 in order to learn more about the proposal.

We understand that all topics must be addressed within a full planning application, and that the EIA should be reserved for topics that have significant impact on the environment.

Our requests regarding the full planning application and EIA are set out in the accompanying report discussed by topic. Please note that all page number references in the report refer to the applicants Scoping Report dated 17th May 2021. The comments in the report are based entirely on currently known information of the proposal provided by the developer, and may change as and when new information is made available.

We kindly ask that you take these points into consideration when you make the decision on the EIA Scoping Report.

Yours Sincerely,



Samantha Main

Director

CARE Suffolk Report for EIA Scoping Opinion

Request DC/21/02958

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Landscape and Visual

We understand the applicant's decision to include this within the EIA, and generally agree with the proposed assessment. However we have some additional requests as follows.

Cumulative Impact

The applicant states on page 18 "*At the time of writing, the application for the Brook Farm Energy Storage System has been granted, and it is anticipated that the Bramford Solar Farm application and the Tye Lane Solar Farm application will both be in planning at the same time as the application for the Proposed Development. Therefore the cumulative effects with these three schemes will be addressed in the LVIA.*"

The following additional developments are all within the immediate area of the proposal, and knowledge of them is all within the public realm. We ask that the cumulative impact include these within the assessment:

- Bramford Gas Generator – planning application DC/19/00046 approved
- Enso Energy – 7.1MW solar farm and battery storage – National Grid TEC register for Bramford substation
- National Grid Bramford to Twinstead transmission lines – non statutory public consultation completed and scoping opinion completed
- National Grid ATNC & AENC transmission lines - Network Options Assessment released in January 2021

Visualisations

We would like to see the additional visualisations included in the application:

Marker on Map	Description	Reason	LI Visualisation Type
1	From PROW within solar farm between proposed points 2 & 10	To illustrate landscape, visual amenity, and public amenity impact from within the site.	Type 3 photomontage
2	From PROW immediately adjacent to site	To illustrate landscape, visual amenity, and public amenity impact from site boundary and of Special Landscape Area.	Type 3 photomontage
3	Along Tye Lane at the field entrance	This field entrance is regularly used by cyclists as a rest stop after climbing the large hill down Tye Lane. Tye Lane is part of National Cycle route 48, and this is one of the first stops cyclists make in their journey through Bramford Tye and Flowton.	Type 1
4	Along Tye Lane at field entrance	This field entrance is regularly used as a passing place and has a good view across the arable countryside and SLA just before entering the village of Flowton. It is attractive for cyclists using National Cycle route 48 and sets the scene for the village. The Enso Energy development is also in the fields of this field so should demonstrate cumulative effects too.	Type 1



We would also like to see type 1 visualisations from the following listed buildings which are included within the ZTV:

- High Hall, Nettlestead – Grade 2*
- Tye Farmhouse, Bramford – Grade 2 and adjacent to development site
- Bullenhall Farmhouse – Grade 2
- Gates Farmhouse – Grade 2
- Granary at Gates Farm – Grade 2

We ask that the visualisations and photo montages are done for the winter season, when the proposed screening such as trees and hedging are not in full leaf and are at their weakest for mitigation purposes.

Further, page 17 states “*The LVIA will consider the effects of the Proposed Development in the following two phases... Operation: considering the residual long term effects during the operational phase of the development with all mitigation measures taken into account and fully established...*” Considering the effects of the operational phase only after the mitigation measures have been fully established does not consider the full effects of the landscape and visual impact in detail, as should be provided in an EIA. We would like to assessments carried out for operational years 1, 5, 10, and fully established. According to correspondence between CARE Suffolk and the Royal Horticultural Society some native hedging species can take around 15 years to reach a height of around 3m, the same height as the highest solar panels proposed by the applicant.

Landscape and Visual – Night Time Effects

We understand the applicant does not intend to include this within the EIA, because they do not intend to include night lighting on site.

During the webinar the applicant stated that the electricity will be converted to 132kV at a substation within their site. The energy would then be transmitted via underground cabling to the 132kV bay at the nearby UKPN substation. UKPN Engineering Design Standards (EDS) 07-1119 for Substation Electrical Services p 8.4.3 states that “External compounds shall have floodlights to provide a minimum luminance of 100 Lux.”

According to the CPRE, who have conducted the largest survey of dark skies in the UK, reports the chosen site area to be within a dark sky area.

The Clean Neighbourhoods and Environment Act 2005, section 102 states that artificial light from premises may be classed as a statutory nuisance as part of the Environmental Protection Act 1990. Thus making it important that light pollution be dealt with accordingly at the planning stage.

The applicant has not yet finalised the location of the 132kV substation within their design. Nor does it appear that they have completed the design of the substation as by saying they are not including lighting they are going against substation design standards.

At the moment, we believe there is not enough information to determine if this needs addressing within the EIA process.

Residential Visual Amenity Assessment

We understand the applicant does not intend to include this within the EIA, because they do not deem the site proposed to breach the threshold for it to be included.

Page 6 states "*Several residential properties lie adjacent to the northern site boundary, and there is an isolated residential property to the south of the Site. Partial views of the Site from these properties will be available however they are likely to be screened or filtered by existing vegetation and field boundaries.*"

"Likely"? This needs to be properly assessed with a site visit before a conclusion can be drawn. Several of the residents have contacted CARE Suffolk and expressed concern about being unable to enjoy their home in the same way they do now. The views will be of a significant change from an "*open, agricultural land*" to an industrial site.

In addition to the view, the site proposed is immediately adjacent and to the south of these homes. Sunlight comes from the southern directions (SE, S, SW). A standard ceiling height in the UK is around 2.4 – 2.6m high. Solar panels up to 3m tall, associated infrastructure even taller, and proposed screening that may eventually grow to a height even taller has the potential then to block sunlight from existing dwellings.

We ask that the Babergh and Mid Suffolk District Council planning department arrange a site visit to the homes in Bramford Tye before deciding whether this assessment should be included.

Cultural Heritage and Archeology

We understand that applicant's decision to include this topic with the EIA, and generally agree with the proposed assessment.

We request that the following listed buildings, in addition to those already suggested by the applicant, are included in the assessment since they are shown within the applicant's ZTV:

- High Hall, Nettlestead – Grade II*
- Gates Farmhouse – Grade II
- Granary at Gates Farm – Grade II

The NPPF does not provide a maximum distance to be assessed, but reminds us that harm extends to the setting too. This may mean the setting that can be seen from the building, and also the setting the building can be seen in.

Biodiversity

We welcome the applicant's decision to include this topic within the EIA.

There is no indication in the scoping report that they will do more than the obvious though, and as a result may miss finding out whether there are any protected or threatened species - especially of invertebrates and flora - in the area. We would suggest therefore that they follow Natural England's advice (as given to Enso Energy):

"Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals" and that "... botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present". "Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups

and individuals" and that "... botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present".

Alongside any biodiversity studies carried out, we ask that the weather conditions of the site during the study are included within the application. On 24th May 2021 around 8pm a resident spoke with an ecologist who was conducting a bat survey on site. Although locals know the bats were not yet active due to the prolonged cold wet weather, the conditions at the time of testing were not in line with best practice. Wattisham weather records at the time showed "*Recent light showers, mostly cloudy, 5mph wind and 7degC.*" These are not the conditions to get insects flying around, which is the reason bats go out hunting. When there are no insects they tend to stay in their nests. Good practice guidelines for bat surveys according to the Bat Conservation Trust gives a minimum temperature of 10°C at sunset.

Residents are keen to know how the applicant plans to avoid cutting off the natural wildlife routes between important wildlife areas, such as the woodlands. In particular the herd of roe deer in the area which are fondly observed crossing, resting, and grazing in the fields proposed for development. Ten Roe Deer were counted by a resident in April 2021, an increase on early 2020 where seven were counted. There are also many muntjac in the area, and recently a large red deer was seen near Millers Wood. Whilst the applicant may not necessarily be going into the woodlands, the wildlife do come out of it, and they explore and use the open arable fields. Wildlife routes between these areas are currently open, agricultural land, but with the development large areas would be fenced off and larger animals in particular would be pushed towards roads.

Land and Soils

We agree that land and soils does not need to be included in the ES as a standalone topic. We would however like to see it covered as part of the cumulative impact topic of the ES due to the significant amount of BMV agricultural land proposed to be lost by numerous other developments in the area.

National Planning Practice Guidance expresses a clear preference for the avoidance of Best and Most Versatile agricultural (BMV) land and the Mid Suffolk development plan goes further, making it quite clear that development will be refused on high quality agricultural land. As a result, the issue will still need to be addressed in a planning application and we look forward to seeing a detailed Agricultural Land Classification report, along with the decision making process the applicant used to settle on a site of BMV land. Soils are an environmentally valuable natural resource and need to be protected.

We further ask that the developer provide details of:

- the areas of current agricultural land (in acres) transferred to the different types of hard and soft development within a scheme;
- loss of agricultural employment and economy;
- loss of domestic food production, including crop types, cycles, and yields from the proposed fields in recent years;
- any current grant schemes that the land is under, and how the proposal compares to the environmental measures of them;
- their soil handling proposals for the conservation and sustainable use of displaced soils;
- and detail their mitigation/reinstatement plan during the decommissioning phase to restore the soils back to their current quality.

Geology, Hydrology, Flood Risk & Drainage

We understand the applicant does not wish to include this with the EIA/ES. At the moment we do not believe there is enough information to decide whether this needs to be included or not.

The applicant has stated that they are not using piling to support the solar arrays, so will they be using concrete bases to hold posts in place? This increases the potential impermeable surface area of the site, and reduces the amount of vegetation cover.

Solar panel studies have shown that the flow of rainfall off a solar panel increases both the concentration of surface water landing on the ground and the speed of the runoff. These increases contribute to soil erosion. Vegetation cover is one of the methods that can contribute to mitigating this.

Further the heavy clay soils in the area are prone to compaction damage, especially during wet weather and when the fields are at their field capacity. Compaction damage such as that caused by heavy machinery used to build solar PV arrays and their associated infrastructure. Compaction of the soil cannot be undone by ploughing for example because there will be solar panels and underground cabling in the way. Compacted soil will further increase surface water runoff and the risk of flooding.

The area is already well known for flooding. This will be further impacted by other solar developments proposed for the area.

Should the applicant indeed be using concrete bases to support the solar arrays then we ask that this topic be scoped into the EIA.

Noise – Construction

We agree that construction noise need not be included in the ES due to its temporary nature, though we would like to see it assessed as part of the general planning application due to its extreme proximity to residential homes. This understanding is based on the applicant's statement that they will not be pile driving the array structures into the ground.

Noise – Operation

We welcome the scoping in of operational noise to the ES. However we note the applicant only intends to look at noise for residential purposes. We would like to see noise impacts on public amenity and animals (both wild and domestic) included for the following reasons:

- Two PROWs go through the site
- One PROW runs adjacent to the site
- The Sustrans National Cycle Route 48 runs adjacent to the site (Tye Lane)
- Tye Lane is currently proposed under the Quiet Lane scheme
- Several tourist accommodation sites in the area draw in tourists because of the tranquil countryside
- Several of the homes along Tye Lane use land for equestrian purposes
- The site is adjacent to areas of wildlife importance, such as ancient woodland
- The site is regularly used by wildlife, such as roe deer, for communication routes

Should the applicant decide to use tracking solar panels, residents would like confirmation of the timing of movements. Approximately 200,000 solar panels moving en masse to reset late in the evening or early morning will produce a lot of noise.

Access, Traffic, and Transport

We agree that traffic does not need to be included in the ES as a standalone topic because the majority of the impact, whilst significant, will be temporary during the construction phase. However we would like to see it addressed as part of the cumulative impact topic as discussed later in this report.

Page 34 states "*The construction period is estimated to be approximately 6 months. Construction deliveries would likely be carried out weekdays (Monday to Friday) between the hours of 07:00 – 19:00 and Saturdays 08:00 – 16:00.*"

We would like to see “*construction deliveries*” restricted to construction work as well as deliveries, and for the hours of 08:00 – 17:00 during weekdays, and 08:00 – 13:00 on Saturdays, with no deliveries or work to be carried out on Sundays or Bank Holidays. We believe this would be in line with the guidance given to Enso Energy.

We maintain that whilst Tye Lane can accommodate an HGV or large agricultural vehicle on occasions, they are very much the exception to the traffic along this road. The applicant proposes something much different to an occasional HGV. The use of Bullen Lane, which has already been improved due to the Bramford substation, EA1 & EA3 substation works, would be a much more suitable road for the traffic suggested.

Should the applicant decide to proceed with Tye Lane for access, we would also like to see an assessment of the directional flow of traffic included within the application. Tye Lane road users are typically travelling eastward during the rush hour times, where construction worker and HGV traffic to site would be westward. The majority of passing places along Tye Lane are small. Many of them would not accommodate an HGV and anything larger than a small car. There are no laybys along Tye Lane for traffic to queue or wait for access to site.

We would also like to see confirmation that The Channel would be excluded from any and all construction related traffic, including that of construction workers.

Cumulative Impact

The applicant appears to have joined Cumulative Impact and Other Environmental Effects into one topic. Whilst we agree that the other environmental effects are not necessary as part of the ES (see further below), we do not agree the same for cumulative impact.

A recent scoping decision made by Babergh & Mid Suffolk for Enso Energy stated Cumulative Impact was required as part of the ES. At the point of this decision there were only two solar PV sites proposed for the area – Enso Energy and EDF Energy. This application makes three, amounting to over 600 acres in total. This application is also adjacent to both of these other sites, and due to it being between them both, will join all three up into one large shroud across the Suffolk countryside.

The applicant states on page 18 “*At the time of writing, the application for the Brook Farm Energy Storage System has been granted, and it is anticipated that the Bramford Solar Farm application and the Tye Lane Solar Farm application will both be in planning at the same time as the application for the Proposed Development. Therefore the cumulative effects with these three schemes will be addressed in the LVIA.*”

The following additional developments are all within the immediate area of the proposal, and knowledge of them is all within the public realm. We ask that the cumulative impact include these within the assessment:

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With such a large area of rural agricultural Suffolk countryside potentially being turned into an industrial facility in a short time span, we ask that all topics be addressed as part of the cumulative impact:

- The landscape will drastically change over a large undulating area
- a significant number of heritage assets will be impacted
- biodiversity (namely wildlife) will be significantly impacted as their communication routes are constricted over many kilometres
- over 600 acres of arable agricultural heritage will be removed from food production
- a large area of permeable soil and underground water routes will be turned into impermeable surfaces of solar arrays and concrete with damaged compacted soil underneath
- the tranquillity of the countryside will be turned into a constant low toned hum over a large distance

- traffic from the construction process of three solar sites at once will cause chaos on narrow single track roads
- the ability for residents to enjoy the outdoors, a vital source of wellbeing, will be significantly diminished as all PROWs are impacted
- the possibility of a string of glint and glare for receptors travelling in the vicinity
- and the loss of tourism due to the extensive industrialisation of the area

Should all these developments be granted approval, there seems to be little time for the land to adjust gradually, and for adjustments to be made. What would be displaced by one development would need to be dealt with, or displaced by another development. For example due to the topography of the land, soil water runoff from EDF and Enso can only be adequately managed by Statkraft if the EDF and Enso systems are working correctly. But with all developers working independently of each other there appears to be little to suggest this has been considered by any of them. Such a large change in such a short time span will undoubtedly bring about unforeseen problems. Problems that the local residents will have to burden and suffer.

We ask that cumulative impact address all the topics and be scoped into the ES.

Other Environmental Effects

Population and Human Health

We agree that this does not need to be included as a standalone topic within the ES. We would however like to see it addressed as sections within the landscape and visual, noise, traffic, and glint and glare sections.

We would also like to see the developer assess the long term change to the wider local economy, such as jobs. Agricultural land and arable farming supports a large supply chain, from farm workers and mechanics to input suppliers and grain merchants. We understand the long term jobs proposed by the applicant is one man in a van once or twice a month and someone remotely to watch the security cameras.

Climate Change

We agree that this does not need to be included as a standalone topic within the ES. The applicant claims "*anticipated reduction in CO₂ emissions is approximately 18,800 tonnes per annum which equates to the annual energy use of approximately 11,800 homes.*" Within the planning application documents we would like to see a full life cycle analysis of the site, including the CO₂ cost to manufacture, construct, operate, and decommission the site, alongside an analysis of the "*displacement of carbon intensive electricity generation*" the applicant claims it will replace here in Mid Suffolk and Babergh.

Glint & Glare

We agree the assessment does not need to be included in the ES, and welcome the inclusion of the assessment within the general planning application.

The applicant notes Wattisham Flying Station (WFS) as an aviation receptor that needs to be assessed. The applicant should note that WFS Station is primarily a helicopter base. Along with a fleet of its own helicopters, it also has an open landing pad for the Air Ambulance. Military helicopters regularly fly over the area, and are known to use Bramford substation as a practice target. Helicopters do not need a runway and can approach from any direction. The impact on helicopters needs to be considered as part of the assessment.

We would also like to see horses and horse riders included within the assessment, as the area is home to several horses.

Tourism and Recreation

We agree that this does not need to be included as a standalone topic within the ES.

However, we ask that it is addressed as part of the cumulative impact section because there are two other large scale solar facilities proposed for the area. EDF Energy and Enso Energy. The applicants' reason for excluding it as part of the ES is because of the "*localised impacts*".

Cumulatively they cover and join up multiple villages, thus the cumulative effect on the area is not localised to just their site, but instead is scattered across over 600 acres of rural Suffolk countryside, with an even greater area of impact on the landscape.

Furthermore, with so many PROWs cumulatively affected by the proposals, residents of these villages will struggle to find a route that is not impacted by solar panels. For example, Flowton and Bramford Tye would have no circular walks left that are not adversely impacted.

Other Concerns

Community Engagement

Scoping report page 6 states "*The Applicant engages with neighbouring communities in advance of submitting any planning application, and welcome community suggestions and views.*"

Post

The applicant posted a single page letter to residents, however the distribution area is unknown. During the webinar the applicant stated 153 letters were posted out. Based on the list of proposed consultee parishes in the applicants Appendix B (and assuming that missing Bramford parish was a typo), there are over 3,000 homes.

Virtual Village Hall

The applicant also provided an online virtual hall, however the information was sparse and the applicant does not appear to have publicised this outside of the 153 letters they sent out.

"Roundtable" Meeting

The applicant states they "*welcome community suggestions*". Numerous requests were made by the public for an open public webinar with a Q&A session, similar to those hosted by Enso and EDF, yet the applicant refused.

Instead they held a behind doors "roundtable" only a few working days after any detail was provided on the application (Scoping Opinion made public on Friday 21st May 2021 and Roundtable on Wednesday 26th May 2021). This meeting was allegedly by invite only to all people who previously contacted the company about the development, some elected representatives, and BMSDC planners.

However we are aware that some attendees, despite being in contact about the development already, were not invited and had to ask. We also know that many members of the public were refused due to "*capacity limits*", including Parish Councillors. Burstall Parish Council members for example had their requests to attend refused, despite having no representative on the list of attendees.

The meeting was held via Zoom, which has a maximum of 300 attendees. Yet only 23 attendees were at the meeting, 4 of which were for the applicant. 23 is far from the capacity limit.

Furthermore, the webinar was time restricted to 90 minutes, and several people were muted after asking their question. This means the public were unable to ask a follow up question to gain clarification of any misunderstanding or confusion in the answer.

Statkraft's Code of Conduct

In all cases the public consultation has been woefully inadequate, and does not appear to meet Statkraft's own Code of Conduct either. "*Statkraft operates sustainably and develops its business in a way that adds value to its shareholder and the countries and local communities in which we operate. We seek to establish a regular and open dialogue on sustainability issues with host communities and other stakeholders*"

We ask that the applicant redo the public consultation. This time notifying all households within the parishes they themselves listed as proposed consultees, although with Bramford added to the list. And by holding an open public webinar followed by a live Q&A session.

Decommissioning

Page 14 states "*Upon decommissioning all equipment and built structures, above ground and shallower than 1.2 m below ground level, associated with the Proposed Development would be removed from the Site and it would return to agricultural use.*" The land here is of a heavy clay, and in order to reinstate the lower soil structure mole drilling would most likely be needed. Mole drilling is typically done at around 2m deep, but would not be possible if structures are still in the ground. We ask that all structures are removed, regardless of depth.

We also request that the applicant provide an assessment of the different potential options at the end of the project period, other than decommissioning.

Waste

The applicant has made no reference to waste. We would like to see this addressed within the planning application, including but not limited to:

- expected types and volumes of waste during the construction;
- handling and storage process for electronic equipment damages (such as panels, batteries, etc.) that occur during transportation to, and construction of, the site;
- handling and storage process for other waste;
- expected lifetime cycles of equipment;
- removal and recycling/disposal plan for all waste.

Appendix B – Proposed Consultee List

We ask that the applicant include Bramford Parish Council, since the majority of the development is in the Bramford Parish.