

Dear Ms Curtis,

Ref: DC/20/05895 & DC/21/00060 – Full Planning Application - Installation of renewable led energy generating station comprising ground-mounted photovoltaic solar arrays and battery-based electricity storage containers together with substation, inverter/transformer stations, site accesses, internal access tracks, security measures, access gates, other ancillary infrastructure, landscaping and biodiversity enhancements including Nature Areas.

I am writing to you on behalf of CARE Suffolk regarding the new documents for the above planning application.

We have reviewed the new documentation submitted by the applicant and find nothing to withdraw any of our previous objections, and unanimously we still **STRONGLY OBJECT** to the above planning application.

Sir Roger Scruton once said “Good things are easily destroyed, but not easily created.” This beautiful part of the Suffolk countryside has been slowly and carefully crafted over thousands of years by local communities. This application would drastically and suddenly destroy that. Please do not allow this beautiful countryside, and all the good that it provides to the local community (residents and wildlife alike), to be obliterated to memories and photos by allowing it to be covered in and blocked out of view by hundreds of thousands of solar panels. It is so much more than a pretty landscape.

There are some additional comments and information that we would like to submit in relation to the new documents, which can be found in the attached appendices.

CARE Suffolk hereby asks the Mid Suffolk and Babergh District Planning Authorities to **REFUSE** the application, and ask that we be informed of the Planning Committee Meeting date so that we may attend.

Yours Sincerely,

A black rectangular box redacting the signature of Samantha Main.

Samantha Main

Chair

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Community Wellbeing & Landscape

On 25th March 2021 Mid Suffolk District Councillors gathered to discuss a motion to a *“review of green space to ensure that it was optimising the biodiversity and well being aspects of natural and amenity green space in Mid Suffolk.”*¹

Councillor Eburne highlighted *“the importance of green space to our communities had been highlighted more than ever with people taking advantage of local outdoor space. Green space was important for many reasons. For both physical and mental health, we know that social prescribing works, that people who can access green space have healthier lives, exercise is beneficial, and time spent outdoors improves our mental health... Ultimately, we need to value our green spaces more. Our communities have shown that they both need and value them.”*

Councillor Fleming said *“that they clearly agreed that accessible natural green space was important to our communities for all of the reasons that Councillor Eburne had mentioned. Open space conveyed a sense of wellbeing and permanency which was very reassuring in a world that was becoming increasingly stressful and hurried.”* And that it *“needed to be linked in with the emerging health and well being strategy.”*

Councillor Flatman felt that *“Mid Suffolk was very lucky to have access to an abundant number of footpaths and bridleways and stressed that it was really important that these areas were kept and maintained for the next generation.”*

Councillor Passmore *“welcomed the approach being taken and supported the Motion.”*

Councillor Warboys spoke in *“support of the Motion and made reference to the Dasgupta review and the natural capital approach.”*

Councillor Mellon commented that *“whilst it was important to have green spaces in our towns, it was also important to have useable green space in the countryside.”*

The Motion was **PUT** to Council and **CARRIED** unanimously.

The villages of Flowton and Burstall have no officially designated open spaces as defined in the Open Space Study May 2019. However, the residents of these villages greatly appreciate the open views of the agricultural countryside that the PRow network provides access to. As do those of neighbouring villages who do have some designated open space. And whilst not officially a designated “open space” as defined in the study, the wide open views of the ancient clay plateau and rolling valley landscapes provide a valuable alternative in lieu of them to the community.

We note that the emerging health and well being strategy referenced as part of the green space review is not yet finalised and is being put to the District Council later this month².

In the Landscape and Visual Impact Assessment Addendum the applicant attempts to assess the impact to views from PRow such as footpaths and bridleways.

The applicants *Figure 2: Illustrative section through Somersham Park woodland and Nature Area* is wholly incorrect and misleading. It suggests that walkers next to Somersham Park are already partially enclosed under overhanging trees, and that their roughly 4m hedge will do little more to add to that sense of enclosure. This is a false representation of the reality of this PRow as demonstrated in the following photo, and the 4m hedge will take 10-15 years to grow to a height to screen the fencing and solar panels anyway.

¹ <https://baberghmidsuffolk.moderngov.co.uk/mgAi.aspx?ID=14689>

² <https://www.keepingintouchwith.co.uk/wellbeing-top-of-councils-agenda/>

Photo of the footpath alongside Somersham Park

The tree line of Somersham Park (to the right) is set back, followed by a ditch, hedging, and then the path and open field. There are less than a handful of trees whose canopy just reaches over the footpath. There is currently no feeling of enclosure along this footpath. However adding fencing, and over time a 4m hedge, would significantly alter that.



We support the comments by the SCC PRoW team that *“the report suggests that existing pylons on the skyline reduce the quality of views. We find this comment misleading as views of open countryside will generally be of quality than enclosed paths.”*

Whilst it is obvious that the public would prefer those pylons and overhead cables to be buried underground, as they were for the EA1 development, the applicant’s attempt to compare an open lattice style pylon on the skyline to their impenetrable wall of solar panels up close is weak. The pylons on the skyline have not reduced the amenity and wellbeing value of the publicly available open landscape on the proposed site in the same way that the solar panels would.

Further within the Landscape and Visual Impact Addendum the applicant states in the Summary and Conclusion at paragraph 6.5.3 that *“Visual effects arising as a result of the Proposed Development would be at their greatest for visual receptors using the PRoW network within the Site and its immediate context in all durations.... would be Major – Moderate Significance and Adverse.”*

This statement supports the SCC PRoW teams comment that *“There remains concern that the amenity value of users experiencing open countryside and having views of open countryside replaced with hedged paths that restrict views over the landscape and may adversely impact the user experience.”*

Here are some of the PRoW footpath open views that the applicant plans to enclose with fencing and hedging...

Footpath from Flowton Road towards Somersham Park in field 2



Same location as above photo but looking towards the row of Black Poplar Trees and SLA



Footpath from Somersham Road looking through field 1 of the proposal down to Valley Farm (Grade 2 listed) and SLA



Footpath between fields 5 (left of grass path) & 6 (right foreground) looking across Statkraft proposed field (background field) towards Flowton



And this is what those views could become... this is a short section of bridleway on the southwest edge of Somersham Park. It is not a typical representation of PRoW's in this open plateau landscape, but it is a short section which exists with no views whatsoever and a strong feeling of enclosure in comparison to the usual PRoW in and around the applicant's proposed site.



The number of planning applications for large scale ground mounted solar facilities is becoming increasingly worrying for local residents. There are currently three of such solar facilities proposed to be packed into four villages in very close proximity to each other around Bramford substation. This application being one of them.

Bramford substation currently handles 20% of the UK's electricity³, and there are plans coming forward to expand the substation and add additional overhead transmission lines into this small pocket of Suffolk countryside. The cumulative impact on this beautiful area of the countryside is turning a rural area into an industrial site.

These applications wouldn't just affect a small number of PRoW, but a large proportion of them in Flowton, and Bramford Tye, and a string of them across Burstall, Bramford, and Somersham too. There would be little escape.

This Enso Energy application triggered an out of the ordinary response from the community. Nine Parish Councils in the area submitted an objection to the application, with no parish in support, which is unprecedented for one planning application.

With the increasing demand on the countryside from National Grid, residents are desperate to protect what is left. The applicants attempt to say that the landscape is already degraded by pylons is a good enough reason to destroy the rest of it is callous. Local communities were pleased when the cables for EA1 and EA3 went underground. But what is left is now proposed to be blighted on a scale out of proportion to the local communities by these solar facilities.

³ Equinor OTNR Virtual Information Session Recording <https://vimeo.com/593280649>

As Chair of CARE Suffolk I have had many concerns shared with me about the impact of these proposals. People who found solace and balance in their health in the open countryside are now relapsing, or experiencing for the first time, anxiety and depression over the proposals to industrialise what is left of this beautiful countryside. I know this because they and loved ones are telling me. Even those I speak to regularly who don't realise it are showing classic symptoms of these mental health conditions.

People are in dismay and despair at how weak the planning system appears to be at protecting the democracy of local communities. People feel lost and unheard. I know this because they are telling me. One resident even came to my home and broke down into tears on my doorstep. And in recent months our villages have increasingly lost several cherished and long serving members of the community who have moved away, citing the solar farms as their reason why.

In the June 2021 edition of The Link Newsletter, Dr Dan Poulter MP for Central Suffolk and North Ipswich wrote:

"...these large scale energy projects cannot continue to be brought about in a piecemeal fashion without proper consideration for the potential consequences to some of our local communities... Whilst we should support appropriately sited solar parks (preferably on brownfield sites), there is also an imperative for our council planners to balance green energy production against the need to protect the countryside which makes Suffolk such an attractive place to live and work. Undoubtedly Suffolk will continue to grow as an energy hub, so it is essential that future energy development is sited in the right locations, so as not to blight our communities or damage our natural environment... Recently, we have seen proposals coming forward for a number of new solar parks near Bramford and concerning plans to install new overhead power pylons between Bramford and Twinstead, which would be a blight to our beautiful Suffolk landscape."

Paragraph 7 of the NPPF Revised 2021 states:

"The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs."

This statement further refers to resolution 42/187 of the UN General Assembly. In reassessing progress on this resolution⁴ at point 10 it was noted that the goals should include *"satisfying human needs by raising the standard of living and improving the quality of life"*.

This proposal by Enso Energy, and that similarly of EDF Renewables and Statkraft, are failing to meet the needs of wellbeing for the present community, and so far appear to have done nothing other than reduce the quality of life for the community.

They say that it is *"better to have loved and lost, than to never have loved at all."* So what that of the wellbeing of our future generations who, if this application were to be approved, would have never had this beautiful countryside to have loved in the first place?

⁴ [Refworld | Implementation of General Assembly resolutions 42/186 and 42/187 : resolution / adopted by the General Assembly](#)

Arboricultural Report

CARE Suffolk welcome the analysis of the Arboricultural Report, specifically the retention of ALL trees.

The applicant proposes in Planning Statement R003 p16 to remove the avenue of Black Poplar trees along Flowton Road, where the road runs between fields 1 & 2 of the development.

These trees were planted in the 1980's by Ray Brooks of Little Park Farm, who ran a very popular and specialist tree nursery until May 1995⁵. They were planted to act as a tall windbreak across the plateau, whilst retaining the expansive open view of the countryside, including that of the SLA to the south and Grade 2 listed building of Valley Farm, Flowton. Fondly nicknamed "windy alley" by many of the Flowton residents, one resident of a five generation family to still live in Flowton village, (now 81 years old) remembers walking along the road as a young girl and enjoying the views across to neighbouring villages. Her daughter also remembers watching from the side of the road as the holes were dug by hand and the saplings were planted. These promising young trees have grown and matured over the years and are now a prominent feature on the landscape, fortuitously marking the border joining Flowton and Somersham together. They are a cherished feature of one of the most popular vistas in this part of the countryside, as evidenced in our previous objection letter on 18th March 2021.

The arboricultural report classifies these as BS5837 category B2. Section 5 describes these as:

"Category B: Trees or groups of some importance with a likely useful life expectancy of in excess of 20 years. Their retention would be desirable; selective removal of certain individuals may be acceptable but only after full consideration of all alternative courses of action ... B2 - ... whose value as landscape features is collectively greater than would warrant as individuals ..."

Thus the removal of these trees is not desired, and the report argues for the retention of all of them due to their landscape value as a collection. This is not in line with the applicant's proposal.

Further, the applicant claims they will "reinstate hedging" along this section of road. However, living memory can never recall hedging here, and the applicant has provided no evidence to show there ever was. The applicant has also made no commitment to replace these trees according to SCC response on 19th January 2021 stating "at least three appropriate (suitable species and provenance) trees must be planted elsewhere, as close as possible to the removed feature." These should be of an equivalent maturity and provide comparable habitat to the existing trees, and they should be planted according to British Standard 8545.⁶

Furthermore, the report summarises that only 6m of hedge over the entire development would be needed to be removed, temporarily, to install cables. Whilst we welcome the more specific figure, we note that the applicant makes no such commitment to this figure, continuing to use ambiguous phrases such as "where possible". Whilst the small figure in comparison to the site size is welcomed, we still query whether this could be reduced entirely by the use of horizontal direct drilling (HDD) to install the cables. The applicant has demonstrated no consideration of this.

Whilst not applicable to the Arboricultural Report specifically, the use of HDD would also enable the applicant to meet the avoid aspect of the mitigation hierarchy for Flowton 92 RNR CWS, as recommended by the SCC Ecology team on 15th September 2021. Reducing the impact by trenching through a location with no known sulphur clover and man orchid (although we note the applicant has not submitted any survey to substantiate this) falls lower down on the hierarchy than avoiding the impact to the CWS altogether, which could be achieved with the HDD technique.

HDD would also enable public highways to remain open during construction, which is a major concern of residents due to the high risk of flooding and badger damage to other routes.

HDD may also avoid the risk of damage, and subsequent risk of soil and groundwater contamination, to a residential sewage discharge pipe that crosses the cable route south of Church Cottage, Flowton. Although we note the applicant so far fails to recognise and assess this obstacle.

⁵ http://www.flowtonopengardens.co.uk/2010/open_gardens.htm

⁶ As per the *Right Tree, Right Place* document adopted in November 2020 by BMSDC as part of their Biodiversity Action Plan.

Heritage and Setting

The Cultural Heritage Addendum submitted by the applicant is intended to reassess a few heritage assets as the “EIA does not fully appreciate the setting of heritage assets or its contribution to their significance”. CARE Suffolk would like to provide additional information that the applicant has not included in their reassessment, which we believe has led to misleading conclusions by the applicant.

We also note that neither Heritage England, nor Built Heritage – Place Services have conducted a site visit as yet and we would appreciate it if they would.

Lovetofts Farm, Flowton

Paragraph 7.4.25 of the Cultural Heritage Addendum states:

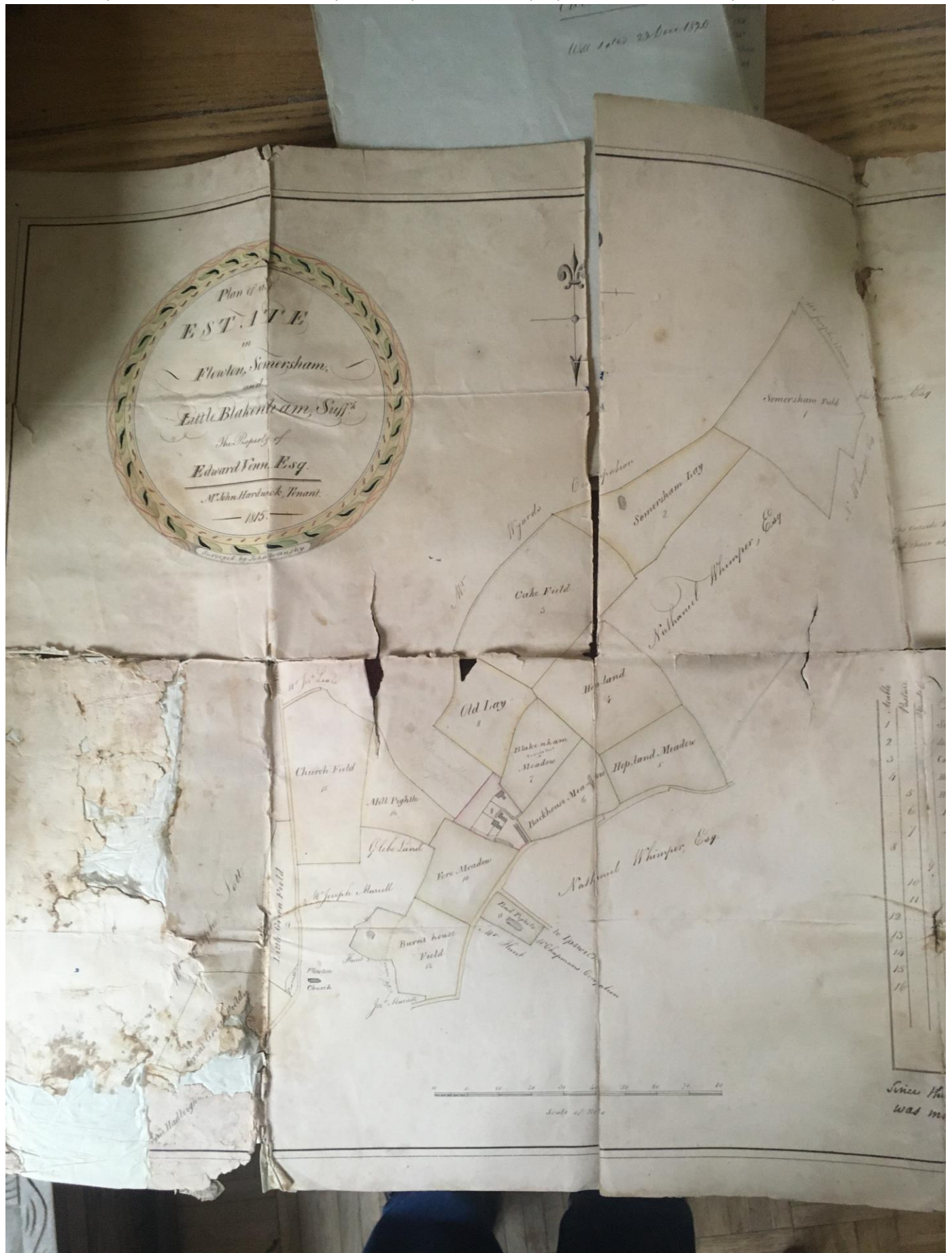
“Views north from the house were not considered to contribute positively to the significance of the building due to the mature woodland screening... The site visit confirmed that Lovetofts Farm is experienced only within close proximity (Figure 7.8) and although its agricultural land holding makes a positive contribution to its significance, this land use is only readily apparent to the south of the farmhouse. The change in land use to the agricultural surroundings north of Lovetofts Farm, although resulting in change to the historic setting of the farmhouse, will not be apparent from the building or the immediate surroundings in which it is experienced, and the conclusions of the ES Chapter 7 that there would be No Effect are considered valid.”

Lovetofts Farm is a beautiful 16th century farmhouse. The architectural features of the farmhouse are indeed best experienced close up. However, the size of the house and farmstead suggest the wealth of the estate was once larger than that of its current landholding today.

It is with permission from the Lovetofts Farm estate, that the following maps are shared.

1881 Map of Lovetofts Farm Estate

Fields Old Lay, Cake Field, Somersham Lay, and Hop Land, are all proposed to be built on by this development.

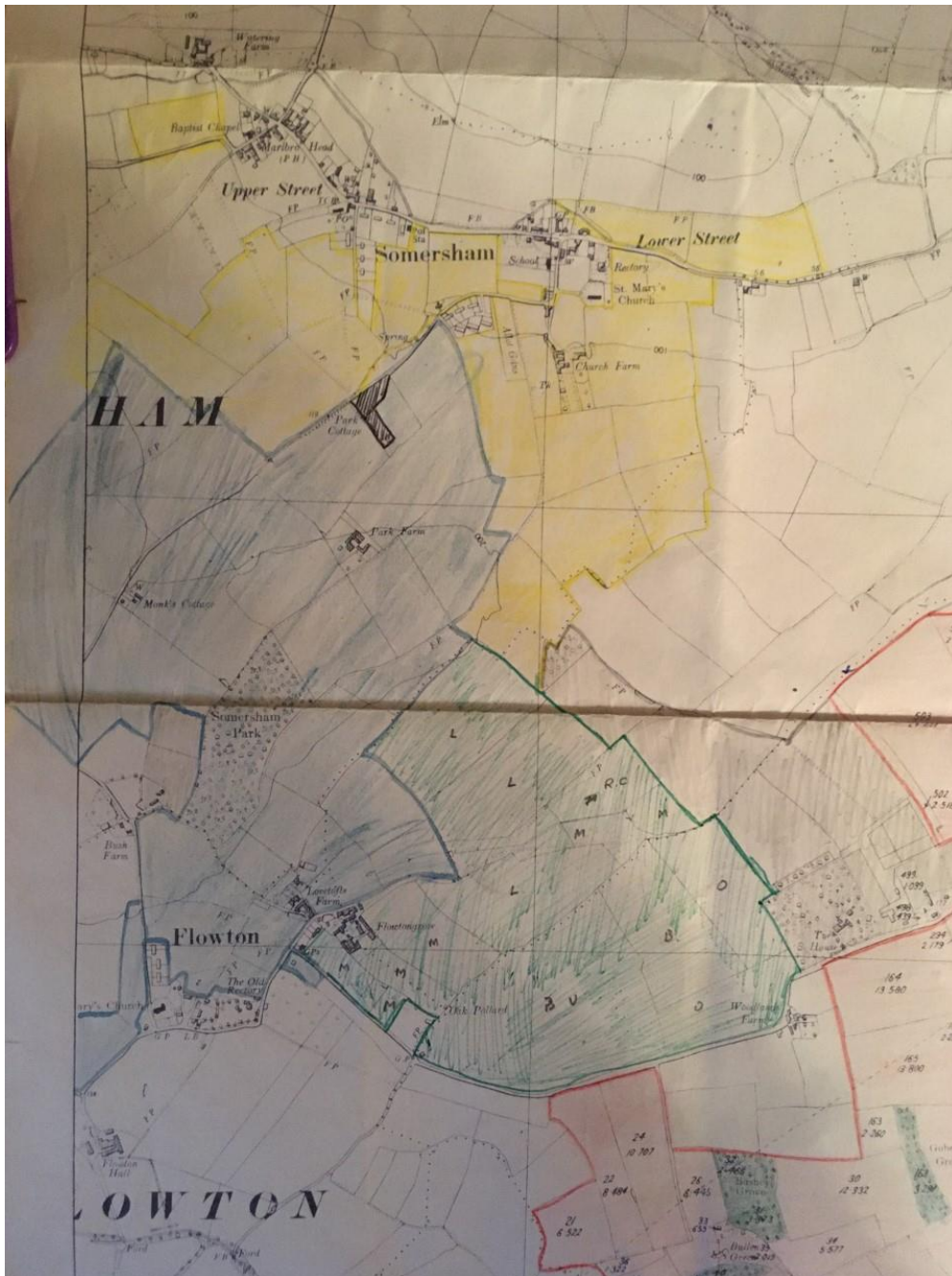


These same fields in 1881 were used for arable crop production, as they continue to be today. The applicant proposes to change these arable fields to grassland with solar panels.

Arable	Pasture	Open	Contents.	A.	R.	P.
1			Somersham Field	11	3	15
2			Somersham Lay	6	1	3
3			Cake Field	10	2	11
4			Hop land	7	1	0
5			Hop land Meadow	4	2	3
6			Back-house Meadow	3	1	37
7			Blakenham Meadow	2	3	38
8			Old Lay	4	1	4
9			Yards, Buildings, &c.	1	3	11
10			Fore Meadow	3	2	31
11			Pond Pightle	0	3	24
12			Burnt house Field	4	2	8
13			Great Green Field	5	1	28
14			Little Green Field	3	1	2
15			Church Field	7	2	31
16			Mill Pightle	3	0	36
				81	2	32
Roads				0	3	15
Total				82	2	7

Since this Plan was taken an addition of $4\frac{1}{2}$ Acres
was made by Purchase offered by Mr Rodwell 1818

Since the 1881 map, the land area acquired by the estate grew substantially as shown on the below map. On the map BLUE shows the largest reaches of Lovetofts Farm. Yellow is Church Farm, Somersham. Green is Grove Farm, Flowton.



The map shows that the Lovetofts Farm estate extended north and west, and included that of Somersham Park CWS, Monks Cottages (now demolished) and Park Farm, Somersham.

So whilst the architecture of the building is best experienced in close proximity to the south, it is the significance and setting of the farmhouse that are actually best experienced in the wider views to the north and east, where the landholding its wealth was created from can be better seen and appreciated, including the open view across to Park Farm Somersham.

Lovetofts Farm and historic estate land from the east next to Somersham Park



According to Historic England⁷ the setting is “*The surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape.*” It must be noted that the setting is the surroundings in which a place is ‘experienced’ and makes no requirement that you can see the heritage asset in the same view. For example it is not possible to see Stonehenge from all areas of the setting around it, but they are still a significant part of the setting and experience.

⁷ https://historicengland.org.uk/advice/hpg/hpr-definitions/#cat_S

180° view of northern setting of Lovetofts Farm from most easterly point of Somersham Park



The applicant proposes to build directly on this setting, namely fields 2 & 3 of their proposal. There is the obvious change of land use, from rural agricultural use to rural industrial⁸ use, which would adversely impact on the setting of Lovetofts Farm. But also the 3m high solar panels and associated infrastructure would visually sever the connection to Park Farm Somersham, further negatively impacting the setting that allows you to best appreciate the significance of the Grade 2 listed building.

⁸ ES paragraph 7.8.12 and Cultural Heritage Addendum paragraph 7.4.11

Furthermore, the proposed site can be seen from multiple points within the current land ownership and setting of Lovetofts Farmhouse, and the 17th century Grade 2 listed barn at the same residency. The spinney at Lovetofts Farm which the applicant refers to as woodland which will screen the site, is deciduous. The following photos were taken in September when in full leaf. The views out would be even more apparent during the winter months.



Proposed Site



It is interesting to note that the applicant claims the EDF Renewables Solar Farm proposal could have a negative impact on Lovetofts Farm, when that development is not being built on the historic estate lands and cannot be seen from Lovetofts Farm. Yet claims its own development will have no effect on the heritage asset even though it would be visible from, built on, and visually sever the link of the building to its historic setting.

We do not agree with the applicants' conclusion that there would be no effect on the setting and significance of Lovetofts Farm. There would be an adverse effect on the setting and significance of the Grade 2 listed building and this therefore must be considered in the balancing process.

Pile Driving

Whilst not directly related to the heritage assessment, we note that the applicant states the development will be only 54m away from Lovetofts Farm. It is of concern that the shallow foundations of the heritage asset may be damaged by ground vibrations from the pile driving.

St Mary's Church, Flowton

As noted in our previous comments regarding St Mary's Church, Flowton, the impact on the church remains a concern for residents. We agree with the applicant that the architecture of the church is best experienced close up⁹, but then isn't this the case for all architecture?

The assessment by the applicant regarding the church setting¹⁰ though is wholly incorrect, mentioning views from Blood Hill and junctions that are elsewhere in the village, and access tracks which the applicant supposedly scrapped.

The immediate setting of the church is the churchyard, but the wider countryside is also part of the setting, given that the church serves a rural community, is the only public amenity building in the village, and is historically connected to its rural surroundings.

On 14th September 2016 BMSDC wrote to The Planning Inspectorate regarding the DCO for East Anglia Three¹¹. We note that page 7 references St Mary's Church, Flowton. Under *Contribution of Setting to Significance* it states: *"Village" location contributes greatly to setting as does the open land to S."*

Some of this land to the south is the same land that the applicant intends to build on with 3m high solar panels, and large shipping containers with either inverters or storage batteries in. Field 5 of the proposal in particular has an elevation difference of around 50m and is visible from the church grounds even with the mature trees already in place.

Current View of St Mary's Church, Flowton from a regularly used bench in the churchyard: Field 5



There are 4 single track country roads into the "village" of Flowton where St Mary's Church is located. Somersham Road to the north, Tye Lane to the east, The Channel to the south, and Flowton Road to the west. The applicant's proposal would be visible from all four roads. This would lead to a first and last impression of this currently rural agricultural village, and the church that serves it, to that of an industrial site. The applicant itself states their development will change the area from a rural agricultural setting to an industrial development in a rural setting¹².

⁹ Cultural Heritage Addendum paragraph 7.4.11

¹⁰ Cultural Heritage Addendum paragraph 7.4.11

¹¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010056/EN010056-001538-Babergh%20and%20Mid%20Suffolk%20District%20Councils>

¹² ES paragraph 7.8.12 and Cultural Heritage Addendum paragraph 7.4.11

The applicant also attempts to imply that St Mary's Church, Flowton and the development will not be seen in the same view as each other. This is simply not true. If we refer back to the photo above, the far edge of field 5 has a public bridleway running the length of it. The first view of Flowton by walkers from Burstall is along this bridleway.

View of St Mary's Church, Flowton from bridleway along field 5



Further, the appreciation of a church and its setting is not a one directional snap shot view as the applicant tries to make out. The Historic England definition of setting¹³ states that it is an 'experience' as explained above for Lovetofts Farm. An experience is a journey across a multitude of views leading up to, during, and away from a heritage asset. By looking only in one direction, the applicant has failed to appreciate the setting of St Mary's Church, Flowton, and the contribution that open land and a village feeling makes to that setting.

We note that in relation to appeal 3214324 (Poplar Hill, Stowmarket, August 2019) the Planning Inspector was concerned with the harm that would arise to features in the landscape surrounding the appeal site as a consequence of development on the appeal site, stating: *"the appeal proposal would compromise the appreciation of sufficiently impressive examples of other characteristic features of the landscape as to cause an unacceptable effect on the landscape character and appearance of the area. These characteristic features are Combs Wood and St Mary's Church both of which have statutory status and so would qualify the landscape to be regarded as valued, to be protected and enhanced in terms of NPPF paragraph 170(a)."*¹⁴

We do not agree with the applicants' conclusion that there would be no effect on St Mary's Church, Flowton. The valued landscape is the setting for the church, and the church adds to the landscape appeal. There would be an adverse effect on the setting and significance of the Grade 1 listed building, and this therefore must be considered in the balancing process.

¹³ https://historicengland.org.uk/advice/hpg/hpr-definitions/#cat_S

¹⁴ Landscape Institute Technical Guidance Note 02/21 Assessing landscape valued outside national designations

Transport, Access & Security

Transport

Oversized Vehicles

We note that the applicant continues to claim that there will be no oversized vehicles needed to construct or decommission this development.

In Appendix 2 paragraph 1.10 it states *“There will be approximately 45 deliveries for cables (approximately one vehicle per MWp). This includes the delivery of a crane.”*

On 2nd September 2021 we asked the applicant if the battery containers would come fully laden and wired up, or empty with the contents arriving separately to be installed on site. The applicant refused to answer.

From our research the majority of battery containers come fully laden and wired up ready to be connected. These 40ft containers are therefore of a weight requiring a crane to lift them off the HGVs, and position them into place. Due to the off road nature of the ground, this would require a crane of around 60 tonnes. This is an oversized load.

We note that the nearby Anesco application DC/10/01601 for a battery storage site of 40ft containers requires a 60 tonne crane on a 28 metre 110 tonne total weight transporter.¹⁵

At the moment the applicant claims they do not know which battery storage containers they would use. In light of this lack of knowledge, and a similar example demonstrating the need for an oversized vehicle, we would like to see the applicant assess the worst case scenario, and include the provisional need for an oversized vehicle in their application. This would enable a proper assessment to be carried out by the highways authorities and planners, rather than the applicant applying for an amendment later on because all of sudden they do need a large crane.

Highways and Deer

In Appendix 2 in response to the Traffic Management Plan, paragraph 1.5 states *“One of the serious PICs resulted from a driver swerving to avoid a deer in the carriageway.”*

The applicant plans to install deer fencing over 242 acres of open farmland that is currently accessible to the deer. The deer can roam freely across the fields with very little need to cross a public highway. As stated in our previous objection, we are concerned that installing so much fencing will push deer further on to roads.

Roe Deer in field 4



¹⁵ Traffic Management Plan Section 5

Construction Worker Parking

In Appendix 2 paragraph 1.7 states *“At this stage, the exact number of car parking spaces is not known. Based on our experience of working on Solar Farm developments of a similar size, there will be approximately 20-30 parking spaces. This information will be confirmed as part of the final CTMP, which will be secured via a planning condition. No parking will occur on the local highway network.”*

The applicant has never built a solar farm before so it is unclear where this experience comes from. Based on the site map provided by the applicant, no provision has been made for a construction compound, nor does there appear to be space for 20-30 car parking spaces on or near to the site.

The road around the Burstall site access is a single track windy countryside road. If construction worker cars were to park on the roadside and verges because not enough provision was made elsewhere then this would cause congestion, and potentially accidents for other road users, including pedestrians, cyclists, and horse riders.

Information confirming where and how much space will be provided for workers needs to be provided prior to any decision being made, to ensure that vehicles will not park on the public highway and road user safety can be assured.

Cumulative Traffic

In Appendix 2 paragraph 1.9 it states *“Table 5.1 shows that there will be approximately 792 deliveries to the Site (1,584 two-way movements). Solar farm construction follows a ‘just in time’ approach and, as such, deliveries are spread out relatively evenly throughout the construction period. Therefore, during a 40 week construction period (200 working days excluding Saturdays to be robust), there will be around 20 deliveries per week (40 two-way movements), or around four deliveries per day (eight two-way movements). This will fluctuate only slightly on a day-to-day basis. The addition of four deliveries (eight movements) per day will not have a material effect on the operation of the highway network.”*

This is not the only solar farm proposed for this area. There is also an application by EDF Renewables (DC/21/04711) and a proposal by Statkraft (pre-app information available as DC/21/02958). What is the cumulative impact of traffic for three potential solar farms being built all at the same time?

“Tight Road”

Personal Injury Collision ref 16131444 states *“V1(Car) travelling towards Burstall around a nearside bend. V2(Car) travelling in opposing direction. V1 clipped nearside bank causing collision with front offside of V2.”* With a causation of road layout being listed. The report states *“The road is very tight”*

This incident involved two cars. How does this road layout and this collision look between an HGV and a car?

Access & PRow

New Access between fields 1 & 2

In Appendix 2 the applicant includes a diagram for the swept path analysis between fields 1 and 2 which cross Somersham Road. There is currently no crossing or agricultural access here. There is however a ditch along the edge of field 2 here.

There appear to be no details as to how the applicant plans to bridge the ditch from the field to the road sufficiently for a loaded HGV. Will the applicant be filling in the ditch to do so? How will the applicant manage water drainage to prevent it from building up on the road?

At this same crossing the visibility splays do not meet the minimum requirements as set out by the local highways authority for an industrial site (DM04). This requires a speed survey to be submitted to confirm acceptance of a shorter visibility splay, but we could not see any such survey submitted.

The straight line of the swept path analysis suggests the HGVs will not need to be turning at all, but is unclear how this would be possible since the site plan B2.0 Proposed Site Plan Rev10A shows fencing and solar panel areas in the

way of the crossing point. If internal tracks and fencing are some of the first structures to be put in place (for public safety and construction access) the swept path analysis appears to have been created without taking into account the development itself and is therefore misleading.

Furthermore, drawing B2.0 Proposed Site Plan Rev10A does not show any internal access tracks in the vicinity of this new crossing. Nor does it show any crossing at all. Will there be additional internal tracks between those shown in the site plan to bridge the gap between fields 1 & 2 for the crossing shown in the swept path analysis? Will these be retained for the duration of the site ready for decommissioning, or will they be removed and reinstated again during decommissioning?

North to South Access Track

In the pre-application stages the applicant proposed an access track across neighbouring fields to join the north and south parcels of the development together. This was to avoid traffic going through Burstall.

In the application the applicant stated this was not desirable and instead would send traffic through Burstall for the southern parcel of the development.

In the Cultural Heritage Addendum, p 7.4.11 states *"This ZVI is predominantly a result of the proposed access track which passes the church to the west of Blood Hill."* And p7.4.27 states *"though the access track comes within c800 m of the shell summerhouse at Nettlestead Chace."*

We could see no access tracks in the vicinity of these listed buildings. Is the applicant now proposing to reintroduce the north to south access track?

Bridleways

A few of our members are experienced horse owners, riders, and/or trainers even. There are major concerns that the glint and glare from such a proposal would most certainly temporarily blind the horse and rider, which is dangerous to say the least, and to add on top of this moving parts (sudden light reflection and noise) will in most cases spook a horse leading to serious injury to the rider/s and potentially the horses.

Horses and deer fencing don't mix and any serious damage to horses legs and/or feet can result in the animal being destroyed, with unnecessary suffering until a vet is on scene.

The digging being undertaken by the archaeological works on the site recently has already been making some of the horses uneasy. There appears to be no risk assessment by the applicant regarding the glint & glare, and noise during the construction, particularly the pile driving, on horses and horse riders of the bridleways.

Security

Deer Fencing

In Drawing BR6.0 Rev02 Fence & Gate Elevations submitted 18th August 2021 it states *"high-tensile, galvanized steel, plan wire deer fence, 2m height."*

This is not the same as the welded mesh fencing it described in the previous version of this same drawing. The security rating of this new type of fence does not meet the safety requirements of SR3 as requested previously by the Designing Out Crime Officer.

On 2nd September we submitted questions to the agent via BMSDC, including one on the topic of the fencing. The applicant refused to answer.

Without confirmation from the applicant, it must be assumed that this new type of fencing will be used throughout the development, including around high voltage areas such as the battery area and substation. Part 3 of The Electricity Safety, Quality and Continuity Regulations 2002, chapter 11 refers specifically to substations.

"Every generator and distributor shall, for every substation which he owns or operates—

(a) enclose the substation where necessary to prevent, so far as is reasonably practicable, danger or unauthorised access;

(b) enclose any part of the substation, which is open to the air and contains live equipment which is not encased, with a fence or wall not less than 2.4 metres in height to prevent, so far as is reasonably practicable, danger or unauthorised access;”

It is unclear if and how much of the substation will be enclosed within the container, and how much outside of it. The current fencing fails to meet these basic requirements for a substation.

Low Level Stock Fencing

Further in the Application Update One document, in response to SWT it states *“In the event the MSDC and BDC require additional reassurance as to the protection of the skylark mitigation area within the described nature area above, it is suggested that access by walkers is prevented through the provision of a low level stock proof fence alongside the PRow together with an information board explaining the objectives of the nature area.”*

There are no drawings supplied for a low level stock proof fence. Without this is information confirmation of adequate security, and other implications such as landscape and biodiversity impact cannot be adequately assessed.

Biodiversity

Great Crested Newt

In the Application Update One response to Suffolk Wildlife Trust the applicant states *“Neutral Grassland with Wildflowers and Scrub: Those parts of this grassland type that are within 50m of ponds known to be used by great crested newt will be cut in late summer at an elevated height of 100mm. Tussocky Grassland With Wildflowers: This grassland type will be cut in late summer (after the skylark breeding season has finished) at an elevated height of 100mm every two years.”*

We would appreciate a commitment from the applicant which states the exact months of the year they are referring to, rather than late summer.

We would also like to see a commitment from the applicant that ALL ponds and their surrounding areas be treated the same as those currently identified for GCN. This would automatically protect GCN should they migrate to these ponds during the life of the development, and it would create suitable habitat that might encourage such migration.

Nature Area for Ground Nesting Birds near Somersham Park

In the Application Update One response to Suffolk Wildlife Trust the applicant states *“Only one area has the combination of being outside the fenced solar array, with recreational access and a low density of planted trees, this being the nature area to the south east of Somersham Park woodland. To provide for safe nesting areas for skylark in this particular nature area the LEMP describes the rotational cutting every second year that will minimise inadvertent disturbance. The management, as described in Paragraph 4.3.3.5, will mean that the nature area will not be a smooth surface over which there might be total public access but have areas of short grass that are ‘desire’ lines through which the public can walk and longer, tussocky grass that will act as a natural deterrent to people and provide secure nesting sites for birds.”*

We note that the applicant makes no mention of how often, what method, and when will the ‘desire’ lines be cut in order to protect any ground nesting birds already on site.

It is also of note that a lot of walkers in the area have dogs or young children. “Desire” lines do not typically deter dogs and young children from disturbing the longer tussocky grass areas.

We also note there is a conflict between the applicant’s intentions for this area. Whilst up until now they have stated this would be a nature area for the public to *“improve recreational amenity for users of the PRow”* they also state that *“In the event the MSDC and BDC require additional reassurance as to the protection of the skylark mitigation area within the described nature area above, it is suggested that access by walkers is prevented through the provision of a low level stock proof fence alongside the PRow together with an information board explaining the objectives of the nature area.”*

This is confusing and we would like to see the applicant make a commitment to one or the other.

Lighting

In the Application Update One document the applicant's response by AEM states *"In the event planning permission is granted, a planning condition could be applied requiring the submission of a CEMP that will include a description of the measures taken to avoid adverse impacts from light during the temporary construction period. This would include avoiding light spill on to natural features such as hedgerows and the adjacent Somersham Park CWS (that is outside the Proposed Development boundary)."*

In previous documents the applicant has clearly stated that there would be no lighting on site during the construction phase, operational phase, nor decommissioning phase. This area is a dark skies area, and the Government PPG on light pollution states *"It can be a source of annoyance to people, harmful to wildlife and undermine enjoyment of the countryside or the night sky, especially in areas with intrinsically dark landscapes. Intrinsically dark landscapes are those entirely, or largely, uninterrupted by artificial light."*

Further it states *"In particular, lighting schemes for developments in protected areas of dark sky or intrinsically dark landscapes need to be carefully assessed as to their necessity and degree."* And that *"Glare needs to be avoided, particularly for safety reasons."*

Without any information regarding the new mention of lighting, the impact cannot be assessed adequately before any decision is made.

Cumulative Impact

We note that the applicant fails to adequately assess the cumulative impact of the proposal and other proposals nearby. Whilst they appear to make a cursory mention of the pylons and nearby EDF Renewables Tye Lane Solar Farm, they make no mention of the Statkraft Greybarn Solar Farm, which is immediately adjacent to the southern parcel of their proposed development.

We would like to see a Cumulative Zone of Theoretical Visibility Map that includes all three solar farm applications, along with visualisations for the southern parcel of land which assesses the cumulative impact of Statkraft Greybarn Solar Farm.

Public Safety

In application DC/18/03114 by Hopkins Homes in Somersham a public highway safety issue was raised prior to the decision being made. It was decided that a solution to this could be dealt with as a planning condition, and the application was granted approval. However, when the options for resolving the safety issue were presented, as discussed during the Somersham Parish Council Meeting on 3rd February 2021, none of the options were able to meet public safety standards and the development therefore failed to meet planning regulations.

It is concerning that the applicant appears to be refusing to provide full information prior to a decision. Instead claiming that some of these are under Associated Permitted Development Rights or that they will only provide it as a condition, once planning permission has been granted. For example Construction Environmental Management Plan, Construction Traffic Management Plan, Emergency Response Plan, Grazing Management Plan, Site Waste Management Plan, Decommissioning Plan, etc.

We are concerned that many of the finer details will not be aligned with the general information given by the applicant so far, and that a lot of changes would come about as a result that, if known prior to decision, would have affected the outcome.

Whilst the construction phase, decommissioning phase, and even operational phase, of the application are all cited to be temporary. Injury, or even death, caused by an incident occurring directly as a result of the development is anything but temporary.

We hereby ask that all details regarding the development that could give rise to a public safety issue are thoroughly addressed prior to any decision being made. This is a full planning application, not an outline application which the applicant appears to be treating it as. Without the various options being known prior to a decision, it is not guaranteed that a safe option that meets the current regulations can even be achieved, and therefore potentially putting public safety in danger.