

# BRAMFORD

## PARISH COUNCIL



Bramford Parish Council, The Parish Room, Ship Lane, Bramford, Suffolk, IP8 4AN  
Tel: 01473 747433 e-mail: [bramfordparishcouncil@btinternet.com](mailto:bramfordparishcouncil@btinternet.com) [www.bramford.suffolk.cloud](http://www.bramford.suffolk.cloud)

DC/21/05468 | Full Planning Application - Construction and operation of a 100MW Battery Energy Storage System, and related infrastructure with associated access, landscaping and drainage. | Land To The South Of Bullen Lane Bramford Suffolk IP8

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### **Bramford Parish Council wishes to object on the Full Planning Application in response to the re-consultation.**

Bramford Parish Council and its residents have expressed extreme concerns regarding the safety aspect of this battery storage system. With recent publications showing insufficient safety features and catastrophic repercussions if this storage site overheats and ignites.

Our previous concerns in our objection of 25<sup>th</sup> October 2021 still stand, along with our support for the report from Care Suffolk at that time. We also support Care Suffolk's recent objection dated 22<sup>nd</sup> March 2022 and we wish to include the facts and data from there report in our objection. We, Bramford Parish Council fully support the document and its contents.

We were greatly concerned that representatives from Cambridge Power had not seen the reports from MFRS. As a result, the application has not been completed with all the relevant information, and not covered safety concerns. We appreciate it is a recent report only published this month, but essential to their work and this application.

### **Battery Risk and Safety**

This subject still causes our residents the most concern. Recent publication of the Significant Incident Report by Merseyside Fire and Rescue Services justifies our response to this application and the lack of battery safety systems in place to ensure we do not have a major fire and chemical event in the air, soil and water table.

There are no standard UK safety regulations on large scale BESS such as this application, therefore we request the evidence available in the mentioned report must be considered. As a result, this application must be refused until further information is available to reassure people of the safety of these projects. This is supported by NPPF Para 97.

Hazardous materials have not been declared on the current application form; however, it is apparent that the batteries themselves are such a hazardous material and the chemical changes in these batteries when they go into thermal runaway generate flammable and explosive hydrocarbons, carbon monoxide, and carbon dioxide. The incident at Merseyside clearly shows how this event can escalate causing an ignition of these gases leading to explosion and fire. We must ensure the relevant bodies are consulted on this application under the Hazardous Substances Regulations 2015 to ensure public safety.

We also wish to bring to your attention the use of Blast Walls, concerns regarding lack of upwind access that apparently is not possible, yet essential for emergency workers to manage an event if one were to occur.

Lack of water connections at the site will make it difficult for emergency workers to manage a fire, as mentioned in MFRS report. Water feed supplies were insufficient at this event and must not be repeated in Bramford.

### **Water Contamination**

This site lies atop a drinking water protection zone and feeds the River Gipping. If a contamination event did occur this would feed into our water supply. Residents are concerned regarding this and question if this is the correct site for this project for this reason alone.

### **Agricultural Land**

The land identified for this project is currently in agricultural use and is listed as grade 2 Best and Most Versatile Land. It is typically afforded greater protection from development compared to lower grades within policy CL11 of the Local Plan 1998 to encourage the conservation of the BMV land.

### **Transport**

Size of vehicles and site access has still not been addressed from concerns raised in previous objections.

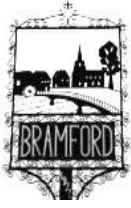
### **Noise**

The Noise Impact Assessment remains unreliable, as it does not take into account developments already granted but not yet complete. Therefore, the data cannot show what noise levels will be when combined with DC/19/03008 and DC/19/00046. Baseline readings provided are therefore unreliable therefore the report is not valid.

Bramford Parish Council hope to see amended detailed plans shortly of a safer application for this project. If systems proposed have failed causing a catastrophic event in another area and reports are available showing how we can prevent such an event happening, or at least be able to manage it effectively and safely for our emergency workers and residents we must act on that information. It is not acceptable to have this information and not take action, we hope no such event would occur, but it has, and we cannot ignore that fact. It has been raised here by us and Care Suffolk and we must act on it, as quoted by Deputy Fire Safety Commissioner *'if we know some things could fail catastrophically or it could have those effects, it is going to be a difficult day in court saying we knew about it but we didn't do anything'*

*Jane Every*

*Parish Clerk to Bramford Parish Council.*



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Tel: 01473 747433 e-mail: [bramfordparishcouncil@btinternet.com](mailto:bramfordparishcouncil@btinternet.com)

FAO Ms Bron Curtis  
Babergh and Mid Suffolk District Council  
Endeavour House  
Ipswich IP1 2BX  
[planninggreen@midsuffolk.gov.uk](mailto:planninggreen@midsuffolk.gov.uk)

25<sup>th</sup> October 2021

Dear Bron,

### **APPLICATION FOR PLANNING PERMISSION - DC/21/05468**

**Proposal: Full Planning Application - Construction and operation of a 100MW Battery Energy Storage System, and related infrastructure with associated access, landscaping and drainage.**  
**Location: Land To The South Of, Bullen Lane, Bramford, Suffolk IP8 4JD**

Bramford Parish Council would like to request a **Holding Objection** because we have received insufficient information about the exact chemistry of the proposed battery system. We understand that some storage configurations can be prone to overheat and trigger a thermal runaway. The fire brigade has said that they would not be able to put out fires caused by this and the recommended action is to leave the fire to burn out. The meltdown from the burned batteries could easily seep into the ground and reach the water table, which is in this case is a main water supply for Ipswich.

Furthermore we need to know what, if any, would be the aftereffects (however unlikely) of a thermal runaway on this site and what are the plans for the mitigation of toxic gas from such an incident being dispersed over the neighbouring countryside and the village of Bramford.

Neil Waterstone, Senior Planning and Claire Norris, Engagement Manager of Pigeon Investment Planning, told us that these questions would be answered in good time before the 26th October, following from the comments made during the Bramford Parish Council Meeting held on the 20th September, but we have not heard from either as yet.

Also, for the sake of repetition we will not be reiterating all the information, but to submit the same information as it is completely in tune with our comments, so we would also like to bring you and the planning committees' attention to the attached document from CARE Suffolk.

Parish Clerk on behalf of Bramford Parish Council.

Dear Ms. Curtis,

**Ref: DC/21/05468** Full Planning Application - Construction and operation of a 100MW Battery Energy Storage System, and related infrastructure with associated access, landscaping and drainage. Land to the South of Bullen Lane Bramford, Suffolk, IP8 4JD.

I am writing to you on behalf of CARE Suffolk regarding the above Planning Application in response to a number of requests and concerns from local residents and members of our community group.

We wish to submit our **OBJECTION** to the above application for the reasons of:

- Presence of significant likely effects should make it an EIA Development
- Poor battery safety, and subsequent risk to public health
- Significant noise impact
- Use of BMV agricultural land

The attached report explains in more detail the reasoning and conclusions of the above objections (Chapters 1 – 4).

The report also details a few other concerns that were raised and some areas of common ground (Chapter 5). These concerns could reasonably be overcome if additional information were supplied by the applicant.

However, we do not feel the objections in Chapters 1 - 4 can be overcome, and that the Council should **REFUSE** the application.

Yours Sincerely,

Samantha Main  
Chair, CARE Suffolk

# CARE Suffolk Report for DC/21/05468

Full Planning Application - Construction and operation of a 100MW Battery Energy Storage System, and related infrastructure with associated access, landscaping and drainage.

Land To The South Of Bullen Lane Bramford Suffolk IP8 4JD

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## 1. EIA Development

- 1.1 We are concerned that the development was not submitted to the LPA for EIA Screening, and that this is because the clients assessment determined there would no significant adverse impacts from the development. They do not appear to have sought the opinion of the Council who would be more aware of local issues and impacts, and therefore the significance of them.
- 1.2 Under p 8.3 of the Design and Access Statement:  
***“Consideration of Likely Effects***  
***Characteristics of the Proposed Development***  
***The Regulations require that the characteristics of the Proposed Development must be considered with particular regard to:***
  - b) cumulation with other existing development and/or approved development;***
  - e) pollution and nuisances;***
  - f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge; and***
  - g) the risks to human health (for example, due to water contamination or air pollution)”***
- 1.3 There are a significant number of existing, approved, and proposed industrial developments in what is supposed to be a rural agricultural area. The applicant has made no attempt to assess the cumulative effect of their development in combination with these developments, and so cannot rule out a significant cumulative impact.
- 1.4 The applicant’s noise assessment is flawed and as such we believe there is potential for significant noise pollution, as discussed in the Noise chapter of this report.
- 1.5 There are significant concerns regarding the safety of lithium-ion type batteries, based on real world events and scientific knowledge, and the devastating impact this would have on pollution and human health. This is explained in the Battery Risk chapter of this report, and we do not agree with the applicant’s methodology to dismiss this and arrive at their conclusion of no significant impact.
- 1.6 Other recent proposals for energy generation in the area, which include battery storage, have been screened by the Council to be EIA Development (DC/20/05895, DC/21/00060, DC/21/04711, and DC/21/02958).
- 1.7 We do not agree with the applicant’s conclusion that there are no potential significant impacts to exclude it from EIA Screening, and as such this should be reviewed by the Council.

## 2. Battery Risk

2.1 There are many concerns relating to the safety of battery storage systems, such as:

- a) Risk of fire & explosion
- b) Risk of toxic gas production from lithium-ion batteries
- c) Risk of contaminated water run-off into the environment and specifically the local drinking water supply
- d) Risk to operations at nearby Bramford Substation

2.2 In terms of safety, the applicant appears to rely on an entirely irrelevant assessment. The Battery Safety Note states:

*"It should also be noted that the issue of safety risks associated with BESS facilities was examined extensively as part of the Cleve Hill Solar Park DCO Examination in 2019 with the Examiners concluding that: "Overall, we are confident that risk will be managed and mitigated through the safeguards and checks during final design, installation and thereafter in operation."*

*"Having thoroughly examined public concerns about the safety of the battery energy storage system, we are satisfied that, by the close of the Examination, the Applicant has provided sound and enforceable basis of managing and mitigating safety risks and there is no compelling evidence to the contrary."*

*These conclusions were subsequently endorsed by the Secretary of State for Business, Energy and Industrial Strategy (BEIS) in issuing the DCO in May 2020."*

2.3 The batteries being used here are lithium-ion based, the same as the Cleve Hill Solar Park. However, this is where the similarities end. The specific chemistry, supplier, on-site setup, and suppression systems used are not the same. And so reliance on the DCO decision that determined the batteries at Cleve Hill are safe to an acceptable level, cannot be automatically transferred to the batteries in this development. This is like teaching a child that a domestic tabby is a cat and is safe, and then saying that a tiger is a cat and is therefore also safe.

### *Over Reliance on Fire Suppression*

2.4 The applicant appears to rely on a fire suppression system within the container, including a video showing suppression of a fire in 3 single cell batteries.

2.5 The onsite fire suppression system in the Arizona BESS fire and explosion in 2019 *"worked as designed, but it was inadequate to prevent or stop the cascading thermal runaway."*<sup>1</sup>

2.6 The investigator for the fire and explosion event at a Liverpool BESS fire in September 2020 stated *"Although there was a fire suppression system in the container, the speed of propagation indicated that this hadn't activated. It was thought that activation would have had little or no effect on the resultant fire/explosion."*

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<sup>1</sup> Hazard Assessment of Battery Energy Storage Systems By Ian Lines, Atkins Ltd, which was commissioned by HSENI

2.7 Further, a study by Diaz et al (2020)<sup>2</sup> noted that the majority of fire safety research has considered only single cells, and there is much less safety information relating to larger scale fires involving pack, modules, or large numbers of cells. The applicant themselves notes that this test does not consider a full battery cabinet.<sup>3</sup>

#### *Risk of Toxic Gases*

2.8 It is well established from catastrophic battery fire events that fire and explosion are a usual feature and that large quantities of toxic smoke and gas (namely hydrogen fluoride) are emitted into the air. Breathing this gas can damage lung tissue and cause swelling and fluid accumulation in the lungs (pulmonary oedema). Skin contact with hydrogen fluoride may cause severe burns that develop after several hours and form skin ulcers.<sup>4</sup>

2.9 A published paper by Larsson, Andersson, Blomqvist and Mellander (2017)<sup>5</sup> provides a useful study of toxic fluoride emissions from lithium-ion battery fires, concluding that *“the emission of toxic gases can be a larger threat than the heat”* and *“the release of hydrogen fluoride from a Li-ion battery fire can therefore be a severe risk”*.

2.10 This was reinforced more recently on 30<sup>th</sup> July 2021 by Fire Officers in Australia when a fire broke out in a new battery storage unit that was still being built.<sup>6</sup>

2.11 A potential dispersal zone of these gases is shown in Diagram 1 below. Red circles represent the area based on 10mph, 20mph, and 30mph winds. The arrow shows the prevailing wind direction. The final dispersion zone and direction would further be affected by relative humidity, temperature, atmospheric stability, and the mixing height.

#### **Diagram 1: Potential Dispersal Zone**

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<sup>2</sup> Diaz, L.B., He, X., Hu, Z., Restuccia, F., Marinescu, M., Barreras, J.V., Patel, Y., Offer, G. and Rein, G., 'Review – Meta-Review of Fire Safety of Lithium-Ion Batteries: Industry Challenges and Research Contributions', Journal of The Electrochemical Society, Vol. 167, 2020.

<https://iopscience.iop.org/article/10.1149/1945-7111/aba8b9/pdf>

<sup>3</sup> Battery Safety Note p.5

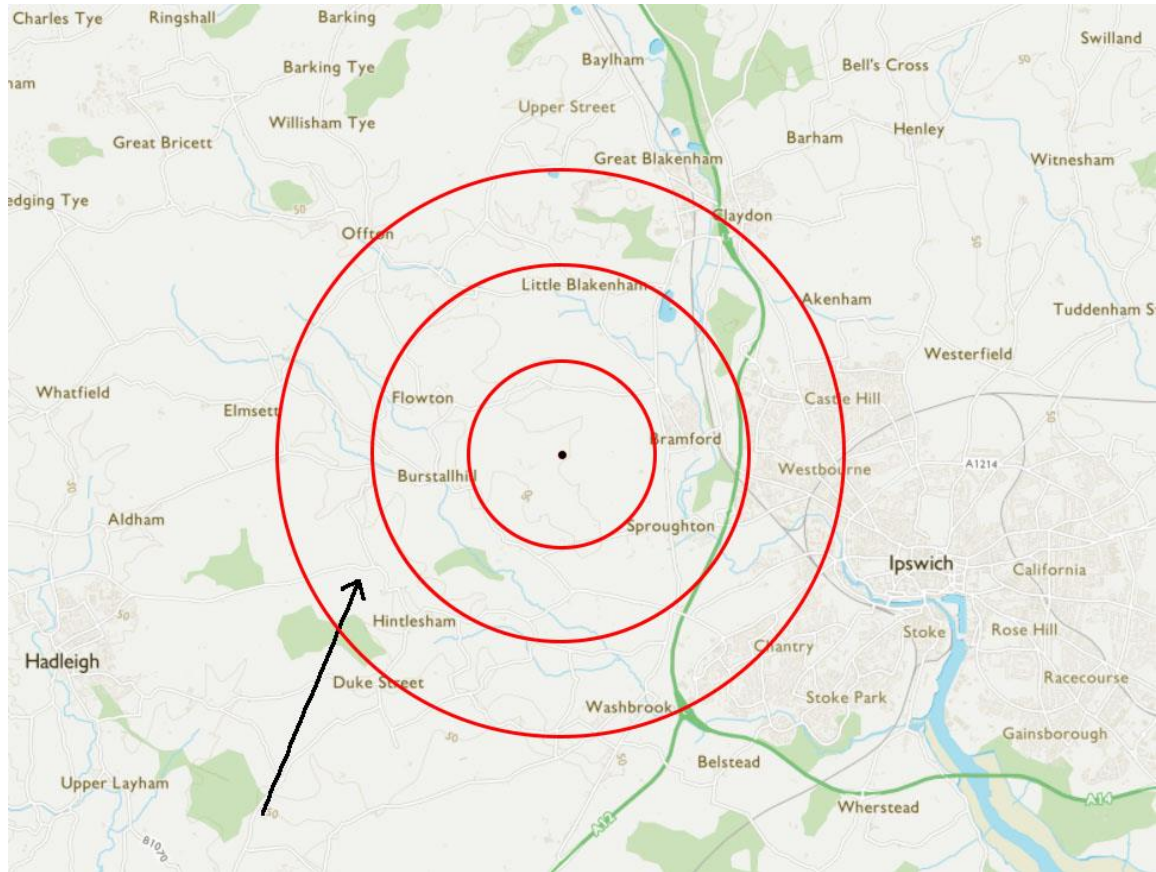
<sup>4</sup> <https://emergency.cdc.gov/agent/hydrofluoricacid/basics/facts.asp>

<sup>5</sup> Larsson, F., Andersson, P., Blomqvist P. and Mellander, B, 'Toxic Fluoride Emissions from Lithium-Ion Battery Fires', Nature, Scientific Reports, Volume 7, Article 10018, 20 August 2017.

<https://www.nature.com/articles/s41598-017-09784-z.pdf>

<sup>6</sup> <https://www.abc.net.au/news/2021-07-30/tesla-battery-fire-moorabool-geelong/100337488>





### *Risk of Groundwater Contamination*

- 2.12 Thermal runaway, which is the primary concern for failure in a BESS, needs huge amounts of water to suppress it, but there is no water supply on, nearby, or proposed to be connected to the site.
- 2.13 An additional point to note from the Liverpool BESS report was that the fire water was collected in tanks on site. This allowed the contaminated water to be disposed of correctly. No such tanks have been included in this application.
- 2.14 The large quantities of fire-water, which will be contaminated with heavy metals and other chemical residues, need to be prevented from release into the environment by collection on site followed by licensed removal. They should not be allowed into the proposed detention basin for discharge into the local ditch system, which supplies a local drinking water aquifer. NPPF paragraphs 174a & e and 185 are relevant here.

### *Risk to Major Infrastructure*

- 2.15 We are also surprised that the security and safety of Bramford Substation is not of greater concern.
- 2.16 When there were some previous threats several years ago, the compound for the UKPN control centre in Ipswich was fortified to the extent that incoming vehicles were locked into an entrance system while they were checked. This procedure is still in place. Yet at Bramford Substation you can get surprisingly close to switchgear on the south side.

2.17 On 15<sup>th</sup> September 2021<sup>7</sup> a fire broke out near a major interconnector between the UK and France, that supplies up to 2GW of electricity to the UK. Bramford Substation transfers up to 20% of the entire UK's electricity consumption, making it a major infrastructure feature in the ability of the UK to basically function. If a fire were to break out near to the Bramford Substation this could have catastrophic consequences for the sustainability of the UK's electricity supply. NPPF paragraph 97 is relevant here.

### Conclusion

2.18 We highlight for you the industry's Energy Storage Summit 2021 held 2nd March 2021 which reports on fire safety issues at BESS, including a call to retrofit newly constructed BESSs:

*"Re-examining and retrofitting older, potentially hazardous battery storage systems should be an "essential" part of preventing harm, according to a panel of industry leaders."*

2.19 At this conference, the Deputy Fire Safety Commissioner of the London Fire Brigade, Charlie Pugsley, asked why battery storage owners would "not want to apply a retrospective look" to their sites if they believe the older technology could carry a safety risk. He was very clear when he stated:

*"If you've got foreseeable events or got systems with the potential to either harm people or harm the environment, why would you not want to apply a retrospective look to it, to actually see that it's safe, or anything can be done."*

2.20 Energy Storage News reported that he went on to state that the London Fire Brigade has spent the past few years "reflecting on what was foreseeable" since the tragic Grenfell Tower fire at a high-rise housing unit in 2017, which was exacerbated by the building's flammable cladding:

***"If we know some things could fail catastrophically or it could have those effects," he said, "it's going to be a difficult day if one of us is standing there in court saying we knew about it but we didn't do anything."***<sup>8</sup>

2.21 While aimed at buildings, the principle behind the new Building Safety Bill, is that there was a flaw in the old system, with appalling results. We acknowledge that there is little in the planning system specifically regarding large-scale BESS safety, and the applicant states several times that planning legislation for BESS is far behind the technology and implementation of it. A flaw in the planning system, which could have appalling results.

2.22 The applicant must demonstrate that the particular technology used in the proposed development is safe to an acceptable level. They have not done so, and based on the evidence available any incident at this location would be appalling.

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<sup>7</sup> <https://www.bbc.co.uk/news/uk-england-kent-58570893>

<sup>8</sup> <https://www.energy-storage.news/news/retrofitting-could-be-essential-for-battery-storage-system-safety>

### 3. Noise

- 3.1 The noise from the development was assessed using BS4142:2014+A1:2019 guidelines, and uses measured readings taken between 13:00 Thursday 18th February to 08:00 Tuesday 23rd February 2021 (p.3.1.1). The predicted or specific noise levels from the development (red area on Image 1 below) were then calculated and compared with the typical background noise level at Bullen Hall Farmhouse (the nearest residential receptor and blue area on Image 1 below).
- 3.2 At paragraph 2.2.10 the applicant states “this Assessment will ensure that the predicted rating level (specific sound level including any character corrections) does not exceed 30dB in bedrooms.”
- 3.3 Under regulations BS4142:2014+A1:2019, the measured noise levels must be reliable. This is where the noise report is fundamentally flawed, as follows:
- a) Another BESS (DC/19/03008 and yellow area on Image 1 below) was granted planning permission for the field immediately west of the site, but it is not yet built. Because it is not yet built the noise levels from this development are not in the measured recordings. But they have also not been taken into account when forecasting the new noise levels.
  - b) A gas generation system (DC/19/00046 and green area on Image 1 below) is also approved for a field opposite Bullen Lane, but is only partially constructed and as such not yet operating. Because it is not yet operating the noise levels from this development are not in the measured recordings. But they have also not been taken into account when forecasting the new noise levels.

**Image 1**



- 3.4 The measured readings used as the basis for the noise report are therefore not reliable as a baseline.
- 3.5 Furthermore, the settings used to calculate the specific sound levels are not in alignment with the proposed design:
- a) It seems that no noise level data has been supplied for the 28 x battery racks on site. It is not clear if these racks do or do not produce sound. This needs to be clarified, and if so, need to be considered in the assessment.
  
  - b) P 4.1.3 states the:
    - *“132kv Transformer has been inputted as a point source at 6m above ground level with provided power level of 78dB Lw,A , this assumes that the sound source is omitting from the top of the transformer”* however the transformer elevations show a height of 6.5m.
    - *“fourteen 33kv transformers have been inputted as point sources at a height of 2.5m above ground level to account for a worst-case scenario whereby the main noise source is generated from the top of the plant with a power level of 48dB Lw,A”* however the transformer elevations show a height of 6.5m.
- 3.6 Also it is confusing that at paragraph 4.1.4 the applicant states *“Figures 1 and 2 in Appendix 4 details the grid noise map during the daytime and night-time periods respectively. Analysis of the grid noise map indicates that the specific noise level at the receptor is as follows: R1 – Bullen Farm: 30.0dB LAeq,1hr (Daytime) and 35.7dB LAeq,15mins (Night-time);”* but these are not the figures they carry forward to Table 6 which suddenly becomes 25.7 and 27.1 respectively.
- 3.7 Based on the unreliability of the measured readings, the flaws in the noise sources outlined above, and the unexplained change in readings described above, it would seem that the noise report is not fit for purpose and does not confirm that the noise levels meet the guidelines.
- 3.8 Considering the cumulative impact of noise and development in the area still to be added, it seems likely that this new proposal would cause night time noise levels at Bullen Hall Farmhouse (blue area on Image 1 above) to exceed the 30dB threshold for night time bedroom noise.
- 3.9 Furthermore, we note that the noise maps demonstrate a significant adverse impact of noise levels of the PRow footpath Bramford 43 to the east of the site, as well as nearby PRow footpaths Bramford 44 and Bramford 47, and Bramford Bridleway 1. Footpaths are well-used in the area, and it is commonly held that a network of enjoyable footpaths in the countryside are beneficial to the health and wellbeing of residents and visitors alike. A pleasant and enjoyable PRow network is supported by many policies in the NPPF. Turning the footpath into a significantly noisy area is likely to deter users, and would be in conflict with several policies in the NPPF that typically serve to ‘protect and enhance’, and the NPPF overarching social objective – *“to support strong, vibrant and healthy communities,.. and by fostering well-designed, beautiful and safe places, with*

*accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;*<sup>9</sup>.

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<sup>9</sup> NPPF 2021 p.8

## 4. Agricultural Land

- 4.1 The land is currently in agricultural use, and is listed by Natural England as grade 2 land. Grade 2 land is also known as Best and Most Versatile Land, and is typically afforded greater protection from development compared to lower grades of 3b, 4, and 5, such as within policy CL11 of the Local Plan 1998 to encourage the conservation of the best and most versatile agricultural land, namely Grades 1, 2 and 3a.
- 4.2 Based entirely on the Natural England ALC map for East Anglia the applicant concludes that all land in the vicinity of the substation is grade 2 land and that *“There is therefore no land of a lower grade in the vicinity of the sub-station.”*
- 4.3 Based on other recent applications in the area (DC/20/05895, DC/21/00060, DC/21/04711, and DC/21/02958) we know this is not accurate. Whilst the majority of it is indeed BMV land, it is not all BMV land.
- 4.4 As such, the proposed development does not comply with the aims of policy CL11.



## 5. Additional Concerns and Common Ground

### 5.1. Transport

- 5.1.1 We note there is no easy turning area for the emergency services, particularly in the event of an incident.
- 5.1.2 We note that the swept path analysis shows access for a 12m rigid vehicle. And this looks tight. The client storage room is 12m in length by itself, so will need a larger articulated HGV. These are around 16.5m. How will the client storage rooms arrive safely on site? Policy T10 of the Local Plan 1998 sets out that the Council will give consideration to the provision of **safe access** [our emphasis]; the suitability of existing roads; the amount and type of traffic generated by the development; and the provision of parking and turning areas. We do not contend that Bullen Lane road is unsuitable for HGV traffic nor the amount proposed for the development, but the angle of the proposed site access does not appear to be safe for **all** the traffic that will need to use it and this needs to be reassessed prior to any decision being made.
- 5.1.3 There is nothing to state the size or weight of the three cranes needed, nor the vehicles that will deliver them. Confirmation should be sought that these will not be exceptional loads, and that there is safe access to the site for the vehicles delivering them in line with our concern above about HGVs.

### 5.2. Heritage

- 5.2.1 With the landscaping mitigation proposed, we do not consider the site would have a significant adverse impact on any nearby listed heritage assets or their settings, namely the Grade 2 listed Bullen Hall Farmhouse.
- 5.2.2 However, there are concerns regarding archaeological impact and the findings of significant archaeological potential on the site. Without conducting an archaeological investigation prior to a decision, the Council cannot determine if the development would have a significant impact on archaeology. In such cases there is a risk that if planning permission is granted for a proposal lacking in detail, significant adverse environmental impacts may only be identified at the discharge of conditions stage when the authority is powerless to go back on the principle of the development already approved, and so cannot prevent it from taking place. A decision to defer the evaluation of a significant adverse effect and any mitigation thereof to a later stage may therefore be unlawful (*R v Rochdale Metropolitan Borough Council ex parte Tew* [2000] Env. L.R. 1, 28-31).
- 5.2.3 In the case of the permission for the neighbouring site (DC/19/03008) this does not preclude the Council from its duty to properly assess the impacts from the proposed development.

### 5.3. Landscape Character and Visual Impact

- 5.3.1 The site proposed will be industrial in nature, and therefore in conflict with the Ancient Plateau Claylands LCT of the area. In the first few years this would have an adverse impact on the landscape character and visual impact. However, with the

landscaping mitigation proposed and the proximity to already wooded areas, we do not consider this would be significant, and this would reduce in time as the planting matures.

5.3.2 The addition of hedging and trees along the PRow Bramford Footpath 43 does reduce the visual amenity appreciated by users in that the openness of the countryside would be lost. Views are currently available in both directions along part of this footpath. However, as the hedging is only on one side of the footpath and does not create a sense of enclosure on both sides, and the wider views to the south east will remain open, we do not consider this to be a significant impact.

#### 5.4. Ecology

5.4.1 In general we have no concerns relating to the ecology plan of the site, and despite the lack of a Biodiversity Net Gain Matrix to demonstrate a measurable net gain, we agree that there is likely to be a net gain in habitat due to the planting proposed. If the Council were minded to approve the application, we ask that a condition be imposed that secures the planting proposed with management for the entire duration of the scheme.

5.4.2 However, we do not believe the enhancement in 6.12 to *“Provide connectivity around the scheme boundary where currently there is open arable farmland”* is relevant since the planting around the boundary does not connect to anything.

5.4.3 We do have two concerns which we believe the Council should seek clarification on prior to determination if they were minded to approve the application:

- a) The applicant states the planting would be retained at the end of the 40 year period. If this were to happen the land would not be able to return to agricultural use as there would be scrub, hedges, and trees in the way. If it is not removed, then surely the applicant should also be seeking a change of land use.
- b) The high noise levels from equipment proposed is likely to deter wildlife from using the new habitat. Policy CL08 of the Local Plan 1998 which protects habitats and biodiversity from development which might give rise to its loss or harm may apply here. The Council should seek further information from the applicant as to how this noise is to likely cause an adverse impact for wildlife in the area.

#### 5.5. Grid Connection Rights

5.5.1 We ask that the Council obtain evidence to satisfy itself that the applicant has indeed secured a grid connection and the date of connection, since there appears to be no public way of confirming this claim and no evidence has been provided in the application.

#### 5.6. Miscellaneous

5.6.1 The Industrial Land Use Map indicates that there are no underground electricity cables nor gas pipelines in the area. This is incorrect and should be updated accordingly. There are underground electricity cables for the EA1 and EA3 developments, and there are at least two high pressure gas mains with Cadent, both within the scope of the map displayed.





Burstall Parish Council  
24 Church Crescent  
Sproughton  
IP8 3BJ

Mid Suffolk District Council  
Planning

Sent by email

22 March 2022

Dear Bron

**Planning Application DC/21/05468: FPA**

Burstall Parish Council hereby submits a further recommendation of objection to planning application DC/21/05468 and would ask that you refer to our original submission of 2 November 2021.

Despite our observations that some updates to the safety features of the site have been made, we believe these continue to be insufficient.

Yours sincerely,

*Mrs S Frankis*

Mrs Susan Frankis

Clerk to the Parish of Burstall



**From:** BMSDC Planning Area Team Green <planninggreen@babberghmidsuffolk.gov.uk>

**Sent:** 10 Mar 2022 11:16:57

**To:**

**Cc:**

**Subject:** FW: DC/21/05468 NE Response

**Attachments:** ufm42\_Standard\_Re-consultation\_Letter.pdf, 371037 NE Letter Response (SSSI No Comment).pdf

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**From:** SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>

**Sent:** 09 March 2022 15:11

**To:** BMSDC Planning Area Team Green <planninggreen@babberghmidsuffolk.gov.uk>

**Subject:** DC/21/05468 NE Response



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Dear Sir or Madam,

Our ref: 385391

Your ref: DC/21/05468

Thank you for your consultation.

Natural England has previously commented on this proposal and made comments to the authority in our letter dated 19 October 2021 (Ref. 371037)

The advice provided in our previous response applies equally to this **amendment** although we made no objection to the original proposal.

The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which **significantly** affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Yours faithfully

Oli Chenkin

Natural England

Consultation Service

Hornbeam House

Crewe Business Park, Electra Way,

Crewe, Cheshire, CW1 6GJ

**Email:** [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)

**[www.gov.uk/natural-england](http://www.gov.uk/natural-england)**

Thriving Nature  
for people and planet



Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of

**environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.**

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

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-----Original Message-----

From: [planninggreen@baberghmidsuffolk.gov.uk](mailto:planninggreen@baberghmidsuffolk.gov.uk) <[planninggreen@baberghmidsuffolk.gov.uk](mailto:planninggreen@baberghmidsuffolk.gov.uk)>

Sent: 02 March 2022 13:29

To: SM-NE-Consultations (NE) <[consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)>

Subject: MSDC Planning Re-consultation Request - DC/21/05468 - FUL

Please find attached planning re-consultation request letter relating to planning application - DC/21/05468 - Land To The South Of, Bullen Lane, Bramford, Suffolk IP8 4JD

Kind Regards

Planning Support Team

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Date: 19 October 2021  
Our ref: 371037  
Your ref: DC/21/05468



Bron Curtis  
Mid Suffolk District Council  
[planninggreen@baberghmidsuffolk.gov.uk](mailto:planninggreen@baberghmidsuffolk.gov.uk)

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

T 0300 060 3900

**BY EMAIL ONLY**

Dear Ms Curtis

**Planning consultation:** Full Planning Application - Construction and operation of a 100MW Battery Energy Storage System, and related infrastructure with associated access, landscaping and drainage.

**Location:** Land To The South Of Bullen Lane Bramford Suffolk IP8 4JD

Thank you for your consultation on the above dated 06 October 2021 which was received by Natural England on 06 October 2021

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.

#### **SUMMARY OF NATURAL ENGLAND'S ADVICE**

##### **NO OBJECTION**

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

#### **Sites of Special Scientific Interest**

Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development.

#### **Sites of Special Scientific Interest Impact Risk Zones**

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the [data.gov.uk](https://data.gov.uk) website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Joe Thorpe  
Consultations Team

## Annex A – Additional advice

Natural England offers the following additional advice:

### Landscape

Paragraph 174 of the [National Planning Policy Framework](#) (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance.

### Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 174 and 175). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#). Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

### Protected Species

Natural England has produced [standing advice](#)<sup>1</sup> to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

### Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 175 and 179 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

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. List of priority habitats and species can be found [here](#)<sup>2</sup>. Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

---

<sup>1</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>2</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>



### **Ancient woodland, ancient and veteran trees**

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

### **Environmental gains**

Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. Development also provides opportunities to secure wider environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120, 174, 175 and 180). We advise you to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

Natural England's [Biodiversity Metric 3.0](#) may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Biodiversity Metric 3.0](#) and is designed for use where certain criteria are met. It is available as a beta test version.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Biodiversity Metric 3.0](#) and is available as a beta test version.

### **Access and Recreation**

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

**Rights of Way, Access land, Coastal access and National Trails**

Paragraphs 100 and 174 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website [www.nationaltrail.co.uk](http://www.nationaltrail.co.uk) provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

**Biodiversity duty**

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).

**From:** BMSDC Planning Mailbox <planning@babberghmidsuffolk.gov.uk>

**Sent:** 28 Oct 2021 11:34:01

**To:**

**Cc:**

**Subject:** FW: FAO Bron Curtis - Woodland Trust comments on application DC/21/05468

**Attachments:**

---

**From:** campaigning@woodlandtrust.org.uk <campaigning@woodlandtrust.org.uk>

**Sent:** 27 October 2021 16:24

**To:** BMSDC Planning Mailbox <planning@babberghmidsuffolk.gov.uk>

**Subject:** FAO Bron Curtis - Woodland Trust comments on application DC/21/05468



**EXTERNAL EMAIL: Don't click any links or open attachments unless you trust the sender and know the content is safe. Click [here](#) for more information or help from Suffolk IT**

Dear Bron Curtis,

Please find below our comments in relation to this application.

**Planning application: DC/21/05468**

**Proposal: Construction and operation of a 100MW Battery Energy Storage System, and related infrastructure with associated access, landscaping and drainage. | Land to the South Of Bullen Lane, Bramford, Suffolk, IP8 4JD**

As the UK's leading woodland conservation charity, the Woodland Trust aims to protect native woods, trees and their wildlife for the future. We own over 1,000 sites across the UK, covering around 29,000 hectares (71,000 acres) and we have over 500,000 members and supporters.

We have concerns regarding this application and the potential for impact on the ancient woodland of Bullen Wood (grid ref: TM102459).

In order to ensure ancient woods are protected from potentially harmful development, the Government implemented protection for them through the National Planning Policy Framework. Paragraph 180 of the NPPF states: *"When determining planning applications, local planning authorities should apply the following principles: c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists."*

Where new development is sited in close proximity to ancient woodland it can have an adverse effect in the form of indirect impacts such as light, noise and dust pollution, increased disturbance, changes to hydrology and so on. It is therefore important to implement appropriate mitigation measures to alleviate such impacts. Natural England's standing advice recommends the following measures:

- *improving the condition of the woodland*
- *putting up screening barriers to protect woodland or ancient and veteran trees from dust and pollution*
- *noise or light reduction measures*
- *rerouting footpaths*
- *removing invasive species*
- *buffer zones - for ancient woodlands, you should have a buffer zone of at least 15 metres to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic.*

In line with the above, we consider that ancient woodland must be buffered from any development by at least 15m. From the plans and the various reports submitted as part of this application, it is not clear whether the ancient woodland will be provided with a 15m buffer free from encroachment of any form of development. As such, we would appreciate clarification as to the size of the buffer zone between the proposed storage system and the ancient woodland. We consider that planning permission should not be allowed until the applicant has ensured that the ancient woodland would be suitably buffered.

We hope you find our comments to be of use to you. If you have any questions or comments please do not hesitate to get in contact with the Trust.

Best regards,  
Jack

## Jack Taylor

### Lead Campaigner – Woods Under Threat

Telephone: 0343 770 5627

Email: [JackTaylor@woodlandtrust.org.uk](mailto:JackTaylor@woodlandtrust.org.uk)

Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL

0330 333 3300

[www.woodlandtrust.org.uk](http://www.woodlandtrust.org.uk)

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Registered Office: Kempton Way, Grantham, Lincolnshire, NG31 6LL.

<http://www.woodlandtrust.org.uk>

Growth, Highways and Infrastructure  
Bury Resource Centre  
Hollow Road  
Bury St Edmunds  
Suffolk  
IP32 7AY

Philip Isbell  
Chief Planning Officer  
Planning Services  
Babergh and Mid Suffolk District Councils  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX

Enquiries to: Rachael Abraham  
Direct Line: 01284 741232  
Email: [Rachael.abraham@suffolk.gov.uk](mailto:Rachael.abraham@suffolk.gov.uk)  
Web: <http://www.suffolk.gov.uk>

Our Ref: 2021\_05468  
Date: 6<sup>th</sup> October 2021

For the Attention of Bron Curtis

Dear Mr Isbell

**Planning Application DC/21/05468 – Land to the south of Bullen Lane, Bramford: Archaeology**

This proposed development site lies in an area of archaeological potential recorded on the County Historic Environment Record, close to the edge of the former medieval Bullen Green. Recent archaeological investigations as part of the East Anglian 1 scheme to the north of the green, have identified medieval archaeology associated with the green edge (BRF 128 and 129) as well as prehistoric features. Prehistoric finds have also been recorded in the vicinity (BRF 060) as well as a cropmark to the north-east (BRF 019). As a result, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any surviving archaeological remains.

There are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 205), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate:

1. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

2. The site shall not be brought into operation until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under part 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

**REASON:**

*To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2019).*

**INFORMATIVE:**

*The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.*

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation will be required to establish the potential of the site and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation.

Further details on our advisory services and charges can be found on our website: <http://www.suffolk.gov.uk/archaeology/>

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Rachael Abraham

Senior Archaeological Officer  
Conservation Team

**From:** BMSDC Planning Area Team Green <planninggreen@babberghmidsuffolk.gov.uk>

**Sent:** 07 Oct 2021 01:34:41

**To:**

**Cc:**

**Subject:** FW: MSDC Planning Consultation Request - DC/21/05468

**Attachments:**

---

**From:** Chris Ward <Chris.Ward@suffolk.gov.uk>

**Sent:** 07 October 2021 11:09

**To:** Bron Curtis <Bron.Curtis@babberghmidsuffolk.gov.uk>

**Cc:** BMSDC Planning Area Team Green <planninggreen@babberghmidsuffolk.gov.uk>; Ben Chester <Ben.Chester@suffolk.gov.uk>

**Subject:** RE: MSDC Planning Consultation Request - DC/21/05468

Dear Bron,

Thank you for consulting me about the proposed battery storage system development at Land to the South of Bullen Lane in Bramford. On reviewing the documents submitted I have no comment to make, as no Travel Plan has been submitted.

Kind regards

**Chris Ward**

Active Travel Officer

Transport Strategy

Strategic Development - Growth, Highways and Infrastructure

Suffolk County Council

Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

web : <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>

-----Original Message-----

**From:** [planninggreen@babberghmidsuffolk.gov.uk](mailto:planninggreen@babberghmidsuffolk.gov.uk) <[planninggreen@babberghmidsuffolk.gov.uk](mailto:planninggreen@babberghmidsuffolk.gov.uk)>

**Sent:** 06 October 2021 11:24

**To:** Chris Ward

**Subject:** MSDC Planning Consultation Request - DC/21/05468

Please find attached planning consultation request letter relating to planning application - DC/21/05468 - Land To The South Of, Bullen Lane, Bramford, Suffolk IP8 4JD

Kind Regards

Planning Support Team

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**From:** BMSDC Planning Area Team Pink <PlanningPink@babberghmidsuffolk.gov.uk>

**Sent:** 09 Jun 2022 12:22:22

**To:**

**Cc:**

**Subject:** FW: DC/21/05468 - Battery storage

**Attachments:**

---

**From:** Dave Pedersen <[Dave.Pedersen@suffolk.gov.uk](mailto:Dave.Pedersen@suffolk.gov.uk)>

**Sent:** 09 June 2022 11:39

**To:** Bron Curtis <[Bron.Curtis@babberghmidsuffolk.gov.uk](mailto:Bron.Curtis@babberghmidsuffolk.gov.uk)>

**Subject:** RE: DC/21/05468 - Battery storage

Morning Bron

I can confirm, subject to Cambridge Power's delivery on its commitment to engage with the Service to develop an emergency response plan, the measures proposed meet the expectations of the Service to enable the Service to respond to an incident.

Regards

Dave



## Dave Pedersen

Area Manager  
Community Risk Management

✉ [dave.pedersen@suffolk.gov.uk](mailto:dave.pedersen@suffolk.gov.uk)

☎ 01473 260588

☎ Mobile: 07901 511029

**Suffolk Fire and Rescue Service**  
**Fire and Public Safety Directorate**

Endeavour House, 8 Russell Road, Ipswich, IP1 2BX





**From:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Sent:** 28 Apr 2022 11:40:44

**To:**

**Cc:**

**Subject:** FW: 2022-04-28 JS reply Land To The South Of, Bullen Lane, Bramford, Suffolk IP8 4JD Ref DC/21/05468 - FUL

**Attachments:**

---

**From:** GHI Floods Planning <floods.planning@suffolk.gov.uk>

**Sent:** 28 April 2022 09:37

**To:** BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>

**Cc:** Bron Curtis <Bron.Curtis@baberghmidsuffolk.gov.uk>

**Subject:** 2022-04-28 JS reply Land To The South Of, Bullen Lane, Bramford, Suffolk IP8 4JD Ref DC/21/05468 - FUL

Dear Bron Curtis,

Subject: Land To The South Of, Bullen Lane, Bramford, Suffolk IP8 4JD Ref DC/21/05468 - FUL

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/05468.

The following submitted documents have been reviewed and we recommend approval subject to conditions

- Site location plan Ref bess-brm-tp-xx-xx-pl-06-dr-030
- Proposed Site Plan Ref bess-brm-tp-xx-xx-pl-06-dr-031 P04
- Flood Risk Assessment / Surface Water Drainage Strategy Ref 201281 Rev 04
- Landscape strategy plan 2424 01 Rev A
- Letter to LLFA dated Feb 2022

We propose the following condition in relation to surface water drainage for this application.

1. The strategy for the disposal of surface water and the Flood Risk Assessment (FRA) (dated April 2022, ref: 201281 Rev 04) shall be implemented as approved in writing by the local planning authority (LPA). The strategy shall thereafter be managed and maintained in accordance with the approved strategy.

*Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained*

2. Within 28 days of practical completion of the last dwelling or unit, surface water drainage verification report shall be submitted to the Local Planning Authority, detailing, and verifying that the surface water drainage system has been inspected and has been built and functions in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks in an agreed form, for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

*Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk*

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

3. No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the LPA. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction

*Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater*

## Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board district catchment is subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a licence under section 50 of the New Roads and Street Works Act
- Any works to a main river may require an environmental permit

## Kind Regards

Jason Skilton  
Flood & Water Engineer  
Suffolk County Council  
Growth, Highway & Infrastructure  
Endeavour House, 8 Russell Rd, Ipswich, Suffolk IP1 2BX

-----Original Message-----

From: [planninggreen@babberghmidsuffolk.gov.uk](mailto:planninggreen@babberghmidsuffolk.gov.uk) <[planninggreen@babberghmidsuffolk.gov.uk](mailto:planninggreen@babberghmidsuffolk.gov.uk)>

Sent: 27 April 2022 12:39

To: GHI Floods Planning <[floods.planning@suffolk.gov.uk](mailto:floods.planning@suffolk.gov.uk)>

Subject: MSDC Planning Re-consultation Request - DC/21/05468 - FUL

Please find attached planning re-consultation request letter relating to planning application - DC/21/05468 - Land To The South Of, Bullen Lane, Bramford, Suffolk IP8 4JD

## Kind Regards

Planning Support Team

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For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

Your Ref: DC/21/05468  
Our Ref: SCC/CON/0790/22  
Date: 8 March 2022  
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



**All planning enquiries should be sent to the Local Planning Authority.**

Email: [planning@babberghmidsuffolk.gov.uk](mailto:planning@babberghmidsuffolk.gov.uk)

The Planning Department  
MidSuffolk District Council  
Planning Section  
1st Floor, Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

For the attention of: Bron Curtis - MSDC

Dear Bron

**TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DC/21/05468**

**PROPOSAL:** Full Planning Application - Construction and operation of a 100MW Battery Energy Storage System, and related infrastructure with associated access, landscaping and drainage.

**LOCATION:** Land To The South Of, Bullen Lane, Bramford, Suffolk IP8 4JD

Further to the submission of additional plans and information, notice is hereby given that the County Council as Highway Authority make the following comments:

The recommended planning conditions from our response dated 20/10/21 (ref: SCC/CON/4614/21) still apply but it would be beneficial to also include the following additional condition:

Condition: Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan.

The Construction Management Plan shall include the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques (if applicable)
- d) storage of plant and materials
- e) provision and use of wheel washing facilities
- f) programme of site and all associated works such as utilities including details of traffic management necessary to undertake these works
- g) site working and delivery times
- h) a communications plan to inform local residents of the program of works
- i) provision of boundary hoarding and lighting
- j) details of proposed means of dust suppression
- k) details of measures to prevent mud from vehicles leaving the site during construction
- l) haul routes for construction traffic on the highway network and
- m) monitoring and review mechanisms.

n) Details of deliveries times to the site during construction phase.

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase.

Yours sincerely,

**Ben Chester**  
**Senior Transport Planning Engineer**  
Growth, Highways and Infrastructure

Your Ref:DC/21/05468  
Our Ref: SCC/CON/4614/21  
Date: 20 October 2021  
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



**All planning enquiries should be sent to the Local Planning Authority.**

Email: [planning@babberghmidsuffolk.gov.uk](mailto:planning@babberghmidsuffolk.gov.uk)

The Planning Department  
MidSuffolk District Council  
Planning Section  
1st Floor, Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

For the attention of: Bron Curtis - MSDC

Dear Bron

**TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DC/21/05468PROPOSAL:**  
Full Planning Application - Construction and operation of a 100MW Battery Energy Storage System, and related infrastructure with associated access, landscaping and drainage.

**LOCATION:** Land To The South Of, Bullen Lane, Bramford, Suffolk IP8 4JD

Notice is hereby given that the County Council as Highway Authority recommends that any permission which that Planning Authority may give should include the conditions shown below:

Condition: No other part of the development hereby permitted shall be brought into use until the existing vehicular access has been improved, laid out and completed in accordance with drawing no. C-700 P2; with a bound surface for a distance of at least 10 metres measured from the nearside edge of the carriageway and made available for use. Thereafter the access shall be retained in the specified form.

Reason: To ensure that the layout of the existing access is improved to an appropriate specification at an appropriate time in the interests of the safety of persons using the access and users of the road.

Condition: Before the access is first used visibility splays shall be provided as shown on Drawing No. C-700 P2 with an X dimension of 2.4 metres and a Y dimension of 59 metres [tangential to the nearside edge of the carriageway] and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no obstruction to visibility shall be erected, constructed, planted or permitted to grow over 0.6 metres high within the areas of the visibility splays.

Reason: To ensure drivers of vehicles entering the road have sufficient visibility to manoeuvre safely including giving way to approaching users of the road without them having to take avoiding action and to ensure drivers of vehicles on the road have sufficient warning of a vehicle emerging in order to take avoiding action, if necessary.

Condition: Before the development is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the road and footpath 1 including any system to dispose of the water. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the highway.

Condition: All HGV delivery traffic movements to and from the site over the duration of the construction period shall be subject to a Deliveries Management Plan which shall be submitted to the Local Planning Authority for approval a minimum of 56 days before any deliveries of materials commence.

No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan.

[The site operator shall maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.]

Reason: In the interests of highway safety, to reduce and / or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas.

Notes:

Note: The public right of way Bramford FP1 cannot be lawfully driven along without due authority. This highway must remain unobstructed at all times. It is an offence to disturb the surface of the highway so as to render it inconvenient for public use. Therefore it is imperative that the surface is properly maintained for lawful use during the construction phase and beyond.

The Highway Authority will seek to recover the cost of any such damage which it actions for repair.

Yours sincerely,

**Ben Chester**  
**Senior Transport Planning Engineer**  
Growth, Highways and Infrastructure

**From:** William Manning

**Sent:** 23 March 2022 11:44

**Subject:** RE: DC/21/05468 Land To South of Bullen Lane Bramford ( SCC Mr Stiff/Mr Fawcett letter attached) EH Land Contamination and Sustainability

Good morning,

DC/21/05468 Land To South of Bullen Lane Bramford

As far as I'm aware we haven't been consulted on the above application.

This site is both outside of a minerals consultation area and is 1.44Ha which is below our 5Ha safeguarding threshold as set out in policy MP10 of the Suffolk Minerals and Waste local plan.

Therefore, the County Council as Minerals and Waste Authority has no comments to make on the above application.

Kind regards,

Billy

**William (Billy) Manning**

Planning Officer

Growth, Highways and Infrastructure

Suffolk County Council

**From:** BMSDC Planning Area Team Green <planninggreen@babberghmidsuffolk.gov.uk>

**Sent:** 15 Oct 2021 02:20:50

**To:**

**Cc:**

**Subject:** FW: MSDC Planning Consultation Request - DC/21/05468 \*Land To The South Of, Bullen Lane, Bramford

**Attachments:**

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**From:** GHI PROW Planning <PROWplanning@suffolk.gov.uk>

**Sent:** 15 October 2021 12:59

**To:** BMSDC Planning Area Team Green <planninggreen@babberghmidsuffolk.gov.uk>

**Cc:** GHI PROW Planning <PROWplanning@suffolk.gov.uk>; Sharon Berry (MSDC) <Sharon.Berry@babberghmidsuffolk.gov.uk>; Ben Chester <Ben.Chester@suffolk.gov.uk>; Kevin Verlander <Kevin.Verlander@suffolk.gov.uk>

**Subject:** RE: MSDC Planning Consultation Request - DC/21/05468 \*Land To The South Of, Bullen Lane, Bramford

## **PUBLIC RIGHTS OF WAY AND ACCESS RESPONSE**

**REF: DC/21/05468**

Thank you for your consultation concerning the above application.

The proposed site does not contain any public rights of way (PROW) but as identified in the 'Planning Design and Access Statement', it is bounded on the north by Bramford Bridleway 1, and on the east by Bramford Public Footpath 43 which connects to Bramford Public Footpath 44 and Bramford Public Footpath 47. The Definitive Map for Bramford can be seen at: <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Bramford.pdf>. A more detailed plot of public rights of way can be provided. Please contact [DefinitiveMaps@suffolk.gov.uk](mailto:DefinitiveMaps@suffolk.gov.uk) for more information. Note, there is a fee for this service.

**We accept this proposal subject to the following:**

- In the 'Planning, Design and Access Statement', under '4.11 Access and Public Rights of Way', it states:
  - The closest Public Right of Way to the Application Site are the public bridleway along Bullen Lane and extending to the west, and a public footpath running alongside part of the site's eastern boundary (W-155 043/01) which then turns to the east and then splits to connect to Bullen Lane (W-115 044/0) and continue to Bramford (W-115 047/0).
- This contains errors and should read:
  - The closest Public Right of Way to the Application Site are the public bridleway (W-155 001/0) extending to the west of Bullen Lane, and a public footpath running alongside part of the site's eastern boundary (W-155 043/0) which then turns to the east and then splits to connect to Bullen Lane (W-155 044/0) and continues to Bramford (W-155 047/0).
- The applicant must also pay specific regard to bullet 3 below and contact the Rights of Way and Access team as instructed with regard to any temporary diversions that ensure the rights of way network can be used continually at all times during construction.

**Furthermore, we ask that the following is taken into account:**

1. PROW are divided into the following classifications:

- Public Footpath – only for use on foot or with a mobility vehicle
- Public Bridleway – use as per a public footpath, and on horseback or by bicycle
- Restricted Byway – use as per a bridleway, and by a 'non-motorised vehicle', e.g. a horse and carriage
- Byway Open to All Traffic (BOAT) – can be used by all vehicles, in addition to people on foot, mobility vehicle, horseback and bicycle

All currently recorded PROW are shown on the Definitive Map and described in the Definitive Statement (together forming the legal record of all currently recorded PROW). There may be other PROW that exist which have not been registered on the Definitive Map. These paths are either historical paths that were not claimed under the National Parks and Access to the Countryside Act 1949 or since, or paths that have been created by years of public use. To check for any unrecorded rights or anomalies, please contact [DefinitiveMaps@suffolk.gov.uk](mailto:DefinitiveMaps@suffolk.gov.uk).



2. The applicant, and any future owners, residents etc, must have private rights to take motorised vehicles over a PROW other than a BOAT. To do so without lawful authority is an offence under the Road Traffic Act 1988. Any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy. We do not keep records of private rights and suggest that a solicitor is contacted.
3. The granting of planning permission IS SEPARATE to any consents that may be required in relation to PROW. It DOES NOT give authorisation for structures such as gates to be erected on a PROW, or the temporary or permanent closure or diversion of a PROW. Nothing may be done to close, alter the alignment, width, surface or condition of a PROW, or to create a structure such as a gate upon a PROW, without the due legal process being followed, and permission being granted from the Rights of Way & Access Team as appropriate. Permission may or may not be granted depending on all the circumstances. To apply for permission from Suffolk County Council (as the highway authority for Suffolk) please see below:
  - **To apply for permission to carry out work on a PROW, or seek a temporary closure – <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/rights-and-responsibilities/> or telephone 0345 606 6071. PLEASE NOTE that any damage to a PROW resulting from works must be made good by the applicant. Suffolk County Council is not responsible for the maintenance and repair of PROW beyond the wear and tear of normal use for its classification and will seek to recover the costs of any such damage it is required to remedy.**
  - To apply for permission for structures such as gates to be constructed on a PROW – contact the relevant Area Rights of Way Team - contact the relevant Area Rights of Way Team <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> or telephone 0345 606 6071.
4. To apply for permission for a PROW to be stopped up or diverted within a development site, the officer at the appropriate borough or district council should be contacted at as early an opportunity as possible to discuss the making of an order under s257 of the Town and Country Planning Act 1990 - <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/public-rights-of-way-contacts/> PLEASE NOTE that nothing may be done to stop up or divert the legal alignment of a PROW until the due legal process has been completed and the order has come into force.
5. Under Section 167 of the Highways Act 1980 any structural retaining wall within 3.66 metres of a PROW with a retained height in excess of 1.37 metres, must not be constructed without the prior written approval of drawings and specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Construction of any retaining wall or structure that supports a PROW or is likely to affect the stability of the PROW may also need prior approval at the discretion of Suffolk County Council. Applicants are strongly encouraged to discuss preliminary proposals at an early stage.
6. Any hedges adjacent to PROW must be planted a minimum of 1 metre from the edge of the path in order to allow for annual growth and cutting, and should not be allowed to obstruct the PROW. Some hedge types may need more space, and this should be taken into account by the applicant. In addition, any fencing should be positioned a minimum of 0.5 metres from the edge of the path in order to allow for cutting and maintenance of the path, and should not be allowed to obstruct the PROW.
7. There may be a requirement to enhance the PROW network relating to this development. If this is the case, a separate response will contain any further information.

**In the experience of the County Council, early contact with the relevant PROW officer avoids problems later on, when they may be more time consuming and expensive for the applicant to address. More information about Public Rights of Way can be found at [www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/](http://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/).**

Thank you for taking the time to consider this response.

Public Rights of Way Team  
Growth, Highways and Infrastructure  
Suffolk County Council  
Phoenix House, 3 Goddard Road, Ipswich IP1 5NP  
[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)

-----Original Message-----

From: [planninggreen@babberghmidsuffolk.gov.uk](mailto:planninggreen@babberghmidsuffolk.gov.uk) <[planninggreen@babberghmidsuffolk.gov.uk](mailto:planninggreen@babberghmidsuffolk.gov.uk)>

Sent: 06 October 2021 11:26

To: GHI PROW Planning <[PROWplanning@suffolk.gov.uk](mailto:PROWplanning@suffolk.gov.uk)>

Subject: MSDC Planning Consultation Request - DC/21/05468 \*Land To The South Of, Bullen Lane, Bramford

Please find attached planning consultation request letter relating to planning application - DC/21/05468 - Land To The South Of, Bullen Lane, Bramford, Suffolk IP8 4JD

Kind Regards

Planning Support Team

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**From:** BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>

**Sent:** 07 Oct 2021 09:53:49

**To:**

**Cc:**

**Subject:** FW: DC/21/05468 Land To The South Of, Bullen Lane, Bramford

**Attachments:**

---

**From:** David Pizzey <David.Pizzey@baberghmidsuffolk.gov.uk>

**Sent:** 07 October 2021 09:51

**To:** Bron Curtis <Bron.Curtis@baberghmidsuffolk.gov.uk>

**Cc:** BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>

**Subject:** DC/21/05468 Land To The South Of, Bullen Lane, Bramford

Hi Bron

I have no objection to this application subject to it being undertaken in accordance with the measures outlined in the accompanying arboricultural report. Although a small number of trees are proposed for removal they are of limited public amenity value and/or poor condition and are not of sufficient arboricultural or landscape importance to warrant being a constraint.

Please let me know if you require any further input.

Kind regards

**David Pizzey** FArborA

Arboricultural Officer

Tel: 01449 724555

[david.pizzey@baberghmidsuffolk.gov.uk](mailto:david.pizzey@baberghmidsuffolk.gov.uk)

[www.babergh.gov.uk](http://www.babergh.gov.uk) and [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

Babergh and Mid Suffolk District Councils – Working Together

-----Original Message-----

**From:** [planninggreen@baberghmidsuffolk.gov.uk](mailto:planninggreen@baberghmidsuffolk.gov.uk) <[planninggreen@baberghmidsuffolk.gov.uk](mailto:planninggreen@baberghmidsuffolk.gov.uk)>

**Sent:** 06 October 2021 11:25

**To:** David Pizzey <[David.Pizzey@baberghmidsuffolk.gov.uk](mailto:David.Pizzey@baberghmidsuffolk.gov.uk)>

**Subject:** MSDC Planning Consultation Request - DC/21/05468

Please find attached planning consultation request letter relating to planning application - DC/21/05468 - Land To The South Of, Bullen Lane, Bramford, Suffolk IP8 4JD

Kind Regards

Planning Support Team

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personal details to a third party so that they can provide a service you have requested, or fulfil a request for information. Any information about you that we pass to a third party will be held securely by that party, in accordance with the Data Protection Act 2018 and used only to provide the services or information you have requested. For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.



23<sup>rd</sup> May 2022

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

By email only

---

*Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.*

---

**Application: DC/21/05648**

**Location: Land To The South Of Bullen Lane Bramford Suffolk IP8 4JD**

**Proposal: Full Planning Application - Construction and operation of a 100MW Battery Energy Storage System, and related infrastructure with associated access, landscaping and drainage**

Dear Bron,

Thank for your re-consulting Place Services on this application.

**No objection subject to securing ecological mitigation and biodiversity enhancement measures**

**Summary**

We have reviewed the Consultation Comment Response (Savills, March 2022) and the detailed comments in the submitted Response to Ecology Comments (Hopkins Ecology, 23 February 2022) and associated information on protected species, completed Biodiversity Metric 3.0 – Calculation Tool, Updated Tree Survey, Arboricultural Impact Assessment (AIA) Preliminary Arboricultural Method Statement & Tree Protection Plan (Hayden's, February 2022) and Landscape Strategy Plan 2424 01 Rev. C (Liz Lake Associates, February 2022). These documents include the additional information requested for CWS and Ancient Woodland, Great crested newt, bats and Dormouse, Badger, and Priority hedgerows to provide certainty of likely impacts prior to determination.

This is in addition to the submitted Ecological Impact Assessment (Hopkins Ecology, June 2021), and consultation comments from the Woodland Trust (27 October 2021). These relate to potential impacts on designated sites, irreplaceable habitat (ancient woodland), protected and Priority species and habitats and identification of mitigation measures.

We are now satisfied that there is sufficient ecological information available for determination of this application.



**Designated sites (CWS, Ancient Woodland (irreplaceable habitat):**

As Bullen Wood CWS and ancient semi-natural woodland (irreplaceable habitat) abuts the south boundary of the Site, we sought clarification on the positioning of the development in relation to the width of the buffer to the woodland and advised on other matters which would need to be secured by conditions of any consent e.g. lighting design.

We welcome that through modifications to the proposed layout, the buffer has been increased and to between 28 and 46m between the edge of the compound and the woodland. We accept that a 50m buffer is not considered necessary here because:

- Direct impacts on trees would be avoided due to the separation to ensure protection of root protection zones.
- The proposals are very unlikely to generate any disturbance during operation.

We are now satisfied that the applicant has demonstrated that a smaller buffer would be sufficient and the LPA has certainty that, as stated in paragraph 180c of the NPPF, the distance proposed will avoid the loss *or deterioration* of this ancient woodland (irreplaceable habitat).

We are pleased to note that the scheme would create an extended non-arable buffer to the woodland and a greater separation of the woodland from intensive arable, including a reduction in incidental impacts such as spray drift. As stated in the Ecological Impact Assessment, the landscaping proposal would enhance the woodland edge through creating a higher quality woodland edge habitat than currently present.

We support the Response to Ecology Comments (Hopkins Ecology, 23 February 2022) and agree that the design and palette of the detailed soft landscape planting proposals as shown on the Landscape Strategy Plan 2424 01 Rev. C (Liz Lake Associates, February 2022) is secured by a condition of any consent for comments by both the LPA's consultant ecology and landscape specialists.

We are satisfied that the suggested condition for provision of detailed landscape planting proposals to be submitted and approved prior to the commencement of development and implemented prior to the first operation of the Site is appropriate.

We are satisfied that the lighting scheme will be motion activated and the level of 'human activity' on site would be restricted to maintenance visits rather than a full-time presence, with consequently less disturbance e.g. noise or even recreational disturbance. We recommend that a sensitive lighting scheme which will further minimise spill onto the woodland edge and other neighbouring areas and secured by a condition of any consent. Ideally Infra-Red security lighting should be considered to avoid disturbance to bats and justification provided if this is not feasible.

**European Protected Species:**

We appreciate confirmation that standard good practice measures and appropriate working methods will be included in a Construction Environmental Management Plan (CEMP): Biodiversity, for mobile species such as Gt crested newt, to be secured as a condition any consent.

We note that the inconsistencies between the AIA and the EcIA have been reviewed and that both Trees T004 and T006 both Oaks have been re-assessed and both are now recorded as having "Low bat roost potential". We agree that these trees will not be directly impacted by the proposed works and indirect impacts would be very low given the distances to the compound and wider considerations. During construction, suitable tree protection measures would be implemented to



avoid impacts on root protection zones and the suggested CEMP (Biodiversity) would include measures such as suitable locations for the works compounds and lighting.

Further to our comments on dormice, we welcome confirmation that the removal of the hedgerow using precautionary works has been agreed with the Applicant. We support the need for flexibility in the scheme of works so recommend that the hedgerow removal works should be covered by a separate Dormouse method statement to be secured by a condition of any consent.

**Protected species:**

We appreciate the provision of a confidential appendix for details of badger activity and details to avoid impacts during construction. As there are numerous records in the locality, we welcome that a pre-works walkover survey will be included within the CEMP (Biodiversity) to determine presence / absence of protected species such as badgers.

**Priority habitats:**

We appreciate confirmation that the north boundary of the Site will be planted as a species-rich hedgerow to ensure functionality of the loss of part of H3 Priority species rich hedgerow habitat and note that the Landscape Strategy Plan now Rev. C (Liz Lake Associates, Feb 2022) has been updated to reflect this.

The mitigation measures identified in the Ecological Impact Assessment (Hopkins Ecology, June 2021) and Response to Ecology Comments (Hopkins Ecology, 23 February 2022) should be secured by a condition of any consent and implemented in full. This is necessary to conserve and enhance protected and Priority species particularly bats and dormice.

**BNG calculations:**

We welcome provision of the full BNG calculations and support the proposed reasonable biodiversity enhancements, which have been recommended to secure measurable net gains for biodiversity, as outlined under Paragraph 174d of the National Planning Policy Framework (2021). We are satisfied that the reasonable biodiversity enhancement measures embedded into the scheme will deliver gain of 11.3% for habitat units and 27.8% for hedgerow units if long term management is secured for the length of time identified by the Biodiversity Metric. We therefore recommend that a Landscape and Ecological Management Plan is required as a condition of any consent which will need to provide details of maintaining the habitats with ecological functionality and connectivity for species.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

Impacts will be minimised such that the proposal is acceptable, subject to the conditions below based on BS42020:2013.

We recommend that submission for approval and implementation of the details below should be a condition of any planning consent.

**Recommended conditions**

**1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS**



*“All mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Ecological Impact Assessment (Hopkins Ecology, June 2021) and Response to Ecology Comments (Hopkins Ecology, 23 February 2022) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.*

*This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details.”*

**Reason:** To conserve and enhance protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species).

## **2. PRIOR TO COMMENCEMENT: HAZEL DORMOUSE METHOD STATEMENT**

*“A Hazel Dormouse Method Statement shall be submitted to and approved in writing by the local planning authority. This will contain precautionary mitigation measures and/or works to reduce potential impacts to Hazel Dormouse during the removal of hedgerow H3 during the construction phase.*

*The measures and/works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter.”*

**Reason:** To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (Priority habitats & species).

## **3. PRIOR TO COMMENCEMENT: CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN FOR BIODIVERSITY**

*“A construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority.*

*The CEMP (Biodiversity) shall include the following.*

- a) Risk assessment of potentially damaging construction activities.*
- b) Identification of “biodiversity protection zones”.*
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
- d) The location and timing of sensitive works to avoid harm to biodiversity features.*
- e) The times during construction when specialist ecologists need to be present on site to oversee works.*
- f) Responsible persons and lines of communication.*
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- h) Use of protective fences, exclusion barriers and warning signs.*





- i) *Containment, control and removal of any Invasive non-native species present on site*

*The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority"*

**Reason:** To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (Priority habitats & species).

#### **4. PRIOR TO BENEFICIAL USE: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME**

*"A lighting design scheme for biodiversity shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans, Isolux drawings and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.*

*All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority."*

**Reason:** To allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

#### **5. PRIOR TO BENEFICIAL USE: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN**

*"A Landscape and Ecological Management Plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior to beneficial use of the development.*

*The content of the LEMP shall include the following:*

- a) Description and evaluation of features to be managed.*
- b) Ecological trends and constraints on site that might influence management.*
- c) Aims and objectives of management.*
- d) Appropriate management options for achieving aims and objectives.*
- e) Prescriptions for management actions.*
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).*
- g) Details of the body or organisation responsible for implementation of the plan.*
- h) Ongoing monitoring and remedial measures.*

*The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the*



*development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.”*

**Reason:** To allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (Priority habitats & species)

Please contact us with any further queries.

Yours sincerely,

**Sue Hooton CEnv MCIEEM BSc (Hons)**

Principal Ecological Consultant

[placeservicesecology@essex.gov.uk](mailto:placeservicesecology@essex.gov.uk)

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

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

**From:** Nathan Pittam  
**Sent:** 12 October 2021 10:33  
**To:** BMSDC Planning Area Team Pink  
**Cc:** Bron Curtis  
**Subject:** DC/21/05468. Land Contamination

**EP Reference : 299011**  
**DC/21/05468. Land Contamination**  
**Land To The South Of, Bullen Lane, Bramford, IPSWICH, Suffolk, IP8 4JD.**  
**Construction and operation of a 100MW Battery Energy Storage System, and related infrastructure with associated access, landscaping and drainage.**

Having reviewed the application I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise that the developer is made aware that the responsibility for the safe development of the site lies with them.

Kind regards

Nathan

**Nathan Pittam** BSc. (Hons.) PhD  
Senior Environmental Management Officer

**Babergh and Mid Suffolk District Councils – Working Together**

**From:** BMSDC Planning Area Team Green <planninggreen@babberghmidsuffolk.gov.uk>

**Sent:** 13 Oct 2021 03:22:08

**To:**

**Cc:**

**Subject:** FW: DC/21/05468 - Air Quality

**Attachments:**

---

**From:** Jennifer Lockington <Jennifer.Lockington@babberghmidsuffolk.gov.uk>

**Sent:** 13 October 2021 12:47

**To:** Bron Curtis <Bron.Curtis@babberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Green <planninggreen@babberghmidsuffolk.gov.uk>

**Cc:** BMSDC Planning Mailbox <planning@babberghmidsuffolk.gov.uk>

**Subject:** DC/21/05468 - Air Quality

Dear Bron

YOUR REF: 21/05468

OUR REF: 299012

**SUBJECT:** Land To The South Of, Bullen Lane, Bramford, Suffolk IP8 4JD

Full Planning Application - Construction and operation of a 100MW Battery Energy Storage System, and related infrastructure with associated access, landscaping and drainage.

**Please find below my comments regarding air quality matters only.**

Thank you for your consultation on the above application.

I have no objections with regard to air quality.

Regards

**Jennifer Lockington (Mrs)**

Senior Environmental Management Officer

**Babergh & Mid Suffolk District Councils - Working Together**

tel: 01449 724706

[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

Please note - I work Tuesdays and Wednesdays

**From:** Susan Lennard <[Susan.Lennard@baberghmidsuffolk.gov.uk](mailto:Susan.Lennard@baberghmidsuffolk.gov.uk)>  
**Sent:** 09 March 2022 15:22  
**To:** Bron Curtis <[Bron.Curtis@baberghmidsuffolk.gov.uk](mailto:Bron.Curtis@baberghmidsuffolk.gov.uk)>  
**Cc:** Andy Rutson-Edwards <[Andy.Rutson-Edwards@baberghmidsuffolk.gov.uk](mailto:Andy.Rutson-Edwards@baberghmidsuffolk.gov.uk)>; Susan Lennard <[Susan.Lennard@baberghmidsuffolk.gov.uk](mailto:Susan.Lennard@baberghmidsuffolk.gov.uk)>  
**Subject:** PLANNING CONSULTATION DC2105468

**PLANNING APPLICATION NO:** DC/21/05468

**PROPOSAL :** Construction and operation of 100Mw Battery Energy Storage System and related infrastructure.

**LOCATION:** Land to south of Bullen Lane, Bramford.

**CONSULTEE COMMENTS:** Noise, Odour, Light, Smoke.

Dear Bron,

I write with regard to the consultation received in relation to the above application. The Environmental Protection Team provided the following comments in respect of the application in October 2021 as follows;

***I have no objections in principle to this development of a 100MW Battery energy storage system. However I would recommend the following conditions:***

#### **NOISE**

***1. Prior to the development hereby permitted coming into beneficial use, a competent person shall have ensured that the rating level of noise emitted from all equipment associated with the proposed fixed installation on site, when running at full capacity does not exceed the sound levels predicted at facades of noise-sensitive premises in the Professional Consult Noise impact assessment report:- 21.006.1R1 dated 9 June 2021. The assessment shall have been made in accordance with the current version of British Standard 4142 and confirmation of the findings of the assessment shall have been submitted to the Local Planning Authority and agreed prior to the condition being discharged. For any measured exceedances of the predicted daytime and night time noise levels measured, a scheme of mitigation shall be submitted to, and agreed in writing by, the Local Planning Authority. This scheme shall be adhered to thereafter during the lifetime of the development being in beneficial use.***

***Reason – To protect the occupiers of noise sensitive dwellings from any adverse impacts of plant noise.***

#### **LIGHTS**

***Any external lighting associated with the development shall be kept to the minimum necessary for the purposes of security and site safety and shall prevent upward and outward light radiation.***

***Reason – To minimise detriment to nearby residential amenity during construction of the scheme.***

**3. Noise intrusive construction/ground works to the site shall be limited to the following hours: Monday to Friday between 08:00 hrs and 18:00 hrs Saturday between 08:00 hrs and 13:00 hrs. No noise intrusive work to be undertaken on a Sunday, Bank, or Public Holiday.**

**Reason – To minimise detriment to nearby existing residential amenity.**

**4. No materials produced as a result of the site development or clearance shall be burned on site. All reasonable steps, including damping down site roads, shall be taken to minimise dust and litter emissions from the site whilst works of construction and site clearance are in progress. All bulk carrying vehicles accessing the site shall be suitably sheeted to prevent nuisance from dust in transit.**

**Reason – To minimise detriment to nearby residential amenity.**

I note that the applicant has provided a revision to the original Noise Report (**Professional Consult** (Report 21.06.R2) dated 18<sup>th</sup> February 2022). This report follows an assessment using modelling software to model the predicted level of noise at the closest receptors to the Site and the report concludes that

- **The rated level of noise proposed by the proposed Development is acceptable at the closest residential receptors.**
- **During the night – time period, the level of noise falls below the internal noise criteria level for bedrooms.**
- **The predicted noise levels from proposed operations at the Site, are considered to be sufficiently low enough to afford compliance with the ‘No Observed Effect Level’ as detailed in the PPG and as such noise should not be deemed to be a determining factor in the granting of planning permission for this Site.**

We note the findings of this report revision however as the recommendation is “prior to the development coming into beneficial use” and thus would expect to see the results of the system in operation by way of post construction/installation noise measurements to demonstrate that the development when operating at full capacity accords with the sound levels predicted at facades of noise-sensitive premises in the Professional Consult Noise impact assessment report:- 21.006.1R1.

With Kind regards

**Sue Lennard**  
**Senior Environmental Protection Officer**  
**Public Protection**

**Please note I am a part time officer working each Monday Tuesday and Wednesday each week.**

**Babergh and Mid Suffolk District Councils – Working Together**

[Susan.lennard@baberghmidsuffolk.gov.uk](mailto:Susan.lennard@baberghmidsuffolk.gov.uk)

01449 724943

[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**From:** BMSDC Planning Area Team Green <planninggreen@babberghmidsuffolk.gov.uk>

**Sent:** 15 Oct 2021 12:08:25

**To:**

**Cc:**

**Subject:** FW: DC/21/05468

**Attachments:**

---

**From:** Andy Rutson-Edwards <Andy.Rutson-Edwards@babberghmidsuffolk.gov.uk>

**Sent:** 15 October 2021 11:38

**To:** Bron Curtis <Bron.Curtis@babberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Green <planninggreen@babberghmidsuffolk.gov.uk>; BMSDC Planning Mailbox <planning@babberghmidsuffolk.gov.uk>

**Subject:** DC/21/05468

Environmental Health -  
Noise/Odour/Light/Smoke

**APPLICATION FOR PLANNING PERMISSION - DC/21/05468**

**Proposal:** Full Planning Application - Construction and operation of a 100MW Battery Energy Storage System, and related infrastructure with associated access, landscaping and drainage.

**Location:** Land To The South Of, Bullen Lane, Bramford, Suffolk IP8 4JD

I have no objections in principle to this development of a 100MW Battery energy storage system. However I would recommend the following conditions:

**NOISE**

1. Prior to the development hereby permitted coming into beneficial use, a competent person shall have ensured that the rating level of noise emitted from all equipment associated with the proposed fixed installation on site, when running at full capacity does not exceed the sound levels predicted at facades of noise-sensitive premises in the Professional Consult Noise impact assessment report:- 21.006.1R1 dated 9 June 2021.

The assessment shall have been made in accordance with the current version of British Standard 4142 and confirmation of the findings of the assessment shall have been submitted to the Local Planning Authority and agreed prior to the condition being discharged.

For any measured exceedances of the predicted daytime and night time noise levels measured, a scheme of mitigation shall be submitted to, and agreed in writing by, the Local Planning Authority. This scheme shall be adhered to thereafter during the lifetime of the development being in beneficial use.

Reason – To protect the occupiers of noise sensitive dwellings from any adverse impacts of plant noise.

**LIGHTS**

2. Any external lighting associated with the development shall be kept to the minimum necessary for the purposes of security and site safety and shall prevent upward and outward light radiation.

Reason – To minimise detriment to nearby residential amenity

During construction of the scheme.

3. Noise intrusive construction/ground works to the site shall be limited to the following hours: Monday to Friday between 08:00 hrs and 18:00 hrs Saturday between 08:00 hrs and 13:00 hrs. No noise intrusive work to be undertaken on a Sunday, Bank, or Public Holiday.

Reason – To minimise detriment to nearby existing residential amenity.

4. No materials produced as a result of the site development or clearance shall be burned on site. All reasonable steps, including damping down site roads, shall be taken to minimise dust and litter emissions from the site

whilst works of construction and site clearance are in progress. All bulk carrying vehicles accessing the site shall be suitably sheeted to prevent nuisance from dust in transit.

Reason – To minimise detriment to nearby residential amenity.

*Andy*

**Andy Rutson-Edwards**, MCIEH AMIOA

Senior Environmental Protection Officer

**Babergh and Mid Suffolk District Council - Working Together**

Tel: 01449 724727

Email [andy.rutson-edwards@babberghmidsuffolk.gov.uk](mailto:andy.rutson-edwards@babberghmidsuffolk.gov.uk)

[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)



**From:** BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>

**Sent:** 28 Oct 2021 10:27:05

**To:**

**Cc:**

**Subject:** FW: DC/21/05468

**Attachments:**

---

**From:** Simon Davison <Simon.Davison@baberghmidsuffolk.gov.uk>

**Sent:** 28 October 2021 08:11

**To:** BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>

**Subject:** DC/21/05468

Dear Bron,

**APPLICATION FOR PLANNING PERMISSION - DC/21/05468**

**Proposal:** Full Planning Application - Construction and operation of a 100MW Battery Energy Storage System, and related infrastructure with associated access, landscaping and drainage.

**Location:** Land To The South Of, Bullen Lane, Bramford, Suffolk IP8 4JD

I have no condition to apply to the application.

Kind regards

Simon Davison PIEMA  
Senior Environmental Management Officer  
Babergh and Mid Suffolk District Councils - Working Together

Mobile: 07874 634932

t: 01449 724728

email: [simon.davison@baberghmidsuffolk.gov.uk](mailto:simon.davison@baberghmidsuffolk.gov.uk)

w: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**Place Services**  
Essex County Council  
County Hall, Chelmsford  
Essex, CM1 1QH  
T: 0333 013 6840  
[www.placeservices.co.uk](http://www.placeservices.co.uk)  
[@PlaceServices](https://twitter.com/PlaceServices)



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

28/03/22

For the attention of: Bron Curtis

**Ref: DC/21/05468; Land To The South Of, Bullen Lane, Bramford, Suffolk IP8 4JD**

Thank you for re-consulting is on the full planning application - Construction and operation of a 100MW Battery Energy Storage System, and related infrastructure with associated access, landscaping and Drainage. This letter sets out our consultation response on how the proposal relates and responds to the landscape setting and context of the site.

We have reviewed the additional document and plans submitted 02/03/22 and welcome the clarifications, the requested visualisations and arboricultural report. An assessment of the site was undertaken by a Chartered Landscape Architect and member of the Landscape Institute during a site visit on 04/03/22. We are satisfied that the site baseline has been accurately represented and the subsequent scheme and mitigation measure have been fully considered.

While there would be noticeable change to the character of the landscape, the visualisations demonstrate that the mitigation measures outlined will sufficiently screen the development and that any residual effects would be localised, therefore we have no landscape objections to the proposed development.

If minded for approval, we would recommend the following conditions for consideration to ensure adequate control over the final design and ensure a satisfactory appearance of the development:

**ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: SUBMISSION OF LANDSCAPE DETAILS**

Prior to commencement of landscape works hereby approved, details comprising plans and particulars shall be submitted to the Local Planning Authority showing precise details of the hard and soft landscaping which shall form part of the development hereby permitted. Any scheme of landscaping details as may be agreed in writing by the Local Planning Authority shall show the existing trees, shrubs, and hedgerows on the site where to be retained and shall include details of:

- a) A specification of soft landscape works, include a schedule of species, size, density and spacing of all trees, shrubs and hedgerows to be planted, indicating any areas of advanced planting.
- b) areas to be grass seeded or turfed, including cultivation and other operations associated with plant and grass establishment.
- c) paved or otherwise hard surfaced areas including the extent and specification for footways and kerbing, together with the type and specification of all permeable paving and asphalt surfaces.
- d) existing and finished levels shown as contours with cross-sections, if appropriate.
- e) A specification for all means of enclosure and site boundary treatments to include height, material, colour and finishes.



Such details as may be agreed, shall be implemented in their entirety during the first planting season (October to March inclusive) following approval, or in any other such phased arrangement as may be agreed in writing by the Local Planning Authority.

Any tree, shrub or hedge plant (including replacement plants) removed, uprooted, destroyed, or be caused to die, or become seriously damaged or defective, within five years of planting, shall be replaced by the developer(s) or their successors in title, with species of the same type, size and in an agreed location, in the first available planting season following removal.

#### **ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPE MANAGEMENT PLAN (LMP)**

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a landscape management plan for a minimum of 5 years. This should include:

- a) Drawings showing:
  1. The extent of the LMP; ie only showing the areas to which the LMP applies, areas of private ownership should be excluded
- b) Written Specification detailing:
  1. All operation and procedures for soft landscape areas; inspection, watering, pruning, cutting, mowing, clearance and removal of arisings and litter, removal of temporary items (fencing, guards and stakes) and replacement of failed planting.
  2. All operations and procedures for hard landscape areas; inspection, sweeping, clearing of accumulated vegetative material and litter, maintaining edges, and painted or finished surfaces.
  3. Furniture (signage, bins)
  4. All operations and procedures for surface water drainage system; inspection of linear drains and swales, removal of unwanted vegetative material and litter.
- c) Maintenance task table which explains the maintenance duties across the site in both chronological and systematic order.

If you have any queries regarding the matters above, please do not hesitate to contact me.

Kind regards,

Kim Howell BA (Hons) DipLA CMLI  
Landscape Consultant

**Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils.** Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

**Place Services**  
Essex County Council  
County Hall, Chelmsford  
Essex, CM1 1QH  
T: 0333 013 6840  
[www.placeservices.co.uk](http://www.placeservices.co.uk)  
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**Planning Services**  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich  
IP1 2BX

08/12/2021

For the attention of: Bron Curtis

**Ref: DC/21/05468; Land To The South Of, Bullen Lane, Bramford, Suffolk IP8 4JD**

Thank you for consulting is on the full planning application - Construction and operation of a 100MW Battery Energy Storage System, and related infrastructure with associated access, landscaping and Drainage. This letter sets out our consultation response on how the proposal relates and responds to the landscape setting and context of the site.

We have reviewed the submitted document and plans and have the following observations and recommendations:

#### Landscape and Visual Impact

In line with Core Strategy CS2 a Landscape and Visual Impact Assessment (LVIA) has been produced and accompanies the application. The LVIA is broadly in line within the principles set out on the third edition of "Guidelines for Landscape and Visual Impact Assessment"(GLVIA3) and includes an assessment of landscape and visual receptors.

That being said, the assessment has judged that the highest sensitivity to the development would be users of several public footpaths to the north and east of the site and two private properties (Fidgeon's Farm and Thornbush Hall) to the east of the site, yet viewpoints close to these receptors have not been included. While we accept that providing photographs from the properties themselves would not be possible, there are Public Rights of Way (PROW) that pass in close proximity to these properties that could be photographed to illustrate that there would be Negligible affect from these locations.

Secondly with regards to the submitted photographs in appendix 2A. These appear to be stitched images which is acceptable, though this has not been stated in the written method section. The size which the photographs are presented at is also unclear. In line with Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019) we would expect these to be 820 x 250 minimum (height as appropriate).

Similarly, the location of the word 'site' on photography is misleading as the development would cover a larger area than shown; the photographs that show the site in its context would benefit from the extent of the redline boundary being shown (eg photos 5 & 8).

It is unclear how the selection of viewpoints was made. The selection fails to include any assessment of the impact on users of the byway 042/0 or footpath 054/0. A plan showing the Zone of Theoretical Influence (ZTI) has not been included with the appendix which may have excluded these views based on landform.



No visual representations of the proposal have been provided as part of the LVIA . A number of elevations of the projected boundary have been provided separately, however these do not represent how the development would be viewed in the context of the landscape. We would recommend that some type 3 – photowire visualisations (AVR level 1) should be produced to illustrate the mass of the development to confirm and verify that the assessment of the visual impacts are accurate. Due to the localised nature of the change to visual amenity we would recommend that viewpoints 1, 5(or 9) and 8 can be used as the basis for these.

### Landscape Proposals

A landscape strategy has been provided that outlines the proposed location of the various landscape elements, though it provides no details of numbers, sizes and finishes etc. Therefore we recommend that a detailed landscape scheme and landscape management plan be secured by condition.

The proximity of the development to Bullen Wood, which is registered with Natural England as ancient semi-natural woodland is of concern. There is potential to indirectly impact this established and valued feature in the landscape. NPPF paragraph 180 c) recommends refusal of development which result in the loss or deterioration of irreplaceable habitats such as ancient woodlands. The planned buffer is 15m, yet the Woodland Trust recommendation is 50m unless it is demonstrated that a smaller buffer would suffice.

Furthermore, the SuDS attenuation basin has been placed to the south of the site, working with existing contours, however we do have concerns with regards to the suitability of this location. There is a potential to alter the water table locally and of chemical contamination from not only the batteries, but the construction phase and ongoing vehicle access to the site. The submitted information fails to demonstrate how the risks will be managed. Consideration should also be given to the cumulative effects of the existing Power station and the potential detrimental effect this may have on Bullen Woods.

Based on the matters above, we would recommend that comment is sought from the LPA's Arboricultural officer, with regard to any foreseeable impacts and the suitability of the offset provided.

In summary, we would advise that the above matters are considered before making a final judgement of the impacts and suitability of the mitigation measures.

If you have any queries regarding the matters above, please do not hesitate to contact me.

Kind regards,

Kim Howell BA (Hons) DipLA CMLI  
Landscape Consultant

**Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils.** Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

**From:** BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>

**Sent:** 26 Oct 2021 03:48:03

**To:**

**Cc:**

**Subject:** FW: DC/21/05468 - Land To The South Of Bullen Lane, Bramford

**Attachments:**

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**From:** BMSDC Public Realm Mailbox <public.realm@baberghmidsuffolk.gov.uk>

**Sent:** 26 October 2021 14:41

**To:** BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>

**Cc:** consultpuplicrealm@baberghmidsuffolk.gov.uk

**Subject:** RE: DC/21/05468 - Land To The South Of Bullen Lane, Bramford

Good Afternoon,

Thank you for your email. We understand there is no comment to make, however the public realm officer who deals with this is on leave this week and would ask if there could be an extension on the date to allow them to respond if required.

Many thanks.

Kind Regard,  
Jane

Jane Barrett  
Administration & Technical Support Officer  
Countryside and Public Realm  
Babergh and Mid Suffolk District Councils – Working together  
Working Pattern Monday - Wednesday

---

**From:** BMSDC Planning Area Team Green <[planninggreen@baberghmidsuffolk.gov.uk](mailto:planninggreen@baberghmidsuffolk.gov.uk)>

**Sent:** 26 October 2021 12:33

**Subject:** DC/21/05468 - Land To The South Of Bullen Lane, Bramford

Good afternoon,

We would have sent yourself a consultation request for the above application on 06/10/2021. Your consultation request is due to expire on 27/10/2021.

If you do not wish to comment, please respond to this email. If you intend to provide comments, we look forward to receiving these at your earliest convenience.

Kind Regards,

**Josie Kett**

**Customer Service Team**

**Babergh and Mid Suffolk District Councils - Working Together**

Please note that my working days are Monday, Tuesday and Fridays.

Thank you for your email.

We aim to respond to your email as quickly as possible, however a full response to more complex enquiries may take up to 10 working days, in line with the councils service standards.

**For our latest Coronavirus response please visit click the following link-**

<https://www.midsuffolk.gov.uk/features/our-covid-19-response/>



*Thank you for contacting us and for your patience, while we work hard to protect our staff, residents, communities and businesses and keep essential services running during the coronavirus outbreak.*

**During this time, we may have to reduce or suspend services, but we aim to respond to your query as soon as possible. In some cases we may not be able to deal with your request until business as usual is resumed.**

Alternatively you may find the answer to your enquiry on our websites:

Email: [planning@baberghmidsuffolk.gov.uk](mailto:planning@baberghmidsuffolk.gov.uk)

Websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

Free advice can be found on the planning portal, please see link below:

[www.planningportal.co.uk](http://www.planningportal.co.uk)

The Customer Service Team

Endeavor House,

8 Russell Road,

Ipswich,

IP1 2BX

Please note that our own Householder and Discharge of Condition forms are now “live” on our website via the following link: <https://www.babergh.gov.uk/planning/development-management/apply-for-planning-permission/> The fees can be paid online by debit or credit card and will attract no additional submission charges (E.g. £20 charged by the Planning Portal)