

# Consultee Comments for Planning Application DC/21/06825

## Application Summary

Application Number: DC/21/06825

Address: Land To The South Of Suggenhall Farm Church Lane Rickinghall IP22 1LL

Proposal: Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure.

Case Officer: Averil Goudy

## Consultee Details

Name: Mrs Leeann Jackson-Eve

Address: Wayside, Cherry Tree Lane, Botesdale Diss, Suffolk IP22 1DL

Email: Not Available

On Behalf Of: Rickinghall Superior And Inferior Parish Clerk

## Comments

The PCs meeting on 3 March was attended by 11 members of the public who relayed their concerns about the reconsultation on the photovoltaic solar array, battery storage and ancillary infrastructure on land to the south of Suggenhall Farm, Church Lane. It was felt strongly that the new submission still did not adequately address the harmful effect on nearby residential and business properties, on wildlife and nature and on the landscape, including two public rights of way which overlook the site, as well as the loss of arable land. The following issues were highlighted:

The re-siting of the buildings would be more prominently visible from neighbouring properties and the Grade I Listed church.

The native hedge screening would not mature to 3m for up to 10 years and there was no indication of how the impact on surrounding properties, and other users of the countryside, would be mitigated during the growth period.

The loss of arable land, particular during a time when supplies of produce were uncertain due to worldwide events, was insupportable. It was felt strongly that the UK should focus on becoming more self-sustaining.

The PC agrees that these issues need to be addressed more adequately within the application and a compelling argument needs to be made to justify the loss of arable land and the loss of amenity to residents and other users of the countryside.

Furthermore, in its previous comments the PC stated With respect of the Botesdale & Rickinghall Neighbourhood Plan, Policy B&R20 states that Development which will result in the loss of existing amenity, sport or recreation open space (defined in the NP as all open space of public value which offer[s] important opportunities for sport and recreation and can act as a visual amenity) or facilities will not be allowed unless it can be demonstrated that it is surplus to

requirement against the local planning authority's standards for the particular location. The PC does not consider that this requirement has been met within the application. B&R21 states that Development which would adversely affect the character or result in the loss of existing or proposed rights of way, will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use. The PC does not consider that this requirement has been sufficiently addressed within the application. The Neighbourhood Plan continues to be ignored by the applicant and so the PC still considers the submission to be insufficient in this respect.

The PC therefore objects to the application for insufficient evidence regarding the concerns outlined above and to the proposal as remaining more harmful than beneficial to the local community.

In addition, it calls on MSDC, SCC and central Government to initiate a more comprehensive approach to the provision of alternative energy sources in Suffolk and the UK. It was suggested that a proactive approach requiring solar panels on new builds and initiating a programme of installing solar panels on industrial buildings and brownfield sites would greatly reduce the need for rural/arable sites such as this. It was felt strongly that not enough thought had been given to the impact solar farms had on the countryside, on the self-sustainability of the UK and on rural amenity characteristics which are a valuable resource for well-being. It was also suggested that Suffolk had already contributed disproportionately to alternative energy sources and Suffolk local authorities should lead the way in providing a masterplan for the county rather than the current piecemeal approach to considering sites.

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Proposal: Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure.

Case Officer: Averil Goudy

## Consultee Details

Name: Mrs Leeann Jackson-Eve

Address: Wayside, Cherry Tree Lane, Botesdale Diss, Suffolk IP22 1DL

Email: Not Available

On Behalf Of: Rickinghall Superior And Inferior Parish Clerk

## Comments

The PCs meeting on 11 January was attended by 15 members of the public who relayed their concerns about the photovoltaic solar array, battery storage and ancillary infrastructure on land to the south of Suggenhall Farm, Church Lane. These focussed primarily on the harmful effect on nearby residential and business properties, on wildlife and nature and on the landscape, including two public rights of way which overlook the site, as well as the loss of arable land.

The PC noted that in the National Planning Policy Framework (2021) there is a presumption in favour of sustainable development, and government targets for energy provision mean that more and more schemes of this type will be approved.

And while the PC accepted the concerns about the effect on wildlife and nature, it was felt that the long-term nature of the project would allow adaptation and restoration of balance in this respect. That said, the PC wished to see more information about the effect on ground-nesting skylarks on site and how that would be mitigated.

In respect of the Botesdale & Rickinghall Neighbourhood Plan, Policy B&R20 states that Development which will result in the loss of existing amenity, sport or recreation open space (defined in the NP as all open space of public value which offer[s] important opportunities for sport and recreation and can act as a visual amenity) or facilities will not be allowed unless it can be demonstrated that it is surplus to requirement against the local planning authoritys standards for the particular location. The PC does not consider that this requirement has been met within the application. B&R21 states that Development which would adversely affect the character or result in the loss of existing or proposed rights of way, will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use. The PC does not consider that this requirement has been sufficiently addressed within the

application.

The PC also felt significant concern about the effect on two neighbouring properties, Suggenhall Farm Barn and Sunnyside, and considered that the application fell far short in its response to the loss of amenity including impairment to wellbeing from glint/glare, noise and the visual impact to residents and employees of these properties and other users of the countryside.

Given the obvious negative impact on the local community, the PC agreed that the environmental, social and economic benefits were not adequately proven. For that reason and based on the concerns outlined above, the PC objects to the proposal.

## BMSDC Planning Area Team Yellow

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**From:** Jessica Fleming (SCC Councillor)  
**Sent:** 16 March 2022 14:21  
**To:** BMSDC Planning Area Team Yellow  
**Cc:** Philip Isbell; David Burn (Cllr); Tom Barker; Cassandra Clements; Jessica Fleming (Cllr)  
**Subject:** FW: MSDC Planning Re-consultation Request Rickingham Solar Farm - DC/21/06825 - FUL  
**Attachments:** ufm10\_Standard\_Re-consultation\_Letter.pdf  
**Importance:** High  
**Categories:** kirsty

My comments area as follows:

As ward councillor I have attended two parish council meetings about this application, both packed with people objecting to the proposal and have received multiple communications from concerned residents which, with 2 exceptions, are strongly opposed to this project on a wide variety of grounds, both local and more strategic. While the amended proposal is an improvement on the original, it does not remove the main objections which people are putting forward.

Locally, there are landscape and visual impacts which would have substantial negative effects on a Grade I listed church, a listed barn, on nearby residences (Sunnyside and Willow Cottage) and on the surrounding landscape in general which, contrary to comments contained in the LVIA, is not in my opinion degraded and is open, beautiful and very characteristic of central/ northern Suffolk. The neighbouring property owner of Sunnyside Farm Shop is likely to be seriously affected by the proposal which would place panels and equipment (glint, glare and nuisance) directly adjacent to his land and buildings thus jeopardising a very sustainable and valued agricultural enterprise where fruit and vegetables are grown, sold and distributed locally.

More strategically, it is clear that the District Council is receiving multiple applications for this type of solar farm (<50MW) due to the anticipated government support for renewables given our zero carbon commitment. There does not appear to be a mechanism in place to assess 'carrying capacity' for these developments on a cumulative basis, but this needs to be remedied as a matter of urgency. Many people expressed concern at the lack of apparent control of how many, where, and what the real value is in allowing multiple applications to go forward without a joined up approach.

I have concerns about effects on the Suffolk landscape from increasing 'urbanisation' due to multiple solar and other energy related developments of which there are many. This will/ would have a lasting detrimental effect on the tranquillity and visual values that are presently still available for both residents and tourists. These characteristics can be progressively eroded quite easily unless controls are put in place, and is the reason I have been pushing for a heritage and historic environment Supplementary Planning Document, which is urgently needed. Until the relevant assessments have been completed and an SPD is in place I would like to see a hold or pause on the multiple largely rural energy projects that are coming in. Some of the large scale projects and NSIPs we clearly cannot stop but can shape, and could shape more effectively with an SPD.

People have also raised concerns about loss of agricultural land, regardless of whether it is grade 2, 3a or 3b. It is all good productive land for grain, other crops and vegetables. The growing need to produce food within our own country is becoming increasingly urgent and in addition to the sustainability and carbon footprint arguments there are real national security arguments as well. This issue was raised repeatedly at local meetings. I am aware that some solar farm operators state that they can run sheep or even geese, however this does not seem in reality to be the norm and be a token response. (Can you imagine trying to herd sheep in a solar array??)

Passive solar in our climate and on greenfield is an inefficient use of land and is by far the least efficient of all possible means of energy generation per unit area. Acknowledging we are in a climate and environmental emergency does imply that we need to respond by seeking sensible ways to generate energy at a local level, however I do not believe that this is the way to do it nor do such projects contribute significant gain to our national picture.

In summary, and despite the energy that such a project would produce, I do not believe that the positives outweigh the negatives and that this application should be refused.

Thank you.

With kind regards,

Jessica

Cllr. Jessica Fleming  
Suffolk County Council, Hartismere Division Chairman, Suffolk Health Scrutiny Committee Mid Suffolk District Council, Rickinghall Ward Cabinet Member for Environment & Waste.  
Email: [jessica.fleming@suffolk.gov.uk](mailto:jessica.fleming@suffolk.gov.uk)  
Tel: (m) 07714-597980

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

From: [planningyellow@baberghmidsuffolk.gov.uk](mailto:planningyellow@baberghmidsuffolk.gov.uk) <[planningyellow@baberghmidsuffolk.gov.uk](mailto:planningyellow@baberghmidsuffolk.gov.uk)>  
Sent: 22 February 2022 08:37  
To: Jessica Fleming (Cllr) <[Jessica.Fleming@midsuffolk.gov.uk](mailto:Jessica.Fleming@midsuffolk.gov.uk)>  
Subject: MSDC Planning Re-consultation Request - DC/21/06825 - FUL

Please find attached planning re-consultation request letter relating to planning application - DC/21/06825 - Land To The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL

Kind Regards

Planning Support Team

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh District Council and/or Mid Suffolk District Council shall be understood as neither given nor endorsed by Babergh District Council and/or Mid Suffolk District Council.

Babergh District Council and Mid Suffolk District Council (BMSDC) will be Data Controllers of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safe, secure, processed and only shared for those purposes or where it is allowed by law. In some circumstances however we may need to disclose your 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.



Historic England

Ms Averil Goudy  
Babergh and Mid Suffolk District Councils  
Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

Direct Dial: 01223 582740

Our ref: P01450378

15 March 2022

Dear Ms Goudy

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND TO THE SOUTH OF SUGGENHALL FARM, CHURCH LANE,  
RICKINGHALL, IP22 1LL  
Application No. DC/21/06825**

Thank you for your letter regarding the amended application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

Historic England previously raised concerns regarding this application in our letter of 14 January 2022 on heritage grounds due to the harm caused to the grade I listed building through inappropriate development within its setting. We advised that development of the northern and western arms of the application site should be removed from the scheme or relocated to a less sensitive location towards the south.

The amended plans show an 8% reduction in solar panels and these have been removed from the northern field inline with our advice. While we welcome this reduction and consider it has gone some way in lessening the impact on the grade I listed church we do not consider this has fully addressed our concerns and would suggest that the solar panels are completely removed from the northern and western arms of the development.

Historic England continues to consider that the proposed application (even with the reduction in the number of solar panels) would result in less than substantial harm to St Mary's church through inappropriate development within its setting. The rural and isolated character of the area contributes to the significance of the church and this would be impacted, as demonstrated by the LVIA, as the solar farm would be seen in views of the tower across the fields and in views from the roads when approaching the church. We would suggest that development of the northern and western arms of the application site are either removed from the scheme or relocated to a less sensitive location towards the south. Should the council be minded to grant planning permission as the application currently stands then we would suggest thicker planting along the western boundary. We would refer the council to our previous letter.



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU  
Telephone 01223 58 2749 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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

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







Historic England

Yours sincerely

**Sophie Cattier**

Assistant Inspector of Historic Buildings and Areas

E-mail: [sophie.cattier@HistoricEngland.org.uk](mailto:sophie.cattier@HistoricEngland.org.uk)



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Historic England

Ms Averil Goudy  
Babergh and Mid Suffolk District Councils  
Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

Direct Dial: 01223 582740

Our ref: P01450378

14 January 2022

Dear Ms Goudy

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND TO THE SOUTH OF SUGGENHALL FARM, CHURCH LANE,  
RICKINGHALL, IP22 1LL**

**Application No. DC/21/06825**

Thank you for your letter of 20 December 2021 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

St Mary's is a rural church which dates to the 14<sup>th</sup> century and was heavily restored in 1868 by W.C. Fawcett. It is constructed of rubble and knapped flint with ashlar and red brick dressings. The square, four stage west tower is a prominent feature within the landscape and can be seen in views across the agricultural fields that surround the church and from road approaches to the east and south. The church is set away from the village of Rickingham and sits within countryside and fields with a number of grade II cottages scattered close by. St Mary's is listed at grade I in recognition of its exceptional level of special architectural and historic interest and so falls within the top 2.5.% of listed buildings nationally.

This application proposes the installation of a photovoltaic solar array, battery storage and ancillary infrastructure in fields to the east of St Mary's church. Due to the isolated nature of the church it has strong links to the surrounding countryside and agricultural fields, the rural and undeveloped character of the area contributes to the significance of the grade I listed building. The LVIA images produced alongside this application demonstrate that the solar panels would be seen in views of the tower from across the fields. While the Heritage Statement suggests that there are no views from the church to the application due to hedgerows and planting it would be helpful for photographs to be produced to support this statement. The proposed location of the solar panels to the north and west of the application site would clearly be in views when approaching the church which would disrupt the isolated and rural character of the area. This would result in less than substantial harm to the significance of St Mary's church through inappropriate development within its setting.



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Telephone 01223 58 2749 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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The National Planning Policy Framework (NPPF) identifies that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (paragraph 189). Paragraph 194 of the NPPF requires applicants to provide sufficient information on the heritage assets affected by the development to allow assessment of that development on their historic significance. Paragraph 197 of the NPPF states that when determining applications local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets. Paragraph 199 also states that when considering impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be), irrespective of the level of harm. Paragraph 200 states that any harm to, or loss of, significance of a designated heritage asset should require clear and convincing justification. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use (Paragraph 202).

Historic England considers the proposed application would result in less than substantial harm to St Mary's church through inappropriate development within its setting. The rural and isolated character of the area contributes to the significance of the church and this would be impacted, as demonstrated by the LVIA, as the solar farm would be seen in views of the tower across the fields and in views from the roads when approaching the church. We would suggest that development of the northern and western arms of the application site are either removed from the scheme or relocated to a less sensitive location towards the south. Should the council be minded to grant planning permission as the application currently stands then we would suggest thicker planting along the western boundary.

## **Recommendation**

Historic England has concerns regarding the application on heritage grounds due to the harm caused to the grade I listed building through inappropriate development within its setting. This harm could be mitigated by reducing the number of solar panels, moving the development out of the northern and western arms of the field and increasing planting along the boundaries. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 197, 199 and 200 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.





Historic England

Yours sincerely

**Sophie Cattier**

Assistant Inspector of Historic Buildings and Areas

E-mail: [sophie.cattier@HistoricEngland.org.uk](mailto:sophie.cattier@HistoricEngland.org.uk)



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# Ministry of Defence

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

# Defence Infrastructure Organisation

Ministry of Defence  
Safeguarding Department  
St George's House  
DIO Headquarters  
DMS Whittington  
Lichfield  
Staffordshire  
WS14 9PY

Tel: 07815484477

E-mail: [DIO-safeguarding-statutory@mod.gov.uk](mailto:DIO-safeguarding-statutory@mod.gov.uk)

[www.mod.uk/DIO](http://www.mod.uk/DIO)

01 March 2022

Your reference: D/21/06825  
Our reference: DIO 10054209

Dear Philip,

## **MOD Safeguarding – SITE OUTSIDE SAFEGUARDING AREA (SOSA)**

**Proposal:** Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure.

**Location:** Land to The South of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL

**Grid Ref:** Easting: 604713      Northing: 274349

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development, with the revised documents, which was received by this office.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

The development is for a PV Solar Array with battery storage and ancillary infrastructure.

This application relates to a site outside of Ministry of Defence safeguarding areas. I can therefore confirm that the Ministry of Defence has no safeguarding objections to this proposal.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely



Kaye Noble  
Assistant Safeguarding Manager  
DIO safeguarding



# Ministry of Defence

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

# Defence Infrastructure Organisation

Ministry of Defence  
Safeguarding Department  
St George's House  
DIO Headquarters  
DMS Whittington  
Lichfield  
Staffordshire  
WS14 9PY

Tel: 07815484477

E-mail: [DIO-safeguarding-statutory@mod.gov.uk](mailto:DIO-safeguarding-statutory@mod.gov.uk)

[www.mod.uk/DIO](http://www.mod.uk/DIO)

10 February 2022

Your reference: DC/21/06825  
Our reference: DIO 10054209

Dear Philip,

## **MOD Safeguarding – SITE OUTSIDE SAFEGUARDING AREA (SOSA)**

**Proposal:** Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure.

**Location:** Land to The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL

**Grid Ref:** Easting: 604743      Northing: 274475

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

The development is for a PV Solar array and ancillary infrastructure.

This application relates to a site outside of Ministry of Defence safeguarding areas. I can therefore confirm that the Ministry of Defence has no safeguarding objections to this proposal.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely



Kaye Noble  
Assistant Safeguarding Manager  
DIO safeguarding



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

From: Rachael Abraham

Sent: 01 March 2022 13:55

Subject: RE: MSDC Planning Re-consultation Request - DC/21/06825 - FUL

Dear Averil,

Thank you for re-consulting us on this application.

Our advice remains the same as that provided on 6/1/ which I have attached for convenience.

Please note the inclusion within the proposed condition wording for a management plan to secure an area of archaeological remains defined by the geophysical survey in situ (as agreed through pre-application discussions with the applicant which is reflected in the submitted plans which remove this area from the area of development entirely).

Best wishes,

Rachael

Rachael Abraham B.A. (Hons), M.A.

Senior Archaeological Officer

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

Philip Isbell  
Chief Planning Officer  
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Our Ref: 2021\_06825  
Date: 6<sup>th</sup> January 2022

For the Attention of Bronwen Curtis

Dear Mr Isbell

**Planning Application DC/21/06825 – Land to the south of Suggenhall Farm, Rickinghall: Archaeology**

This site lies in an area of archaeological potential recorded on the County Historic Environment Record, in close proximity finds scatters dating from the prehistoric to the medieval periods (RKS 007, 013, 015, 021) and close to the site where Roman occupation was defined (RKS 014). A geophysical survey of the proposed solar farm site has defined an area of anomalies likely to be archaeological in origin. Although excluded from the proposed development area, this indicates the potential for further associated remains which geophysical survey was unable to detect across the wider solar farm area. 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 archaeological remains which exist.

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.
- h. Mitigation details for the preservation *in situ* of archaeological features within the development area during construction and a management plan for the ongoing protection of these features in perpetuity.**

2. The solar farm 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.

As current plans propose to preserve the area of geophysical anomalies *in situ* by avoiding the placement of any solar panels in this area, a management plan for this area will be required which sets out a methodology to ensure that no ground disturbance occurs within defined Preservation In Situ area (PIS) both during development and throughout the long-term use of the site. Provided that ground disturbance is avoided **entirely** in this part of the site and that appropriate measures are put in place to secure the long term preservation of the archaeology, then further archaeological mitigation work in this area will not be required. Should **any** groundworks be planned, then this area will need to be subject to archaeological assessment and mitigation prior to the commencement of any development in this part of the proposal area.

The management plan will need to clearly define the extent of the PIS area and will also need to set out that this area must be fenced off during construction work with clear signage, that no machinery may track across the PIS area and that it must not be used for material or spoil storage or site access/compounds during construction.

In addition, there will need to be an appropriate methodology for the upgrading of the existing site access which runs adjacent to the PIS area that avoids ground disturbance, otherwise archaeological mitigation may be required.

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 Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Sent:** 06 Jun 2022 10:44:28

**To:**

**Cc:**

**Subject:** FW: 2022-06-06 JS Reply Land To The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL Ref DC/21/06825 - FUL

**Attachments:**

---

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

**Sent:** 06 June 2022 10:38

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

**Cc:** Averil Goudy <Averil.Goudy@baberghmidsuffolk.gov.uk>

**Subject:** 2022-06-06 JS Reply Land To The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL Ref DC/21/06825 - FUL

Dear Averil Goudy,

Subject: Land To The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL Ref DC/21/06825 - FUL

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/06825

The following submitted documents have been reviewed and we recommend **approval subject to conditions** at this time.

- Site location plan Ref 3044-01-02
- Flood Risk Assessment Final Report v1.1
- Technical Note, Proposed Surface Water Drainage Ref v2.1
- Plan of Watercourse Ref Ditches

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

1. No development shall commence until details of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the local planning authority (LPA).

*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. No development shall commence until details of the implementation, maintenance, and management of the strategy for the disposal of surface water on the site have been submitted to and approved in writing by the LPA. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

*Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.*

3. 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/>

4. 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. The approved CSWMP shall include:
- Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-
- i. Temporary drainage systems
  - ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
  - iii. Measures for managing any on or offsite flood risk associated with construction

*Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater*  
<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-management-plan/>

#### 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: [planningyellow@babberghmidsuffolk.gov.uk](mailto:planningyellow@babberghmidsuffolk.gov.uk) <[planningyellow@babberghmidsuffolk.gov.uk](mailto:planningyellow@babberghmidsuffolk.gov.uk)>  
Sent: 17 May 2022 11:47  
To: GHI Floods Planning <[floods.planning@suffolk.gov.uk](mailto:floods.planning@suffolk.gov.uk)>  
Subject: MSDC Planning Re-consultation Request - DC/21/06825 - FUL

Please find attached planning re-consultation request letter relating to planning application - DC/21/06825 - Land To The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL

#### Kind Regards

Planning Support Team

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh District Council and/or Mid Suffolk District Council shall be understood as neither given nor endorsed by Babergh District Council and/or Mid Suffolk District Council.

Babergh District Council and Mid Suffolk District Council (BMSDC) will be Data Controllers of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safe, secure, processed and only shared for those purposes or where it is allowed by law. In some circumstances however we may need to disclose your 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.

**From:** GHI Floods Planning

**Sent:** 02 March 2022 13:14

**Subject:** 2022-03-02 JS Reply Land To The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL Ref DC/21/06825 - FUL

Dear Averil Goudy,

Subject: Land To The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL Ref DC/21/06825 - FUL

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/06825

The following submitted documents have been reviewed and we recommend a maintaining a **holding objection** at this time:

- Site location plan Ref 3044-01-01
- Site location plan Ref 3044-01-02
- Flood Risk Assessment Final Report v1.1
- Technical Note, Proposed Surface Water Drainage Ref v1.1

A holding objection is necessary because the information provide does not satisfy the previous consultation reply regarding surface water drainage for the proposed development.

**The holding objection is a temporary position to allow reasonable time for the applicant and the LLFA to discuss what additional information is required to overcome the objection(s). This Holding Objection will remain the LLFA's formal position until the local planning authority (LPA) is advised to the contrary. If the LLFA position remains as a Holding Objection at the point the LPA wishes to determine the application, the LPA should treat the Holding Objection as a Formal Objection and recommendation for Refusal to the proposed development. The LPA should provide at least 2 weeks prior notice of the publication of the committee report so that the LLFA can review matters and provide suggested planning conditions, even if the LLFA position is a Formal Objection.**

The points below detail the action required in order to overcome our current objection:-

1. Supply a detail strategy for the disposal of surface water

Document Submitted	Document Description
<b>Flood Risk Assessment (FZ3 or Site &gt;1Ha)</b>	Evaluation of flood risk (fluvial, pluvial & groundwater) to the site – will guide layout and location of open spaces. (SCC may require modelling of ordinary watercourse if EA Flood Maps not available)
<b>Drainage Strategy/Statement (less detail required for Outline)</b>	Document that explains how the site is to be drained using SuDS principles. Shall include information on:- <ul style="list-style-type: none"><li>• Existing drainage (inc adjacent roads)</li><li>• Impermeable Area (Pre and Post Development)</li><li>• Proposed SuDS</li><li>• Hydraulic Calculations (see below)</li><li>• Treatment Design (i.e. interception, pollution indices)</li><li>• Adoption/Maintenance Details</li><li>• Exceedance Paths</li></ul>



<b>Contour Plan</b>	Assessment of topography/flow paths/blue corridors
<b>Impermeable Areas Plan</b>	Plan to illustrate new impervious surfaces
<b>Evidence of any third party agreements to discharge to their system (i.e. Anglian Water agreement or adjacent landowner)</b>	Evidence of any permissions or permits being obtained.
<b>Detailed Development Layout and SuDS Provision Plan (including landscaping details)</b>	Dimensioned plans showing the detailed development layout including SuDS components, open spaces and exceedance corridors.
<b>Full SI Report</b>	Detailed assessment of ground conditions – leading on from initial testing <ul style="list-style-type: none"> <li>• Widespread coverage of trial pits to BRE 365</li> <li>• Contamination/Pollution check</li> <li>• Groundwater Monitoring</li> </ul>
<b>Detailed Drainage Scheme Plan</b>	Dimensioned plan showing main aspects of the drainage infrastructure. Plans should ref:- <ul style="list-style-type: none"> <li>• SuDS details (size/volume)</li> <li>• Pipe Numbers/Sizes/Levels</li> <li>• Outfall &amp; Permitted Discharge (if applicable)</li> </ul>
<b>Detailed SuDS Drawings (Open SuDS)</b>	Dimensioned plans of proposed SuDS components i.e. scaled cross sections/long sections
<b>Full hydraulic calculations (MicroDrainage “Network” output)</b>	At this stage, SCC require simulations of the drainage network inc SuDS components. MicroDrainage Network should be submitted for 1,30 and 100yr+CC storms. (Source Control files are useful but not enough on their own)
<b>Discharge Agreements</b>	Evidence of any permissions or permits being obtained.
<b>Health and Safety Risk Assessment</b>	Where deep open SuDS (water level >0.5m) are proposed a H&S file will be required.

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Suffolk County Council  
Growth, Highway & Infrastructure

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

**Sent:** 23 Feb 2022 11:45:23

**To:**

**Cc:**

**Subject:** FW: 2022-02-23 JS Reply Land To The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL Ref DC/21/06825

**Attachments:**

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

**Sent:** 23 February 2022 11:44

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

**Cc:** Averil Goudy <Averil.Goudy@baberghmidsuffolk.gov.uk>

**Subject:** 2022-02-23 JS Reply Land To The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL Ref DC/21/06825

Dear Averil Goudy,

Subject: Land To The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL Ref DC/21/06825

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/06825

The following submitted documents have been reviewed and we recommend a **holding objection** at this time:

- Site location plan 3044-01-01
- Site location plan 3044-01-02
- Flood Risk Assessment Final Report v1.1

A holding objection is necessary because the applicant has failed to submit any evidence of a strategy for the disposal of surface water in line with national and local policy/guidance.

The density, height and number of PV panels will dictate the type of surface water management system that is required by the LLFA. This can be done by utilising perimeter swales or filter strips every 5<sup>th</sup> row of PV panels.

Auxiliary buildings, depending on where they are located, and their plan area can normally have the surface water drainage design/built in accordance with Building Regulations Part H. However, a surface water drainage strategy utilising SuDS principles may be required if the LLFA believe this is necessary depending on the site.

Below Panel Maintenance needs to be considered, as below the panel will normally be laid to grass or pastureland, the type of maintenance will vary depending on how the ground below and around the panels is to be utilised.

-  
If the area is to be laid to grass, it is recommended that this is a 80/20% grass/wildflower mix to allow for biodiversity enhancement/net gain. The management of this area should then be done in accordance with the species that utilise the grass and wildflowers. Careful consideration shall be given to the use of wheeled machinery to ensure that the soils are not overly compacted.

-  
If the area below the panels is to be used for pastureland or grazing land, it is recommended that this is limited to a low-density number of sheep. Cattle or bovine species should not be used as they could cause damage to the PV panels and would compact the soil.

Sheep do not compact the soils and thus help the natural drainage of the soils. Careful attention needs to be paid to areas where the sheep may flock to avoid poaching and the grazing of the areas should be rotated.

Existing flood flow routes or blue corridors should be maintained.

**The holding objection is a temporary position to allow reasonable time for the applicant and the LLFA to discuss what additional information is required to overcome the objection(s). This Holding Objection will remain the LLFA's formal position until the local planning authority (LPA) is advised to the contrary. If the LLFA position remains as a Holding Objection at the point the LPA wishes to determine the application, the LPA should treat the Holding Objection as a Formal Objection and recommendation for Refusal to the proposed development. The LPA should provide at least 2 weeks prior notice of the publication of the committee report so that the LLFA can review matters and provide suggested planning conditions, even if the LLFA position is a Formal Objection.**

The points below detail the action required in order to overcome our current objection:-

1. The applicant is to provide details of how the sites surface water will be drained.

Kind Regards

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

Dear Bron Curtis,

Subject: Land To The South Of Sugghenhall Farm, Church Lane, Rickinghall, IP22 1LL Ref DC/21/06825

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/06825

The following submitted documents have been reviewed and we recommend a holding objection at this time:

- Site location plan 3044-01-01
- Site location plan 3044-01-02

A holding objection is necessary because the applicant has failed to submit an assessment of flood risk, which is a requirement for all major development and has not presented any evidence of a strategy for the disposal of surface water in line with national and local policy/guidance.

NPPF Para 167. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk

assessment 55

Footnote 55 A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use

The holding objection is a temporary position to allow reasonable time for the applicant and the LLFA to discuss what additional information is required in order to overcome the objection(s). This Holding Objection will remain the LLFA's formal position until the local planning authority (LPA) is advised to the contrary. If the LLFA position remains as a Holding Objection at the point the LPA wishes to determine the application, the LPA should treat the Holding Objection as a Formal Objection and recommendation for Refusal to the proposed development. The LPA should provide at least 2 weeks prior notice of the publication of the committee report so that the LLFA can review matters and provide suggested planning conditions, even if the LLFA position is a Formal Objection.

The points below detail the action required in order to overcome our current objection:-

1. The applicant is to submit a flood risk assessment
2. The applicant is to provide details of how the sites surface water will be drained.

As a minimum, we require the following document and information to be submitted for each type of planning application or stage with the planning process.

Document Submitted    Document

Description    Full

Flood Risk Assessment

(FZ3 or Site >1Ha)    Evaluation of flood risk (fluvial, pluvial & groundwater) to the site – will guide layout and location of open spaces. (SCC may require modelling of ordinary watercourse if EA Flood Maps not available)   

Drainage Strategy/Statement (less detail required for Outline)

Document that explains how the site is to be drained using SuDS principles. Shall include information on:-

- Existing drainage (inc adjacent roads)
- Impermeable Area (Pre and Post Development)
- Proposed SuDS
- Hydraulic Calculations (see below)
- Treatment Design (i.e. interception, pollution indices)
- Adoption/Maintenance Details
- Exceedance Paths

Contour Plan    Assessment of topography/flow paths/blue corridors   


Impermeable Areas Plan    Plan to illustrate new impervious surfaces   

Evidence of any third party agreements to discharge to their system (i.e. Anglian Water agreement or adjacent landowner) Evidence of any permissions or permits being obtained.   


Detailed Development Layout and SuDS Provision Plan (including landscaping details)

Dimensioned plans showing the detailed development layout including SuDS components, open spaces and exceedance corridors.   

Full SI Report    Detailed assessment of ground conditions – leading on from initial testing


- Widespread coverage of trial pits to BRE 365
- Contamination/Pollution check
- Groundwater Monitoring 

Detailed Drainage Scheme Plan Dimensioned plan showing main aspects of the drainage infrastructure. Plans should ref:-


- SuDS details (size/volume)
- Pipe Numbers/Sizes/Levels
- Outfall & Permitted Discharge (if applicable) 


Detailed SuDS Drawings


(Open SuDS)

Dimensioned plans of proposed SuDS components i.e. scaled cross sections/long sections 

Full hydraulic calculations

(MicroDrainage “Network” output) At this stage, SCC require simulations of the drainage network inc SuDS components. MicroDrainage Network should be submitted for 1,30 and 100yr+CC storms. (Source Control files are useful but not enough on their own) 

Discharge Agreements Evidence of any permissions or permits being obtained. 

Health and Safety Risk Assessment Where deep open SuDS (water level >0.5m) are proposed a H&S file will be required. 

Kind Regards

Jason Skilton

Flood & Water Engineer

Suffolk County Council

Growth, Highway & Infrastructure

Endeavour House, 8 Russell Rd, Ipswich , Suffolk IP1 2BX

**\*\*Note I am remote working for the time being\*\***

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

From: planningpink@baberghmidsuffolk.gov.uk <planningpink@baberghmidsuffolk.gov.uk>

Sent: 20 December 2021 14:57

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

Subject: MSDC Planning Consultation Request - DC/21/06825

Please find attached planning consultation request letter relating to planning application - DC/21/06825 - Land To The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL

Kind Regards

Planning Support Team

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh District Council and/or Mid Suffolk District Council shall be understood as neither given nor endorsed by Babergh District Council and/or Mid Suffolk District Council.

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For more information on how we do

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

**Sent:** 11 Jan 2022 11:20:05

**To:**

**Cc:**

**Subject:** FW: FAO AVERIL GOUDY

**Attachments:**

---

**From:** Angela Kempen <Angela.Kempen@suffolk.gov.uk>

**Sent:** 10 January 2022 17:07

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

**Subject:** FAO AVERIL GOUDY

Good afternoon Ms. Goudy

DC/21/06825 - RICKENHALL

On behalf of the Suffolk Fire and Rescue Service please include the following comment your consultation.

SFRS would expect the developer and operator to produce a fire risk management plan that would ensure the impact of a fire or hazardous material spill is minimised and appropriate measures are taken to reduce the impact on the environment. Access to, and within, the site for fire appliances must be maintained to ensure any intervention is not delayed

Thank you and Kind regards

Angie Kempen

Water Officer

Suffolk Fire and Rescue Service

Endeavour House

Russell Road

Ipswich

IP1 2BX

Suffolk.

**Our Mission Statement:** We will make a positive difference for Suffolk. We are committed to working together, striving to improve and securing the best possible services.

*we*

**Our Values:** Wellbeing, Equality, Achieve, Support, Pride, Innovate, Respect, Empower



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

**Sent:** 28 Feb 2022 10:28:48

**To:**

**Cc:**

**Subject:** FW: MSDC Planning Re-consultation Request - DC/21/06825 - FUL

**Attachments:**

---

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

**Sent:** 28 February 2022 10:27

**To:** Averil Goudy <Averil.Goudy@babberghmidsuffolk.gov.uk>

**Cc:** BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>

**Subject:** RE: MSDC Planning Re-consultation Request - DC/21/06825 - FUL

Dear Averil,

Thank you for notifying me about the re-consultation. On reviewing the planning documents submitted I have no comment to make.

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/>

Dear Bron,

Thank you for consulting me about the proposed solar development at Land to the South of Suggenhall Farm in Rickinghall. On reviewing the documents submitted I have no comment to make, as the development does not meet the thresholds that require a Travel Plan in accordance with the Suffolk Travel Plan Guidance.

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/>

Your Ref: DC/21/06825  
Our Ref: SCC/CON/0668/22  
Date: 28 February 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: Averil Goudy - MSDC

Dear Averil

**TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DC/21/06825**

**PROPOSAL:** Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure.

**LOCATION:** Land To The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL

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

The recommended conditions and notes from our previous response dated 05/01/22 (ref: SCC/CON/5706/21) still apply.

Yours sincerely,

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

Your Ref:DC/21/06825  
Our Ref: SCC/CON/5706/21  
Date: 5 January 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/21/06825**

**PROPOSAL:** Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure.

**LOCATION:** Land To The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL

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 part of the development shall be commenced until details of the proposed accesses (including the position of any gates and visibility splays) indicatively shown on drawing nos. 3044-01-D01 and 3004-01-012 have been submitted to and approved in writing by the Local Planning Authority. The approved access shall be laid out and constructed in its entirety prior to any other part of the development taking place. Thereafter the access shall be retained in its approved form.

Reason: To ensure that the accesses are designed and constructed to an appropriate and acceptably safe specification and made available for use at an appropriate time.

\*This needs to be a pre-commencement condition because access for general construction traffic and other traffic is not otherwise achievable safely.

Condition: Before the access onto the B1113 is first used visibility splays shall be provided as shown on Drawing No. 3044-01-D01 with an X dimension of 2.4 metres and Y dimensions of 155 and 164 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 highway have sufficient visibility to manoeuvre safely including giving way to approaching users of the highway without them having to take avoiding action and to ensure drivers of vehicles on the public highway 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 highway 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: 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.

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.

Condition: Before the development is commenced details of the areas and infrastructure to be provided for the loading, unloading, manoeuvring and parking of vehicles including powered two-wheeled vehicles and electric vehicle charging points shall be submitted to and approved in writing by the Local Planning Authority.

The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles in accordance with the current Suffolk Guidance for Parking where on-street parking and or loading, unloading and manoeuvring would be detrimental to highway safety.

Note: It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification.

The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing. For further information please visit:

<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/application-for-works-licence/>

Yours sincerely,

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

**From:** GHI PROW Planning >

**Sent:** 17 February 2022 12:47

**Subject:** RE: MSDC Planning Consultation Request - DC/21/06825 - FUL \*Land To The South Of Suggenhall Farm, Church Lane, Rickinghall

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

**REF: DC/21/06825**

Thank you for your consultation concerning the above application.

As acknowledged in the 'Planning and Design & Access Statement', the proposed site does not contain any public rights of way (PROW) but there are PROW in the vicinity of the site including Rickinghall Superior Public Footpath 016 to the east of the site, Rickinghall Superior Public Footpath 024 south east of the site, and Rickinghall Superior Public Footpath 006 west of the site. The Definitive Map for Rickinghall Superior can be seen at: <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Rickinghall-Superior.pdf> and a more detailed plot of public rights of way can be requested by the Applicant to accurately plot PROW on relevant plans. Please contact [DefinitiveMaps@suffolk.gov.uk](mailto:DefinitiveMaps@suffolk.gov.uk) for more information. Note, there is a fee for this service.

**We ask that where relevant, the following bullet points are all taken into account. In addition we have attached a PROW Position Statement containing guidance regarding Solar Farms and PROW:**

1. **PROW MUST remain open, unobstructed, and safe for the public to use at all times, including throughout any construction period.** If it is necessary to temporarily close or divert a PROW, the appropriate process must be followed (please see points 4 and 5 below).
2. 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).

3. 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.

4. **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.
5. **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.
6. 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.
7. **There may be a further 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



Dear Bron

YOUR REF: 21/06825

OUR REF: 301670

SUBJECT: Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure.

Land To The South Of Suggenhall Farm, Church Lane, Rickingham, IP22 1LL

Please find below my comments regarding air quality matters only.

Thank you for your consultation on the above application.

I have referred to the Environmental Protection UK (EPUK) Guidance, 2017 – Land Use Planning and Development Control: Planning for Air Quality, in assessing this application with regard to air quality. The data in the Transport Statement shows that the development would not meet the criteria in the EPUK Guidance for requiring an air quality assessment.

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:** Jennifer Lockington  
**Sent:** 02 March 2022 15:34  
**Subject:** DC/21/06825 - Air Quality

Dear Averil

YOUR REF: 21/06825

OUR REF: 303941

**SUBJECT:** Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure.  
Land To The South Of Suggenhall Farm, Church Lane, Rickinghall,  
IP22 1LL

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

Thank you for your re-consultation on the above application.

The additional information has no impact on air quality. Therefore, I have no objections with regard to air quality.

Regards

**Jennifer Lockington (Mrs)**  
Senior Environmental Management Officer  
**Babergh & Mid Suffolk District Councils - Working Together**

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

**Sent:** 28 Feb 2022 04:11:59

**To:**

**Cc:**

**Subject:** FW: WK303943 DC2106825

**Attachments:**

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

**Sent:** 28 February 2022 15:36

**To:** Averil Goudy <Averil.Goudy@baberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Subject:** WK303943 DC2106825

Noise/Odour/Light/Smoke

**APPLICATION FOR PLANNING PERMISSION - DC/21/06825**

**Proposal:** Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure.

**Location:** Land To The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL

**Reason(s) for re-consultation:** Revised documents received 21.02.22

Thank you for re consulting me on this application. I have no additional comments or requirements to add to those I have already submitted.

*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@baberghmidsuffolk.gov.uk](mailto:andy.rutson-edwards@baberghmidsuffolk.gov.uk)

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

Environmental Health -

Noise/Odour/Light/Smoke

APPLICATION FOR PLANNING PERMISSION - DC/21/06825

Proposal: Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure.

Location: Land To The South Of Suggenhall Farm, Church Lane, Rickingham, IP22 1LL

Thank you for consulting me on this application, having studied the documents submitted to support this Environmental Protection have no objections in principle. However we have the following comments to make with regard to noise/light/dust

#### NOISE

1. Prior to the development at Land To The South Of Suggenhall Farm, Church Lane, Rickingham, IP22 1LL hereby permitted coming into beneficial use, a competent person shall have ensured that the rating level of noise emitted from all mechanical equipment and inverter sets on site, when running at full capacity does not exceed the sound levels predicted at facades of noise-sensitive premises within the Noise and Vibration Consultants Ltd. Noise Impact Assessment report: R21.0906/DRK dated 10th December 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 LAeq15mins 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.

3. A method for reporting glare complaints and a programme for mitigation to reduce complaints of glare that are substantiated shall be in place prior to the development coming into beneficial use

Reason – To minimise detriment to nearby residential amenity

Ongoing condition during the construction of the PV Solar Farm and Battery.

4. 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 09:00 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.

5. 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

6. Finally as the site is in proximity to existing dwellings, it is essential that a Construction Management Plan be in place to minimise loss of amenity arising from construction of the development as follows:.

- No development shall commence until a Construction Management Statement (CMS), to cover both site clearance and construction phases of the development, has been submitted to and approved in writing by the Local Planning Authority. The CMS shall be undertaken in accordance with best practice guidelines and BS: 5228:2009 + A1:2014 (and any revisions thereof). The plan shall include details of:

-

- a) scheduled timing/phasing of development for the overall construction period,
- b) loading and unloading of plant and materials,
- c) location and management of wheel washing facilities,

- d) external lighting,
- e) location and nature of compounds and storage areas (including maximum storage heights),
- f) location and nature of temporary buildings and boundary treatments,
- g) dust management,
- h) noise management (both in terms of workers and local residents, and to include noise limit at the nearest sensitive residential property, or agreed representative accessible monitoring point) and
- i) waste/litter management during the construction phases of the development.

Thereafter, the approved construction plan shall be fully implemented and adhered to during the construction phases of the development hereby approved, unless otherwise agreed in writing by the Local Planning Authority.

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@baberghmidsuffolk.gov.uk](mailto:andy.rutson-edwards@baberghmidsuffolk.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 Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Sent:** 25 Feb 2022 09:56:35

**To:**

**Cc:**

**Subject:** FW: WK303942 DC2106825

**Attachments:**

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

**Sent:** 25 February 2022 09:01

**To:** Averil Goudy <Averil.Goudy@baberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Subject:** WK303942 DC2106825

Environmental Health - Land Contamination

**APPLICATION FOR PLANNING PERMISSION - DC/21/06825**

**Proposal:** Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure.

**Location:** Land To The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL

**Reason(s) for re-consultation:** Revised documents received 21.02.22

Thank you for re consulting us on this application. In terms of land contamination only I have no further or alternative comments to add to those already submitted by my colleague.

*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@baberghmidsuffolk.gov.uk](mailto:andy.rutson-edwards@baberghmidsuffolk.gov.uk)

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



**From:** Nathan Pittam  
**Sent:** 05 January 2022 11:16  
**Subject:** (301671) DC/21/06825. Land Contamination

**EP Reference : 301671**  
**DC/21/06825. Land Contamination**  
**Suggen Hall Farm, Church Lane, Rickinghall Superior, DISS, IP22 1LL.**  
**Development of a photovoltaic solar array, battery storage and ancillary infrastructure.**

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.

Please could the applicant be made aware that we have updated our Land Contamination Questionnaire and advise them that the updated template is available to download from our website at <https://www.babergh.gov.uk/environment/contaminated-land/land-contamination-and-the-planning-system/>.

For the purposes of clarity these comments **only** relate to matters of Land Contamination.

Regards

Nathan

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

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

Email: [Nathan.pittam@baberghmidsuffolk.gov.uk](mailto:Nathan.pittam@baberghmidsuffolk.gov.uk)  
Work: 01449 724715  
websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

*I am working flexibly - so whilst it suits me to email now, I do not expect a response or action outside of your own working hours*

**Minimum requirements for dealing with unexpected ground conditions being encountered during construction.**

1. *All site works at the position of the suspected contamination will stop and the Local Planning Authority and Environmental Health Department will be notified as a matter of urgency.*

2. *A suitably trained geo-environmental engineer should assess the visual and olfactory observations of the ground and the extent of contamination and the Client and the Local Authority should be informed of the discovery.*
3. *The suspected contaminated material will be investigated and tested appropriately in accordance with assessed risks. The investigation works will be carried out in the presence of a suitably qualified geo-environmental engineer. The investigation works will involve the collection of solid samples for testing and, using visual and olfactory observations of the ground, delineate the area over which contaminated materials are present.*
4. *The unexpected contaminated material will either be left in situ or be stockpiled (except if suspected to be asbestos) whilst testing is carried out and suitable assessments completed to determine whether the material can be re-used on site or requires disposal as appropriate.*
5. *The testing suite will be determined by the independent geo-environmental specialist based on visual and olfactory observations.*
6. *Test results will be compared against current assessment criteria suitable for the future use of the area of the site affected.*
7. *Where the material is left in situ awaiting results, it will either be reburied or covered with plastic sheeting.*
8. *Where the potentially contaminated material is to be temporarily stockpiled, it will be placed either on a prepared surface of clay, or on 2000-gauge Visqueen sheeting (or other impermeable surface) and covered to prevent dust and odour emissions.*
9. *Any areas where unexpected visual or olfactory ground contamination is identified will be surveyed and testing results incorporated into a Verification Report.*
10. *A photographic record will be made of relevant observations.*
11. *The results of the investigation and testing of any suspect unexpected contamination will be used to determine the relevant actions. After consultation with the Local Authority, materials should either be: • re-used in areas where test results indicate that it meets compliance targets so it can be re-used without treatment; or • treatment of material on site to meet compliance targets so it can be re-used; or • removal from site to a suitably licensed landfill or permitted treatment facility.*
12. *A Verification Report will be produced for the work.*



FAO: Planning Department,  
**Babergh / Mid Suffolk District Council**

Ref: DC/21/06825  
Date: 23/02/2022  
Second Response

## HISTORIC BUILDINGS AND CONSERVATION ADVICE

Dear Sir / Madam,

**RE: Land To The South Of Suggenhall Farm Church Lane, Rickinghall, IP22 1LL.**

Built Heritage Advice pertaining to an application for: Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure.

This letter should be read in conjunction with the first response dated 13<sup>th</sup> January 2022.

The proposed development site is surrounded by several heritage assets, all of which have the potential to be impacted through change within their setting.

An assessment of those heritage assets had raised concerns regarding the impact on the setting of the Grade II listed Suggenhall Farm House (List Entry Number: 1260663) and its associated farm buildings.

Suggenhall Farm House is a late seventeenth-century (possibly earlier) timber-framed farmhouse extended in the nineteenth century. It is situated within a complex of associated farm buildings on the north side of Church Lane which borders the proposed development site. The farmstead enjoys views of the open agrarian landscape to the south which makes a positive contribution to its setting. Suggenhall Farm House and its related farm buildings have a historically functional relationship with the proposed development site and as such has associative value which contributes to the setting and special historic interest of the heritage asset.

It was considered that the original scheme failed to enhance or better reveal the significance of the heritage asset (Paragraph 206 of the NPPF) and constituted a scheme that leads to less than substantial harm to the special historic interest of the heritage asset (Paragraph 206 of the NPPF). It was recommended that the scale of the proposed solar farm be reduced in an effort to mitigate this harm.

The amended proposals, specifically the reduction in the number of solar panels to the north-west field and the relocation of the DNO substation and associated buildings away from Church Lane, has gone some way to reducing the harm to the heritage asset.



Whilst the amended proposals continue to constitute a scheme which would lead to less than substantial harm to the identified heritage asset, this is now considered to be at the lower end of the scale of harm.

Yours sincerely,

Samantha Pace IHBC  
Historic Environment Team  
Place Services

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



FAO: Planning Department,  
**Babergh / Mid Suffolk District Council**

Ref: DC/21/06825  
Date: 13/01/2022

## HISTORIC BUILDINGS AND CONSERVATION ADVICE

Dear Sir / Madam,

**RE: Land To The South Of Suggenhall Farm Church Lane, Rickinghall, IP22 1LL.**

Built Heritage Advice pertaining to an application for: Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure.

The proposed development site is surrounded by several heritage assets, all of which have the potential to be impacted through change within their setting.

An assessment of those heritage assets has raised concerns regarding the impact on the setting of the Grade II listed Suggenhall Farm House (List Entry Number: 1260663).

Suggenhall Farm House is a late seventeenth-century (possibly earlier) timber-framed farmhouse extended in the nineteenth century. It is situated within a complex of associated farm buildings on the north side of Church Lane which borders the proposed development site. The heritage asset enjoys views of the open agrarian landscape to the south which makes a positive contribution to the setting of the heritage asset. Suggenhall Farm House and its related farm buildings has a historically functional relationship with the proposed development site and as such has associative value which contributes to the setting and special historic interest of the heritage asset.

It is considered that the proposals would have detrimental visual impact on the views of the open landscape to the south of the heritage asset, which contributes positively to its setting. As such the proposals would fail to enhance or better reveal the significance of the heritage asset making Paragraph 206 of the National Planning Policy Framework (NPPF) relevant.

Furthermore, it is considered that the proposals would have a detrimental impact on the strong visual links between the proposed development site and Suggenhall Farm House and subsequently the associative value of the site and the heritage asset. This would obscure the legibility and understanding of Suggenhall Farm House as part of a farmstead associated with agricultural land to the south. As a result, the proposals would constitute a scheme that would lead to less than substantial harm to the special historic interest and significance of the heritage asset making Paragraph 202 of the NPPF relevant.



It is not possible to support the proposals as they are in conflict with Paragraphs 202 and 206 of the NPPF and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The reduction in the scale of the proposed solar farm may be an effective mitigation measure. The omission of all solar panels from the north-east field of the proposed development would greatly reduce the harm to the setting of the heritage asset, whereas a reduction in the proposed row of reductions closest to Church Lane would go some way to mitigating this harm.

Yours sincerely,

Samantha Pace IHBC  
Historic Environment Team  
Place Services

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



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

15/03/2022

For the attention of: Averil Goudy

**Ref: DC/21/06825; Land To The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL**

Thank you for consulting us on the Full Planning Application for the development of a photovoltaic solar array, battery storage and ancillary infrastructure.

Further to our earlier letter dated 20/01/22 additional information has been submitted:

The LVIA now includes Appendix 1 LVIA Methodology, Appendix 2 Visualisation Methodology Appendix 3 Assessment of Landscape Effects and Appendix 4 Assessment of Visual Effects .

Furthermore, the layout has been amended to reduce the extent of development creating an offset from Church Lane. Visualisations of viewpoints 1, 3, 5 and 6 have also been updated in line with the revised layout.

We are now satisfied with the level of detail provided and agree with the assessment judgement that with mitigation measures the long-term visual effects can be adequately reduced to 'minor' adverse.

On this basis, although we have no landscape objection to the revised layout, it should be noted that there will still be a change in the landscape character and potentially some loss of visual amenity. Therefore, if minded for approval, we would advise the following recommendations are taken into consideration:

- The new alignment of the northern boundary respects the apparent field boundary pattern (though not actually following documented historical field boundary). The reduction would provide better opportunity to view the Church from Footpath 16, though this would be for a short stretch and at an oblique angle due to the proposed buffer planting. More could be done to maintain the open character of the landscape, such as a further reduction of the arrays in line with the northern boundary of field 1.
- The extent and scale of the proposed buffer planting to the north and west boundary of field 1 would likely still obscure desirable views. A hedgerow maintained at 3m with hedgerow trees would be sufficient and more in keeping for the Northern boundary of field 1, though a more generous vegetative buffer may still be needed to appropriately screen field 2 of the development due to the sloping landform.
- We recommend that further details of the materials, colours and finishes of the built form are secured as 'grey/green' and 'steel/GRP' are insufficient to determine suitability with the local landscape. This could be done with a suitability worded condition.

- Clarification is sought on the purpose of the 'clearings' within the solar arrays.

The following conditions should also be considered:

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

Prior to commencement on site, 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 to 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 specification of soft landscape works, include a schedule of species, size, density and spacing of all trees, shrubs and hedgerows to be planted.
- areas to be grass seeded or turfed, including cultivation and other operations associated with plant and grass establishment.
- paved or otherwise hard surfaced areas including the extent and specification for all tracks
- existing and finished levels shown as contours with cross-sections, if appropriate.
- All means of enclosure and all boundary treatments including all boundary treatments around the perimeter of the site and all boundaries adjacent to the service road.

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.

*Reason - To ensure adequate control over design and to ensure a satisfactory appearance in the interests of visual amenity*

#### **ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: ADVANCED PLANTING.**

Before any works commence on site, details of advance planting to site boundaries shall be submitted and approved by the Local Planning Authority. Implementation will need to be carried out prior to any other construction work and in accordance with an implementation timetable agreed in writing with the Local Planning Authority.

*Reason - In order to ensure key structural / screening landscape planting is carried out at the earliest opportunity, in the interest of the landscape character and amenity of the locality, and the character, setting and significance of heritage assets.*

#### **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:
  - a. 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:
  - a. 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.
  - b. All operations and procedures for hard landscape areas; inspection, sweeping, clearing of accumulated vegetative material and litter, maintaining edges, and painted or finished surfaces.
  - d. 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.

*Reason - To support plant establishment and ensure appropriate management is carried out and to maintain functionality and visual aesthetic.*

If you have any queries regarding the matters raised above, please let me know.

Yours sincerely,

Kim Howell BA (Hons) Dip LA 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.



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

20/01/2022

For the attention of: Averil Goudy

**Ref: DC/21/06825; Land To The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL**

Thank you for consulting us on the Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure.

This letter sets out our landscape response to the proposed development regarding how the proposal relates to and responds to the landscape setting and context. This response is based on both review of the submitted documents and site visit which was conducted from publicly accessible routes by a Chartered Landscape Architect on a clear sunny day in January 2022.

The application proposes the installation of ground mounted photovoltaic solar arrays, associated infrastructure and vegetative mitigation measures. The proposal would bring forth development in the countryside which is covered by Mid Suffolk Core Policy CS2 Development in the countryside, however the nature of the development falls within one of the defined categories of acceptable development. Policy CS 5 Mid Suffolk's Environment (Mid Suffolk Core Strategy 2008) states that; "All development will maintain and enhance the environment, including the historic environment, and retain the local distinctiveness of the area" and that with regard to the "Landscape: The Council will protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape as a whole rather than concentrating solely on selected areas, protecting the District's most important components and encourage development that is consistent with conserving its overall character". Therefore, the application must demonstrate that due consideration has been given to the magnitude of harm to the landscape character of the site and its wider environs, and that these impacts have been reduced and residual harm mitigated against in an appropriate and sensitive manner.

The site is currently in arable agricultural use and comprised of two fields approximately 30 acres (12.3 ha) in total. The agricultural land classification is grade 3 'good to moderate', meaning it has some "limitations that affect the choice of crops to be grown, timing and type of cultivation, harvesting or yield". The submitted Agricultural land classification assessment confirmed that the majority of the site is with subcategory 3B. Field one to the northeast is rectangular in shape and shares its northern boundary with Church Lane. Field Two is irregular in shape, similar to an inverted 'L', the south westerly tip adjoins Finningham Road, B1113 for a short section.

The settlements of Rickinghall and Botesdale lay approximately 1Km to the north, though these are visually separated from the site by intervening vegetation along the A143 corridor, landform and the built forms of the water and electric utility sites and Suggenhall Farm and Barn on Church Lane. There is agricultural land to the east, south and west with associated farmstead. St

Mary's Church, Grade I listed, which is regarded locally as a key landmark (as stated in the Botesdale & Rickinghall Neighborhood Plan, Landscape Appraisal, 5.3) stands approximately 400m to the northwest of the site boundary.

The site itself is rolling in nature with field 1 having a higher elevation and being generally flatter with the land gently falling to the west for field 2. The current boundaries of the fields also differ with field 1 being visually open; bounded by narrow, deep drainage ditches and a few singular trees, whereas field 2 is sloping with an irregular westerly boundary which has sections of vegetation present, making this feel more visually intimate.

The site is not subject to any statutory or local designations, though the landscape is highly valued by local residents for its recreation and amenity value. An adopted neighborhood plan is in place for Botesdale & Rickinghall, though the site lies outside of the indicated peripheral areas in the accompanying Landscape Appraisal.

The Suffolk Landscape Character Assessment identifies this site as falling with the Ancient Plateau Claylands, Key characteristics of this LCA are:

- *Flat or gently rolling arable landscape of clay soils dissected by small river valleys*
- *Field pattern of ancient enclosure – random patterns in the south but often co-axial in the north. Small patches of straight-edged fields associated with the late enclosure of woods and greens*
- *Dispersed settlement pattern of loosely clustered villages, hamlets and isolated farmsteads of medieval origin*
- *Villages often associated with medieval greens or tyes*
- *Farmstead buildings are predominantly timber-framed, the houses colour-washed and the barns blackened with tar. Roofs are frequently tiled, though thatched houses can be locally significant*
- *Scattered ancient woodland parcels containing a mix of oak, lime, cherry, hazel, hornbeam, ash and holly*
- *Hedges of hawthorn and elm with oak, ash and field maple as hedgerow trees.*
- *Substantial open areas created for WWII airfields and by 20th century agricultural changes*
- *Network of winding lanes and paths often associated with hedges create visual intimacy*

There are no PROW on the site, however the site or parts of it are visible from Footpath 5, 6 and 16. Footpath 16 forms part of the 'Millennium Walk' promoted by Suffolk County Council for this area.

It should be noted that whilst on site we observed a significant number of recreational users/ walkers, joggers and numerous dog walkers along Church Lane, which is a narrow, single vehicle surfaced carriageway. While this would be considered a vehicular route, the high number of recreational users (high sensitivity receptors) should be considered as part of any landscape and visual impact assessment. Furthermore, we noted that there are opportunities to view the site from the A143, mostly fleeting glimpses through the roadside vegetation which may be lessened when in leaf.

With regards to the impact on private residential property the greatest impact would be upon Suggenhall Barn, which overlooks Field 1 (and also the setting for Suggenhall Farm) and Sunnyside which adjoins the northwestern corner of field 2 and some minor effect from Falcons Hall Cottages. We also note that there is potential visibility from residential housing on Ryders Way, Botesdale, though we were unable to confirm that on site. Long range views of field 1 site also possible from the residential area on West Street, just south of viewpoint 8.

## Review of submitted information

The application was not supported by a topographical survey of the existing site nor was it supported by an arboricultural impact assessment of the existing vegetation on and adjacent to the site. We would expect this to form part of the submission for a development of this kind and in this setting.

While indicative dimensioned plans and elevations auxiliary buildings were supplied, no details of materials, colour or finish were provided. The proposed deer/stock fencing is of suitable materials, height and construction for the rural setting, though it should be noted that the predominated agriculture in the area is arable therefore this could be perceived as being 'out of context' with its surroundings.

The submitted Landscape and Visual Impact Assessment (LVIA) appears to have been carried out in line with the principles set out on the third edition of "Guidelines for Landscape and Visual Impact Assessment"(GLVIA3), however the submission fails to include Appendix 1-4 which LVIA methodology, Visualisation Methodology, Assessment of Landscape Effects and Assessment of Visual effects.

The main part if the LVIA document provides a summary of the proposal, baseline and effects assessment and is accompanied by figures 1-15 including photographs and photomontages of the current site and proposal. However the site assessment was undertaken in September when the trees and other vegetation were in full leaf, therefore not assessing the 'worst case scenario', as is noted in 3.5 Limitations.

Without the full narrative of the appendices, we are unable to ascertain how the assessment levels have been arrived at.

Nevertheless, we generally agree with the assessment and the judgement that there would be a moderate adverse effect on the landscape character. However, we do not agree that this would reduce to minor adverse in the long term due to "*introduction of new hedgerows and hedgerow trees and changes to the management of existing hedgerows*". These introductions would have a long-term effect on the visual experience and character of the landscape, though these impacts would be mostly felt in a localised area in close proximity to the site.

For example, while the proposed boundary vegetation and woodland buffer in field 1 would adequately screen the ground mounted solar arrays and auxiliary buildings from both Church Lane and FP16 these features would also reduce or remove desirable long-distance views to the west and views of St Mary's Church and would have a significant adverse effect on the current open character of the site and would impact on the setting of Suggenhall Farm House, a grade II listed property.

While the site may cover a smaller geographical area in comparison to neighbouring renewable energy sites, the cumulative landscape and visual effects need to be considered. For example, combined effect/loss of agricultural land, leading to a general degradation and loss of character, and sequential views experienced by receptors travelling through the landscape, for example traveling along the A143. At present, this does not seem to have been addressed in the LVIA document.

Considering the above points, we request that a **holding objection** be placed on the application until such time that the following can be submitted and agreed:

- A topographical plan of the site and it's immediate context; identifying levels and any key features such as hedgelines, ditches, power or communication posts.
- An Arboricultural Impact Assessment in line with BS 5837:2012 showing all vegetation that might reasonably be affected by the proposal, including on neighbouring land.
- The outstanding sections of the LVIA and in addition we would request that a cumulative impact assessment be added to cover both the landscape and visual.

If you have any queries regarding the matters raised above, please let me know.

Yours sincerely,

Kim Howell BA (Hons) Dip LA 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.



26 April 2022

Averil Goudy  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich, IP1 2BX

By email only

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

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**Application:** DC/21/06825  
**Location:** Land To The South Of Suggenhall Farm Church Lane Rickinghall IP22 1LL  
**Proposal:** Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure.

Dear Averil,

Thank you for re-consulting Place Services on the above application.

### **Holding objection due to insufficient ecological information upon Priority species**

#### **Summary**

We have reviewed the Ecological Assessment (Avian Ecology Ltd, Nov 2021) and the response on ecology: Skylark Plots (Avian Ecology Ltd, January 2022), submitted by the applicant, relating to the likely impacts of development on designated sites, protected and Priority Species & Habitats.

We are not satisfied that sufficient ecological information is available for determination.

We have reviewed the additional information regarding Skylark utilisation of the site and it is accepted that the site has the opportunity to provide increased foraging opportunities for Skylark at certain periods of the year. However, we disagree that adequate evidence has been provided to confirm that the development will have a negligible potential on the Priority species, as we are not satisfied that the sufficient information has been provided to demonstrate that the development can appropriately mitigate the permeant loss of breeding habitat for the species. Furthermore, as skylark plots typically require a 50-metre buffer from field boundaries should be implemented, we are uncertain whether several Skylark nesting areas could realistically be delivered within the proposed landscape plan.

As a result, we still recommend that a Breeding Bird Survey in line with the Common Bird Census methodology should be provided for this application prior to determination. This will inform the need



for a bespoke mitigation strategy for Priority farmland bird species, as well as any necessary on-site and off-site compensation measures.

If Skylark breeding territories are identified to be present and affected, then we still recommend that mitigation measures should include the provision of Skylark Plots<sup>1</sup> (two per territory lost), unless an alternative solution is agreed to be acceptable with the LPA.

However, if suitable land is not available in the applicant's control, it is indicated that the measures will be required via a legal agreement with local landowners or stakeholders, which could be brokered by Whirledge and Nott<sup>2</sup>. Any finalised mitigation strategy for this Priority species will need to be set out prior to commencement and should include post-construction monitoring to determine the success of the compensation and inform future Solar Farm proposals.

Therefore, this further information is needed to enable the LPA to demonstrate its compliance with its biodiversity duty under s40 NERC Act 2006.

We look forward to working with the LPA and the applicant to receive the additional information required to overcome our holding objection.

Please contact us with any queries.

Yours sincerely,

**Hamish Jackson ACIEEM BSc (Hons)**

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.

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<sup>1</sup> <https://www.gov.uk/countryside-stewardship-grants/skylark-plots-ab4>

<sup>2</sup> <https://www.whirledgeandnott.co.uk/>



27 January 2022

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

By email only

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

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**Application:** DC/21/06825  
**Location:** Land To The South Of Suggenhall Farm Church Lane Rickinghall IP22 1LL  
**Proposal:** Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure.

Dear Bron,

Thank you for consulting Place Services on the above application.

### **Holding objection due to insufficient ecological information upon Priority species**

#### **Summary**

We have reviewed the Ecological Assessment (Avian Ecology Ltd, Nov 2021), submitted by the applicant, relating to the likely impacts of development on designated sites, protected and Priority Species & Habitats.

We are not satisfied that sufficient ecological information is available for determination of this application, due to insufficient ecological information upon Priority farmland bird species, particularly Skylark.

As a result, a Breeding Bird Survey in line with the Common Bird Census methodology should be provided for this application prior to determination. This will inform the need for a bespoke mitigation strategy for Priority farmland bird species, as well as any necessary on-site and off-site compensation measures.

If Skylark breeding territories are identified to be present and affected, then mitigation measures should include the provision of Skylark Plots<sup>1</sup> (two per territory lost), unless an alternative solution is

---

<sup>1</sup> <https://www.gov.uk/countryside-stewardship-grants/skylark-plots-ab4>





agreed to be acceptable with the LPA. However, if suitable land is not available in the applicant's control, it is indicated that the measures will be required via a legal agreement with local landowners or stakeholders, which could be brokered by Whirledge and Nott<sup>2</sup>. Any finalised mitigation strategy for this Priority species will need to be set out prior to commencement and should include post-construction monitoring to determine the success of the compensation and inform future Solar Farm proposals.

It is also highlighted that there is minimal evidence to suggest that Skylark will regularly nest between solar panels and research has concluded that ground-nesting birds often require an unbroken line of sight and therefore Skylark may actively avoid nesting at solar farms in most circumstances<sup>3</sup>. Therefore, as the proposed solar farm will contain panels which are closely spaced, there is potential for the development to result in a permanent loss to Skylark breeding habitat.

Therefore, this further information is needed to enable the LPA to demonstrate its compliance with its biodiversity duty under s40 NERC Act 2006.

We look forward to working with the LPA and the applicant to receive the additional information required to overcome our holding objection.

Please contact us with any queries.

Yours sincerely,

**Hamish Jackson ACIEEM BSc (Hons)**  
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.

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<sup>2</sup> <https://www.whirledgeandnott.co.uk/>

<sup>3</sup> Montag H, Parker G & Clarkson T. (2016). The effects of solar farms on local biodiversity. A comparative study. Clarkson and Woods & Wychwood Biodiversity.

**From:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>  
**Sent:** 28 Jan 2022 11:15:56  
**To:**  
**Cc:**  
**Subject:** FW: MSDC Planning Consultation Request - DC/21/06825 - FUL  
**Attachments:** ufm2\_Standard\_Consultation.pdf

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-----Original Message----- From: BMSDC Local Plan Sent: 28 January 2022 08:16 To: BMSDC Planning Area Team Yellow Subject: FW: MSDC Planning Consultation Request - DC/21/06825 - FUL Good Morning, Re DC/21/06825 Please be aware that there will be no CIL charge or liability attached to this development. Kind Regards, Richard Kendrew Infrastructure Officer Babergh District & Mid Suffolk District Council “ Working Together 01449 724563 www.babergh.gov.uk & www.midsuffolk.gov.uk



**Suffolk Wildlife Trust**

Brooke House  
Ashbocking  
Ipswich  
IP6 9JY

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info@suffolkwildlifetrust.org  
suffolkwildlifetrust.org



Averil Goudy  
Planning Department  
Babergh and Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich, IP1 2BX

11<sup>th</sup> March 2022

Dear Averil,

**RE: DC/21/06825. Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure. Land To The South Of Sugghenall Farm, Church Lane, Rickinghall, IP22 1LL.**

Thank you for sending us details of this application, we wish to submit a **holding objection** to this application, and we have the following comments:

We maintain our comments made on January 10<sup>th</sup>, 2022, that a breeding bird survey is required prior to determination in order to assess whether skylark will be impacted by this development. A Skylark Mitigation Strategy may also be required if skylark are present on site, as the development could result in permanent loss of breeding habitat. Comments made by Avian Ecology confirm that skylarks rarely utilise solar sites for nesting (Response on Ecology, 12<sup>th</sup> Jan 2022). Additionally, comments made by Avian Ecology that 'Most cereals are now sown during the autumn, which means that the crops are too tall and dense to allow skylarks to raise more than one early brood' do not remove the need to complete a breeding bird survey and mitigate for the loss of skylark breeding territories if identified on site. Skylark are a red listed Bird of Conservation Concern, due to breeding population decline of more than 50% since 1969<sup>1</sup>, therefore any potential for permanent loss of breeding habitat should be suitably mitigated.

Please do not hesitate to contact us should you require anything further.

Yours sincerely

Ellen Shailes  
Ecology and Planning Adviser

---

<sup>1</sup> [BB 2021 DECEMBER \(britishbirds.co.uk\)](http://britishbirds.co.uk)



**Suffolk Wildlife Trust**

Brooke House  
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Averil Goudy  
Planning Department  
Babergh and Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich, IP1 2BX

10<sup>th</sup> January

Dear Averil,

**RE: DC/21/06825. Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure. Land To The South Of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL.**

Thank you for sending us details of this application, we have read the Ecological Assessment (Avian Ecology Ltd, Nov 2021) and we wish to make the following comments:

We note the presence of skylark records locally (Suffolk Biodiversity Information Service), however no breeding bird survey has been undertaken in order to inform this application. Due to the habitats present, this development may result in the permanent loss of breeding habitat for skylark, therefore we believe a breeding bird survey should be required in order to determine potential impacts to breeding skylark. Skylark are a Red Listed Bird of Conservation Concern in the UK<sup>1</sup> and listed under Section 41 of the Natural Environment and Rural Communities (NERC) act<sup>2</sup>. If skylark are to be impacted by this proposal then offsite mitigation may be required which should be detailed within a Skylark Mitigation Strategy.

Notwithstanding the above, we recommend that a Landscape Environment Management Plan (LEMP) and a Biodiversity Enhancement Strategy should be secured as a condition of planning consent. These should include the following details to ensure the site provides suitable biodiversity enhancements:

- Hedgerow management – planting to include native fruit and nut bearing species and management should allow for at least 2m wide and tall hedgerows with grassland/wildflower buffers along their length, ensuring hedgerows on site provide habitats for breeding birds, small mammals and reptiles.
- Details of wildflower seed mix – wildflower mix to include a range of native flowering and grass species suited to soil types on site.
- Grassland management - management should allow for a long flowering season, to ensure nectar source for invertebrates. Varied grassland management across the site will maximise potential biodiversity enhancements.

<sup>1</sup> [bocc-5 \(bto.org\)](http://bocc-5(bto.org))

<sup>2</sup> <http://publications.naturalengland.org.uk/publication/4958719460769792>

Please do not hesitate to contact us should you require anything further.

Yours sincerely

Ellen Shailes  
Ecology and Planning Adviser

**From:** Fiona Cairns

**Sent:** 08 March 2022 09:01

**Subject:** RE: DC/21/06825 Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure - Land To The South Of Suggenhall Farm Church Lane Rickinghall IP22 1LL

Dear Averil

Having reviewed the revised drawings, the reduction in the extent of the solar panels on the norther boundary is welcomed, which will help to mitigate some of the impacts on Suggenhall Farm and barn. Notwithstanding this, our concerns regarding the principle of using of high grade agricultural land for energy production remain, as set out in our letter dated 12 January.

Thank you again for arranging to make the superseded drawings available.

Kind regards

**Fiona Cairns IHBC MRTPI**  
**Director**  
**Suffolk Preservation Society**  
**Little Hall, Market Place**  
**Lavenham**  
**Suffolk**

12 January 2022

Ms Averil Goudy  
Planning Officer  
Mid Suffolk District Council  
Endeavour House, 8 Russell Rd,  
Ipswich, IP1 2BX

Dear Ms Goudy,

DC/21/06825 | Full Planning Application - Development of a photovoltaic solar array, battery storage and ancillary infrastructure.

Land to the South of Suggenhall Farm, Church Lane, Rickinghall, IP22 1LL

I write on behalf of the Suffolk Preservation Society (SPS) with reference to the above application for a 7MW solar farm on 11 hectares of agricultural land south of the A143 south of the villages of Botesdale and Rickinghall. SPS supports the transition towards a zero-carbon energy system and recognises that this requires a rapid and substantial increase in renewable energy generation, including solar. We therefore support renewable energy schemes which balance the necessary considerations of our natural environment, heritage, landscape and the views of local people which allow local communities to positively shape their energy futures.

The SPS calls for the use of brownfield land, rooftops and other previously developed land to be prioritized for large scale solar schemes. Where greenfield sites are proposed we urge that best practice is followed, namely that schemes are community led, are restricted to the lowest soil quality sites, are designed in a way that yields biodiversity net gain while integrating effectively with the topography of the site and other natural landforms to minimise visual impact. Accordingly, we do not object to this application in principle, however we wish to make the following observations:

## Policy Considerations

The National Planning Policy Framework states that all communities have a responsibility to help increase the use and supply of green energy. The planning system must support the transition to a low carbon future in a changing climate and support renewable and low carbon energy and associated infrastructure (NPPF para 152). However, when determining planning applications for

renewable and low carbon development, local planning authorities should only approve the application if its impacts are (or can be made) acceptable (NPPF para. 158). Furthermore, planning decisions should enhance the local environment by recognising the intrinsic character and beauty of the countryside, and other benefits of the best and most versatile agricultural land, and of trees and woodland (NPPF para.174b).

The Planning Practice Guidance on Renewables (2013) also makes clear that the need for renewable energy does not automatically override environmental protections and the planning concerns of local communities (para.5). It clearly states that large scale solar should preferably be sited on previously developed land, and where greenfield sites are proposed they should continue in a form of cultivation or provide high levels of biodiversity net gain (para.27).

In considering planning applications the NPPG also makes clear that local topography is an important factor in assessing whether large scale solar farms could have a damaging effect on landscape and recognise that the impact can be as great in predominately flat landscapes as in hilly or mountainous areas. It also states that great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. Finally, it makes clear that local amenity is an important consideration which should be given proper weight in planning decisions and states “As with other types of development, it is important that the planning concerns of local communities are properly heard in matters that directly affect them” (para. 5).

The emerging Babergh Mid Suffolk Joint Local Plan Policy LP27 - Energy Sources, Storage and Distribution - makes clear that renewable, decentralised and community energy generating proposals will be supported subject to: the impact on (but not limited to) landscape, heritage and residential amenity and the local community has been fully taken into consideration and where appropriate, effectively mitigated; the impact of on and off-site power generation infrastructure (for example over-head wires, cable runs, invertors, control buildings, security fencing and highway access points) is acceptable to the Local Planning Authority; the provision of mitigation, enhancement and compensation measures when necessary.

The policy also states that where proposals for renewable and low carbon energy have an impact on the setting of heritage assets the applicant must be able to demonstrate to the satisfaction of the Local Planning Authority that potential harm resultant from development can be effectively mitigated and that there are no alternative sites available within the District. (Joint Local Plan - Pre-submission (Reg 19) - Nov 2020)

The Botesdale and Rickingham Neighbourhood Plan (Adopted 2020) does not include policies which specifically provide for renewable energy projects. However, the objectives of the plan clearly set out an aspiration that development should conserve and enhance heritage assets within the plan area, maintain the villages’ rural setting, protect important countryside and rights of way,



protect important views and links with the wider countryside while promoting the inclusion of native planting in and around new development.

### Landscape and Visual Impact Considerations

Although the application site is on a green field site, it is of a relatively small scale at 11.3 hectares located proximate to the Rickinghall substation and on land that is stated by the applicant to be grade 3b. The topography of the site is fairly flat and the proposed landscape mitigation as shown on drawing 3044-01-12 is considered to be effective at minimising the visual impacts. The proposed 600m<sup>2</sup> of woodland edge planting, 1300m<sup>2</sup> of woodland planting, 36 hedgerow trees and provision of 1.1km of new hedges and/or gapping up of existing hedges around the perimeter of the site will cumulatively contribute to effective screening over time. Furthermore, the proposed 6m perimeter green buffers, planted with wildflower and grass mix, will also make a positive contribution to a net gain in biodiversity value of the site.

We note that the site does not include any PROWs and the nearest public footpath is 60m from the site, and there are only a small number of dwellings along Church Lane. However, the site is featured in a number of local walks including the High Point Walk and the Millennium Walk. The site is located in a relatively rural and tranquil area, forming part of the hinterland of the villages of Rickinghall and Botesdale, and is a popular with walkers. Therefore, the number of visual receptors should not be limited to an assessment of the proximity of the nearest public right of way. The site will also be prominent from those receptors driving and cycling along Church Lane and Finningham Road.

A 4m high acoustic fencing is proposed around the BESS, which will have the potential to appear visually intrusive as a result of its height in a largely flat landscape. However, we recognise that it has been located fairly centrally within the site, thereby minimising the visual impact on receptors in the area. We also note that the 11,000 panels will be a maximum height of 2.4m, sufficient to allow grazing beneath, and the boundary hedges will ultimately be maintained at a height of 3m, thereby ensuring that most of the development will be effectively screened, other than the CCTV poles at 3m high and the previously mentioned acoustic fence. However, the use of infra-red lighting on the CCTV poles will also assist in minimising intrusion into the rural landscape. Nevertheless, the proposed mitigation will take a number of years to be effective, and even then, the winter months will see a material reduction in the effectiveness of the screening.

### Heritage Considerations

Suggenhall Farmhouse, a 17<sup>th</sup> century timber framed building and listed grade II, is the closest heritage asset to the development site. The Heritage Impact Assessment states that it is located 60m north of the site. However, we note that the report only considers the impact on the setting of the farmhouse, located some distance within the site, set back from the highway and behind

Suggenhall Barn. It is surprising that the report fails to consider the impact of the development on Suggenhall Farm Barn, which faces directly onto the site. It is not clear why the report has not identified Suggenhall Farm Barn as a designated heritage asset as it appears that this was in the same ownership at the time of listing of Suggenhall Farm in 1988, and in 2004 was subsequently granted listed building consent for conversion to residential. In the opinion of the SPS, it is clear that the barn has the status of a listed building and should be assessed accordingly.

It is acknowledged that the proposals provide for a substantial woodland belt on the north boundary of the site closest to the listed barn, which in time will effectively provide a natural screen. However, in the short to medium term there will undoubtedly be an impact on the setting of the barn which will result in a level of heritage harm. This should be clearly identified and assessed in the relevant supporting documents, in accordance with Historic England Guidance, The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition 2017).

Finally, we note that the southern portion of the site has been excluded as an area of high archaeological sensitivity. This is welcomed but we defer to the views and advice of Suffolk County Archaeology Team regarding any further amendments to safeguard the archaeological resource in this historically rich and diverse location.

In conclusion, while recognising the preference by many in the local community for maintaining countryside in its undeveloped state, wherever possible, this must be balanced against the contribution that solar development can make to the Net Zero agenda. If the local planning authority is minded to grant permission, then a Landscape and Ecological Management Plan should be put in place to ensure that the proposed mitigation is delivered and maintained to ensure its effectiveness to minimise the visual impacts and the identified heritage harm. It is also considered that the proposed 40 years duration is excessive at a time of rapid technological advancement and a shorter lifespan of any consent would allow for review of circumstances in renewable energy generation change.

We trust that you will find these comments helpful and ask to be reconsulted on any further amendments to this and other proximate commercial solar schemes in the district.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

**Fiona Cairns IHBC MRTPI**  
**Director**

Ccs:

Ward Councillor

County Councillor

Parish Council – Botesdale and Rickinghall