

**From:** [Elizabeth Flood](#)  
**To:** [Alicia Norman](#)  
**Subject:** DC/22/02948 - Tabled papers for 10th August committee 1/3 emails  
**Date:** 04 August 2022 10:00:45

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From: BMSDC Economic Development <BMSDCEconomicDevelopment@baberghmidsuffolk.gov.uk> Sent: 03 August 2022 15:24  
To: BMSDC Planning Area Team Green <planninggreen@baberghmidsuffolk.gov.uk>  
Cc: Elizabeth Flood <Elizabeth.Flood@baberghmidsuffolk.gov.uk>  
Subject: RE: BDC Planning Consultation Request - DC/22/02948 - FUL

Good Afternoon,

Thank you for this consultation.

Economic Development broadly support the principal of this application and understand the requirement to utilise space to generate energy that can in turn support the businesses long term sustainability, protecting existing employment and to improve its environmental impact. However we are concerned that the use of this space for a solar array prevents any future expansion of employment use into this land, currently allocated for employment, either to enable business growth and expansion for the applicant themselves or to be occupied by a third party, so it may be helpful to understand whether any other options, for example utilising the current building roof space, have been considered and if so if and why they have been discounted.

Kind Regards

Clare

Sector and Skills – Economic Development and Regeneration team Babergh and Mid Suffolk District Councils  
– Working Together



e: [clare.free@baberghmidsuffolk.gov.uk](mailto:clare.free@baberghmidsuffolk.gov.uk)

**From:** [Elizabeth Flood](#)  
**To:** [Alicia Norman](#)  
**Subject:** DC/22/02948 - Tabled papers for 10th August committee 1/2 emails  
**Date:** 04 August 2022 10:01:12  
**Attachments:** [image001.png](#)

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**From:** Gillian Davidson <gillian@portlandplanning.co.uk>  
**Sent:** 28 July 2022 13:30  
**To:** Elizabeth Flood <Elizabeth.Flood@baberghmidsuffolk.gov.uk>  
**Subject:** DC/22/02948 1 Northern Road, Chilton Industrial Estate

Dear Elizabeth

Further to my earlier email, in response to Parish Council comments regarding the additional land to the east, the applicant has commented as follows:

- The land was, until 1999, a farmer's field growing crops. The land was acquired by Jukes Coulson Stokes Ltd (trading as JCS Hi-Torque LTD) when it was added to the zoned industrial park, in anticipation of an expansion of the factory, and in order to provide for this expansion without requiring the business to move. The farmer was offered the opportunity to continue to use the land for a nominal rent until such time as it was needed for the factory expansion, but declined. It was therefore left to self-seed and became the grassland you see today. This land does not have a long history of being grassland. In the meantime the business actually contracted with the loss of a major customer in the early 2000s, and the decommissioning and sale of a number of very large machines. Thus the growth that has subsequently been seen in the other activities has been able to be housed within the existing building up to now. However, we are now at a point where space is becoming an issue for our operations.

At some point in the future as the business grows, we anticipate wanting to expand the factory into the field. In the first instance into the part of the field that has not been earmarked for the solar park, but latterly into the whole field, at which point we would mount the solar panels on the roof of the new buildings. So whilst we are very happy to use the land currently for added biodiversity, it must be remembered that this land was an open field zoned for industrial use, and will at some point be used for this.

Kind regards

Gill

Mrs G Davidson BA(Hons) MRTPI

**From:** [Elizabeth Flood](#)  
**To:** [Alicia Norman](#)  
**Subject:** DC/22/02948 - Tabled papers for 10th August committee 3/3 emails  
**Date:** 04 August 2022 10:01:31  
**Attachments:** [image001.png](#)  
[image002.png](#)


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Elizabeth Flood

Principal Planning Officer  
**Babergh and Mid Suffolk District Councils**

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**From:** Gillian Davidson <[gillian@portlandplanning.co.uk](mailto:gillian@portlandplanning.co.uk)>  
**Sent:** 28 July 2022 13:19  
**To:** Elizabeth Flood <[Elizabeth.Flood@baberghmidsuffolk.gov.uk](mailto:Elizabeth.Flood@baberghmidsuffolk.gov.uk)>  
**Subject:** FW: DC/22/02948 1 Northern Road, Chilton Industrial Estate

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Dear Elizabeth

On the Flood and Water comment, I would point out that the site is actually 0.98ha. This is confirmed on the application form and on the site layout plan. We had the FRA done for a very slightly larger site, which was just over 1ha, but it was reduced before finalisation of the application. According to the County Council Guidance:

It is generally accepted that PV panels and the associated auxiliary buildings/structures have a limited impact on flood risk due to their comparatively small footprint and lack of ground contacting surfaces. However, it does not mean that this does not need to be fully considered. The LLFA will still expect a site-specific flood risk assessment (FRA) to be submitted with every PV application that is more than 1 hectare in size or is in a flood risk area. If the site is within a area at risk of flooding, the flood risk sequential and exception test maybe applied by the local planning authority.

The site is under 1ha and is not in a flood risk area.

Therefore, please ask the County Council Flood and Water Officer to withdraw his objection.

In response to Parish Council comments:

- The land to the east of the solar site is owned by the applicant. It is being retained for possible future industrial development. The applicant would consider seeding grass/wild flower mix appropriately, to enhance biodiversity.
- The solar panel provider has experience of sheep on solar parks and advises that unless the facility has been specifically designed to accommodate sheep, they damage cables and can cause problems. The applicant does not want to consider sheep at the site. The applicant will be minimally mowing a strip in front of the panels, and the rest will be left alone to be wild grass and plants as now.
- The panels are at a height from the ground which avoids any shading from grass and weed growth, between mowings. Any shading from grass and weeds has an adverse effect on generation by the panels.
- The mounting system will use either a tent peg style fixing, where small 1" diameter pegs are driven in using a hand held Hilti gun, making localised noise, or a solar park piling machine, which is a small hydraulic rig. This bears no resemblance whatever to a large building site piling machine. There is some noise, but the small piles (about 3m long and 150mm x 50mm in section) would all be installed within a week or so, and in the industrial context of the site would be largely unnoticed. Impact on the local area will be minimal and there is no requirement for a CEMP.
- CCTV

- The CCTV posts are **3m tall**. There are to be 9 of them – the Parish Council appear to think they will be 9m tall. The existing lighting on Church Field Rd is at least 8m high and far more of a visual intrusion. We will have no light at night.
- The CCTV cameras will be set to capture images largely within the perimeter fencing of the park. They form an overlapping ring of protection and will pick up human movement within those zones only. The aim is to see when the fencing has been breached, and someone is in the park.
- It is deemed necessary to have this level of security due to the attractiveness of the copper cabling and solar panels within the site.
- Planting and biodiversity
  - The site has been bare industrial land for a long time, and we have made proposals to enhance the site as far as possible, within the necessary operational constraints of the site. It is not possible to screen completely, as the panels can not be shaded at any time. The existing northern fence and view of the factory buildings, and adjacent industrial buildings, form the site context.
  - The planned biodiversity improvements have been compiled following site surveys and a report from professionally trained ecologists.
  - A full reptile survey was carried out over a period of weeks and none was found.
- Decommissioning
  - This is often considered at planning stage when the land is to be leased, as other parties may become involved as the site is developed. In this instance, the solar park will be privately owned and any decision as to when decommissioning may be required will be taken by the owner, who will also bear all associated costs.

Please let me know if any further information is required.

Kind regards

Gill

Mrs G Davidson BA(Hons) MRTPI

t: [REDACTED] m: [REDACTED] e: [gillian@portlandplanning.co.uk](mailto:gillian@portlandplanning.co.uk)

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



Please note: I will be away on holiday from 29 July 2022, for 2 weeks.

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**From:** Gillian Davidson <[gillian@portlandplanning.co.uk](mailto:gillian@portlandplanning.co.uk)>

**Sent:** 27 July 2022 16:13

**To:** 'Elizabeth Flood' <[Elizabeth.Flood@babberghmidsuffolk.gov.uk](mailto:Elizabeth.Flood@babberghmidsuffolk.gov.uk)>

**Subject:** RE: DC/22/02948 1 Northern Road, Chilton Industrial Estate

Thank you Elizabeth. I'll contact the applicant and get back to you soonest.

Kind regards

Gill

Mrs G Davidson BA(Hons) MRTPI

t: [REDACTED] m: [REDACTED] e: [gillian@portlandplanning.co.uk](mailto:gillian@portlandplanning.co.uk)

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



Please note: I will be away on holiday from 29 July 2022, for 2 weeks.

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**From:** Elizabeth Flood <[Elizabeth.Flood@baberghmidsuffolk.gov.uk](mailto:Elizabeth.Flood@baberghmidsuffolk.gov.uk)>  
**Sent:** 27 July 2022 15:26  
**To:** Gillian Davidson <[gillian@portlandplanning.co.uk](mailto:gillian@portlandplanning.co.uk)>  
**Subject:** RE: DC/22/02948 1 Northern Road, Chilton Industrial Estate

Dear Gillian

Thank you for your email, the application is currently on the schedule to go to Planning Committee on the 10 August. Any decision would be subject to resolving the holding objection from the Flood and Water Officer, it would be helpful if this could be progressed prior to Committee. There are also a number of concerns from Chilton Parish Council which you may wish to address.

Kind regards

Elizabeth Flood

Principal Planning Officer  
**Babergh and Mid Suffolk District Councils**

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**From:** Gillian Davidson <[gillian@portlandplanning.co.uk](mailto:gillian@portlandplanning.co.uk)>  
**Sent:** 25 July 2022 09:46  
**To:** Elizabeth Flood <[Elizabeth.Flood@baberghmidsuffolk.gov.uk](mailto:Elizabeth.Flood@baberghmidsuffolk.gov.uk)>  
**Subject:** FW: DC/22/02948 1 Northern Road, Chilton Industrial Estate

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Dear Elizabeth

Further to my email of 18 July, please see attached letter from JCS explaining the need for the proposal and how it will support the factory into the future.

In response to your query about use of the energy to be generated:

- **The design aim is to maximise on-site consumption by JCS, and thereby minimise any export. For this reason a substantial Battery Energy Storage System (BESS) is being installed alongside the solar array. This will capture as much unused generation as possible, and allow the factory to use it at times of high demand, or overnight when the sun is not shining. When the factory is not working, and the BESS is full to the required capacity, any surplus power will be exported, up to the DNO (UKPN) limit of 200kW. Estimates from the BESS supplier using JCS actual consumption profile and calculated solar half hourly generation profile for Sudbury are that 91% of the generated power will be used on site. This is an exceptionally high figure.**
- **It is not possible to sell surplus power to third parties at this scale.**

Do let me know if anything else is required.

Kind regards

Gill Davidson

Mrs G Davidson BA(Hons) MRTPI

t: [REDACTED] m: [REDACTED] e: [gillian@portlandplanning.co.uk](mailto:gillian@portlandplanning.co.uk)

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



Please note: I will be away on holiday from 29 July 2022, for 2 weeks.

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**From:** Gillian Davidson <[gillian@portlandplanning.co.uk](mailto:gillian@portlandplanning.co.uk)>  
**Sent:** 18 July 2022 14:42  
**To:** 'Elizabeth Flood' <[Elizabeth.Flood@baberghmidsuffolk.gov.uk](mailto:Elizabeth.Flood@baberghmidsuffolk.gov.uk)>  
**Subject:** RE: DC/22/02948 1 Northern Road, Chilton Industrial Estate

Dear Elizabeth

Thank you for your email.

I attach the location plan with blue outline added.

I have asked the client to provide answers your other 2 points and will come back to you asap.

Kind regards  
Gill Davidson  
Mrs G Davidson BA(Hons) MRTPI

t: [REDACTED] m: [REDACTED] e: [gillian@portlandplanning.co.uk](mailto:gillian@portlandplanning.co.uk)

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



Please note: I will be away on holiday from 29 July 2022, for 2 weeks.

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**From:** Elizabeth Flood <[Elizabeth.Flood@baberghmidsuffolk.gov.uk](mailto:Elizabeth.Flood@baberghmidsuffolk.gov.uk)>  
**Sent:** 18 July 2022 12:39  
**To:** [gillian@portlandplanning.co.uk](mailto:gillian@portlandplanning.co.uk)  
**Subject:** DC/22/02948 1 Northern Road, Chilton Industrial Estate

Dear Gillian

This application is location on land which is allocated for employment related purposes under Policy EM02 of the Babergh Local Plan. The proposed solar park will not directly create any jobs and therefore there is concern that the application will be contrary to Policy EM02 of the Babergh Local Plan.

I understand that the purpose of the application is to provide electricity to the adjacent factory J.C.S Hi Torque Ltd. This relationship is likely to make the application acceptable as it is protecting jobs for the long term, however I need some further information to understand this link:

- A site location plan showing J.C.S Hi Torque Ltd within a blue line and the site red lined.
- In the planning statement it states that electricity will be sold onto the grid, this is a concern as it doesn't indicate that the solar array is directly related to J.C.S Hi Torque Ltd. Please can you indicate if it has been agreed that the grid will take electricity from the site (the Council is aware that locally other sites have not been granted this) and in what circumstances will electricity to sold on e.g. is it just at weekends when the factory is closed? If it can't be sold on, would it be possible for it to be provided to other units locally?

- The application will need to go to Planning Committee so it will be really helpful if you could provide a letter directly from J.C.S Hi Torque Ltd explaining the need for the solar array and how this will support the factory in the future.

I am keen to support this application so these additional details will be really helpful.

Kind regards,

Elizabeth Flood

Principal Planning Officer  
**Babergh and Mid Suffolk District Councils**

Tel: 0784 9078665

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

I work Monday, Wednesday and Thursday.

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

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

**Sent:** 08 August 2022 11:10

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

**Cc:** Elizabeth Flood <Elizabeth.Flood@baberghmidsuffolk.gov.uk>

**Subject:** 2022-08-08 JS Reply 1 Northern Road, Chilton Industrial Estate, Sudbury, Suffolk Ref DC/22/02948 - FUL

Dear Elizabeth Flood,

Subject: 1 Northern Road, Chilton Industrial Estate, Sudbury, Suffolk CO10 2YH DC/22/02948 - FUL

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/22/02948.

The following submitted documents have been reviewed and we recommend approval at this time.

- Flood Risk Assessment (FRA) Ref P4417.1.0
- Email from agent dated 28<sup>th</sup> July 2022

Note: the proposed development will not increase flood risk as the panel will run off to ground and drain naturally. The two ISO containers are less than 250sqm and would not be subject to a formal surface water drainage strategy, but may have to be drained in accordance with Building Regulation's part H.

Kind Regards

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



Officers note: Given the removal of the holding objection from the Flood and Water Officer the resolution has been revised to state:

### **RECOMMENDATION**

That the application is **GRANTED** planning permission and includes the following conditions:

- Standard time limit
- In accordance with the approved plans
- Construction Management Scheme
- Ecological appraisal recommendations
- Biodiversity enhancement strategy
- Landscaping scheme including details of boundaries landscaping and land between solar panels.