

Appendix 1 – Summary of draft Local Impact Report in respect of the district of West Suffolk

The Local Impact Report takes the following form and structure, addressing the main environmental topics that arise from the proposed development:

1. Terms of Reference

- Sets out the respective roles of the Applicant and the four host authorities.
- Confirms that the Councils have had regard to the purpose of Local Impact Reports as set out in s60(3) of the Planning Act 2008 (as amended).
- States that the main content of the report is a description of the impacts of the proposed development on the administrative areas of the Councils and that the impacts are dealt with under headings by topic.
- For each topic area the report sets out:
 - National and local policy context;
 - Positive, neutral and negative impacts during construction, operation and decommissioning;
 - Suitability of proposed mitigation;
 - Where applicable, proposals by the Councils for alternative or additional mitigation; and
 - The need for obligations and requirements.

2. Description of the Area

- Addressed in relation to:
 - the natural and built environment;
 - economic background;
 - social and demographic factors;
 - transport;
 - a comparison of the area in which the Cleve Hill Development is located; and
 - other recent developments in the area (in particular solar schemes).

3. National Policy and Principle of Development

- Reference to National Policy Statements and the Planning Act 2008.

4. Statutory Development Plans

- Reference to local development plans.

5. Other Relevant Local Policy

- For example, Local Transport Plan, Green Access Strategy and Suffolk Guidance for Parking.

6. Impacts by Issue

Cultural heritage

Archaeology

- The archaeological mitigation strategy is incomplete; however, the Rochdale Envelope approach is considered to be acceptable in this case as it allows sufficient flexibility in the approach to mitigation and design.
- While trenching fieldwork has been completed for most of the scheme area in Suffolk, there are several fields that have had limited trenched evaluation. The work undertaken to date may be considered sufficient to establish the principle of development, it is insufficient to fully characterise the archaeological resource and inform the exact nature of further archaeological investigations and extent of mitigation areas.
- The cable routes within the solar farm do not yet have fixed locations and there is subsequent scope to alter the design and layout of the panel strings to accommodate preservation in situ, if warranted.
- There is scope to consider alternate approaches to the mechanism for installation of the cable crossing point of the historic routeway between Worlington and Rectory Farm, which is an undesignated heritage asset recorded on the County Historic Environment Record. Whilst on balance the archaeological impact of a single crossing point can be adequately managed through appropriate archaeological mitigation, SCCAS would not wish to see large portions of this feature impacted through ground disturbance or alteration of its historic landscape value, for example, to upgrade surfaces or clear vegetation to provide access along this route.
- While the archaeological mitigation strategy is still in development, the trench-based evaluation results will be assessed alongside the geophysical survey plots to validate or change the scope and areas where a range of archaeological mitigation work is needed. A number of areas needing further archaeological investigation to mitigate development impacts are indicated by the results of the evaluation so far undertaken. Currently areas for protection have only been developed from geophysical survey data.
- Positive Embedded Design Mitigation for archaeology includes the removal of ten areas of significant (high value) archaeological sites from construction impacts: seven in Cambridgeshire and three in Suffolk. Although they constitute non-designated heritage assets, the character of some of the sites (particularly in ECO5) suggests that they may be of equivalent status to designated heritage assets. An Historic Environment Management Plan should be prepared to provide a mechanism by which these sites will be suitably protected under pasture, managed and maintained - indicating by whom throughout the life of the solar farm, along with proposals for what will happen to them should the site be decommissioned and dismantled.
- A Detailed Archaeological Mitigation Strategy (DAMS) will be prepared by the applicant and will respond to the requirements of the local authority

archaeology brief. Design Briefs for the outstanding evaluation trenching, and areas of mitigation (following completion of the trenching), will be provided by SCCAS upon request. SCCAS would prefer to see the draft DAMS further developed, so that a mitigation strategy that takes into account the knowns and unknowns can be developed and agreed prior to determination.

- The post-consent programme of archaeological investigation, monitoring, assessment, reporting, archiving and publication will need to be secured through DCO Requirements and Conditions.

Built heritage

- The settings of the listed buildings have been assessed and, due to reasons of topography, orientation, screening/vegetation and/or intervening development, it is concluded that there would be no harm caused by the development to the settings of listed buildings in West Suffolk.
- Settings of the Conservation Areas in Worlington, Freckenham, Exning, Barton Mills and Newmarket. The settings of the conservation areas have been assessed and, due to reasons of topography, orientation, screening/vegetation and/or intervening development, it is concluded that there would be no harm caused by the development to the settings of the conservation areas in West Suffolk.
- DCO areas within the Freckenham and Exning Conservation Areas. These areas are identified where the AIL would overhang private land. It is a temporary measure required when the loads pass through and no permanent changes would be made in these areas.
- Although an assessment of the proposals on NHDAs, including historic buildings, is mentioned in the Cultural Heritage chapter of the ES, sections 7.6 and 7.7 which deal with this assessment only refer to the impact on archaeology. No mention is made of the any NDHAs outside the conservation areas. Clarification is required as to whether this is an omission, in which case details are required, or the fact that there are no NDHAs.
- The Limekilns. This is an open space located in East Cambridgeshire and used for the exercise of racehorses and for recreation. The impact of the development would not directly affect any built heritage or views from the conservation areas in the district of West Suffolk, but would have implications for landscape, ecology and archaeology.
- U6006 Badlingham Lane. This unclassified road is possibly associated with the route of the Icknield Way. Although it has no relationship with any built heritage within WS, it appears to form the route to Badlingham Manor, a listed building within East Cambridgeshire, so they may wish to comment on any significance it may have in that respect. It also possesses landscape, ecology and archaeological interest which would be affected by the development.

Ecology and Biodiversity

The proposals have the potential to impact on a number of sites designated for their ecological interest. In West Suffolk these include Breckland Special Protection Area, Worlington Heath County Wildlife Site and Badlingham Lane County Wildlife Site.

The Councils do not agree with the applicant that there would be no significant residual effects to ecological receptors during construction and operation of the proposals.

The Council is concerned that:

- There are some shortcomings in the ecological surveys undertaken.
- The mitigation hierarchy has not been fully implemented for all ecological receptors. Impacts should be avoided in the first instance and if this is not possible then mitigation and, in the last instance compensation measures should be applied. Given the type of development, it is considered that more could have been done within the scheme layout to adhere to the Mitigation Hierarchy, particularly in relation to stone curlew, arable flora, acid grassland and associated terrestrial invertebrates.
- A number of ecological assessments are not fully comprehensive and do not allow for clear conclusions on the level of impact expected and the suitability of the mitigation proposals: Badlingham Lane CWS and Worlington Heath CWS, wintering bird assemblage, wintering skylark, wintering linnet, watercourses, badgers, bats and construction impacts on stone curlew.
- Whilst in many cases mitigation and/or compensation measures are proposed to address impacts, in a number of cases these measures are either inadequate, too vaguely defined or inadequately secured by the proposed DCO to give certainty that all ecological impacts can be satisfactorily addressed as part of the development proposal including in the long-term post decommissioning.
- There is a heavy reliance on the Framework Construction Environmental Management Plan, Operational Environmental Management Plan and Landscape and Ecology Management Plan, however these documents are lacking in clarity, detail and in some cases are inconsistent.

It is also essential that adequate monitoring provisions are put in place and secured, during the construction, operation, and decommissioning phases, to ensure that mitigation and compensation measures are being / have been implemented successfully and retained in the long term.

Flood Risk, Drainage and Water Resources

- An unspecified number of watercourses will be crossed by the cable route and/or other necessary infrastructure via either intrusive or non-intrusive means. There should be measures to minimise intrusive crossings and incorporate appropriate mitigation where intrusive crossings cannot be avoided to manage impacts on the water environment both now and in the future.
- Dependent on the final positioning of the panels and supporting infrastructure, access to existing surface water features for essential maintenance/remedial works may be restricted.
- It is stated that some of the supporting infrastructure may require the installation of septic tanks or similar rather than connecting into the foul sewer network to manage foul effluent, which has the potential to increase risk of pollution to watercourses if not properly installed and managed.
- The drainage strategy must be supported by infiltration testing where infiltration-based features are proposed as geological mapping is proposed on a national scale and unlikely to be an accurate representation of local conditions. Features designed to incorrect or assumed ground information may not function as expected. The assumed rate of 1×10^{-5} m/s is relatively high and is unlikely to be representative of the geology locally. The proposed SuDS are not in accordance with the requested design parameters included in the Suffolk SuDS guidance document.
- All watercourses must be considered as part of the application, failure to consider seasonal or dry watercourses may result in increased flood risk.
- Areas at medium to high risk of pluvial flooding should be fully considered, however isolated they are to ensure the proposal does not increase flood risk.
- Whilst measures to manage the quantity of surface water runoff have been proposed, there is less information on how the sustainable drainage features will address the other 3 pillars of SuDS; water quality, amenity and biodiversity. Furthermore, the allowance for climate change has recently been updated and 40% uplift to allow for increases in peak rainfall intensity may no longer be applicable. A 1.2m distance should be left between the base of an infiltration feature and maximum groundwater rather than 1.0m as stated. FEH rainfall data should be used in preference over FSR as it has been shown to be more conservative and thus has a greater safety factor associated with it.
- Consideration should be given to temporary changes in flood risk from changes in surface water runoff (e.g. exacerbation of localised flooding due to deposition of silt, sediment in drains, ditches) and changes in flood risk due to the construction of any part of the Scheme within an area at risk of flooding.

Landscape and Visual

The Councils are concerned that:

- The scale, duration and geographical extent of the proposed development are likely to result in widespread and significant adverse landscape impacts, and prolonged and in some cases permanent adverse visual impacts.
- The design and mitigation measures are not sufficiently tailored across a variety of landscape character types and are not ambitious enough to sufficiently deal with the degree of harm caused by the project.
- Once operational, the expansive solar arrays, BESS, substations, weather stations, fencing, access points and access roads and other associated infrastructure would transform the existing agricultural and rural landscape into an essentially industrial landscape.
- The fragmented layout of the proposals, located amidst and around several settlements, including Worlington, and Freckenham in West Suffolk, is likely to impact on local character to such an extent as to affect sense of place.
- The embedded landscape mitigation and the tree and hedgerow planting within the *Landscape and Ecology Management Plan* lacks the required detail to give confidence that the proposals are deliverable. The limited information provided is not sufficient to fully understand and assess the provision of landscape and ecological enhancement measures nor does it convey the full intention of the proposals.

Areas of particular concern include

- Sunnica West A - which impacts on the historic landscape around Chippenham Park and which the Councils consider should not be used for solar panels
- The U6006 Road – works should be limited to a single crossing for the cable route only
- Parcel E12 - impacts on the landscape qualities of the U6006 road and it is suggested that this parcel is reduced in size, set back, and screened or removed from the scheme.

Other areas which require significant additional landscape screening include:

- BESS at parcel E33
- Parcels E30, E31 and E32 off Golf Links Road
- Along Elms Road including the BESS at E18

Noise and Vibration

- Adverse noise and vibration impact of construction (and decommissioning) activities on noise receptors
- The change caused to the existing rural noise climate
- Potential for adverse impact to sensitive receptors from additional noise and vibration during operation, including tonal characteristics
- Potential adverse impacts from dust

- Potential adverse impacts from light

Socio-economics and Land Use

- Agricultural land use (noting the concerns that are being raised by the community in respect of the accuracy of the Applicant's Soils and Agriculture Baseline Report).
- Potential of positive impacts from investment in the local economy if the correct mitigation and partnership working is put in place.
- Potential negative impacts due to a change in investor perception of the area as a destination for the horseracing industry as well as potential for direct impacts on the industry.
- Opportunities for investment in local/regional supply chains (subject to commitment by Applicant to do so).
- Positive impacts from additional spend in the area from workforce versus impact on businesses and supply chain to other construction projects due to workforce displacement and churn.
- Economic cost of congestion and journey time delays as a result of construction traffic and highway works.
- Potential for local employment opportunities and improvement of skills and prospects of local workforce (subject to appropriate assessment of baseline conditions and ambitious target setting).
- Impacts on employment rates at the end of construction period and lack of opportunities during operational phase.
- Potential impacts on tourism in relation to attraction as a visitor. destination, loss of accommodation to workforce (and benefits of the same) and impacts on public rights of way network.
- Impact on existing land uses.

Transport and Access

- ES Sensitivity test
 - Methodological issues with the way that link sensitivities have been determined, with consequences for assessments of impact on junctions.
 - It's not clear whether all links are included in each assessment.
- Transport Assessment
 - Difficulties in validating HGV numbers in the Transport Assessment - raises concerns about the reliability of conclusions in the TA, but could be addressed by the applicant committing to controls on HGV numbers in the CTMP.
- Junctions
 - Closer examination of the B1102/Newmarket Road junction in Worlington has raised concerns about whether the junction has the physical space to manage certain HGV movements. This may require a more intrusive intervention than anticipated to ensure safe movements.

- Road Safety
 - Unclear how traffic generated by the proposal will impact the 5-ways roundabout in terms of safety.
 - National Highways have proposed closures of the gaps crossing the A11 near the site. Since the NH proposals are fairly recent, the Sunnica application does not grapple with the safety implications at present, or account for it in transport modelling or design of site accesses.
 - Concerns about potential for the proposal to worsen the safety record of the A11 off-slip to Elms Road and consider that accident management proposals need to be in place in the CTMP.

- Accesses
 - The application documentation relating to accesses is generally poor, and has some inconsistencies between documents, making it difficult to determine whether all accesses are deliverable or safe.

Air Quality

- Impact of additional traffic from construction, operation and decommissioning phases.
- Operational impacts resulting from unplanned atmospheric emissions from the Battery Energy Storage Systems in the event of a fire cannot be clearly identified at this stage.

Contaminated Land

- Applicant's assessment work makes recommendations for further intrusive investigations, which should be secured through Requirements.
- Where remediation is necessary a remediation method statement must be prepared with all measures supported by a subsequent validation report.

Sustainability

- The reduction of greenhouse gas emissions from construction activity should be addressed.
- Impacts associated with the use of resources and generation of waste during construction and decommissioning.
- Low carbon energy generation.