

16 November 2023

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

Dear Ms Goudy,

**DC/23/04644 Planning Application - Erection of a Solar Photovoltaic Farm with associated substations and other supporting infrastructure including inverters and transformers, fencing, CCTV and landscaping.**

#### **Land West of Blacksmiths Lane Earl Stonham**

I write on behalf of the Suffolk Preservation Society (SPS) with reference to the above application for a 30MW solar farm on agricultural land to the west of Blacksmith's Lane, Earl Stonham. SPS supports the transition towards a zero-carbon energy system and recognises that this requires an increase in renewable energy generation, including solar. However, the benefits of renewable energy schemes must be balanced with our natural environment, heritage, landscape and the views of local people.

SPS objects to this application as the proposed scheme will result in a stark change in character to this sensitive area which is a deeply rural, agricultural landscape containing a significant number of designated heritage assets in close proximity to the boundary of the site. The Heritage Assessment accompanying this application identifies 32 listed buildings within the 1km study area and Spalls (Sporles) Farmhouse, Jockeys Farmhouse, Cherry Tree Farmhouse and Water Run Farmhouse (all grade II listed) are immediately adjacent to the site.

#### **Relevant National and Local Policy**

The National Planning Policy Framework states that 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). 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).

The emerging Babergh Mid Suffolk Joint Local Plan Policy LP25 - Energy Sources, Storage and Distribution - makes clear that renewable energy generating proposals will be supported where: *a) the impact on (but not limited to) landscape, highway safety, ecology, heritage, residential amenity, drainage, airfield safeguarding and the local community having been fully taken into consideration and where appropriate, effectively mitigated; and d) the provision of mitigation, enhancement and compensation measures when necessary.*

Crucially, the policy also states that *Where proposals for renewable and low carbon energy impact on nature conservation sites, the Areas of Outstanding Natural Beauty, or the setting of heritage assets (including conservation areas), the applicant must be able to convincingly demonstrate that potential harm resultant from development can be effectively mitigated and that there are no alternative sites available within the District.*

## **Heritage Impact**

We note and agree with the assessment by your Heritage Team which concludes that varying degrees of harm to the significance of these designated heritage assets will result due to a change to the character of land within their wider setting. Although field patterns have been changed, and some historic field boundaries removed, the character of this area as agricultural land bordered by narrow country lanes remains. The designated farmhouses have an historic association with the surrounding agrarian landscape and the introduction of solar panels, inverters, substations and industrial fencing with CCTV cameras, will result in an industrialisation of this landscape within their setting.

In particular, the main heritage impacts concern Spalls Farmhouse, which lies only 25m to the south of the site boundary, and Jockeys Farmhouse on Blacksmiths Lane, 100m east of the site and close to the proposed permanent access track to the solar farm. There will also be a lesser impact on the significance of Cherry Tree Farmhouse and Water Run Farmhouse, also on Blacksmiths Lane, the impact being reduced due to the increased distance from the proposed solar panels.

Spalls Farmhouse is in an isolated agricultural setting, some distance from the highway. The proposals indicate that the solar farm will be on part of the land historically associated with the farm and will extend to its northern boundary resulting in its rear elevation facing a vast swathe of solar panels. Moreover, whilst the boundaries of Spalls Farmhouse are currently heavily screened by trees which limits views to and from the farmhouse, the effectiveness of this cover will vary by the season and cannot be guaranteed to remain.

Jockeys Farmhouse is located to the east of Blacksmith Lane and would be slightly further from the closest solar panels. Much of the site is within its wider agricultural setting, however, and some

visibility of the proposed development will result. Of greater concern is the proposed access road, customer switchgear and substation which would be in close proximity. These will be entirely alien structures within this rural landscape and may appear in views of Jockeys Farmhouse when approaching from the south along Blacksmiths Lane. It is unfortunate, therefore, that the submission LVIA does not include a visualisation of the visual impacts from this direction.

### **Mitigation planting**

SPS is concerned that the proposed landscaping scheme falls short of providing adequate mitigation for the heritage impacts identified above as well as the visual impact of the proposals on residents and those travelling on the road and footpath network around the site. If the lpa is minded to allow the development of a solar installation on this site, SPS would urge for a more meaningful package of landscape mitigation and buffer areas to be agreed.

This should include a greater setback of panels to the north of Spalls Farmhouse together with more planted screening. SPS also urges that the applicant be encouraged to consider the relocation of the access road, DCO substation and customer switchgear to a less sensitive area of the site. We also question the seemingly arbitrary siting of the new hedgerow to the north of the new access road. Its set back from the roadside cuts the existing field pattern in half and it is unclear whether the remaining tract of land between the roadside and the hedge will be cultivated or planted as an additional buffer area between the solar panels and properties along Blacksmith Lane.

We trust that you will find these comments helpful and ask to be consulted on any amendments to this application.

Yours sincerely,

**Bethany Philbedge BSc (Hons) MSc (Town Planning) MRTPI  
Planning Officer**

Ccs:

Ward Councillor

Parish Council – Earl Stonham

Thomas Pinner – Babergh Mid Suffolk Heritage Team