axis

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Our Ref: 2921-01/PR

13th January 2021

Planning and Growth
West Suffolk District Council
West Suffolk House
Western Way
Bury St Edmunds
Suffolk
IP33 3YU

**Sent via** planning.help@westsuffolk.gov.uk

Dear Sir/Madam,

**PROPOSED SOLAR FARM ON LAND TO THE EAST OF BREACH FARM, OFF NESS ROAD (B1102), WEST SUFFOLK, INCLUDING GRID CONNECTION CABLING EXTENDING TO THE NATIONAL GRID SUBSTATION AT BURWELL, EAST CAMBRIDGESHIRE.**

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 - REGULATION 6 – REQUEST FOR A SCREENING OPINION**

We are writing on behalf of Burwell 11 Solar Limited (the 'Applicant') to request a formal Screening Opinion under Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2017 (hereafter referred to as 'the EIA Regulations') for the above development proposal, hereafter referred to as 'the Proposed Development'. The location of the site, access and grid connection is illustrated on Figure 1 and the extent of the likely solar farm development is shown on Figure 2.

The majority of the Proposed Development would be located within West Suffolk, with a small part of the solar farm, access track and the proposed grid connection corridor located in East Cambridgeshire. As such, the screening request has been submitted to both West Suffolk Council and East Cambridgeshire District Council

To assist in the adoption of a Screening Opinion we have provided a summary of the Proposed Development location and a brief description of the nature and purpose of the Proposed Development.

We then set out our view on whether the Proposed Development falls within Schedule 1 or Schedule 2 of the EIA Regulations.

Finally, consideration is given to the information required to complete the EIA Regulations Screening Matrix[1] . This is presented under the following headings:

1. Natural Resources

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1 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/643241/TCPA_EIA_Screening_Matrix_2017_Regs.pdf

2. Waste
3. Pollution and Nuisances
4. Population and Human Health
5. Water Resources
6. Biodiversity (Species and Habitats)
7. Landscape and Visual
8. Cultural Heritage/Archaeology
9. Transport and Access
10. Land Use
11. Land Stability and Climate
12. Cumulative Effects
13. Transboundary Effects

Each section seeks to address the selection criteria for screening Schedule 2 development provided in Schedule 3 of the EIA Regulations.

**Site Location and Context**

The Site is located to the north east of the settlement of Burwell and to the west of the smaller settlement of Landwade (see Figure 1). The solar panels and associated infrastructure would be within the red line boundary shown on Figure 1, with an access road linking it to Ness Road. The site of the solar panels and associated infrastructure comprises an area of c.73 hectares, as illustrated on Figure 2. In addition, a temporary construction compound will also be required. The precise location of this temporary construction compound has not been identified at this stage, but it is likely to be within the footprint of the main development. The Site comprises farmland crossed by a network of ditches and drains, with tree lines, wooded strips and hedgerows. These features are characteristic of the local landscape.

The Site is served by an existing access track from Ness Road, which would be used for construction and maintenance access. Ness Road (B1102) leads south into Burwell where it meets the B1103 which subsequently connects with the A14. To the north Ness Road connects with the A142.

The grid connection route would extend west to the existing electricity substation at Burwell. The precise route has not been finalised, but it is expected to follow the route shown on Figure 1. The route extends along Haycroft Lane and Howlem Balk to Burwell. It then extends south along North Street until it reaches the junction with Hythe Lane where it would travel west before turning south along Weirs Drove until it reaches the existing substation.

The solar farm site would predominantly be located within West Suffolk Council (WSC), but with two small parts within East Cambridgeshire District Council (ECDC). The access road from Ness Road to the Site and the grid connection route would be within ECDC.

Haycroft Lane is a byway open to all traffic to the south of the site, and a section of it adjoins the Site's southern boundary. There is a restricted byway defining the eastern boundary of the site, which connects to PROWs providing access to St Nicholas Church to the north east. Both Haycroft Lane and the restricted byway are part of the adopted highway network according to Cambridgeshire County Council's online mapping.

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The site is not subject to any landscape, heritage or conservation area designations and there are no listed buildings on the site itself. The nearest listed buildings are to the north east in Landwade. This includes a barn, Landwade Hall (both Grade II), the Church of St Nicholas (Grade II*) and associated wall and cross (both Grade II). There is a moated site to the east of the Church which is a Scheduled Ancient Monument (SAM). Further SAMs are located at Burwell Castle and the site of a Roman Villa and Iron Age Settlement to the north of Reach. These heritage features are all illustrated on Figure 3. The nearest conservation areas are Burwell High Town and Burwell North Street.

The nearest ecological designations within 2.5km of the Site are illustrated on Figure 3 and are summarised below:

- Wicken Fen Site of Special Scientific Interest (SSSI), Ramsar and National Nature Reserve (NNR) (c.4.1km)
- Fenland Special Area of Conservation (SAC) (c.2.1km)
- Devils Dyke SSSI (c.3.7km)
- Brackland Rough SSSI (c.2.2km)
- Chippenham Fen SSSI, Ramsar and NNR (c.2.1km)
- Snailwell Meadows SSSI (c.2.1km)

The main site is predominantly located within flood zone 1 ('low risk' of river or sea flooding) with sections along the centre and north-east of the site being located in flood zone 2 ('medium risk') and flood zone 3 ('high risk'), albeit benefitting from flood defences in most areas. The cable route would run through areas with a low risk and high risk of flooding, but would be located underground.

Based on available baseline mapping the Site comprises Grade 2 and 3 (undifferentiated) agricultural land.

There are no residential dwellings within the main site. There are some scattered dwellings located nearby. The closest dwellings to the Site are Beechams House (c.120m south) and the four cottages to the south of Landwade Farm (c.99m east). The grid connection route would run in the carriageway adjacent to residential properties in Burwell.

**Planning History**

A review of the West Suffolk and East Cambridgeshire planning websites has highlighted the following planning history that is relevant to the Proposed Development:

*East Cambridgeshire*

| Planning Ref. | Description | Date |
|---|---|---|
| 13/00451/CLP | Erection of new flood defences located along the alignment of the current boundary fence on the Burwell Substation - Approved | July 2013 |

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| | | |
|---|---|---|
| 17/02205/FUL | Development of a 49.9MW battery storage facility, bridge and associated infrastructure – Approved to the east of Weirs Drove | April 2018 |
| 19/00155/FUL | Application for the construction and operation of a 49.9MW battery storage facility, fencing, landscape planting and site access on land adjacent to the operational Burwell 400kV substation – Approved to the west of Weirs Drove | April 2019 |
| 19/00427/SCOPE | Scoping opinion request for 500MW Solar Farm on land north of Snailwell and South of Chippenham Park and associated grid connections to Burwell Substation. The grid connection route to Burwell Substation encroaches into a very small corner of the proposed site – DCO application | April 2019 |
| 20/00557/ESF | Proposed Development of a Solar Farm and Ancillary Development – Approved | August 2020 |

*West Suffolk*

| Planning Ref. | Description | Date |
|---|---|---|
| DC/19/0472/EIASCO | Scoping Opinion Under Environmental Impact Assessment Regulations 2011 - Development Consent for the Sunnica Energy Farm | April 2019 |

Approximately 2km to the east of the Site is the closest (excluding grid connection) part of the Sunnica Energy Solar Farm. This is a classified as nationally significant infrastructure project and therefore will be determined by the Secretary of State through a Development Consents Order. The grid connection corridor for the Sunnica Energy Solar Farm passes immediately to the north and west of the Breach Solar Farm site and in part follows the line of the access road to Breach Farm. The Sunnica application is expected to be submitted in Q2 of 2021.

It can be seen from the above planning history review that there have been previous energy related planning applications / scoping opinions in the vicinity of Burwell Substation and the site.

**Description of the Development**

The Proposed Development would comprise a solar farm with an export capacity of up to 49.995MW of electricity (MWe). The site comprises an area of c.73 hectares (excluding grid connection and access) as illustrated on Figure 2. The solar farm would consist of the following key elements:

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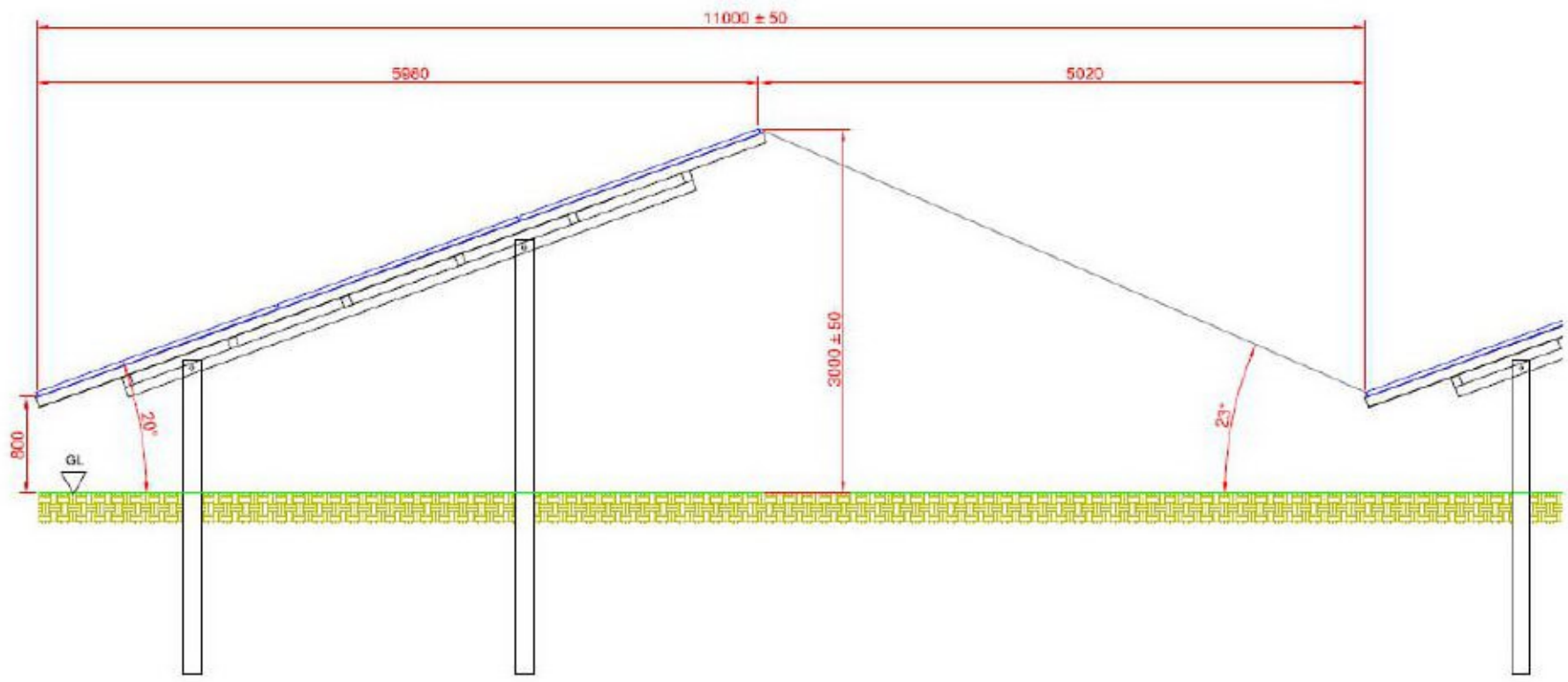
- Photovoltaic (PV) solar panels (up to 3m high) and associated support frames and cabling
- Inverter & Transformer Stations
- Battery Storage Containers
- Control Building
- Switchgear Building
- Storage buildings
- Access tracks
- Security fencing
- CCTV security cameras & supports
- Cable connection to substation

The Proposed Development would be for a time limited period of 40 years after which time the site would be decommissioned and restored back to full agricultural use.

A typical configuration for the solar panels and supports is illustrated below. During operation, the land under the solar panels would be managed for biodiversity gains and sheep grazing.




The cable route would follow adopted and unadopted highways as described above.

The construction period for the solar farm is anticipated to last approximately 36 weeks.

**EIA Screening**

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 define EIA development as that falling under either Schedule 1 Development, or Schedule 2 Development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

***Schedule 1 Development***

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Projects defined within Schedule 1 are EIA development and it is mandatory for planning applications for such developments to be supported by an Environmental Statement.

The Proposed Development does not fall under any of the Schedule 1 categories. Therefore, the Proposed Development is not Schedule 1 development and mandatory EIA is not required.

***Schedule 2 Development***

Schedule 2 of the EIA Regulations includes a table that sets out various categories of development that may require EIA. The table includes applicable thresholds and criteria, which if exceeded, mean that the development is considered to be Schedule 2 development.

Schedule 2 development is required to be screened against the criteria set out in Schedule 3 to determine if the development is likely to give rise to significant effects on the environment. If the Proposed Development is deemed likely to give rise to significant effects by virtue of its location, characteristics or potential impacts then EIA is required.

In the context of Schedule 2 the Proposed Development is considered to be an 'industrial installations for the production of electricity, steam and hot water (Schedule 2, 3a).

The Schedule 2 indicative threshold for industrial installations for the production of electricity, steam and hot water is that the area of the development exceeds 0.5 hectares. At >73 hectares the Proposed Development exceeds the Schedule 2 threshold. Accordingly, the Proposed Development is considered to fall within category 3a of Schedule 2 of the EIA regulations.

In order to establish whether the proposed works are likely to give rise to significant environmental effects, and therefore if the application must be subject to EIA, planning authorities are required to consider (or 'screen') the proposals against the criteria set out in Schedule 3 of the EIA Regulations.

***Schedule 3***

Schedule 3 sets out three main criteria against which the development should be considered, as follows:

1) Characteristics of development;
2) Location of development; and
3) Types and characteristics of the potential impact.

A number of sub-criteria are also provided, and these are considered below in the context of the EIA Screening Matrix, referenced above. In addition, reference is made to government EIA guidance in respect of indicative thresholds and criteria for Schedule 2 developments.[2]

***1. Natural Resources***

The Proposed Development will not lead to any significant change to the topography of the area and earthworks would be limited to soil stripping for track construction and formation of

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2 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/630689/eia-thresholds-table.pdf

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foundations for inverters, transformers, control building, switchgear building and service connections etc. Stripped soils would be retained on site and be cultivated into the areas below solar panels prior to seeding. The solar panel supports would be mechanically driven into the soil and would not require excavations or foundations. These types of activities are common to most types of industrial development and are unlikely to result in any significant environmental effects.

The Proposed Development would facilitate the generation of renewable energy and this would conserve natural resources that would otherwise be used to generate power. Whilst the solar panels, frames and ancillary equipment would use natural resources during construction this would not be in significant quantities that could have wider significant environmental impacts.

The site is indicated as Grade 2 and Grade 3 agricultural land on Figure 4. As such the Site is likely to be considered the best and most versatile agricultural land. The Proposed Development would not result in the permanent loss of this natural resource. During operation the Site would be used for sheep grazing and the partial reduction in land management options (i.e. removal of arable options) would not result in significant long-term impacts on agricultural land in the context of this wider resource available in East Cambridgeshire.

***2. Waste***

The Proposed Development would not generate significant waste during construction or operation. Following decommissioning at the end of the scheme's operational life or when panels need to be replaced due to failures/damage solid waste will be created. PV panel disposal is covered by the Waste Electrical and Electronic Equipment (WEEE) Directive. As such, any disposal of panels will need to comply with this directive. PV panels comprise a high proportion of glass along with smaller amounts of plastic, aluminium and other metals. All of these components are readily recyclable, with c.80% of the panel materials able to be recycled at specialist processors. Solid waste generated by decommissioning works can be effectively managed by moving waste up the waste hierarchy through recycling for beneficial use. As such significant effects associated with disposal of waste as a result of the Proposed Development would not occur.

***3. Pollution and Nuisances***

The Proposed Development would not result in any emissions to air, with the exception of vehicle emissions associated with the delivery/removal of material during construction/decommissioning and dust during construction/decommissioning. These potentially polluting activities would occur for a limited time period and potential for dust can be mitigated by standard construction management techniques. As such significant effects are not considered likely.

There would be limited noise and light pollution associated with the construction / decommissioning periods and this would be localised and mitigated by standard construction management techniques. During operation the main noise emissions would be from the transformers and inverters and this would be attenuated to levels that would not result in any significant impacts at sensitive noise receptors.

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The site comprises previously undeveloped agricultural land and as such there is limited risk of any contamination of land and water as a result of existing ground conditions. The Proposed Development would not result in increased risk of contamination due to the nature of the development.

In conclusion, the Proposed Development is unlikely to result in significant pollution and nuisances.

***4. Population and Human Health***

As set out above, effects as a result of emissions that could affect human health would be limited to vehicle movements during the limited construction and decommissioning phases. During these phases traffic controls would be put in place along with appropriate signage and management to ensure that there would be no conflict between construction traffic and pedestrians/cyclist. Construction activities could be controlled by a Construction Environmental Management Plan (CEMP) to ensure that risks to the public and environment are managed effectively.

There are limited residential properties near to the site and in the unlikely event of an explosion or fire at one of the inverters/transformers or battery storage containers the risk to the public would be negligible.

As such there is limited risk to the surrounding population as a result of the Proposed Development.

***5. Water Resources***

The Proposed Development is located adjacent to a number of drainage ditches and a number of ditch crossings will need to be created for access tracks and cable crossings. Where possible cable crossing points would be combined with track crossings. With the exception of ditch crossings all development would be located more than 5-6m from all ditches. Subject to following best practice set out in the CEMP the risk of any pollution of ditches can be effectively managed. Crossings would be designed so as not to impede flows within the ditches to ensure that the existing hydrological continuity is maintained.

The site is remote from nearby rivers and does not overlay any ground water source protection zones.

Whilst the solar panels would introduce large areas of impermeable material, each panel would drain to the land immediately below the support structure and rainwater would permeate into the ground as per the existing undeveloped situation. Surface water would be managed by a suitable sustainable drainage system (SuDS) scheme that would ensure overall runoff rates from the site would not increase. This would ensure that there would be no increased risk of flooding as a result of any increased impermeable areas at the site.

The majority of the site is at low risk of flooding. However, there are some areas that are within Flood Zone 2 and 3 (defended and undefended). Whilst the site covers a relatively large area the actual physical footprint of the development on the ground is much smaller and would be limited to the footprint of the support frames, inverter/transformer & battery container bases,

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control building, storage buildings and switchgear building. All inverter/transformer & battery container bases control building, storage buildings and switchgear building would be located outside areas of flood risk and as such the most vulnerable parts of the Proposed Development would not be at risk of flooding.

Effects on water resources can be effectively managed through design to avoid any potential for significant environmental effects that would trigger the need for EIA.

***6. Biodiversity (Species and Habitats)***

As illustrated on Figure 3 the site is remote from SSSIs, Ramsar Sites, SACs, Special Protection Areas (SPAs), NNRs and Local Nature Reserves (LNRs). Whilst the proposed development would be located within the impact zones for a number of SSSIs there would be no discharges to air or water as a result of the solar farm that could have a negative effect on these designations and associated SACs and Ramsars.

The arable fields that would be used for the development are of low ecological value due to their intensive agricultural cultivation. However, the area could be used by different species at different times of the year depending on the nature of crops/cultivation.

The ditches, hedgerows, tree lines and wooded strips within the site are likely to represent the best habitat resource. The proposed development would ensure a minimum of a 5-6m buffers to these features and the buffer zone would be seeded with species rich grassland and wildflowers and managed for biodiversity benefits and to improve the habitat within the Site. This could include localised fencing to reduce grazing pressure along sections of ditches and planting of appropriate food sources to enhance the existing habitats water voles etc.

The areas underneath the solar panels would be agricultural grassland and would be managed by low intensity sheep grazing and manual cutting as required.

Overall, it is considered that the Proposed Development would not have any significant effects on biodiversity and that there is potential for net biodiversity gains as a result of taking the land out of intensive arable production and managing the areas under and around the solar panels for habitat benefits.

***7. Landscape and Visual***

There are no areas or features on or around the Site which are protected for their landscape and scenic value. The Proposed Development would be located within a landscape setting that contains a number of existing screening features in the form of hedgerows, tree lines and woodland strips. This would break-up the visibility of the Proposed Development and the entire solar farm would not be seen in its entirety. The preliminary Digital Surface Model (DSM) Zone of Theoretical Visibility (ZTV) for the Proposed Development is illustrated on Figure 5. The ZTV indicates that visibility would be contained by existing landscape features within the Site and immediate surroundings, as well as ridgelines to the east, west and south of the site. As such visibility of the Proposed Development would not be extensive from the wider landscape. Additional, hedgerow planting would be incorporated within the solar farm layout and existing hedgerows would be managed to maximise screening.

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In this context the Proposed Development would not give rise to widespread significant landscape and visual effects that would trigger the need for EIA.

***8. Cultural Heritage/Archaeology***

There are no SAMs, listed buildings, conservation areas, registered parks and gardens or historic battlefields within or immediately adjacent to the site. The nearest such features are illustrated on Figure 3.

The DSM ZTV illustrates that the Proposed Development would not be widely visible from these heritage assets and as such effects on the setting of these assets would not be significant.

Appendix A provides a summary of the potential Cultural Heritage constraints within and immediately surrounding the Site. This confirms that there is a high potential for buried pre-historic and Roman archaeological remains, due to the level of historic assets in the surrounding landscape from these periods. However, potential for early historic and medieval and post-medieval archaeological remains is low. It is considered that any unknown archaeology could be conserved in situ or by record through an approved written scheme of investigation (WSI) secured through a planning condition. This would ensure that there would be no likely significant effects of cultural heritage or archaeology.

***9. Transport and Access***

There would be no long-term direct impacts on public rights of way (PROW). However, there would be temporary short term effects on Haycroft Lane, Howlem Balk, North Street, Hythe Lane and Weirs Drove during installation of the grid connection cable. These works would be of short duration and temporary. Access would be maintained at all times through appropriate signage and health and safety measure.

Construction and maintenance traffic would access the Site directly from the B1102, via the existing surfaced access track to Breach Farm. Table 9.1 summarises the number and type of deliveries that are anticipated to be generated during the 36-week construction period.

**Table 9.1 – Anticipated Trip Generation during the Construction Period**

| Description of Temporary / Ancillary Works and Equipment | Details of Load | Number of Loads |
|---|---|---|
| Office / welfare accommodation (portacabins) | Low loader | 3 |
| Generator | Pickup | 1 |
| Excavator | Driven or low loader | 2 |
| Crane | Driven or low loader | 1 |
| Piling machine | Pickup | 2 |
| Switch gear | Low loader | 2 |
| Building material for substation | Pick up | 10 |
| HV installation | Hiab delivery | 2 |
| **Construction Support** | | **24** |
| PV panels | HGV | 192 |
| Metal frames | HGV | 204 |
| Cabling | Curtain sided lorry | 153 |

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| | | |
|---|---|---|
| Inverters and transformers | Low loader | 26 |
| Fencing | Pick up | 51 |
| Aggregate for roadways | Tipper truck | 600 |
| **PV Equipment / Components** | | **1226** |
| **TOTAL (one-way deliveries)** | | **1250** |

As summarised in Table 9.1, it is anticipated that the total number of deliveries requiring access to the development site would be some 1,250 one-way trips (2,500 two-way trips) across the full 36-week construction period.

During the first 4 weeks of the construction period, there would be a total of 55 daily two-way delivery-related movements to the site, on average. This would reduce to approximately 7 two-way delivery-related movements per day for the remainder of the construction period. This level of trip generation is considered to be insignificant.

In addition to the above, there will also be approximately 50 staff requiring access to the site per day, on average. During peak activities, the number of construction-related staff may rise to 120.

Traffic generated during construction traffic would be modest and would be short term and temporary.

The Proposed Development is unlikely to result in significant environmental effects associated with effects on a PROW or increased traffic on the public highway.

***10. Land Use***

The site is not allocated in the local development plan for any land use other than agriculture. Whilst likely to result in restrictions on the use of Grade 2 & 3 agricultural land some farming activities (sheep grazing) would be able to continue. The agricultural land holdings that would be affected are all involved with the project and their overall farm businesses would not be adversely affected by the Proposed Development.

Future residential and employment allocations in Burwell and Exning would be remote from the site of the proposed development.

As such the Proposed Development would not conflict with land use designations or existing adjacent uses, and significant effects in terms of land use are unlikely.

***11. Land Stability and Climate***

Whilst parts of the Site are within the defended and undefended flood zone the scheme can be designed in such a way that key infrastructure is protected and that there is no increased risk of flooding elsewhere.

The development of renewable energy projects is essential for addressing climate change and delivering the Government's target of net zero by 2050. As such, there would be beneficial climates impacts associated with the Proposed Development.

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***12. Cumulative Effects***

There are existing, consented and proposed solar farms in the surrounding countryside. The main cumulative effects are associated with a reduction in the best and most versatile agricultural land. However, the solar farms would be subject to a temporary consent and would be removed at the end of its life and the land restored to full agricultural use. As such there would be no long-term cumulative impacts in this respect.

Traffic associated with this and other solar farm construction would be temporary in nature and would be unlikely to all occur at the same time or affect the same highway networks. As such significant cumulative traffic effects are not considered likely.

Whilst multiple solar farms in the surrounding landscape could be visible, their effects would be localised due to the rolling topography and screening effects of localised vegetation, and proposed mitigation planting. As such, cumulative visual effects are likely to be in succession as people move through the landscape, rather than in combination. This would help reduce any cumulative landscape and visual effects with other projects.

The ZTV illustrated on Figure 5 shows the localised nature of visibility and that there would be limited if any intervisibility with other schemes. As such there would be no long-term cumulative impacts associated with the operation of the solar farm.

***13. Transboundary Effects***

Due to the geographic location, scale and nature of the Proposed Development there would be no potential for transboundary effects. The site extends across two local authority area but this in itself does not constitute a transboundary effect.

**Screening Request**

This letter provides a brief description of the Proposed Development and the likely significant effects on the environment in line with the requirements of Regulation 6(2) and Schedule 3 of the EIA Regulations. Whilst the Proposed Development is Schedule 2 development, screening against Schedule 3 of the EIA Regulations, and the related guidance in the PPG, clearly demonstrates that with appropriate standard mitigation in place the Proposed Development is not likely to result in significant environmental effects. As such, it is considered that the Proposed Development does not constitute 'EIA development'.

**Planning Submission**

Notwithstanding the above, the planning submission will be accompanied by a series of assessments setting out the details of the Proposed Development and the results of various technical assessment. These will include the following:

- Planning and Design & Access Statement;
- Planning Drawings;
- Glint and Glare Assessment;
- Ecological Assessment;
- Flood Risk Assessment and Surface Drainage Strategy;

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- Landscape and Visual Impact Assessment
- Cultural Heritage Assessment;
- Noise Assessment
- Agricultural Land Assessment, and
- Transport Statement.

Based on the previously undeveloped nature of the site it is not proposed to submit Phase 1 Ground Condition reports.

The final list of documents to be submitted in support of the detailed planning applications will be confirmed with West Suffolk and East Cambridgeshire District Councils. We trust that the contents of this letter along with the attached plans are sufficient to aid you in adopting a screening opinion. We look forward to receiving your response within the statutory three-week period; in the meantime, please do not hesitate to contact us should you have any queries. We look forward to your views on the intended scope of the planning application.

Yours sincerely

[redacted]

Phil Roden
**Director**

Enclosed:

Figure 1: Site Location Plan
Figure 2: Development Area
Figure 3: Environmental Constraints
Figure 4: Agricultural Land Classification
Figure 5: DSM ZTV

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