

# Planning Addendum for Solar Development and Associated Works.

**Land West of Boxted.**

On behalf of RES Ltd.

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## Document Management.

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# 1. Introduction

1.1. This Planning Addendum has been prepared to address the comments raised by the Local Planning Authority, those raised by statutory consultees and the general public following the conclusion of the statutory consultation period for Application Reference DC/23/05127.

1.2. This proposal is for a solar development (PV) farm on land at west of Boxted. This development would have the capacity of up to 20MW of clean and renewable (low carbon) energy. The description of development is:

**“Construction and operation of a solar farm with all associated works, equipment, necessary infrastructure and biodiversity net gains.”**

1.3. This report addresses the following matters:

- Built Heritage and Archaeology – Section 2
- Landscape and Visual Assessment – Section 3
- Arboriculture – Section 4
- Flood Risk and Drainage – Section 5
- Highways – Section 6
- Fire Risk Statement – Section 7
- Crime Prevention – Section 8
- Planning Policy – Section 9
- Response to Public Comments –Section 10
- Summary and Conclusion – Section 11

## 2. Built Heritage and Archaeology

- 2.1. This section seeks to address the comments made by Historic England (dated 24 November 2023), Babergh and Mid-Suffolk Officer (dated 13 December 2023) and the Suffolk Preservation Society (dated 12<sup>th</sup> December 2023) and a Heritage Addendum (Appendix 1) prepared.
- 2.2. As discussed within the Addendum, the scheme has the potential to cause less than substantial harm at the low end of the scale to the Grade II listed Moorhouse Farm and the Grade II Listed Water Hall. Photomontages VP7 and 10 show that whilst the scheme is visibility in the view of Moorhouse Farm from across the Glem Valley, the scheme does not form a clear backdrop to the asset, nor is there any sense of the panel's 'wrapping around' the asset. There is a generous buffer in the eastern side of the asset and there are no panels to the west of the asset. The foreground of the view of the asset is not part of the Scheme and will remain free from development allowing the asset to be viewed in surrounded by open fields.
- 2.3. For Water Hall, the 1840 tithe map shows there was an association between Boxted Hall, Water Hall and small portion of land within the Site, however this link is now severed. There is a possibility of glimpsed views of the eastern portion of the Site in winter vegetation, and the change to a portion of the rural setting of the asset which was once associated is where the low level of harm is derived
- 2.4. In terms of archaeology, the scope of trial trenching has been agreed with the Senior Archaeological Officer for Suffolk County Council. A provisional number of trenches were agreed, and it was agreed that the nominated sub-contractor would design the trench plan in accordance with the agreed parameters. A contractor has been appointed for the works and they are currently preparing the Written Scheme of Investigation (WSI). The trenching is forthcoming.
- 2.5. It is concluded that the proposed scheme is temporary, with any harm arising to significance through setting being capable of being reversed upon decommissioning. The harm must be placed within the planning balance as discussed within the submission Planning Statement and the wider documentation on need, and assessed accordingly.

## 3. Landscape and Visual Assessment

- 3.1. This section seeks to address the comments made by Place Services with regards to landscape matters, dated 11 December 2023. The response to these comments is detailed within the submitted response document at Appendix 2. The LVIA has also been updated (Appendix 3) to address the updated planning policy context that has evolved since the application was submitted.
- 3.2. As requested the submitted photographic record provides the updated five requested locations and a revised Landscape Masterplan (Drawing Reference P21-2950\_EN\_004 Rev D).
- 3.3. Whilst it is acknowledged that some impact on landscape character and local views would arise but that the landscape masterplan has been carefully considered to positively respond to local character and provide visual mitigation as far as practicable, and this is reported in the updated LVIA. It is considered that the impacts would be limited and localised and

confined to locations adjacent to the site itself or within more distant view from the south-facing valley side.

- 3.4. In this context it is considered that the wider benefits of the scheme outweigh the effects identified within the LVIA.

## 4. Arboriculture

- 4.1. This section seeks to address the comment made in relation to arboriculture. The applicant welcomes conclusion of no objection from the Arboricultural Officer. It is however noted that queries have been made by a number of other consultees with regards to the use of the access adjacent to the Park Wood Ancient Woodland and the impacts that this would have on the woodland.
- 4.2. This addendum is supported by an Arboricultural Method Statement (AMS) (Appendix 4). This document identifies that a section of cellular confinement track will be utilised for the construction adjacent to the ancient woodland. Furthermore, the track drainage swale will be routed along the northern edge of the track in order to maintain a reasonable amount of clearance from the Ancient Woodland Buffer. The use of the cellular confinement will preclude the need for excavation into the existing ground level.
- 4.3. This is also the most appropriate methodology for access tracks from an ecological perspective as it utilises an existing track without the need to create a new break in the existing hedgerows.
- 4.4. An updated Arboricultural Impact Assessment (AIA) (Appendix 5) has been prepared following the required amendments for drainage and fire related infrastructure. This report maintains its conclusion that overall the arboricultural impacts of the development proposal on trees and hedgerows at the site are to remain very low. Any minor losses can be mitigated by the proposed new tree and hedgerow planting.

## 5. Flood Risk and Drainage

- 5.1. This section seeks to address the comments made by the Lead Local Flood Authority, dated 15 November 2023. A meeting with Officers in February 2024 to discuss the requirement for a revised flood risk assessment and surface water drainage strategy referencing the LLFA Standing Advice and the implementation of swales within the development.
- 5.2. The submitted LLFA Response (Appendix 6) addresses each of the points raised in turn. The submitted drainage scheme for the site include for swales and gravel trenched to capture any overland flows from the development and to promote the infiltration of surface water. These features are proposed in addition to the swales to access tracks within the scheme detailed on Figure 6 (Drawing Number O4806-RES-ERW-DR-PT-001 Rev 1) submitted with the application.
- 5.3. The report concludes that the impact of the proposed solar panels on existing flow route is considered to be negligible and a surface water drainage strategy is proposed to ensure the infrastructure proposed on site does not impact existing overland flows.

5.4. As such, it is considered that the proposed development meets the requirements of the LLFA standing advice and addresses the concerns that have been raised.

## 6. Highways

6.1. This section seeks to address the comments made by Suffolk County Council dated 24 November 2023. The applicant welcomes the Highways Authority's assertion that the proposal is generally acceptable.

6.2. It is not proposed that any traffic movements relating to earthworks will be required as the spoil generated would be redistributed within the site. As such, the CTMP has been prepared on the basis that these trips would not be required.

6.3. A request for information was submitted with regards to the bridge on Braggons Hill and the weight restriction. The response received from the Structures Condition and Assessment Manager at Suffolk Highways confirms that the 40/44 tonnes vehicles can legally cross the bridge (Appendix 7). Those relating to the construction and operation of the scheme can therefore be accommodated on the bridge.

## 7. Fire Risk

7.1. This section seeks to address the comments made by Suffolk Fire and Rescue (SFR), dated 20 November 2023 and our subsequent meeting with the Service on 12 November 2024.

7.2. The applicant has provided a Fire Risk Statement (Appendix 8) which indicates how Boxted Solar Farm has been designed to address fire risk in several ways in line with discussions held with Officers. The Fire Risk Statement contains key mitigation measures against the risk of fire ignition and propagation within the battery energy storage units which are designed as part of a hybrid solar and battery storage project.

7.3. The overarching fire risk management strategy would adopt the following controls:

- Implement measures that result in a very low risk of fire ignition and any suitable environment for sustaining fire.
- Implement measures that result in a very low risk of fire propagation and spread within a fire source (e.g BSE). The risk of fire spread between battery storage systems is considered low due to the separation of systems associated with each inverter and the dispersed nature of inverters across the site.
- Ensure fire spread between significant elements of the project is not expected, through application of design standards and use of calculations/modelling as necessary.
- Include adequate provisions to allow the fire service to monitor a fire event, intervening only if there is a failure of the controls above.

7.4. It is acknowledged that most recent guidance states a requirement for two points of access to be achieved within a development. The enclosed document provides a wind rose to show the direction of prevailing wind at the site. This details that the wind is approximately 90



degrees from the site access direction and therefore it is unlikely that the access onto the site will be hindered by poor visibility from fire smoke plumes.

- 7.5. Following discussions with Fire Officers and the requests within the response, turning heads to accommodate access to the site have been included within the layout as well as a number of hydrant water storage locations.
- 7.6. Battery technology and associated understanding of fire risk is continually evolving within the industry. As such, this document sets out key principles and mitigation measures based on the current understanding of battery fire risk but does not include a detailed Fire Risk Management Plan. A detailed Fire Risk Management Plan would be developed during detailed design, following battery selection. The applicant would be happy to accept an appropriately worded condition to secure the final Fire Risk Management Strategy to any consent.

## 8. Crime Prevention

- 8.1. This section seeks to address the comments that have been raised Suffolk Constabulary. A number of points of clarification have been requested and each are dealt with in turn below.

### Fencing and Access Gate

- 8.2. With regards to the fencing that is proposed (Ref Figure 10 – Typical Perimeter Deer Fence Ref O4806-RES-SEC-DR-PT-002 Rev 1) that is proposed to be installed at the site boundary, it is common practice for the fencing as specified for the purpose of this application to be installed to the perimeter of solar proposals. It is considered that this type of fencing can be maintained in a manner to ensure the security of the site whilst not detracting visually from the views of the local area. The level of security provided by the proposed fencing is considered generally acceptable and needs to be balanced with visual consideration. It is considered that if anything more substantial were to be installed, this may not be acceptable visually. It can however be confirmed that the fencing will be installed so that the gap between the base of any fencing and the ground is minimal, and the gap provided within the fencing is to allow for the crossing of a small mammal. It is confirmed that with this type of fencing the client can obtain relevant insurance for the scheme.
- 8.3. In addressing comments made by the Lead Local Flood Authority a number of swales have been included within the scheme design. These are located along the north most boundary of the site in the topographical lower areas and are located outside of the fencing line acting as further deterrent to access from these boundaries. The full details of the location of these swales can be seen on the revised Landscape Masterplan (Drawing Reference P21-2950\_EN\_004 Rev D). There is also planting proposed to the boundaries of the site that will act as further obstacle to accessing the perimeter fencing.
- 8.4. It should also be noted that at the substation, the fencing would comprise a 2.4m high wire mesh fence (Ref Figure 9 – Typical Security Fence Ref O4806-RES-SEC-DR-PT-001 Rev 2). This type of fencing has been selected as it is deemed to be less visually intrusive than a palisade fence.
- 8.5. A security gate is proposed at the access to the site in a similar manner to those proposed around the substation area, these are detail within Figure 9.



### CCTV and Lighting

- 8.6. In addition to the fencing, 3.5m high pole mounted CCTV security cameras would be positioned at intervals along the inside edge of the fencing to capture activity within and along the fence line. The CCTV system will be capable of recording clear images that will meet the standards as set out in the Home Office Publication 28/09 CCTV Operational Requirement Manual 2009 as well as the UK Police Requirement for Digital CCTV Systems 09/05.

As detailed on submitted Figure 11 (Drawing Reference O4806-RES-SEC-DR-PT-003 Rev 1) the CCTV poles can be fitted with anti-climbing guards and the lighting installed will be infrared.

### Additional Security Measures

- 8.7. The additional security measures outlined with regards to CCTV signage, the marking of infrastructure and panels are noted. Visits for maintenance will be logged and site staff will be made aware of access and egress arrangements to the site.
- 8.8. As such, it is considered that the scheme meets the relevant national standards and can be maintained in a manner that will ensure the security of the scheme across the lifetime of the development.

## **9. Planning Policy**

- 9.1. It is acknowledged that since the submission of the original application, there has been a policy context change at both a national and local level with the following documents now published and carrying material weight in the determination of this planning application:

- National Planning Policy Framework (December 2024)
- Clean Power 2030 Action Plan: A new era of clean electricity (December 2024)
- Babergh and Mid Suffolk Joint Local Plan (November 2023)

- 9.2. A Planning Policy Addendum has been prepared to assess the scheme against these updated policies (Appendix 9).

- 9.3. As discussed within the document the proposed development is in accordance with the relevant policies of the development plan as a whole and accords with national policy. The acknowledged urgent national requirement to increase renewable energy generation to address the climate emergency, energy security, affordability and economic growth is a significant material consideration which also weighs substantially in favour of granting planning permission.

## **10. Response to Public Comments**

- 10.1. Over the course of the application process, the application has received 240 objections and submissions from Save the Glem Valley.

- 10.2. Appendix 10 provides a breakdown of the key topic areas raised and the responses to each point. Where necessary, information has been signposted to the original submission and relevant sections of this Planning Addendum.

## 11. Summary and Conclusions

- 11.1. As discussed within the Planning Statement, the proposed development supports the UK Government's intention to move to a low carbon economy, which represents a substantial benefit. The impacts of the proposal have been shown to be acceptable and, where necessary mitigation measures have been set out to reduce potential impacts of the proposed development.
- 11.2. RES have worked hard to address the comments made by both statutory consultees and local residents. Where required, changes have been made and additional information supplied to address comments and suggestions provided.
- 11.3. This Planning Addendum identifies the additional works that have been undertaken and the manner in which the scheme has been designed to represent a sustainable form of development which addresses all material planning considerations.
- 11.4. The application is in accordance with national and local planning policy and in accordance with the NPPF presumption in favour of sustainable development<sup>1</sup>, planning permission should be granted without further delay.

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<sup>1</sup> National Planning Policy Framework – December 2024, paragraph 11

Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

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