

BROME and OAKLEY PARISH COUNCIL

Email: clerk@bromeandoakleyparishcouncil.gov.uk

Tel: 07881 963195

13 August 2026

EcoPower Suffolk
via Email to contact@ecopowersuffolk.com

Dear Sirs,

Response to Statutory Consultation to deliver a Solar Farm and Battery Energy Storage System

Context

Brome and Oakley Parish Council (PC) has made three earlier responses to the Ecopower Suffolk (EPS) non-statutory consultation. This response is made in the light of new data presented by EPS at the Statutory Consultation phase.

The Parish Council accepts the benefits of solar power where such schemes are restricted to:

- industrial and commercial rooftops;
- brownfield sites; and/or
- small scale community schemes where generated power is consumed locally.

We remain fundamentally opposed to the EPS development for the following reasons:

1. We oppose the use of agricultural land for solar farms; the majority of agricultural land proposed for solar panels in Brome and Oakley is Grade 2 or 3 i.e. *best and most versatile agricultural land*.
2. We are concerned about the cumulative effects of such schemes in this area of East Anglia. Nearby existing or proposed schemes include Grange Solar Farm and Marsh Lane Solar Farm in Palgrave, Gissing Solar Farm and East Pye Solar. We are also affected by National Grid's Norwich to Tilbury 400kV electricity transmission route and Essex & Suffolk Water's Suffolk Water Recycling Transfer and Storage (SWRTS) scheme. The preferred location for the SWRTS Western Service Reservoir is within Brome and Oakley.
3. The Babergh & Mid-Suffolk Joint Local Plan (B&MS JLP) permits the development in the countryside outside of Settlement Boundaries for reasons set out in Policy SP03. The EPS proposal does not satisfy any of these requirements.
4. Development of Strategic Infrastructure is set out in the B&MS JLP Policy SP08 and specifically para 1a to 1e. The EPS proposal does not satisfy any of these requirements.
5. The NPPF sets out a requirement to safeguard the intrinsic character and beauty of the countryside. This includes but is not limited to section 15 – extract below. The EPS proposal does not satisfy any of these requirements.

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15. Conserving and enhancing the natural environment

187. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

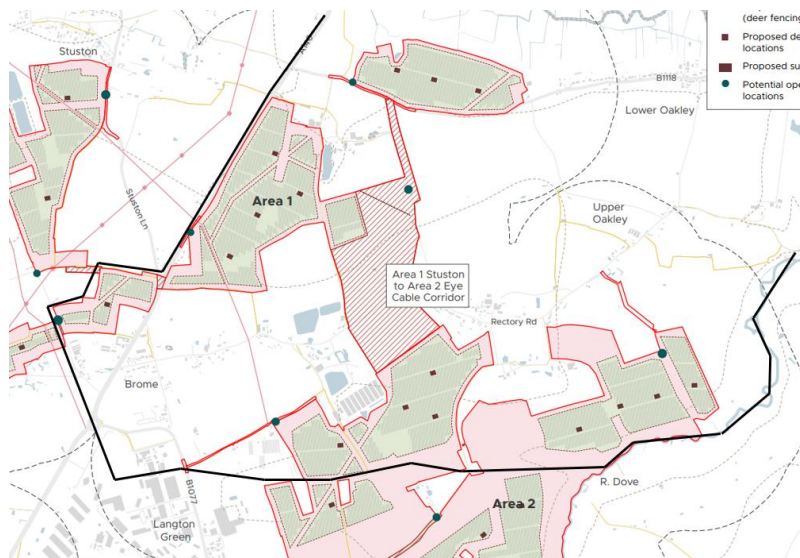
Extract from NPPF, December 2024, pp54

5. The NPPF Policy S5 sets out the requirements for settlement outside of Settlement Boundaries. The proposals will result in the long-term loss of countryside and in some instances will result in permanent damage to productive farmland. We do not consider that these adverse effects are outweighed by the benefits.

6. We consider that the need for sustainable solar power can be achieved through the installation of solar panels on roofs of commercial, industrial and residential premises which would not result in an adverse impact on the intrinsic character and beauty of the countryside.

Relevant Area

The PC has restricted its comments primarily to the area within the Parish boundary, shown in black superimposed on the EPS map below:



Based on Figure 2.2a Indicative masterplan

A number of measures proposed in the PC's previous responses have been adopted by EPS and these changes are hereby acknowledged. There are also some environmental measures not requested explicitly by the PC but which nonetheless are broadly welcomed.

However, there remain ten principal areas of concern which the PC wishes to see resolved under the Statutory Consultation process and before DCO application.

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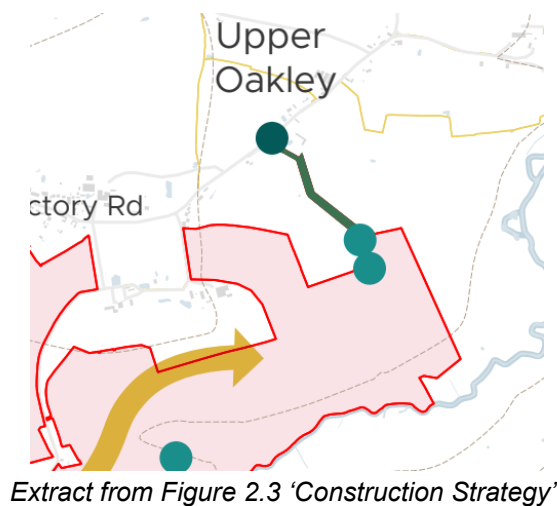
These fall into the following broad areas:

1. Construction and maintenance access;
2. Panelled areas;
3. Planting and screening around panelled areas;
4. Operational noise;
5. Battery sites;
6. Environmental impact
 - 6.1 Public Rights of Way and permissive paths
 - 6.2 Listed buildings and heritage assets
7. Wildlife protection;
8. Panel maintenance and replacement;
9. Decommissioning; and
10. Financial matters and accountability.

1. Construction and maintenance access

We have significant concerns regarding the access and egress from Area 2.

The drawing included in the Draft Outline Construction Traffic Management Plan as Figure 2.3 indicates the Primary Access to be off the B1077 along Nick's Lane and for internal haul roads linking to Area 1. However, an additional route is indicated to the east of the Area 2 off Upper Street, Upper Oakley which according to the legend is identified as a 'Potential Construction Access' and connects to the panel area along a farm track which is identified as a 'Route potentially requiring highway works' (see below):



Our concerns relate to the “additional route” and the associated Potential construction access.

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Access locations are addressed in the Construction Traffic Management Plan in paragraph 4.3.11 and Table 4.2. An extract of Table 4-2 is included below.

2	Internal	Internal access route via Area 1 Stuston	An internal access route serving Area 2, typically of limited width and designed for localised movements rather than through traffic. A new access point would be required internally to accommodate all vehicle types, including HGVs.
	Primary	Nick's Lane	A narrow unclassified and private rural lane, providing access to farms and residential properties with low traffic volumes and constrained geometry. HGVs would access Area 2 via Nicks Lane, which is accessed from B1077 Brome Lane to the west, connecting to the A140 via a roundabout. Existing access is suitable for all vehicles, including HGVs.

Extract from 'Construction Management Plan' Table 4-2

The use of the "additional route" is not addressed within the Draft Outline Construction Management Plan. The "additional route" is not identified within Table 4-2 nor is it identified anywhere else in the plan. The plan states in paragraph 5.15.1 that "routing for HGV through local villages will be avoided as far as reasonably practical." This is repeated in Table 5.1 ID TT01-CTMP. We also note that the same undertaking is given in the Draft Construction Environmental Management Plan Table 4-8 ID NV1-CEMP.

The proposed primary route set out in the Construction Strategy Figure 2.3 identifies a primary route off the B1077 and a haul road accessing from Area 1 and directly onto the B1118 and A140. These routes use roads which are suitable for HGVs and other Construction Traffic vehicles and avoids access along narrow country lanes and through villages.

Therefore, there are acceptable routes which avoid the narrow country lanes and the local villages and as a result it is practical to avoid these locations.

We have queried the intention for the "additional route" with EPS and have been advised by email that "the stretch of private track identified would likely only be required for construction vehicles to exit from the most eastern sections of Area 2. Work is ongoing, in consultation with Suffolk Highways, to understand the feasibility for construction vehicles to travel along the track and then onto the local network via Upper Oakley".

The road through Upper Oakley to the East of the possible access to the B1118 passes through the village of Upper Oakley and is extremely narrow with insufficient width in many locations for other vehicles to pass HGVs and this includes emergency service vehicles and school buses. The road to the west of the possible "additional access" point passes through Brome Street and Rectory Road in the heart of Brome village and is extremely narrow for most of its length. Note that a section of this track is the only means of access to the property known as Long Beren.

We have discussed this issue with representatives from EPS Suffolk at a roadshow. They advised that they would very much prefer to use the proposed primary access route for all construction traffic, but the alternative route has been included solely because SCC Highways approval has not yet been obtained for the preferred routes.

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The PC requests that:

- ***The primary access routes and temporary haul road as set out in the Draft Construction Management Plan table 4-2 are confirmed as the only construction access into Area 2;***
- ***The “additional route” at Upper Oakley is removed from Figure 2.3.;***
- ***The Potential Construction access point in Upper Oakley is removed from Figure 2.3; and***
- ***The Draft Construction Management Plan is clarified to make it clear that no construction vehicles are to use Upper Street, The Street or Rectory Road and that no construction traffic will be routed through the villages of Brome, Upper Oakley and Lower Oakley.***

2. Panelled Areas

Area west of Brome Hall Drive - the PC notes the proposed modification to the outline of the panelled area, but re-states its request for the environmental mitigation to be increased adjacent to Brome Hall Drive and at Gooderham's Plantation – see diagram below. This is a popular route for walkers (see para 6 below). Brome and Oakley residents use this section of the Mid Suffolk Footpath as part of a circular walk or for access to Eye. In the winter months, when the existing hedging and tree line has lost its leaves, the panels will be clearly visible unless the buffer zone is increased to 50m and suitable screening is introduced.

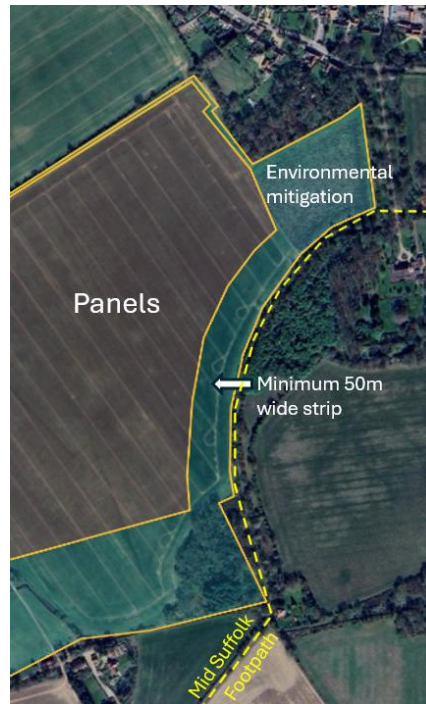
Because Brome Hall Avenue is a private drive, the permissive footpath connecting Brome Street to Brome Avenue which is parallel to Brome Hall Avenue is extremely well used. The rectangular parcel of land between Brome Avenue and Gooderham's is small for modern farming equipment – it's around 100 x 150m - and has not been cultivated for several years. It is also shaded north, south and east by tall, established woodland although there are open views between Brome Hall Avenue and the permissive path when leaf cover is light. This area is rich in wildlife, including the red deer herd, a large variety of different birds, and invertebrates.

Consequently, the residents of Brome Hall, the people of Brome and the many visitors who walk the route have enjoyed this small but rich and unspoilt countryside amenity for some time and feel strongly that its development would be unwelcome and is unnecessary.

The PC requests EPS to:

- ***leave the area SE of Gooderham's Plantation untouched,***
- ***To not impact or close, including during construction, the permissive footpath connecting Brome Street to Brome Avenue and parallel to Brome Hall Avenue, and***
- ***redraw the perimeter to run from the SE corner of Gooderham's south towards Footpath 6 – see schematic below:***

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Gooderham's Plantation area and Brome Hall Drive

Easternmost part of Area 2 – the PC notes the changes to the Draft Order Limits and the substantial reduction in area to be covered in panels. We re-state our preference for this area to be removed from the scheme in its entirety, on grounds of reducing impact on wildlife, and visual amenity for users of the Upper Oakley Road, the Mid Suffolk Way footpath and residents of Upper Oakley, many of which live in Grade 2 Listed buildings – see schematic in section 6.2.

However, in the event that some panels are essential in this location, we request a minor modification to their distribution, whereby the northern boundary of the easternmost panelled area is re-drawn broadly to follow the 35m contour. This will minimise the visibility of the panel array while maintaining the same gross area under panels. See proposed modification below:

The PC requests that:

- ***In the event that the easternmost parcel is to be retained for panels, the northern boundary is moved down the slope to the 35m contour and oriented approximately NE-SW.***



Easternmost parcel – effect of redrawing northern panel boundary

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3. Planting and Screening

EcoPower Suffolk's Preliminary Environmental Findings discusses the visual impact in the first year of operation and again after 15 years. We need indications of the status of proposed planting mitigation measures after say five years and again at 10 years. We also need considerably more detail regarding the species to be used and the anticipated growth rates, so that we can understand how long it will take to mature to a point where glint and glare is no longer an issue.

Wherever possible along the northern margins of panelled areas (where shade from mitigation planting will be negligible or non-existent) bunding should be used to provide an immediate head start to screening. We assume, but require confirmation, that the screening species will comprise a combination of native species such as hawthorn and blackthorn plus species which can be coppiced e.g. field maple and hazel.

With particular reference to the easternmost parcel of land in Area 2, the PC requires confirmation that the map shown in the EPS website document library is out of date, and that it should indicate screening to the northern and eastern boundaries – see below:



Extract from Illustrative Environmental Masterplan.

The PC also needs to understand who will be responsible for the maintenance of the screening plants as evidence from similar schemes identifies negligence in this area, with many hedging and screening plants failing to establish – as evidenced by Palgrave Parish Council in connection with a nearby solar scheme.

The PC requests:

- ***Wherever possible along the northern margins of panelled areas (where shade from mitigation planting will be negligible or non-existent) bunding should be used to provide an immediate head start to screening;***
- ***Wherever screening is required, native species such as hawthorn and blackthorn plus species which can be coppiced e.g. field maple and hazel, are used;***
- ***Clear accountability for the maintenance of the screening plants.***
- ***Screening from the north east corner.***

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4. Operational Noise

The PC is concerned that Preliminary Operational Noise Modelling maps (Figs 12.2 and 12.3) illustrate 'preliminary predicted operational daytime / nighttime noise levels dB(A)', but do not provide an equivalent explanation of what each decibel level means in real world terms, nor the distance at which it becomes more or less audible. In addition, the modelling is based on Battery Energy Storage System (BESS) and Solar arrays that have yet to be agreed on.

We understand that the bulk of solar panels will be on tracking systems, rather than fixed arrays, however this has not been communicated in the Preliminary Environmental Findings (12.4.16). Residents from the south side of Brome Street in particular are concerned about noise from nearby distributed BESS units, the 33kv -132kv sub-station, and tracking panels.

Table below (page 44) 'Examples of mitigation measures', requires detail - this is the first mention of 'solid acoustic barriers', with no indication as to size, position, visibility from roads, PRoW etc.

Table 12-1: Examples of mitigation measures

Mitigation measure	Description
Layout optimisation	Increase distance between sources and receivers, as well as using structures such as ancillary building as acoustics screening.
Source directivity	For noise sources with defined directivity, such as fans or openings on one side of a unit, position them to avoid facing receptors directly e.g. orienting them towards the centre of the Site.
Plant selection	Technology will continue to evolve, and equipment incorporating low-noise plant or plant with a low-noise mode may become more readily available
Acoustic barriers	Solid acoustic barriers breaking line of sight between sources and receptors. Perimeter and internal barriers located close to the sources provide more effective screening. The use of absorbing barriers can also help minimise reflected noise into the surrounding environment.
Acoustic enclosures	Solid enclosures containing noisy plant, with any access doors or panels sealed.
Attenuators	Attenuators installed to decrease noise emissions from cooling fans.
Acoustic louvres	Where airflow requirements preclude continuous solid enclosures, acoustic louvres may be included.

The PC requests:

- ***explanation of what each decibel level means in 'real world terms', and***
- ***Noise modelling to be undertaken and acoustic mitigation introduced so no nuisance is created for any residential properties in the area.***

5. Battery sites

The PC has serious concerns regarding the lack of detail at this stage regarding the distributed BESS locations. We can see locations marked on the Indicative Masterplan but we were unable to locate individual site addresses and grid references in the documentation and the Outline Battery Safety Management Plan (OBSMP) page 5 states: *'the precise BESS power rating (MW), storage duration, individual site addresses and grid references will be confirmed at the detailed design and procurement stage.'*

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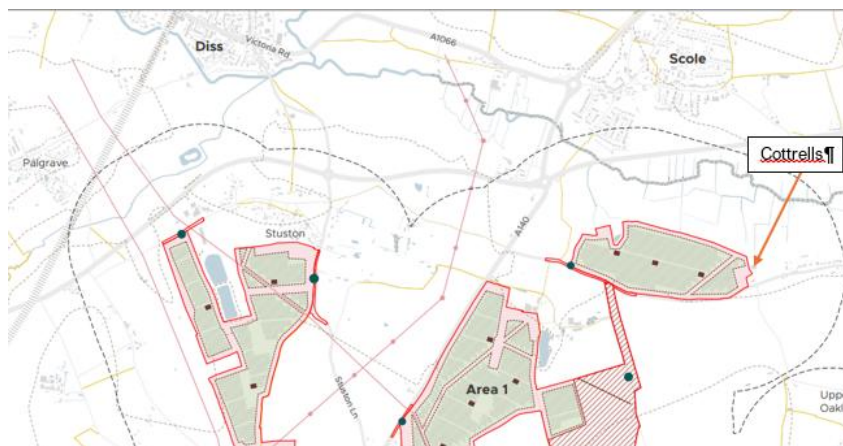
We are concerned about the operational access to these facilities for emergency vehicles. The OBSMP states (page 21: 4.7.1): *'As a broad statement of intent, each BESS area will be served by access arrangements that provide a clear and unobstructed approach for fire and rescue service appliances, with internal loop-type roads around BESS compounds wherever practicable to allow appliances to approach from more than one direction.'* It is unclear precisely where access points will be and where the internal loop-type roads will be.

EPS Indicative Masterplans for Area 1 (Figure 2.2a) and Area 2 (Figure 2.2b) show BESS compounds placed within the residential and farmed landscape of the Parish of Brome & Oakley. As these maps, being indicative masterplans, do not provide precise locations, it is difficult to quantify exact distances. However, several BESS locations appear within a few hundred metres of homes. Both masterplans show the River Dove, with several BESS locations seeming to be within short overland run-off distance of the river and its drainage network. We are concerned that, should there be a fire or spill event, pollutants could reach the River Dove rapidly, affecting downstream receptors. Echoing the position of Suffolk Country Council (SCC's response to the Statutory Consultation in respect of the EPS Suffolk Solar Farm – page 25), we are concerned that EPS Suffolk has not provided any information for surface water drainage proposals, and that 'An Outline Drainage Strategy' will only be submitted with the DCO application.

Meteorological information for both Area 1 and Area 2 about prevailing wind direction and plume travel is available from e.g. The Progress Power application of 2015:

- The prevailing wind direction = South-Westerly (SW)
- Plume travel = North – Easterly (NE)

The indicative Masterplans for both Area 1, specifically the site along the B1118, and all of Area 2, indicate that there will be multiple decentralised BESS locations. With prevailing winds direction of SW, previous modelling appears to indicate that smoke plume travel from both Area 1 and Area 2 would be NE, towards Brome and Oakley. We are concerned that smoke plumes travelling NE from Area 1 along the B1118 could impact road users and homes that are strung out along Low Street, Lower Oakley. Of specific concern is the impact that any fire and / or smoke plumes may have on nearby properties, such as 'Cottrells', which is a thatched property that abuts the eastern end of this particular site – see marked-up screen shot below.



Based on Figure 2.2a Indicative masterplan

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We are also concerned that smoke plumes travelling NE from any one of the many decentralised BESS locations in Area 2 could impact a variety of residential property in Brome and Oakley, as well as farmland and PRow.

The Outline Battery Safety Management Plan confirms that the consultant is capable of producing Smoke Plume Analysis Reports (SPAR) (page 7 1.3 Greenfire Solutions), but we have found no evidence in the document that site-specific SPAR have yet been undertaken or published for the EPS Suffolk BESS proposals. We therefore would like to know if SPAR have been completed for the proposed BESS locations in Areas 1 and 2, and if so, when will they be published?

The Draft Outline Operational Environmental Management Plan contains Air Quality mitigation measures, including 'Notification of potentially affected members of the public to move to a cleaner air location in the event of a BESS fire'. The PC requires detailed guidance and support for elderly and/or less mobile residents to locate and access the cleaner air location.

We note that the Draft Outline Battery Safety Management Plan refers to a Fire Response Plan. This has not been included in the Statutory Consultation documents and therefore we are unable to assess the safety of the proposals. The need for robust Fire Response Plans are brought into sharper focus in the summer of 2026 with numerous field fires and more widespread wildfires in the UK arising from dry conditions. We therefore retain an objection to the safety of the proposal.

The PC requests:

- ***Precise details of the distributed BESS***
- ***Smoke Plume Analysis Reports for the proposed BESS locations in Areas 1 and 2 and demonstrate that the BESS locations do not cause harm to residents***
- ***Detailed guidance and support for elderly and/or less mobile residents to locate and access the cleaner air location***

6. Environmental Impact

6.1 Public Rights of Way and permissive paths

The NPPF sets out to protect and enhance public rights of way at section 105.

105. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

*Extract
from
NPPF,
Dec
2024*

The PC considers that the impact the current proposals have will be deleterious to the community's use and enjoyment of a number of footpaths/public rights of way in the parish. The proximity of solar panels to a number of well-used footpaths may reduce their use by walkers in the long term and certainly be extremely disruptive during the construction stages. This could have adverse impacts on residents' physical and mental health.

The following comments reference Suffolk County Council's current Definitive Map and Statement of public rights of way:

Brome Parish Footpath 7 – Nick's Lane to Rectory Rd and Footpath 9 from its right-angled bend behind Church Farm south to the beck, and then into Eye towards Mustard Pot Farm.

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This is a well-used footpath for walkers from Rectory Rd and Brome Street to Eye, and/or a circular route back to Brome Hall. The North-South section in particular enjoys clear views over a shallow 'V' area of farmland and small woods. It is rich in bird and mammal life and well away from road traffic. All this will be lost to panel installations, some de-centralised BESS and a significant sub-station.

The PC requests that:

- ***site access routes and construction will not adversely affect this section of footpath***
- ***the siting of the panels will also not adversely affect this footpath - generous buffer zones and screen planting should be designed in to ameliorate the negative impact of panels in this area.***

Brome Parish Footpath 6 – from Brome Hall to the boundary with Eye at The Lodge then on to Mustard Pot Farm/Eye

This is probably the most walked section of footpath in Brome & Oakley. Known as Brome Avenue, it is routinely used by dog walkers, recreational walkers and those walking between Brome & Oakley and Eye. Between April and November hedges and trees shade the lane and restrict the views across open farmland and small woods. In winter the views are unrestricted by leaf cover and many walkers often enjoy the presence of the large herd of red deer (60+ in recent years) and some roe deer which routinely roam this area. The proximity of uncultivated land nearby also attract rich birdlife, including owls, raptors and songbirds.

The PC requests that:

- ***particular attention is paid to the margins between perimeter fencing and the footpath so that the currently rich wildlife habitat is maintained and***
- ***that margin is at least 50m between perimeter fence and footpaths***
- ***a dedicated study of red deer movements will be used to determine a site layout which does not adversely affect their traditional roaming grounds***

Upper Oakley Footpath 8 – Rose Farm to the Old Mill

This is also a well-used footpath either as part of a circular route through Upper Oakley or as part of a walk to Hoxne. It forms part of the Mid Suffolk Footpath. It skirts several good-sized woodland areas connected by hedgerow/wildlife corridors and consequently hosts red and roe deer, scrub and grassland mammals and a rich diversity of birdlife and invertebrates. Walkers enjoy excellent views over open countryside and the pleasure of being close to this wildlife.

The PC acknowledges that EPS has adjusted its development area in this section in response to previous submissions nevertheless it strongly urges EPS to take account of this especially rich wildlife area and its proximity to Footpath 8 when designing the final perimeter and panel footprint and to ensure the local biodiverse character of this area is maintained/enhanced.

The PC requests:

- ***when designing the final perimeter and panel footprint and to ensure the local biodiverse character of this area and view from the footpath is maintained/enhanced***

6.2 Listed buildings and heritage assets

According to English Heritage data there are 41 listed properties in Brome & Oakley of which 35 are occupied houses. The most dense concentration is in Brome Street with most of the others evenly distributed in Rectory Rd, Upper Oakley and Lower Oakley. There is also a scheduled Ancient Monument near St Mary's Brome.

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A major preoccupation of owners and occupiers of these houses is how to maintain them sympathetically with their heritage status. In this context there are already concerns about a) the negative impact on property settings of their proximity to industrial sized solar farm development and b) the added negative impact – because of listed status – of damage repair, screening and amelioration from the construction phase, cable routing and maintenance operations.

The diagram below shows the impact of the development on the views from residents of Upper Oakley and the users of Footpath 8 as discussed above.



Impact on Upper Oakley residents and Footpath 8 users of easternmost parcels

There is, additionally, a specific concern over a medieval moat immediately south of St Mary's Church and next to Church Farm. This is a scheduled ancient monument (English Heritage listing No. 1019674). It has only been lightly and partially excavated and English Heritage identify it as a site where further excavation could yield important historical information going back to the Norman Conquest. That area is also thought to be the site of the old medieval centre of Brome, possibly of Saxon origin.

While it appears there are no proposals for panels in that immediate area nevertheless there is a site for cabling designated very close to the moat. It is imperative that the final cabling route avoids this area.

The PC requests that:

- ***Rectory Road, Brome Street and Upper Oakley are avoided for use as construction and service access routes because of their basic unsuitability for this kind of traffic and the concentration of listed properties along them (27 households in a 3k stretch);***
- ***cabling routes as currently outlined will not encroach on any of these same properties nor go close to the designated ancient monument site (English Heritage listing No. 1019674).***

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7. Wildlife Protection

The following species of principal importance as defined in the 1994 UK Biodiversity Action Plan (UK BAP) have been observed within or immediately adjacent to the draft order limits and require conservation and designated action plans:

Birds

Sky Lark
Barn Owl
Lapwing

Common Cuckoo
Fieldfare

Grey Partridge
Redwing

Mammals

Badger
Otter

Brown Hare
Soprano Pipistrelle bat

Hedgehog

Reptiles and Amphibians

Common Toad

Great Crested Newt

The PC's concerns regarding larger mammals include:

Deer – there are large numbers of wild red deer within the draft order limits, along with roe, muntjac and Chinese water deer. Completely deer-proof perimeter fencing can cause road safety hazards by pushing deer into traffic or trapping them inside the arrays. The PC requires that any fencing should include drop-down sections or specific escape routes;

Badgers - perimeter deer-fencing should include bottom wire-mesh gaps or dedicated badger gates so that badgers can safely traverse their historic foraging routes;

Brown hares- brown hares rely on seeing long distances to detect predators and so corridors between solar arrays should be at least 10 m wide and planted with low-lying, native grasses. Aggressive mowing or sheep grazing during the hare breeding season should be avoided.

The PC requests that:

- ***Any deer fencing should include:***
 - ***drop-down sections or specific deer escape routes;***
 - ***bottom wire-mesh gaps or dedicated badger gates;***
- ***Aggressive mowing and/or maintenance or sheep grazing during the breeding seasons for hares and ground nesting birds should be avoided.***

8. Panel Maintenance and Replacement.

The Draft Outline Operational Environmental Management Plan, page 9, section 3.10 Panel Cleaning, states that 'Due to the wet UK climate, solar PV panels are largely self-cleaning and deterioration in PV system output due to dust or dirt is generally low.' Given our increasingly dry summers, the dust generated from agricultural activities such as harvesting will increase dust and adversely impact the efficiency of the panels. The PC wishes to understand the resultant demands for additional cleaning, as defined by increased water usage and maintenance traffic.

The need to replace the panels during the period of operation of the solar installation is mentioned in several locations within the documents however, no details are presented within the documents for how

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this process will be undertaken or managed. This issues refers to ad hoc replacement of any failed panels as well as a more comprehensive panel replacement or upgrade scheme.

We consider that the omission of these details represents a serious deficiency in the consultation documents as presented. We therefore requests that confirmation is sought from EPS and the Statutory Consultation extended until this information has been made available all given time to review the details.

The PC requests:

- ***An understanding of demands for additional cleaning, as defined by increased water usage and maintenance traffic***
- ***EPS's policy regarding replacement of panels during the period of operation of the solar installation;***
- ***The Statutory Consultation is extended until panel replacement policy has been made available and time allowed to review the details.***

9. Decommissioning

The Draft Outline Battery Safety Management Plan paragraph 5.3 refers to a Site Decommissioning, Restoration and Aftercare Plan (DRAP). This has not been included within the Consultation documents.

We consider that the omission of these details represents a serious deficiency in the consultation documents as presented. We therefore require access to the DRAP and require that the Statutory Consultation period is extended until this information has been made available and all consultees given adequate time to review the details.

The PC requests:

- ***Access to the Decommissioning, Restoration and Aftercare Plan;***
- ***The Statutory Consultation is extended until DRAP has been made available and time allowed to review the details.***

10. Financial issues and accountability

The PC considers the community benefit fund currently proposed by EPS to be completely inadequate. We consider £125,000 per annum for 40 years for a 250MW solar project spread over numerous parishes and villages in the area is an insufficient return per parish/per head of population for several years of construction disruption followed by decades of landscape blight and damage to property values from this project.

Given there is not yet a regulatory requirement for developers to offer a community benefit fund nevertheless there are a) Dept of Energy Security and Net Zero proposals in the pipeline for such funds to be mandatory after 2027, and b) established Scottish Government Good Practice Guidelines in Scotland which DESNZ is considering as a template for UK projects.

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The latest Good Practice Guidelines from the Scottish Government¹ call for a developer contribution of £700 - £1,000 per installed MW for community development funds from solar projects. The EPS proposal translates to only £500 per MW, well short of the Scottish guidelines.

There are also examples in England of much better deals. e.g. the Great North Road project near Newark is an 800MW project where the CBF comes out at £1,250 per MW per annum. Where smaller projects are being developed the per MW p.a. rate is lower but these are a) less disruptive in their local communities because they are more compact and b) sometimes include shared community ownership, e.g. Forest Gate Wiltshire, with a CBF of £400 per MW/p.a. plus a 20 per cent community ownership stake.

The total size of the fund offered can be reduced by administration costs levied by the fund administrator, often the local authority. We call for some or all of any CBF agreed to be remitted directly to the affected parish councils. This view is shared by other councils affected by the EPS project.

The PC requests:

- ***EPS to increase the proposed CBF to £1,250 per MW p.a. (i.e. £312,500 per annum and index linked)***
- ***Some or all of Brome & Oakley's share to be managed directly by its Parish Council;***
- ***EPS to guarantee the long-term viability of the CBF, including index-linking and security of the funds needs to be assured at setup in the event of Econergy divesting its ownership of the EPS Suffolk SPV.***

Summary

The Parish Council remains fundamentally opposed to the use of productive agricultural land for solar farms. As presented, there is believed to be potential for significant harm to both the well-being of the community and to the natural environment. Notwithstanding that, the PC as a statutory consultee has laid out a range of concerns which need to be addressed to protect the wellbeing of our residents and the long-term health of our natural environment.

We summarise these below:

1. Construction access

- *The primary access routes and temporary haul road as set out in the Draft Construction Management Plan table 4-2 are confirmed as the only construction access into Area 2;*
- *The "additional route" at Upper Oakley is removed from Figure 2.3.;*
- *The Potential Construction access point in Upper Oakley is removed from Figure 2.3; and*
- *The Draft Construction Management Plan is clarified to make it clear that no construction vehicles are to use Upper Street, The Street or Rectory Road and that no construction traffic will be routed through the villages of Brome and Upper and Lower Oakley.*

¹ <https://www.gov.scot/news/communities-benefit-from-renewable-energy>

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2. Panelled Areas

- *leave the area SE of Gooderham's Plantation untouched;*
- *To not impact or close, including during construction, the permissive footpath connecting Brome Street to Brome Avenue and parallel to Brome Hall Avenue;*
- *redraw the perimeter to run from the SE corner of Gooderham's south towards Footpath 6; and*
- *In the event that the easternmost parcel is to be retained for panels, the northern boundary is moved down the slope to the 35m contour and oriented approximately NE-SW.*

3. Planting and Screening

- *Wherever possible along the northern margins of panelled areas (where shade from mitigation planting will be negligible or non-existent) bunding should be used to provide an immediate head start to screening;*
- *Wherever screening is required, native species such as hawthorn and blackthorn plus species which can be coppiced e.g. field maple and hazel, are used;*
- *Clarity on who will be responsible for the maintenance of the screening plants, and*
- *Screening from the north east corner.*

4. Operational Noise

- *explanation of what each decibel level means in 'real world terms';*
- *Noise modelling to be undertaken and acoustic mitigation introduced so no nuisance is created for any residential properties in the area.*

5. Battery Sites

- *Precise details of the distributed BESS*
- *Smoke Plume Analysis Reports for the proposed BESS locations in Areas 1 and 2 and demonstrate that the BESS locations do not cause harm to residents*
- *Detailed guidance and support for elderly and/or less mobile residents to locate and access the cleaner air location*
- *Noise modelling to be undertaken and acoustic mitigation introduced so no nuisance is created for any residential properties in the area.*

6. Environmental impact

6.1 Public Rights of Way and permissive paths

- *site access routes and construction will not adversely affect Footpath 9;*
- *the siting of the panels will also not adversely affect footpath 9 - generous buffer zones and screen planting should be designed in to ameliorate the negative impact of panels in this area;*
- *particular attention is paid to the margins between perimeter fencing and footpath 6 (Brome Avenue) so that the currently rich wildlife habitat is maintained and*
- *that margin is at least 50m between perimeter fence and footpaths;*
- *a dedicated study of red deer movements will be used to determine a site layout which does not adversely affect their traditional roaming grounds; and*
- *when designing the final perimeter and panel footprint of the easternmost parcel, ensure the biodiverse character of this area and view from the footpath is maintained/enhanced*

6.2 Listed buildings and heritage assets

- *Rectory Rd, Brome Street and Upper Oakley are avoided for use as construction and service access routes because of their basic unsuitability for this kind of traffic and the concentration of listed properties along them (27 households in a 3k stretch); and*
- *cabling routes as currently outlined will not encroach on any of these same properties nor go close to the designated ancient monument site (English Heritage listing No. 1019674).*

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7. Wildlife protection

- *Any deer fencing should include:*
 - *drop-down sections or specific deer escape routes;*
 - *bottom wire-mesh gaps or dedicated badger gates; and*
- *Aggressive mowing and/or maintenance or sheep grazing during the breeding seasons for hares and ground nesting birds should be avoided.*

8. Panel Maintenance and Replacement

- *An understanding of demands for additional cleaning, as defined by increased water usage and maintenance traffic;*
- *EPS's policy regarding replacement of panels during the period of operation of the solar installation; and*
- *The Statutory Consultation is extended until panel replacement policy has been made available and time allowed to review the details.*

9. Decommissioning

- *Access to the Decommissioning, Restoration and Aftercare Plan; and*
- *The Statutory Consultation is extended until DRAP has been made available and time allowed to review the details.*

10. Financial Issues and accountability

- *EPS to increase the proposed CBF to £1,250 per MW p.a. (i.e. £312,500 per annum and index linked);*
- *Some or all of Brome & Oakley's share to be managed directly by its Parish Council; and*
- *Econergy to guarantee the long-term viability of the CBF, including index-linking and security of the funds needs to be assured at setup in the event of Econergy divesting its ownership of the EPS Special Purpose Vehicle.*

We require these concerns to be addressed and remedied in full prior to any DCO grant being considered.

Please confirm receipt of the above submission to the statutory consultation closing on 16 August 2026.

Yours faithfully,



Sarah Foote FSLCC
Clerk.