



Kettleburgh Parish Council

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10th March 2025

Dear Mr Brereton,

DC/25/0693/EIA

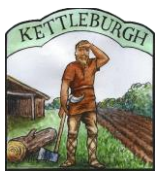
EIA Screening Opinion - Installation and operation of a Solar Development and Battery Energy Storage System with associated equipment and necessary infrastructure: Land North of Kettleburgh Road Easton and Land South of The Street Letheringham Suffolk

Further to my e-mail dated 5/3/25, I have now seen the letter submitted by Letheringham Parish Council (PC) and although there has not yet been time to convene a meeting of our parishioners, I thought it best if I state Kettleburgh's position. It is a reasonable assumption that our parishioners' views will be aligned with those of our neighbours – i.e. extremely concerned about the proposed development.

We share the concern that the paper submitted by the developer lacks detail and may contain errors and compliance failings. It appears disingenuous and does not provide all the information that you need to decide on whether an EIA is needed.

Environmental Impact

We believe that an EIA is essential in considering whether such a large solar installation may be installed in an attractive River Valley Landscape. As a bare minimum a Landscape and Visual Impact Assessment (LVIA) is required, given that even at this early stage it is clear that the 3m high panels would for example completely block the attractive view across the valley from the footpath next to Sessions Wood.



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The critical matter that we believe you must challenge is the complacency that we perceive in the applicant's paper. This applies particularly to the alleged recoverability (remediation) of land and return to agriculture. No doubt you are aware of what happened on Anglesey recently. It is early days for solar farms (and Planning Departments) against a background of a proven greater incidence and ferocity of storms in the UK. We believe that there is substantive risk of wind and storm damage to such farms and even without storm damage, as they deteriorate, dangerous materials and substances such as lead, cadmium and glass shards may make the underlying soil economically unrecoverable, leading to wildlife impacts and the sites being declared 'brown field'.

When the site is decommissioned, more so if the commissioning company has gone out of business, will the removal of the panels and battery housing leave a rapidly deteriorating wasteland that is not viable or safe for farming and expensive for potentially the state to clear up? In parts of the USA it has proved difficult to regulate decommissioning 'on the ground' – for 'the regulators to keep up with pollution' as the panel infrastructure degenerates and the company responsible quickly takes its money and moves on, or the site is abandoned ahead of decommissioning. The state is left with all the resultant legal actions. How is this to be addressed at application time?

It will also be important for you to consider the environmental impact of land preparation – what chemicals will be used to clear the land and keep the panels clear of herbage/saplings and what impact will that have on the land's future viability for farming? It is impractical to keep sheep on the farm given the obstacles and potential hazards. Who will monitor degeneration and pollution during the lifetime of the farm?

The paper does not address any of this and indeed makes no attempt to recognise that the development will cause harms at all. That in turn leads to the lack of proposed mitigations.

Economics and the Environment

In the meantime, how do the economics stack up in terms of local benefit – a brief period of employment for brought in labour then nothing, and then the decommissioning costs and probable legal actions and compensation, compared to the per acre economic activity benefit of cropping?

Avoidance of Regulation

The selection of a 'solar array of maximum of 49.9 MW' is disingenuous at best. Clearly the scheme calculatingly falls just below the 50 MW threshold for an EIA. It is easy to foretell what will happen towards the end of development – 'oops we miscalculated, it is 52 MW but that's only a little isn't it?' We believe this approach may have been used at some other locations. Given the very large land area involved, within a designated attractive and



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historic location, and we believe you can properly and should apply a margin of error and take 49.9 MW as 50 or more.

Spatial issues

Regarding Heritage, Letheringham PC provides helpful further data about missing sites and makes an important point that the omission of so many heritage assets whether deliberate or otherwise acts to diminishes the significance of the sensitivity of the site. We agree that the number of errors that they identify along with the complacency to which we refer earlier, sheds much doubt on the submission's conclusions.

As a village also subject to significant flooding, we would emphasise the issue of flooding, the evidence from Storm Babet, the omission of rainfall infiltration as an issue, and the role of the application sites as part of the watershed for the Deben catchment.

Yours sincerely

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