

Please send any response to: The Aldeby Parish Clerk, Anna Godsave, 12 Hampton Avenue, Thurlton, Norfolk NR14 6RH Telephone 01508 549143 email:

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Response to the Planning Application for Installation of a Solar Park on the Ex-Landfill Site in Aldeby, Norfolk Planning

Application No: FUL/2021/0015 19th August 2021

Dear Sirs, Aldeby Parish Council OBJECTS to the Application under consideration for the construction of a Solar Farm on part of the Aldeby Land Fill Site for the following reasons:

1) Traffic Management Plan

The proposed one-way Traffic Management Plan via Common Road and Dun Cow Road is flawed as it does not take sufficiently into account the fact that there are 47 dwellings and 22 businesses, a children's playing field and a Sense Day Care Centre along the proposed route, which has neither footpaths nor pavements. Each of these road users, when exiting their premises, will have no way of knowing which way the traffic flow along the proposed route is phased at the time of their entry on to the road, which presents a very real challenge to the safety of road users during the proposed 4-month+ duration Traffic Management Plan.

a) The companies based on Aldeby Business Park will inevitably suffer delays and access issues using the affected roads and Hamiltons Removals, for instance, who operate an international removal and storage business will have great difficulty manoeuvring their lorries around the proposed diversionary route without them becoming stuck, a view backed up by the local farmer (who operates livestock vehicles) and who states it is impossible for large HGVs to negotiate the proposed right-angle turn at the junction of Common Road and Dun Cow Road. These lorries would in any event be breaking the 7.5ton weight restriction already in place on Common Road and Dun Cow Road, as would the solar park construction HGVs.

b) The Sense Day Care centre is based on the Business Park on Common Road, and offers support on a daily basis for people with acute complex disabilities. As part of the care and rehabilitation process, they frequently walk their multi-disabled clients, several of whom require the use of large wheelchairs, accompanied by their carers, along Common Road and Dun Cow Road, where there are no footpaths. Aldeby Parish Council considers that the additional risk to which these vulnerable users would be put is entirely unacceptable, and flies in the face of the vehicle weight limit of 7.5tons which has already been deemed necessary by NCC Highways Department

c) In addition, the proposed traffic system channels vehicles past the Parish children's play area, which is used by both adults and children, again along roads which have no footpaths. Aldeby Parish Council considers that this would pose a significant risk to public safety, including to farm traffic, pedestrians, and to the many equestrian users along these roads.

The Developers have made no mention of considering the use of the existing, purpose-built Haul Road, which allows heavy traffic to pass from Rectory Road straight to the Waste Site entrance without endangering users of minor roads with 7.5 ton weight limits. The landowners across which the Haul Road runs confirm they have not been approached by the Developers. Aldeby Parish Council is dismayed at this apparent lack of concern for the safety of local residents, when there is a purpose-built readily available alternative road route for use by construction traffic, and urges the Developers to explore this acceptable alternative.

2) The Waste Site - Delay in Restoration

The Landfill site was intended to be fully reinstated, with all capping and planting completed by 8th July this year, as stipulated in the original Planning Permission. Planning Permission for the Landfill site has been extended at least twice – this area should already be 5-10 years into its restoration plan, yet the site restoration is still some way from completion. It is clear the construction of a Solar Park would lead to further indeterminate delays in restoration, and clarification on this point is required. The Applicant states this is a brownfield disused landfill site – technically correct, but one that should now be in its restoration phase, like the gravel pit adjacent which is now fully restored. The Parish was promised, in the original Planning Consent, a fully restored site at the end of the life of the Landfill, yet this restoration would be delayed by some 35 years were this proposal to be accepted, and Aldeby Parish Council feels that some recognition by the developer of this loss of amenity must be taken into account.

3) Siting of the Solar Panels

The proposed location of the solar panels means that there would be a major visual impact for at least 20 miles, since the panels would be visible from as far away as The Angles Way. There is concern about reflections from the panels causing distraction to anyone on the River Waveney and the adjacent footpaths, the Carlton Marshes Nature Reserve and to migratory birds. Aldeby Parish Council considers the capped waste site is currently approximately 2 metres higher than stipulated in the original planning application. Therefore, the finished height of the fitted solar PVs would be at least 2 metres higher than this application suggests. The current screening is 20-30 years old, yet is still not dense enough or high enough to screen the top of the site, (where PVs are proposed to be installed), so any mitigating screening to be planted would not be effective under the current proposals. The residents of adjacent properties and businesses will be affected by the location of the solar panels, as the panels will be visible daily for the next 35+ years contrary to their belief that the site would be allowed to settle back into the landscape. The proposed development could also negatively impact the holiday accommodation on College Farm and other nearby farms that have visitor accommodation, who are seeking to diversify their livelihoods by creating a tourism offering to the benefit of the Parish as a whole. Aldeby Parish Council has significant concerns regarding the photographic evidence submitted by the developers, feeling it is highly selective and does not accurately reflect the actual visual impact of the development. Regrettably, it seems there has been a degree of disingenuousness in regard to this aspect of the Application. This point is particularly well illustrated by the following two landscape photos taken from the banks of the River Waveney.

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Immediately below – a view of the site formatted to show as it would appear if fully restored (as per the requirements of the existing planning permission).



Immediately below - the view of how the site would look under the existing proposals for the Solar Park.



Please note the existing screening (hedges) have been in place for nearly 30 years, and do not screen the site at the moment and never have done, even when in full leaf.

The applicant states that views between nearby settlements are largely screened by the nearby woodland and hedges along the boundary – these photos prove this to be false, as this site in its present state can be seen from as far away as Beccles and Worlingham.

The applicant states that there is an absence of national landscape designations – yet across the road not 3 metres from its boundary is the protected landscape of the Broads National Park, plus the Boons Heath Conservation area, and furthermore there are SSSI's and Ramsar sites close by at Seven Mile Carr and Castle Marsh. College Farm Marshes below East End Farm are in Entry Level Stewardship and Higher Level Stewardship.

The solar park is proposed to be sited on the area of maximum environmental amenity impact, being the area most visible from the Broads National Park and right next door (metres away) from the conservation area at Boons Heath.

4) Intrusive Noise

There are concerns regarding the noise to be generated by the installation, especially during the night time when the rest of the countryside is quiet. Aldeby Parish Council does not consider it viable that an energy-producing company would risk turning off their inverters, servers, transformers, etc at night in case they could not be re-started in the morning. The application states that there would be 3 fans in the electrical equipment container, each one being about as loud as a vacuum cleaner, yet there is no mention of sound insulation to mitigate the considerable disruptive noise that could result during the night for local residents. Also, there is an increasing trend for Solar Parks to supply the National Grid continuously, using battery stored power during the night – we have no assurances that this would not be the case in the future, and so must insist that such assurances are part of the planning conditions.

Response from Mr Don Wiltshire, Vice Chair of the Aldeby Waste Liaison Group

Mr Wiltshire has prepared a technical report regarding this Application, which is appended to this Response and with which Aldeby Parish Council whole-heartedly concurs. However, in addition to his general comments, Mr Wiltshire has raised concerns on a number of safety issues about which Aldeby Parish Council would appreciate reassurances from the Developer.

In Conclusion

To summarise the points which would mitigate the impact on the local community and environment, and which would enable Aldeby Parish Council to support the proposal:

1. The proposed traffic management plan using traffic lights along Dun Cow Road and Common Road should be abandoned, and instead the existing Haul Road should be used for both the completion and decommissioning of the Solar Park – anticipated to take place approximately 30+ years after installation.
2. Re-site the Solar Panels from the highest point on the southern slopes of the landfill site to just over the crest facing Boon's Heath, and consider using the latest PV design which enables the panels to move orientation to track the sun and maximise solar yield – this

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would minimise any anticipated loss of yield if the panel were sited over the crest of the site, and would entirely remove any objections in terms of the loss of visual amenity.

3. Require the developers to give solid assurances that the noise emitted by the site would not be disruptive to local residents, especially at night, and that if noise disruption were found to be occurring then rapid steps would be taken to address the problem.

Aldeby Parish Council requests that the decision on this Application goes to Committee and that the Committee members carry out a site visit in order to consider the potential short and long term impacts of this proposal.

The Parish Council and Parishioners who have conveyed their opinions to the Councillors have no issue with Solar Parks per se, and in fact are very supportive of green energy generation. Aldeby Parish Council and the majority of parishioners would be able to support the Application if the modifications to the reasonable proposals requested in this document are put in place.

Yours faithfully,

Timothy Wright

Chairman Aldeby Parish Council

on behalf of Aldeby Parish Council

Appended: Response from Mr Don Wiltshire, Vice Chair of the Aldeby Waste Liaison Group

Received on 29/08/2021

Response to Planning Application FUL/2021/0015 Installation of a Solar Park at Aldeby Landfill Site

Prepared by Don Wiltshire, Deputy Chairman, Aldeby Waste Liaison Committee

INTRODUCTION

The Applicant has notified the Parish Council of issue of the above planning application being submitted to Norfolk County Council, as the relevant Waste and Minerals Authority.

The proposed site, known as 'Aldeby Solar Park' would have a generating capacity of approximately 7 Megawatts ('MW') and would cover a total area of approximately 11.2 hectares ('ha') approximately 27.7 acres.

- Planning Application FUL/2021/0015
- Planning, Design, And Access Statement
- Environmental Statement
- The following review has been based on the following attachments to the application:
- Environmental Statement Non-Technical Summary
- Traffic Statement

PLANNING RECORD

The Planning Application Form should clarify in Section 6 - Existing Use, that the proposed site includes a fully operational Low Carbon Power Generation Plant running on captured landfill gas (CLM) from the closed landfill site which will be operational until closure of the proposed solar park.

PLANNING, DESIGN AND ACCESS STATEMENT

1.3 The Applicant

States "*The solar project would be developed with due consideration to the existing landfill infrastructure ...*". The two systems will operate in parallel and since a large proportion of the gas collection infrastructure is present over most the proposed site which require special consideration. See Section 2.2 comments.

It is stated the infrastructure is in place for the grid connection, The Applicant has confirmed that the connection is adequate for the existing, approximately 2 Megawatt output of the CLM generation plant and the Solar Farm output of approximately 7 Megawatt without

upgrading of the external grid connection but no detail has been provided regarding the actual capacity of this connection,

1.7 Landfill Restoration Plan

This paragraph states, *“The Development would defer the implementation of the affected area of the restoration plan for the lifetime of the Development. Upon decommissioning of the Development, the restoration plan would be re-implemented. The amendment to the timing of the*

restoration would be implemented via a separate Section 73 application which will be made to vary the restoration scheme (as approved under application C/7/2018/7007,

drawing no 601R294) to defer the implementation of the approved restoration plan for

the area of the Site”. Consideration of retention or reinstatement of the existing Haul Road would be required

1.8.2 Community Consultation

It is stated residential properties within 500m of the site have been notified of the proposals, this excluded a large part of Common Road and all of Dun Cow Road and Lily Lane and commercial and charitable premises in Aldeby Business Park, who would be affected by the Transport Proposals. (Refer to comment below on the Transport Statement).

2.1 Development Description

2.1.2.2 Associated Infrastructure

This section refers to CCTV cameras being installed, it is not clear if these operate in ambient light conditions or if site lighting is required. If so this would be contrary to current planning regulations which do not allow this because of light pollution, particularly adjacent to the Broads National Park.

2.2 Site Description

This section states as follows: *“The Site is currently utilised for landfill gas management and leachate management for compliance with an Environmental Permit with the Environment Agency. Infrastructure associated with this activity is spread across the Site. The*

Development would not interfere with this infrastructure and operation would continue as normal. The design of

the Development ensures safe separation of electrical equipment to gas infrastructure and technicians are able to safely access landfill infrastructure for ongoing monitoring and operations.”.

Evidence of a study is required to demonstrate that the Solar Park electrical installation complies with The Environmental Standards Association (ESA) Industry Code of Practice ESA ICoP 2 edition 1, November 2005: - Area Classification for Landfill Gas Extraction, Utilisation and Combustion, to identify potential sources of Explosive Gas Atmospheres. This shall be applied for parts of the new electrical installation that are in proximity to existing landfill gas infrastructure, e.g. gas wells, manifolds, sampling points, leachate removal points, gas monitoring points etc. as defined by the code. Any equipment so affected shall comply with the relevant national and international standards, namely BS EN 60079 and IEC 79 – Explosive Atmospheres and be designed, manufactured and approved for use in potentially explosive atmospheres.

3,1 Overview

The application states “*Access would be via the existing landfill site access point off Common Road to the west, providing connectivity to Rectory Road and the A143 via Dun Cow Road*”.

3.3 Access

Refer to comments on the **TRANSPORT STATEMENT** below

3.5.2 Construction Control Mechanisms

3.5.2.1 Traffic Management

Refer to comments on the **TRANSPORT STATEMENT** below.

3.5.2.2 Working Hours

Standard daytime working hours are likely to be utilised, between 7:30am to 6pm Monday to Friday and 7:30am to 4pm on Saturdays.

Currently working hours for the Landfill site exclude weekend working.

Also, these start and finish times coincide with peak periods of pedestrian activity on the access roads with dog walkers, equestrian and dog walkers using the roads.

3.7 Decommissioning Overview

When the operational phase ends, the Development will require decommissioning. The operational phase is limited to 35 years therefore decommissioning must be considered.

Decommissioning would be expected to take between 3-4 months.

This will have similar impacts as the construction phase and the same concerns regarding Transport and Access would apply.

5.3 Landscape

Residents of East End Lane and St Mary's Road should be consulted with regard to the Visual Impact as they may have a different opinion to the Zone of Theoretical Visibility Studies presented in the application.

5.9 Noise and Vibration

5.9 Noise and Vibration

The following proposals have been included in this Statement

"The nearest receptors of potential noise effects are College Cottages located 135 m to the southwest of the access track and 240 m from the closest panels (privately owned dwellings). Collage Farm is approximately 260 m south of the Site (privately owned dwelling); and Oakland's Farmhouse – approximately 300 m north of the Site (privately owned dwelling).

Construction of the Development will involve negligible noise and vibration, as the excavation requirements would be minimal, and no large machinery is needed for excavation or piling.

During the operational phase of the Development, the only noise generated would be by the inverters (with noise reduced by housing around them), switching stations and battery storage containers (air conditioning units) (located in the southwest of the Site), but this is very low-level noise. With the existing noise from roads (which pass along all

four boundaries of the landfill site) and the CLM generators already located on the landfill site, noise from the Development will not be discernible to nearby receptors over that which is already part of the noise baseline. Additionally, solar panels only operate during daylight hours, and therefore there is no noise generated in the evening, night and early morning, when ambient noise levels are typically at their lowest.”

This makes no reference to the properties on East End Lane, and off St Mary's Road at College Farm tourist residential properties.

The electrical transmission system details will comprise, we have been informed, A container enclosing Inverters, batteries, and a distribution transformer. Given the nominal rating of the output is 7 megawatts, there will be significant heat generated in this enclosure but no information is given of any cooling plant such as fans which could significantly add to the noise output. The problem that was experienced with the existing generators was the tonality of the noise which, although below the statutory weighted average limit, contained a 50Hz component in the form of a constant hum. More detail is required regarding individual equipment noise levels to comment on this.

ENVIRONMENTAL STATEMENT

NTS.1 NON-TECHNICAL SUMMARY

NTS1.2.6 Design Rationale

This section states that the layout has designed to avoid impacts on the CLM structure. However, there is no evidence that the impacts have been studied of the CLM infrastructure on the Solar Generation System

Evidence of a study is required to demonstrate that the Solar Park electrical installation complies with The Environmental Standards Association (ESA) Industry Code of Practice ESA ICoP 2 edition 1, November 2005: - Area Classification for Landfill Gas Extraction, Utilisation and Combustion, to identify potential sources of Explosive Gas Atmospheres. This shall be applied for parts of the new electrical installation that are in close proximity with existing landfill gas infrastructure, e.g. gas wells, manifolds, gas monitoring points etc. as defined by the code. Any equipment so affected shall comply with the relevant national or standards, namely BS EN 60079 and IEC 79 – Explosive Atmospheres and be designed, manufactured and approved for use in potentially explosive atmospheres.

NTS1.6 Traffic and Access

NTS1.6.1 Introduction

The following statement regarding the proposed construction route should be amended as follows: -

- Continue along Common Road for approximately 1 mile, turning left at the junction with Dun Cow Road and Lily Lane and continue along Common Road before reaching the site entrance.

NTS1.6,3 Assessment of Effects

Our detailed comments to the Appendix A6.1 – Transport Statement are detailed below.

The statement that the “The effect of construction on traffic generation on Dun Cow Road and Common Road is considered to result in a negligible magnitude of change on a receptor of medium sensitivity. Thus, the effect of increased traffic on this route is considered negligible and not significant as per the EIA Regulations” is in our opinion incorrect and does not reflect the character and sensitivities of the roads forming the proposed access route.

Given the large number of vehicle movements, the uncertainty in the duration, that is likely, in our experience due to inclement weather and the considerable inconvenience experienced by residents, users and businesses along these public access roads, we strongly recommend that access to the site should be along the existing “Haul Road” that runs directly from Rectory Road via a crossing on Lily Lane to a point directly opposite the existing site entrance.

(See Appendix 4.2 Mark-up at the end of this report for the location and route of this road).

NTS1.8 Summary of Effects

We strongly disagree that there are no significant effects due to the proposed Traffic and Access arrangements as detailed above and in our comments to the Transport Statement,

1.4.10 Major Accidents or Disasters

Operational Phase

Referring to our comments in Section NTS1.2.6 Design Rationale, the absence of a hazardous area assessment which is a legal requirement under the Dangerous Substances & Explosive Atmosphere Regulations there remains a risk due to incorrect electrical installations. This would need to be addressed in the detailed design, material selection and operation of the system including, where required, mitigation by use of equipment designed and manufactured in accordance with the appropriate part of BSEN 60079, the inclusion of gas detection systems and if necessary systems to eliminate the likelihood of an explosive gas atmosphere occurring around the source of ignition, or eliminate the source of ignition (i.e. shutting down the electrical supply to that part of the system). The inclusion of this study should also be a condition of a planning consent

2.4 Construction Phase Overview

2.4.2.1 Traffic management

Refer to comments on the TRANSPORT STATEMENT below

2.4.2.2 Working Hours

Standard daytime working hours are likely to be utilised, between 7:30am to 6pm Monday

to Friday and 7:30am to 4pm on Saturdays.

Also, these start and finish times coincide with peak periods of pedestrian activity on the access roads with dog walkers, equestrian and dog walkers using the roads.

Currently working hours for the Landfill site exclude weekend working

Also, these start and finish times coincide with peak periods of pedestrian activity on the access roads with dog walkers, equestrian and dog walkers using the roads.

2.6 Decommissioning Overview

Decommissioning will take place after 35 years at which time the same disruption will occur if alternative access arrangements are not put in place as detailed in NTS 1.6.1.

4 LANDSCAPE AND VISUAL ASSESSMENT

4.4.4 Visual Baseline

Table 4.11: LVIA Selected viewpoints

A view point from East End Lane should have been reported in the study

4.5.5 Visual Baseline

4.5.5.1 Settlements and Residential Properties

The statement that *“The Site is in a rural landscape in which the local settlement pattern within the study area is limited to villages, and a variety of dispersed hamlets with a scattering of isolated farmsteads and residential properties along connecting roads”* understates the diversity of the area surrounding the proposed site. There are in total; 62 residential properties and 1 tourist accommodation site situated along these roads, many of which will be impacted by these proposals. Also the site borders the Broads National Park.

4.10.1 Viewpoint Assessment

Eight viewpoint location were identified in the visual baseline study. The viewpoint at East End Lane should also have been included as this will also be effected by visual impacts.

4.10.2 Visual Effects on Views from Residential Properties

This section states - *“However, eight dwelling receptors have been assessed (College Cottages, College Farm, Hope Cottage, York Cottages, The Hovel, Greenways, Oaklands Farm and Eastend Farm) Aldeby Solar Park Environmental Statement as they are located within 0.5km of the Development. Field and garden boundary vegetation filter views from these residential properties and most of these properties in the vicinity of the site have been scoped out of the assessment at the baseline stage based on limited or no theoretical visibility indicated by the augmented ZTV (see Figure 4.6b). There may be potential for patchy and low-level visibility such*

as winter views or glimpsed views from upper storeys. However, these views will be intermittent and mostly screened by intervening landform and vegetation”.

Residents in these locations may have a differing opinion based on their own observations rather than theoretical, desk-top study results.

6 TRAFFIC AND ACCESS

6.3.2 Elements Scoped Out of Assessment

6.3.2.2 Decommissioning Effects

This states “Traffic associated with decommissioning of the Development will be the same or less than that experienced during construction. It is not possible to accurately forecast baseline traffic flow levels 40 years into the future. For the above reasons, further work would be undertaken at the time of decommissioning to determine if significant transport effects might be experienced”.

This future work should be a condition of planning consent

6.2.3.6 Air Quality

Given the rural nature of the proposed access route, any increase in traffic movements will lead to significant increase in air pollution; with a predicted increased level of 7,458 two-way movements, the increase would be significant and detrimental to the residents.

6.3.3 Study Area

The following statement is included: *“There are no public roads located within the Site. Access would be via the existing landfill site access point off Common Road to the west, providing connectivity to Rectory Road and the A143 via Dun Cow Road. The existing access road within the site boundary has been utilised by HGVs throughout the operation of the landfill site and is therefore suitable for use by construction vehicles. This minimises the requirement for new access junctions or tracks to be constructed, except for a small section of track to reach the solar array.”*

No reference has been made regarding the separate dedicated Haul Road giving direct access from Rectory Road to the site which is available and following completion of the Landfill Operation has limited use for maintenance and leachate removal only. This should be the preferred route for access during construction and decommissioning.

Refer to comments to Appendix A6.1 and Appendix 4.2 mark-up below.

6.3.5.1 Sensitivity of Receptors

Due to the diverse nature of the receptors along these routes, the greatest sensitivity should be applied in these studies

6.4 Baseline Conditions

The list of sensitive receptors should be expanded to reflect that these roads are used throughout the day by pedestrians, comprising; dog walkers, joggers, horse riders, wheelchair users and their carers unaware of the status of traffic movements.

The narrowness of the roads would provide no refuge and make it totally unsafe for these users to use the roads at the same time as the heavy goods vehicles

6.5.2 Accidents and Safety

The following statement is included in this section: *“It has been concluded that these roads are operating within acceptable safety parameters at present and in the absence of identifiable trends in RTCs or known accident hotspots, an increase in overall traffic flow or HGV composition is not sufficient to affect a change in safe operation of the road network. Hence, the temporary increase in overall traffic and HGVs for the duration of the construction of the Development will not result in an adverse effect in respect to accidents and safety”*. We totally agree that; the roads are operating safely at present due to low traffic levels and familiarity with local traffic conditions. However, the introduction of the proposed traffic management system and increased traffic levels will in itself create confusion and may lead to accidents.

6.5.3 Pedestrian Amenity

The following statements are included in this section: -

“Pedestrian amenity, fear and intimidation can be affected by changes to traffic flow and composition. Rectory Road does not have pedestrian footways, except where they pass through settlements, while Dun Cow Road Common Road does not have footways at all. HGV (a maximum movement of 2 HGVs per day) traffic levels are not predicted to increase above the relevant thresholds of significance throughout construction on sensitive receptors along the proposed construction route.”

“It is acknowledged that it is likely that staff and visitors to the post office and business park will walk on, and may cross, the delivery route on the way to and from these facilities. However, the predicted increase in traffic is not of a magnitude to cause a disruption to the status quo. That notwithstanding, drivers of all delivery vehicles to be made aware during induction of the presence of these facilities within these settlements.”

It will be seen from our comments to the Transport Statement that there are many more sensitivities and hazards to pedestrians, horse riders and wheelchair users along Common Road, Dun Cow road and Lily Lane than assumed in this statement. With normal rural traffic levels these are manageable since users are familiar and aware. The proposed additional traffic will impose intolerable additional hazards due to frequency and unfamiliarity with these changes.

6.5.4 Driver Delay

It is incorrect to assume that these roads are operating below capacity and no evidence has been submitted to substantiate this. There is a regular pattern of daily use with vehicles going about their daily business as detailed in our response to The Transport Statement.

6.6.1 Mitigation Measures

It is not sufficient in our opinion to rely on driver induction to maintain safe speeds approaching and leaving the site, particularly on Rectory Road and in the local roads affected by the Transport management scheme. Local speed restrictions should also be considered. Refer also to

comments on the Transport Statement below.

6.6.2 Residual Effects

We disagree that the effect of increased traffic will be minor for the reasons stated in our review of the Transport Statement

6.8 Summary of Effects

We disagree that the effect of increased traffic will be minor for the reasons stated in our review of the Transport Statement

ENVIRONMENTAL STATEMENT NON-TECHNICAL SUMMARY

For our comments to the topics covered in this document, refer to those given to the Environmental Statement and The Traffic Statement.

APPENDIX 6.1: TRANSPORT STATEMENT

The application makes the following proposals: -

1.1 Background

Infinis Solar Developments Ltd ('the Applicant') is proposing the installation of a ground mounted Solar Park with associated infrastructure ('the Development') on a closed landfill site off Common Road, Aldeby, Norfolk ('the Site').

This Transport Statement provides an overview of the Development in relation to traffic and will assess the anticipated impact of the Development on traffic and transportation resources within the local area.

1.2 Overview of the Development

The Development is located on a closed landfill site to the southeast of Aldeby, which occupies an area of approximately 27.9 hectares (ha). The Solar Park will occupy an area of approximately 8.5 ha and have a capacity of approximately 7 MW. Construction of the Development will involve the installation of ground mounted solar PV array and associated infrastructure including inverters, a switching compound as well as fencing, security cameras, cabling, storage containers and access tracks.

Access to the Site will take place via an existing access road off Common Road to the west, providing connectivity to Rectory Road and the A143 via Dun Cow Road. Vehicles will approach the site via the A12, A143 or A146 corridors. Traffic management procedures are

required to be implemented on Dun Cow Road and Common Road in order to facilitate safe use of these routes for construction traffic.

Figure 1 included in Appendix A indicates the site location and route to the Site.

2 LEGISLATION, POLICY AND GUIDANCE

Content noted

3 EXISTING CONDITIONS

3.1 Highway Infrastructure

Content noted

3.1.1 A143 - Yarmouth Road

Content noted

3.1.2 Rectory Road

The following statements are made: -

Rectory Road follows on from Beccles Road and is subject to a 40-mph speed limit. It is categorised as a rural single-carriageway road and runs along the northern outskirts of Aldeby and connects to the unnamed access road for the Aldeby Landfill Site.

The junction connecting the access road to Rectory Road is a simple priority junction. Rectory Road is at national speed limit within the vicinity of this junction. As this junction has historically been utilised by HGV traffic it is expected to be suitable for use by the proposed construction traffic for the development

As detailed below, this is our preferred access to the proposed solar park site.

3.1.4 Dun Cow Road

The following statements are made: -

Dun Cow Road is a single-track road which passes from Beccles Road in the north to Common Road in the south. It serves a number of residential properties and farms. The road is less than 5 m width on most of its length. Whilst there are a small number of passing places, these are infrequent and are not intervisible.

Swept path analysis was undertaken for this road which indicated that it is not possible for two opposing HGVs to pass each other, or for a car to pass an HGV. Therefore this route is not suitable for two-way construction traffic. Consequently traffic management procedures have been proposed in Section 5 of this Transport Statement.

This road has been classified by Highways Department as Unsuitable for HGV's

3.1.4 Common Road

The following statements are made: -

Common Road is a single-track road which passes from Beccles Road in the north to site entrance in the south. It serves a number of residential properties and farms. The road is less than 5 m width on most of its length. Whilst there are a small number of passing places, these are infrequent and are not intervisible.

Swept path analysis was undertaken for this road which indicated that it is not possible for two opposing HGVs to pass each other, or for a car to pass an HGV. Therefore this route is not suitable for two-way construction traffic. Consequently, traffic management procedures have been proposed in Section 5 of this Transport Statement.

This road also accesses a children's playground and Aldeby Business Park with several businesses and a charity day centre and college as detailed in our comments to Section 4 The Proposed Development

3.2 Baseline Traffic Flow Data

Content noted

3.3 Road Traffic Collision Assessment

The assessment has identified that, in the last five years, between the site and the A143, there have been two RTC's; one 'serious' and one 'fatal'. Both were on the west end of Rectory Road at Stanley Hills, a known local blackspot due to a combination of bends and blind corners and summits. This point on the route would be unavoidable, whichever route to site is selected and has no bearing on the status of the roads comprising the applicant's proposed route.

THE PROPOSED DEVELOPMENT

Construction Traffic Composition

See Table 4.1

No reference has been made regarding delivery of any construction plant for earth movement, lifting and on site transportation of materials on site. Are these included in Table 4.1?

Construction Vehicle Routing

The following has been proposed: -

“All construction vehicles approaching the site will be directed to use the approved approach route to site. The approved route is indicated on Figure 1 included in Appendix A and is listed below:

- *Exit A143 onto Hollow Way Hill;*
- *Follow Hollow Way Hill for approx. 0.5 miles, continuing onto Beccles Road;*
- *Follow along Beccles Road for approximately 1.2 miles, continuing onto Rectory Road north of Aldeby;*
- *Continue on Rectory Road for 0.2 miles;*
- *Turn right onto Common Road; and*
- *Continue along Common Road for approx. 1 mile, turning ~~right~~ left at the Dun Cow Road Junction before reaching Site entrance.*

All construction vehicles departing the Site will use Common Road before continuing straight onto Dun Cow Road towards Rectory Road”

The above proposals are totally unacceptable because they only address traffic considerations and ignore the impact on the safety, livelihood and wellbeing of local residents of the affected roads, namely: Dun Cow Road, Common Road and Lily Lane. There are in total; 47 residential properties, 2 agricultural properties, 21 business properties and 1 charitable organisation situated along these roads, all of which will be impacted by these proposals.

The following are the principal concerns: -

- These roads are used throughout the day by other users, comprising; pedestrians, dog walkers, joggers, horse riders, wheelchair users and their carers unaware of the status of traffic movements.
The narrowness of the roads would provide no refuge and make it totally unsafe for these users to use the roads at the same time as the heavy goods vehicles and increased traffic volume.
- Dun Cow Road and Common Road have both been classified as Unsuitable for HGV's
- A children's playground is located on Common Road.
- The residents in the properties along the proposed route would be to subjected to the noise and vibration of the higher volumes of traffic including heavy goods traffic going to and from the site
- Agricultural vehicles permanently use the roads and would be impaired by the proposed traffic management scheme unaware of the status of traffic movements and direction of traffic flow.

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- The residential property owners drive on these roads throughout the day would be caught up in the one-way traffic system also unaware of the direction of traffic flow potentially leading to accidents
- The proposals make no provision for residential parking on these roads.
- The Aldeby Business Park on Common Road, currently accommodates 22 businesses and one Charitable organisation. There are traffic movements from each of these occupants throughout the day including a removals and storage facility with large, articulated vehicles which would be required to detour via Dun Cow Road with articulated HGV lorries negotiating a right turn into Dun Cow Road.
- The Charitable Group based on the Business Park is "Sense" which is for those living with complex disabilities, and for everyone who is deafblind and to help them to communicate and experience the world. Their centres offer a place for people with complex disabilities to build connections by developing communication skills and independence, meeting other people, being creative with arts and crafts and taking part in sport and exercise – supported by skilled, specialist staff. As part of their work they regularly take escorted walks in groups along these local roads. What is proposed will definitely not be a suitable environment for such activity
- Waste and Recycling collections will be disrupted.
- Postal and household delivery deliveries will be disrupted.
- Traffic will, as a result, divert along St Marys Road into the village centre causing additional danger from congestion and narrow roads.

Following a planning application from FCC Environment (the landfill site operators) and rejection by Norfolk Council, the suitability of the local roads being used for access to the landfill site rather than retention of the existing haul road, was reviewed under appeal under Application No C/7/2018/7021 and in their Appeal Decision reference: APP/X2600/W/19/3225900 the appeal was granted with the following statement made with regards to the unsuitability of using the local roads instead of the existing Haul Road.

Paragraph 20 of the decision notice states as follows: -

"The haul road is proposed to be used by monitoring vehicles beyond the sites' restoration, although no evidence has been provided that monitoring would be difficult to undertake if it were no longer in place. Concerns have been raised that indicate possible impacts on the living conditions of occupiers of nearby properties if monitoring traffic in the form of HGVs uses the local road network. The surrounding local road network, including Common Road leading to the landfill site itself, is narrow and would not allow for two vehicles to pass simultaneously potentially resulting in the need for reversing in the highway or damage being caused to highway verges. Common Road and Lily Lane currently have 7.5 tonne weight restrictions in place which restrict HGV movements away from surrounding residential properties. Due to the narrow width of the surrounding road network, if HGVs were displaced on to the surrounding roads, these would pass close to residential properties with consequent impacts on living conditions of occupiers due to noise and vibration. "

The haul road has been granted an extension for use until 8th April 2023. With the planning consent for the Landfill site expired on the 8th July 2021, the use of the Haul Road will be much reduced being only for maintenance access and removal of waste and leachates.

It would therefore be a safer and more acceptable solution for the Applicant to enter into an agreement with FCC Environmental and the landowners for shared use of the road over some part of this remaining period while construction of the Solar Park is ongoing.

Clarification is required as to whether Infinis has explored this option with FCCE

A marked up copy of Figure 4.2 showing the location and route of the existing Haul Road is attached below.

4.3 Construction Traffic Volume

4.3.1 Site Mobilisation and Demobilisation

Reference has been made regarding delivery of project plant. Are these included in the total of 7,458 movements detailed in Table 4.1 and will this include all lifting, on-site transportation and earth moving plant?

4.3.2 Access Tracks

Content noted

4.3.3 Switching Stations, Cabling, Cabling and other Electrical Containers

The DNO switching station container is 10m long and the Battery and General Storage Containers are 12m long. These require long wheel base HGV transport to deliver them to site and we have been by local HGV drivers, that the bends at the junction of Common Road with Dun Cow Road and Lily Lane are not suitable to negotiate with long wheelbase HGV lorries.

4.3.4 Frames and Inverters

Content noted

4.3.5 Panels

Content noted

4.3.6 Staff

Has sufficient onsite parking been included for the maximum staffing levels?

4.3.7 Fuel

Content noted

4.3.8 Overall Delivery Programme

Reference has been made regarding delivery of project plant. Are these included in the total of 7,458 movements detailed in Table 4.1 and will this include all lifting, on-site transportation and earth moving plant?

4.4 Effect on Highway Safety

The assessment has identified that, in the last five years, between the site and the A143, there have been two RTC's; one 'serious' and one 'fatal'. Both were on the west end of Rectory Road near Stanley Hills, a known local blackspot due to a combination of bends and blind corners and summits. This point on the route would be unavoidable, whichever route to site is selected and has no bearing on the status of the local roads comprising the applicant's proposed route.

As stated existing site access at both the existing Landfill entrances on Rectory Road and Common Road are currently in use by HGV traffic associated with the landfill site. No RTCs were noted at either location which indicates that the junctions are operating safely. We can therefore see no justification for the proposed new route via public roads, i.e. Common Road and Dun Cow Road, which in our opinion would have a negative impact on highway safety.

4.5 Operational Traffic

We have no objections to the use of these public roads for the operational vehicle movements detailed other than due care and safe speeds of additional traffic being a condition of consent. Temporary traffic speed restrictions could be applied for the duration of the construction phase and considered during the operational phase.

5.0 TRAFFIC MANAGEMENT

The following proposals have been included in this Statement

“A number of traffic management procedures will be implemented to ensure safe operation of routes within the vicinity of the Site.

Once appointed, the Principal Contractor will be responsible for implementing specific traffic management policies and procedures. The following sub-sections of this report will outline the general management procedures which will be implemented.”

Refer to our comments to section 5.1 below.

5.1 Management of Dun Cow Road and Common Road Approach Route

The following proposals have been included in this Statement

“In order to prevent the risk of obstruction of these routes due to construction traffic it is proposed to implement a temporary one-way system. Additionally temporary traffic lights would be installed at the Dun Cow Road/Common Road junction in order to control access to the final section of Common Road towards the site entrance.

Final details of the traffic management procedures will be provided prior to the commencement of construction. These will be developed by the Principal Contractor or their appointed traffic management sub-contractor and would be agreed in consultation with Norfolk County Council Highways department prior to installation. It is anticipated that a number of temporary traffic regulation orders (TTROs) would be required in order to implement the proposed measures.

The following specific measures are provided as an outline of how the route could be managed, although it is anticipated that these will be refined and developed during the consultation process:

- *Common Road to temporarily become one-way (southbound) from the Beccles Road Junction to Dun Cow Road Junction;*
- *Dun Cow Road to become temporarily one-way (northbound) from the Common Road junction to Rectory Road/Beccles Road;*
- *Temporary traffic lights to be located at the Dun Cow Road/Common Road/ Lily Lane*

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Junction to control traffic on Common Road between this junction and the site entrance junction.

Figure 3 included in Appendix A indicates the layout of the proposed traffic management system as outlined above.

It is considered that the above measures if implemented would be sufficient to allow construction traffic to approach the site without the risk of road blockage.

Due to the extremely low number of vehicles associated with operation of the Development no traffic management procedures are proposed for the operational phase”

Response to Section 5.1

The above proposals are totally unacceptable because they only address traffic considerations and ignore the impact on the safety, livelihood and wellbeing of local residents of the affected roads, namely: Dun Cow Road, Common Road and Lily Lane. There are in total; 47 residential properties, 2 agricultural properties, 21 business properties and 1 charitable organisation situated along these roads, all of which will be impacted by these proposals.

The following are the principal concerns: -

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- The residents in the properties along the proposed route would be to subjected to the noise and vibration of the higher volumes of traffic including heavy goods traffic going to and from the site
- Agricultural vehicles permanently use the roads and would be impaired by the proposed traffic management scheme unaware of the status of traffic movements and direction of traffic flow.
- The residential property owners drive on these roads throughout the day would be caught up in the one-way traffic system also unaware of the direction of traffic flow potentially leading to accidents
- The proposals make no provision for residential parking on these roads.
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and experience the world. These centres offer a place for people with complex disabilities to build connections by developing communication skills and independence, meeting other people, being creative with arts and crafts and taking part in sport and exercise – supported by skilled, specialist staff. As part of their work they regularly take escorted walks in groups along these local roads. What is proposed will definitely not be a suitable environment for such activity

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The haul road has been granted an extension for use until 8th April 2023. With the planning consent for the Landfill site expiring on the 8th July 2021, the use of the Haul Road will be much reduced being only for maintenance access and removal of waste and leachates.

It would therefore be a safer and more acceptable solution for the Applicant to enter into an agreement with FCC Environmental and the landowner for shared use of the road over some part of this remaining period while construction of the Solar Park is ongoing.

Clarification is required as to whether the Applicant has explored this option with FCCE

A marked up copy of Figure 4.2 showing the location and route of the existing Haul Road is attached below.

6 CONCLUSION

The statement concludes that traffic management procedures proposed would ensure safe operation of the approach route to site during construction.

The comments above detail additional sensitivities which demonstrate that these proposals will in fact increase risk and reduce the safety of the residents. Furthermore a route following the existing landfill access road would provide safe access with minimal traffic impact

RESTORATION PLAN

This paragraph states, *“The Development would defer the implementation of the affected area of the restoration plan for the lifetime of the Development. Upon decommissioning of the Development, the restoration plan would be re-implemented. The amendment to the timing of the*

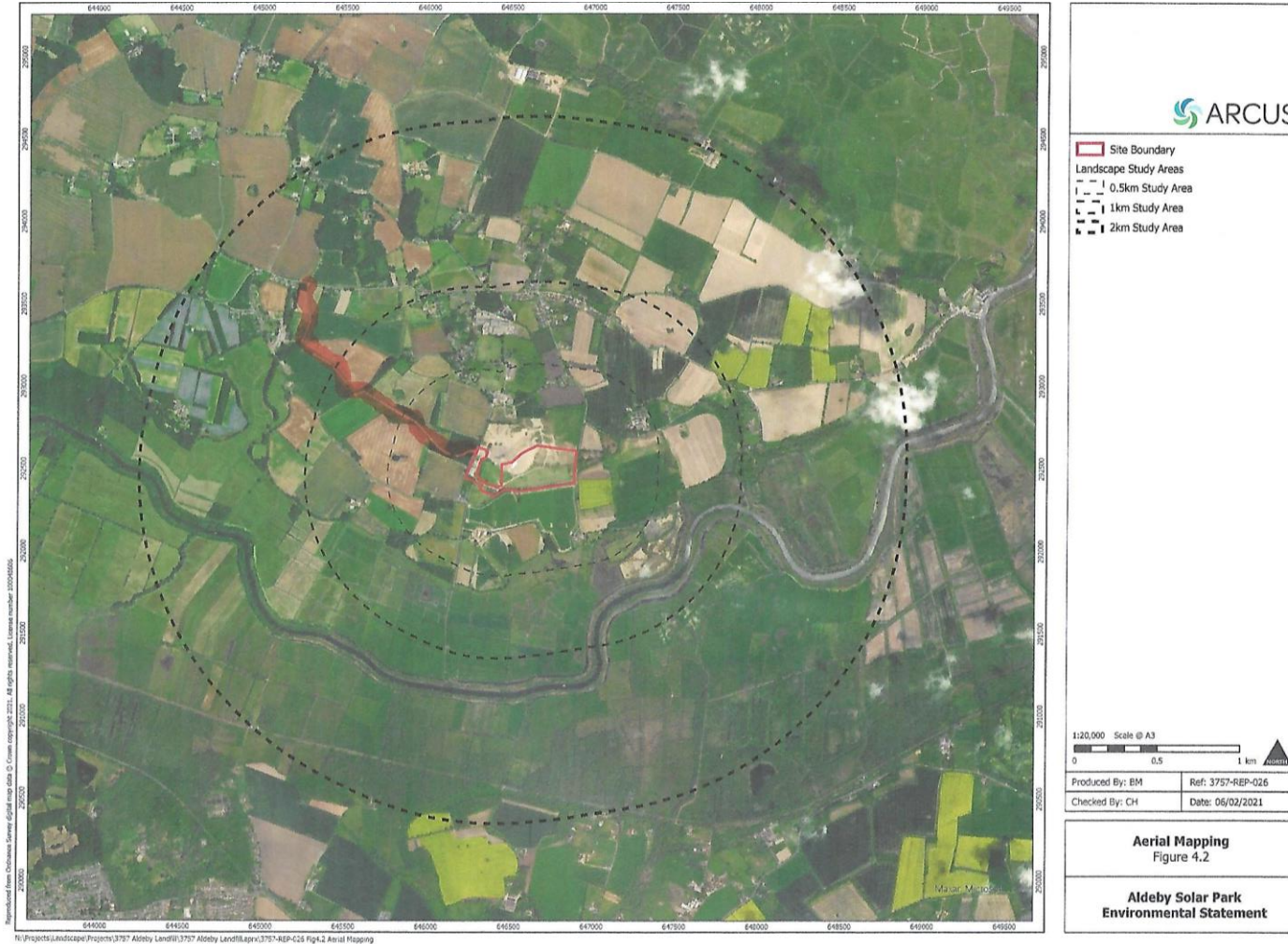
restoration would be implemented via a separate Section 73 application which will be made to vary the restoration scheme (as approved under application C/7/2018/7007, drawing no 601R294) to defer the implementation of the approved restoration plan for the area of the Site”.

Consideration of retention or reinstatement of the existing Haul Road would be required for decommissioning also.

COMMUNITY CONSULTATION

It is stated residential properties within 500m of the site have been notified of the proposals, this excluded a large part of Common Road and all of Dun Cow Road and Lily Lane and commercial and charitable premises in Aldeby Business Park, who would be affected by the Transport Proposals. (Refer to comment below on the Transport Statement).

A notification based on post code was proposed during the pre-planning consultation virtual meeting on the 1st March 2021. This has not happened and as a result the majority of residents on Common Road and all of the residents in Dun Cow Road have not been consulted despite the impacts of the construction traffic proposals by which they would be affected.



Appendix 4.2: Mark-up showing the route of the existing Access Road (highlighted in red)