



Natural Environment Team

To: Planning Services
Name: Ralph Cox
Ref: FUL/2021/0015

Date: 7th September 2021

Title: Aldeby: Aldeby landfill site, Common Road, Aldeby, Beccles, NR34 0BL:
Installation of a solar photovoltaic array/solar park with associated infrastructure:
Infinis Solar Developments Ltd

Summary

Arboriculture – root protection area and fencing query

Ecology – further information required

Landscape – Further information required

Holding Objection

Arboriculture

Thank you for consulting me on this application.

I query why the protective fencing and site fencing along the southern boundary of the site do not exclude the full root protection areas shown on the Tree Protection Plan for the trees that are located north of the hedge line.

Apart from a minor adjustment to the fencing, I have no objections from an arboricultural perspective, providing the development is carried out strictly in accordance with the Tree Protection Plan document (Arcus Consultancy Services June 2021).

Anne Crotty, Senior Arboriculture and Woodland Officer

STATUS

Choose an item.

Choose an item.

Green

Ecology

Thank you for your consultation with regards to ecological impacts.

The generation of electricity via PV arrays is a rapidly evolving field however the impacts on wildlife are not well understood due to an absence of research.

Site selection & Impact assessment

The application site is in close proximity to an ecological sensitive area being located 800 m north of several nationally and internationally designated ecological sites, including Broadland Special Protection Area (SPA) and Ramsar, The Broads Special Area of Conservation (SAC) and Barnby Broad and Marches Site of Special Scientific Interest (SSSI). The Site is also adjacent to the west of Boons Heath County Wildlife Site.

Given the environmental sensitivity of the wider area I am concerned that no reference is made in section 2.7.1 of the ES (site selection) to the proximity of the

site to the SPA/Ramsar/SAC/SSSI. As this is an important consideration in site selection (and identification of impacts).

Due to the proximity of the site to internationally important areas for birds I would recommend consulting Natural England and the RSPB (see [RSPB, 2014](#)), as I am concerned that:

1. The site and land adjacent to may be functionally linked. Due to its proximity to internationally designated sites for wintering and breeding birds the impact assessment should be based on survey data.
2. The Environmental Statement does not address all potential impacts as per guidance prepared by [Natural England, 2017](#). These impacts include fragmenting (caused by fencing), disturbance and displacement (e.g. by noise), and collision (namely bats, birds and invertebrates) ([European Commission, 2020](#)), [Natural England, 2017](#)). Given the proximity of the site to a large body of water collision risk is a concern given that the panels reflection mimics that of water.

Layout & Enhancement

I have overlaid the proposed scheme with the consented restoration strategy (see page 6.

Given the existing consents the proposed layout should reflect the restoration strategy and thus reflect the mitigation hierarchy – avoid loss – minimise – compensate (for losses that cannot be avoided). Should the application be granted as proposed there will be a delay of circa 35 years in the creation of priority habitats (woodland and hedgerow) onsite.

Could the applicant clarify the spacing between the panels and confirm that spacing will be sufficient to allow sunlight to reach vegetation and soil, ensuring that the proposed species rich grassland will be viable (see [European Commission, 2020](#))

Enhancement proposals should considered the following guidance: [BRE National Solar Centre Biodiversity Guidance for Solar Developments](#).

It is not clear if the existing structures in the south western corner will remain as part of the proposed scheme – they are shown on the proposed layout plan but under the consented restoration scheme¹ this area is identified as part of the SuDS.

¹ Drawing 601R294 Plan number 7. Final Restoration Masterplan. FCC Environmental May 2014)

The EclA² should, in line with CIEEM guidelines for EclA, assess potential impacts associated with all stages of the proposal from site clearance, construction, operation, maintenance, closure and decommissioning as per CIEEM guidelines, as such the assessment is incomplete. The Cumulative effects section (5.9) should also clearly identify which plans/projects have been assessed.

In line with CIEEM guidelines it is requested that the names and qualifications/experience of the ecologist who completed the ecological surveys and prepared the ES chapter is provided to the planning authority.

As the application currently stands there has not been sufficient consideration/assessment of the potential ecological impacts of the scheme.

Kind regards,

Catherine Dew, Senior Ecologist

STATUS

Choose an item.

Amber

Choose an item.

Landscape

Thank you for consulting me on the above application.
Pre-Application advice was provided in November 2020 in relation to this site which informed the applicant that, amongst other things, a full LVIA and Landscaping Plan showing any displaced/proposed landscaping. A further screening request was responded to in December 2020.

Thank you for consulting me on the above application in relation to Landscape and Visual Impacts.

The site has been afforded permission for various activities dating back to the 1950/60s with the first record of restoration in 1996. However, in more recent years there have been several extensions of time causing the delay of restoration, most recently to 2012, later again to 2018, and then again to July 2021. To date it does not appear that restoration has been completed on the site, the current application confirms that this is the case.

The current application looks to use the site for a period of 35 years, with a 4-month construction period, this would mean there is a risk of restoration being delayed to beyond 2057. No clarification is given on how long restoration would take following decommissioning or if the restoration could be completed before works begin on site, should you be minded to grant permission, this restoration should be undertaken in line with the existing permissions and not subject to further delays.

² For information, CIEEM's 2016 [Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.1](#) were updated in September 2018.

The baseline conditions for the site form the basis of the ES assessment, however it is noted that the site has not been restored as per the Final Restoration Plan so whilst the LVIA (as part of the ES) does understandably look at the site as it currently stands, there should be some weight given to the restoration which could have been in place and matured to a level by now.

The LVIA has been produced in line with industry standard guidance, and broadly concludes that there would be minor to negligible adverse landscape and visual effects and that there is little impact on the setting of The Broads to the south.

I am particularly concerned about the impact on the immediately adjacent Broads, and the setting of the Broads area and given the high value and moderate sensitivity to change of the landscape. The sequential Viewpoint (No. 6) is described as having extensive views, but that there is a greater visual relationship to the south and south east, with views of the urban fringe of Lowestoft. Later the chapter goes on to talk of “some farming infrastructure and elements of an industrial nature”. Farm buildings and associated agricultural infrastructure would be very unlikely to be perceived as industrial or engineered by members of the public experiencing these views, rather these are likely to be perceived as part of a rural landscape – in direct contrast to any urban fringe views to the south and south east.

Currently it appears the site forms the skyline and horizon of many of the views to the south, particularly those from The Broads and Angles Way. By nature of the elevated position of the site, the intervening vegetation would do little to screen the 2.6-3.0m panels being proposed, and at the ridge of the site, these panels could break the horizon line and become even more visually obtrusive. Considering the wider landscape of rural uses and farm buildings, the panels array is likely to appear as an engineered industrial structure in the landscape, both when black, and if seen with glint/glare.

It is acknowledged that some of these views will be glimpsed, however the receptors in these locations are sensitive when using recreational routes and looking to experience a National Park Landscape.

The current Landscape Strategy doesn't appear to offer any additional screening planting apart from a small area of infill native hedge planting to the south east corner and some tree belt and hedge planting to the south west corner. Without any additional screening planting along the southern boundary, the current hedge is unlikely to offer sufficient screening.

As the application currently stands I do not feel there has been a sufficient assessment of the potential landscape and visual impacts of the scheme and that the proposed mitigation planting is unlikely to be sufficient to mitigate the landscape and visual impacts.

Emily Smith, Green Infrastructure and Landscape Officer		
STATUS		
Choose an item.	Amber	Choose an item.

