



## Natural Environment Team

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

Date: 04/02/22

Title: ADDITIONAL INFORMATION: 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 Grid Ref: 646595292458

### Summary

Ecology- no objection  
Landscape – Objection on the basis of adverse impacts on the sensitive landscape of The Broads.

Holding Objection

### Arboriculture

I have no further objections or comments provided the development is carried out in accordance with the Tree Protection Plan (Arcus, dated November 2021).

Anne Crotty, Senior Arboriculture and Woodland Officer

### STATUS

Choose an item.

Choose an item.

Green

### Ecology

Thank you for your re-consultation.

Following previous comments on 7/09/21 proposals have been amended. Details of amendments to the landscaping plan, to accommodate the consented restoration scheme, are provided in the 'Response to Reg25 Letter' from Arcus dated 19/11/21 and shown on the 'Landscape Mitigation Plan (drawing 3757-DR-LAN-101 Revision B dated 23/03/21). I agree with the Broads Authority (dated 24/01/22) that this helps overcome our concern regarding the delay in implementation of the restoration scheme.

I have reviewed Arcus's letter (dated 03/12/21) which provides details in response to my previous comments. I have also reviewed Natural England's comments (dated 23/12/21) who are of the opinion that the scheme will not

have significant adverse impact on statutorily protected nature conservation sites or landscapes.

NE advise that to meet the requirements of the Habitats Regulations, we should record a decision that a likely significant effect can be ruled out.

Pending, this should you be minded to grant consent, mitigation measures identified in Chapter 5 (5.7.4.1, 5.7.5.1, 5.7.6.1) of the Environment Statement should be secured via a RAMS/CEMP: Biodiversity.

Details for species planting/placement and management thereof should also be secured e.g. via an Ecological Design Strategy

### **Construction Environmental Management Plans (Biodiversity) (CEMP: Biodiversity)**

“No development shall take place until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP shall include the following (tailor as appropriate):

- Risk assessment of potentially damaging construction activities;
- Identification of ‘biodiversity protection zones’;
- Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction;
- The location and timing of sensitive works to avoid harm to biodiversity features;
- The times during construction when specialist ecologists need to be present on site to oversee works;
- Responsible persons and lines of communication;
- The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person;
- Use of protective fences, exclusion barriers and warning signs.

If several years have passed since surveys were undertaken, then update surveys may be required at the reserved matters stage and any additional mitigation measures that need incorporating into the site’s design agreed with the local planning authority. The validity of the ecological surveys will be informed by CIEEM guidelines (2019)

see <https://cieem.net/resource/advice-note-on-the-lifespan-of-ecological-reports-and-surveys/>.

The approved CEMP: Biodiversity shall be adhered to and implemented through the construction phases strictly in accordance with the approved details, unless agreed in writing by the local planning authority.

A 'statement of good practice' shall be signed upon completion by the competent ecologist, and be submitted to the LPA, confirming that the specified enhancement measures have been implemented in accordance with good practice upon which the planning consent was granted'.

### **Ecological Design Strategies (and ecological creation and restoration schemes etc) Condition**

No development shall take place until an ecological design strategy (EDS) addressing enhancements recommended within Section 5 of the environmental statement, and details of proposed planting) has been submitted to and approved in writing by the local planning authority.

The EDS shall include the following:

- a. Purpose and conservation objectives for the proposed works
- b. Review of site potential and constraints
- c. Detailed design(s) and/or working method(s) to achieve stated objectives
- d. Extent and location/area of proposed works on appropriate scale maps and plans
- e. Type and source of materials to be used where appropriate (e.g. native species or local provenance)
- f. Timetable for implementation demonstrating that works are aligned with the proposed phasing of development
- g. Persons responsible for implementing the works
- h. Details of initial aftercare and long-term maintenance
- i. Details of monitoring and remedial measures
- j. Details for disposal of any wastes arising from works

k. Woodland, tree, hedgerow, shrub, wetland and flower planting and establishment

The EDS shall be implemented in accordance with the approved details and all features will be retained in that manner thereafter.

A 'statement of good practice' shall be signed upon completion by the competent ecologist, and be submitted to the LPA, confirming that the specified enhancement measures have been implemented in accordance with good practice upon which the planning consent was granted'.

The Design strategy should include details of mammal gaps beneath the fence.

Catherine Dew, Senior Ecologist

**STATUS**

Choose an item.

Choose an item.

Choose an item.

**Landscape**

Thank you for consulting me on the additional information regarding the above application.

As I understand it, the amended proposals include:

- Reduction in the extent of panels
- Reduction in panel height from 2.6m above ground level to 2.0m

It is appreciated that the Landscape Strategy now includes the proposed tree and shrubs as required for the restoration. This is supported by the letter (*Ref: 3757/Reg25*), where it is confirmed:

"All the planting that overlaps with the restoration plan planting which is proposed around the perimeter of the Solar Park would be implemented as part of this Development, following construction of the solar park. Other restoration plan planting on the wider landfill would be delivered by FCC."

This alleviates previous concerns regarding delay in restoration from the previous application and conditions that the site was subject to.

The photo montages that have been submitted as part of this additional information demonstrate baseline, end of construction, 1 year following completion, and 15 years following completion. These are listed as Viewpoint 1; however, clarity should be given with this as the location does not relate to VP1 in the previously submitted Environmental Statement.

This viewpoint used for the photo montages is based on Angles Way, not far from the original VP6, and offers a useful means to assess the impact from The Broads. However, we note that two limitations exist in these photomontages:

- The baseline image was taken when the tree canopies are largely still in leaf, during winter the screening will be much more limited
- The baseline image has been taken on an overcast day, sun would cause the panels to be more visible due to glint and glare.

These aside, looking at the photomontages provided at 15 years the array is still largely visible in the landscape. The vegetation along the southern boundary will go some way towards screening the lowest of the panels, but this is a small percentage of the overall array. Previous concerns regarding the panels breaking the horizon have been alleviated due to the reduction of the overall array, and the softening by the northern proposed planting. But the panel array is still highly visible and therefore my concerns remain that it would be highly visible from the sensitive landscape of The Broads area.

The proposal is on an elevated landform in an area which overlooks the river valley, and therefore The Broads Area to the south, this results in adverse impacts on the landscape character and setting of The Broads, as well as adverse visual impacts on receptors using the Angles Way path and potentially users of The Broads for recreational pursuits.

Emily Smith, Green Infrastructure and Landscape Officer

**STATUS**

Red

Choose an item.

Choose an item.