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Date: 29 December 2020

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Dear Mr Mott

**Aldeby: Aldeby Landfill Site, Aldeby, Norfolk: EIA Screening Request for proposed Solar Park development: Arcus Consultancy Services Ltd**

I refer to your email of 16 November 2020 requesting a Screening Opinion in accordance with Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') for the above development. I apologise for the delay in this response.

The proposal is for the development of a ground mounted solar PV array and associated infrastructure on part of the existing Aldeby closed landfill site currently undergoing final restoration. The development boundary would extend to 11.7 hectares on the southern part of the landfill site. Once in operation the solar PV array would have an export capacity of approximately 7 megawatts. It is understood a temporary planning consent would be applied for (the length is not specified) and following the end of their useful life the PV panels would be removed, and the site decommissioned.

The development does not fall within Schedule 1 of the EIA Regulations. As recognized in your Screening Report, whilst solar development is not explicitly referenced in Schedule 2 the proposal would fall within paragraph 3(a): 'Energy Industry' of the EIA Regulations (Industrial Installations for the production of electricity, steam and hot water).

Whilst the proposed site is adjacent to the Broads Authority Executive Area ('the Broads'), as defined as a sensitive area in the EIA Regulations, the site is not actually within or partly within a sensitive area. On this basis the thresholds and criteria have been taken into account in column two of Schedule 2, and in relation to paragraph 3(a) of the EIA Regs, you have confirmed the site area would be 11.7 hectares therefore exceeding the 0.5 hectare threshold.

On this basis the selection criteria in Schedule 3 need to be taken into account in determining whether the proposal would be likely to have significant effects on the environment. Under Schedule 3, the matters to be considered are the characteristics of the development, the location of the development, and the characteristics of the potential impacts.

### 1. Characteristics of development

In terms of the characteristics of the proposed development and specifically its size and design, with the total site area proposed exceeding 11 hectares in size this is considered to be significant. The main pollution and nuisances would be likely to occur whilst the PV array is under development from vehicle movements etc however the construction phase would be temporary in nature. The works themselves would not be likely to result in a significant production of waste either during construction or once the development is operational, and the proposal would not use a significant amount of natural resources.

### 2. Location of development

With regard to the location of the scheme, the site is not within a sensitive area as defined by the EIA Regulations. The existing and approved landuse is a former quarry now in the final stages of being capped and landscaped having been landfilled with non-hazardous waste. Subject to appropriate engineering methods to prevent contamination etc, the proposed development would not be likely to have a significant impact on the landfill site itself, and the site is not within a densely populated area.

However, according to your Site Location Plan (figure 1) submitted within your Scoping Report, the site is adjacent to the Broads a 'sensitive area' as defined by the EIA Regulations which lies directly to the south and east of the proposed site. In the context of Schedule 3, this is not only a wetland but also a landscape of historical and cultural significance, and whilst not designated a National Park under statute, the Broads holds the same status. Furthermore the site is also within 800 metres of Barnby Broad and Marshes Site of Special Scientific Interest (SSSI) that form part of the Broadland Special Protection Area (SPA) and the Broads Special Area of Conservation (SAC), both European protected sites. On this basis both Natural England (NE) and the Broads Authority were consulted on the Screening Request due the proximity to the sensitive areas.

Natural England commented that on the basis of the material supplied with the consultation, there are potential likely significant effects on statutorily designated nature conservation sites or landscapes and further assessment is required. In addition, in confirming the proposal could have adverse impacts on the designated nature conservation sites and landscapes in Norfolk detailed above, it also underlined the adverse impacts that could potentially effect both the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) some 4.3 kilometres to the south, and also the Suffolk Heritage Coast some 10 kilometres to the south east.

The Broads Authority in their response also highlighted that the location of the site made it potentially visible from the Broads by both users of the Angles Way and the Waveney river particularly as it would be situated on at a relatively elevated position on the northern valley side. Furthermore, the solar PV development would also be of an uncharacteristic use and appearance in relation to the Broads and the Broads Authority raised the potential for there to be significant effects as a result of scheme.

### 3. Types and Characteristics of potential impact

Finally with regards to the characteristics of the potential impacts, the duration of the landscape impact would be one that is both temporary and reversible given the PV panels and associated infrastructure would be removed following the end of their operational life and the temporary consent that would be applied for. However, the impact would nonetheless be a long term one and there is a high probability that there would be an impact given the relatively elevated position of the proposed site on the northern valley side of the River Waveney.

### Conclusion

In conclusion, on the basis of the location of the site adjacent to the Broads which is a landscape of both historical and cultural significance, the development would be likely to have significant impacts on this sensitive area. There is a high probability of an impact given the scale and size of the design which would be uncharacteristic at this location, and the likelihood is that it would be visible from both footpaths and waterways within the protected wetland. Therefore, the County Planning Authority is of the view that an Environmental Impact Assessment (EIA) **would need to be undertaken** to accompany an application for the proposed development. However, there is the possibility of reducing the impact with appropriate landscaping and screening to mitigate the impact on the Broads, and this would need to be borne out and demonstrated in the Environmental Statement. Should you be minded to pursue this scheme we can obviously advise on the scope of the EIA should you request this under Regulation 15(1) of the EIA Regulations.

The full the consultation responses received including from the Broads Authority and Natural England these can be viewed here:

<http://eplanning.norfolk.gov.uk/PlanAppDisp.aspx?AppNo=SCR/2020/0005>

I hope the above is clear but should you have any queries, please do not hesitate to contact me on 01603 223318.

Yours sincerely



Nick Johnson  
Head of Planning