

From: [Cheryl Peel](#)
To: [Planning Services](#)
Subject: Your Ref: FUL/2021/0015
Date: 16 August 2021 09:50:07

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RE: BA/2021/0279/CCP Aldeby Landfill Site

Dear Ralph,

Thank you for consulting the Broads Authority on the above development. Our comments are as follows:

The site is immediately adjacent to the Broads area and has significant potential to affect the setting of the Broads. The site is on the northern valley side at a relatively elevated position. The site lies approximately between 11m and 29m AOD. This makes it potentially visible from the Broads area by sensitive visual receptors including users of Angles Way and the river. The sensitivity of the receiving environment is high according to the Broads Authority's *Landscape Sensitivity Study Detailed assessment: Photovoltaic panels 4, 5, 6* which identifies Field mounted Medium – 1 to 5 hectares solar PV development on land outside the Executive Area as of high sensitivity. This is due to the extent of inter-visibility of adjacent valley sides, the relatively undeveloped nature of the area, and the perceived sense of remoteness, which indicate higher sensitivity.

An LVIA is included in the Environmental Statement (ES) submitted. This has been produced in accordance with relevant guidance. Assessment of impact on Landscape character of Broads Landscape Character Area (LCA) 4 *Aldeby to Burgh St Peter* (ES 4.9.1.2) concludes that the impact of the development would be *Minor adverse* falling to *Negligible* after 15 years. This conclusion is reached by giving the landscape a *moderate* value, a *low* sensitivity to the development and *small* magnitude of change.

ES 4.9.1.4 Assessment of Effects on The Broads National Park: Gives a *high value* to the landscape, a *moderate sensitivity* to change and a *small* magnitude of change, again concluding that the overall impact would be *Minor adverse* falling to *Negligible* after 15 years.

Assessment of Visual Effects includes a Sequential Viewpoint (no. 6) (ES 4.10.1.6) and Visual Effects on Views from Recreational Routes particularly Angles Way. Both reach the same conclusion of negligible impact. This seems to be based on an argument that views contain 'some farming infrastructure and elements of an industrial nature (i.e., engineered landform)' (ES 4.10.3). The Broads Authority would suggest that farms and farm buildings would not be perceived by receptors as uncharacteristic features, and that the partially restored landfill site would not be perceived as industrial or engineered. Overall, these judgements undervalue the landscape impacts in relation to the Broads Authority's LCA and Landscape Sensitivity Study.

In views from the south especially from Angles Way the surface of the landfill site appears to form the skyline. There is little tree or other vegetation as a backdrop to soften the skyline. With the proposed panels being 2.6 -3.0m high, the northern most elevated PV arrays could potentially break the skyline and being in such an elevated position would be more visible. The appearance of the panel arrays would be as large-scale hard-engineered structures of black colour with at times, glint and glare. Although it is accepted that views may be glimpsed, nevertheless the arrays are likely to be perceived by sensitive receptors such as users of Angles Way, as unexpected, uncharacteristic elements in a high-quality National Park landscape. The

LVIA asserts that *the limited height of the Development and the high degree of containment afforded by existing boundary vegetation ensure that effects are small in magnitude and restricted to the Site and its immediate setting*. Whilst it is accepted that the panels themselves are of limited height, this does not fully consider the elevated position of the site together with the relatively limited screening function of existing boundary vegetation, which would tend to increase adverse visual effects.

Existing hedgerow along St Marys Road (southern boundary of site) has some existing trees. However, its function as screening for the development would be rather limited. Apart from some additional tree planting around the south-west corner of the site, the Landscape strategy [ES Figure 4.9] only shows the existing hedgerow as retained and managed, with no additional planting indicated. Screening would be improved by additional tree planting along this boundary. ES 2.7.3 *Future Baseline* mentions a proposed hedge along the northern solar park boundary. This would be welcome, however, the Landscape Strategy does not seem to show this hedgerow.

In summary, the conclusions of the LVIA are considered to undervalue the adverse impacts which the development would have on the landscape character and setting of the Broads and although some mitigation is proposed, this is not clear, and as it stands is not considered likely to fully mitigate adverse effects on the Broads. The Broads Authority therefore object to the proposal.

Regards

Cheryl

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