Planning Inspectorate
Arolygiaeth Gynllunio

Hearing Transcript

Project:	EN0110013 - The Droves Solar Farm
Hearing:	Recording of Issue Specific Hearing 2 (ISH2) - Part 3
Date:	08 September 2026

Please note: This document is intended to assist Interested Parties.

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The video recording published on the Planning Inspectorate project page is the primary record of the hearing.

1
00:00:00,151 --> 00:00:05,880
Good afternoon. It's 1:45. This issue-specific hearing

2
00:00:06,061 --> 00:00:11,460
is resumed. So we'll start off with noise and vibration, which is issue

3
00:00:11,700 --> 00:00:12,720
item number four.

4
00:00:20,866 --> 00:00:24,645
With reference to the Borough Council of Kings Lynn and West Norfolk statement of

5
00:00:24,720 --> 00:00:30,360
common ground, reference REP3-024, item

6
00:00:30,540 --> 00:00:36,120
KLWN8-1, could the applicant provide an update on

7
00:00:36,151 --> 00:00:40,710
discussions with the council on its outstanding concerns with the modeling and

8
00:00:40,770 --> 00:00:43,485
magnitude of operational noise effects?

9
00:00:48,060 --> 00:00:53,940
Thank you, sir. It's Bilal Ahmed, Principal Acoustics Engineer in Hoare Lea, on

10
00:00:53,970 --> 00:00:55,170
behalf of the applicant.

11
00:00:56,520 --> 00:01:00,526
A response was provided to the statement of common grounds,

12
00:01:01,981 --> 00:01:07,904
and I would welcome any further comments or concerns that are still

13
00:01:07,950 --> 00:01:11,370

outstanding.

14
00:01:17,670 --> 00:01:21,330
Okay. So there's no update since the statement of common ground.

15
00:01:21,390 --> 00:01:22,680
Is that your position?

16
00:01:24,660 --> 00:01:27,930
Bilal Ahmed, on behalf of the applicant. Yes.

17
00:01:28,140 --> 00:01:32,520
The response in the statement of common grounds outlined our conservative

18
00:01:32,610 --> 00:01:38,551
assumptions, worst-case noise propagation predictions, the likely levels,

19
00:01:39,000 --> 00:01:44,970
and it stated that given these conservative assumptions, the applicant is confident

20
00:01:45,120 --> 00:01:49,230
that the operational noise effects from the scheme will be non-significant in near

21
00:01:49,470 --> 00:01:55,141
terms at all human receptors, including those in Kings Lynn and West Norfolk

22
00:01:55,230 --> 00:01:55,920
Council area.

23
00:01:58,860 --> 00:01:59,130
Thank you.

24
00:01:59,880 --> 00:02:02,580
Okay. Any comment from Julie Barrow?

25
00:02:02,970 --> 00:02:05,220
Julie Barrow, Borough Council of Kings Lynn and West Norfolk.

26
00:02:05,310 --> 00:02:09,510
I do have my senior community safety and neighborhood nuisance officer with me here

27
00:02:09,570 --> 00:02:11,580
today if there are any specific questions.

28
00:02:11,610 --> 00:02:16,230
But generally, we do agree that we are now in a place where we are happy with the

29
00:02:16,830 --> 00:02:21,421
operational noise assessment. We're confident that a worst-case scenario has been

30
00:02:21,510 --> 00:02:25,275
assessed, and we are currently reviewing the latest version of the statement of

31
00:02:25,290 --> 00:02:29,010
common ground, which hasn't been submitted into the examination.

32
00:02:29,550 --> 00:02:32,460
But we are likely to come back and confirm that those matters are agreed.

33
00:02:41,790 --> 00:02:45,690
Okay. And do you expect that you'll be in a position to do that by deadline four?

34
00:02:46,710 --> 00:02:50,070
Yes, sir. We are anticipating responding this week to the applicant so they have

35
00:02:50,130 --> 00:02:51,391
good time for next week.

36
00:02:53,700 --> 00:02:57,660
Okay. Thank you. Any further comments from the applicant? No.

37
00:02:59,070 --> 00:03:00,495

Okay. No further comments. Thanks.

38
00:03:00,510 --> 00:03:01,200
Okay. Thank you.

39
00:03:02,430 --> 00:03:06,105
The next question then. So with reference to Breckland District Council's statement

40
00:03:06,150 --> 00:03:11,550
of common ground, reference REP3-017, item

41
00:03:11,700 --> 00:03:16,980
BC5-6, could the applicant provide an update on discussions with the council on its

42
00:03:17,220 --> 00:03:21,090
outstanding concern with cumulative operational noise effects?

43
00:03:22,980 --> 00:03:25,531
Bilal Ahmed, on behalf of the applicant.

44
00:03:26,910 --> 00:03:32,744
In the written response for the second written questions, Q13.0.1,

45
00:03:33,541 --> 00:03:36,960
I believe Breckland District Council confirmed that they are satisfied with the

46
00:03:36,990 --> 00:03:42,180
update of paragraph 2.5.4 of the outline

47
00:03:42,270 --> 00:03:47,355
construction environment management plan, REP1-0.1,

48
00:03:47,970 --> 00:03:51,599
regarding cumulative noise levels at the off-farm receptor.

49
00:03:52,951 --> 00:03:58,830
This outlined the applicant's commitment to collaborate with the undertakers of the

50
00:03:58,860 --> 00:04:03,000
hydro solar farm to seek to achieve cumulative levels

51
00:04:04,380 --> 00:04:08,610
to not exceed 35 dBA at the off-farm receptor. Thanks.

52
00:04:11,281 --> 00:04:15,390
So I'm just trying to establish if there is a disagreement here or if there are

53
00:04:15,421 --> 00:04:18,270
just two documents that are saying different things.

54
00:04:18,330 --> 00:04:21,870
So from Breckland District Council, Simon Wood.

55
00:04:21,990 --> 00:04:26,190
Simon Wood, Breckland Council, and I'll ask my colleague Michael Doyle to respond.

56
00:04:29,460 --> 00:04:29,610
It's

57
00:04:31,290 --> 00:04:33,480
Michael Doyle on behalf of Breckland Council.

58
00:04:34,410 --> 00:04:35,820
Yes, I agree with the applicant there.

59
00:04:36,180 --> 00:04:40,531
The council's broadly content with the current position, with the concerns

60
00:04:40,620 --> 00:04:44,550
primarily resolved via the applicant's commitment to collaboration with High Road

61
00:04:44,640 --> 00:04:49,650
Solar and the 35 dBA commitment at the off-farm receptor.

62
00:04:50,040 --> 00:04:53,160

And I believe that's reflected in the latest version of the statement of common

63
00:04:53,175 --> 00:04:53,414
ground.

64
00:04:54,795 --> 00:04:57,765
Sir, if I might just clarify matters if that's right.

65
00:04:57,824 --> 00:05:01,065
I think what's happened here is that we've submitted a version of the statement of

66
00:05:01,080 --> 00:05:05,145
common ground into the examination at deadline three, as the position was in

67
00:05:05,160 --> 00:05:10,470
Breckland Council's deadline three submission, REP3090.

68
00:05:10,800 --> 00:05:12,120
They've confirmed that

69
00:05:13,680 --> 00:05:19,591
our updated paragraph 2.5.4 of the OCEM regarding that commitment is acceptable

70
00:05:19,650 --> 00:05:23,490
to them, and therefore, the statement of common ground needs to be updated at

71
00:05:23,520 --> 00:05:25,620
deadline four to reflect that agreed position.

72
00:05:25,710 --> 00:05:29,820
So I think it's just a sort of lag in the submissions, if you like, rather than any

73
00:05:29,970 --> 00:05:30,091
disagreement.

74
00:05:30,150 --> 00:05:33,031

Okay. Yep. I understand that. Thank you.

75
00:05:39,060 --> 00:05:43,980
Okay, I'll go to the room then. Are there any contributions from interested parties

76
00:05:44,010 --> 00:05:45,690
regarding noise and vibration?

77
00:05:50,010 --> 00:05:53,400
No, I'm not seeing any hands up. Anybody online?

78
00:05:58,770 --> 00:06:04,110
No, no hands online. Okay. So we'll just go through the actions then, as we've just

79
00:06:04,140 --> 00:06:09,690
discussed. So Borough Council of Kings Lynn and West Norfolk, if you can

80
00:06:09,720 --> 00:06:12,451
respond by deadline four.

81
00:06:13,951 --> 00:06:19,320
And similarly, if the applicant can update the statement of common ground with

82
00:06:19,380 --> 00:06:21,841
Breckland District Council. Thank you.

83
00:06:29,369 --> 00:06:34,800
Okay, I'll move on to the next item, which is main issue item five,

84
00:06:34,860 --> 00:06:36,360
transport and access.

85
00:06:39,870 --> 00:06:45,331
So with reference to Norfolk County Council's statement of common ground, REP3-019,

86
00:06:45,901 --> 00:06:51,436
item NTC6-3, could the applicant provide an update on the council's

87
00:06:51,540 --> 00:06:55,605
queries in relation to the requirements and purpose for each of the access

88
00:06:55,710 --> 00:07:00,901
junctions that are associated with the proposed development for both construction

89
00:07:00,960 --> 00:07:05,850
and operational access, as well as clarifications on the routing of traffic from

90
00:07:05,910 --> 00:07:07,110
each access point?

91
00:07:10,530 --> 00:07:13,050
Thank you, sir. Alex Dresden on behalf of the applicant.

92
00:07:13,410 --> 00:07:16,350
I'm hoping to pass over to our transport

93
00:07:17,730 --> 00:07:21,990
expert who's dialing in online, Claudio Ricci from Velocity.

94
00:07:22,081 --> 00:07:25,815
He is dialing in from his holiday, but he has said he will be here, so I'm hoping

95
00:07:25,860 --> 00:07:26,880
he will pop up.

96
00:07:28,800 --> 00:07:31,831
Yeah. Good afternoon, everyone. Claudio Ricci on behalf of the applicant.

97
00:07:33,841 --> 00:07:37,380
So as an introduction, my name is Claudio Ricci from Velocity Transport Planning.

98
00:07:37,470 --> 00:07:40,020
I'm a transport consultant working on behalf of the applicant.

99
00:07:41,010 --> 00:07:46,725
So just in response to the question as it was raised, the applicant's

100
00:07:46,740 --> 00:07:50,250
formal deadline three position from the statement of common ground with Norfolk

101
00:07:50,311 --> 00:07:54,360
County Council is that the vehicle routing strategy set out within the outline

102
00:07:54,390 --> 00:07:58,020
construction traffic management plan is agreed.

103
00:07:58,081 --> 00:08:03,210
However, the cumulative traffic and access clarifications remain under discussion.

104
00:08:03,240 --> 00:08:06,660
The applicant's of the view that these points have now been addressed by way of the

105
00:08:06,690 --> 00:08:10,620
clarifications and updates made at deadline three through the applicant's response

106
00:08:10,680 --> 00:08:14,730
to written representation to deadline two submissions, as well as the updated

107
00:08:14,790 --> 00:08:19,079
outline construction traffic management plan and can now be recorded as agreed.

108
00:08:19,140 --> 00:08:22,680
So we would welcome Norfolk County Council's confirmation that all matters are in

109
00:08:22,710 --> 00:08:26,430
agreement and is happy to provide further clarifications if that's helpful.

110
00:08:27,630 --> 00:08:32,610
In also response to the point about the access clarifications as that question came

111
00:08:32,640 --> 00:08:38,311
through, table 2.1 of the outline construction traffic management

112
00:08:38,341 --> 00:08:42,645
plan was updated at deadline three to be explicit on each of the access points,

113
00:08:42,720 --> 00:08:46,980
what they're used for, and also their purpose during construction and operation.

114
00:08:49,890 --> 00:08:51,840
Okay. Thank you, Claudio Ricci.

115
00:08:53,220 --> 00:08:55,290
Norfolk County Council, Andrew Szurkowski.

116
00:08:56,040 --> 00:08:58,350
Thank you, sir. Andrew Szurkowski from Norfolk County Council.

117
00:08:58,500 --> 00:09:03,931
Sir, I will introduce my colleague, John Curtis, who is here on behalf of Local

118
00:09:03,960 --> 00:09:04,829
Highway Authority.

119
00:09:05,970 --> 00:09:07,620
Yeah. John Curtis, Norfolk County Council.

120
00:09:07,860 --> 00:09:10,980
I'll be working with the applicant regarding highways matters.

121
00:09:11,580 --> 00:09:15,420
Generally, we're pretty okay with the transport and access strategy.

122

00:09:17,070 --> 00:09:22,320
We have a couple of queries I'd just like to raise regarding High Grove and the

123
00:09:22,350 --> 00:09:26,431
accumulative traffic. We're aware that obviously that's still going to be ongoing

124
00:09:27,000 --> 00:09:30,960
subject to High Grove coming forward with the application.

125
00:09:31,230 --> 00:09:36,931
We as a council will be looking at the network to make sure that there's no massive

126
00:09:36,960 --> 00:09:39,240
accumulation for the local impact.

127
00:09:41,311 --> 00:09:44,220
Regarding hedge removal, which was brought up earlier,

128
00:09:46,020 --> 00:09:50,130
for temporary accesses at Horwich, we'd look to reduce the

129
00:09:51,780 --> 00:09:56,625
hedgerow removal to ensure safe. But because it's only going to be temporary, we'll

130
00:09:56,640 --> 00:09:57,990
try to put it back easier.

131
00:09:59,640 --> 00:10:04,740
Regarding the MOD mitigation, if we can just be informed of what that would be for

132
00:10:04,770 --> 00:10:09,660
traffic numbers, if at all, on top of what's already been submitted.

133
00:10:10,830 --> 00:10:11,130
Thank you.

134
00:10:13,350 --> 00:10:15,660

Thank you. Alex Tressiden.

135
00:10:16,590 --> 00:10:18,840
Thank you, sir. Alex Tressiden on behalf of the applicant.

136
00:10:19,050 --> 00:10:22,740
I'll pass over to Claudio again if he's got anything to say on those matters that

137
00:10:22,770 --> 00:10:24,480
have just actually been raised.

138
00:10:25,830 --> 00:10:28,320
Claudio Ricci on behalf of the applicant.

139
00:10:28,950 --> 00:10:34,276
So in terms of the first question on High Grove, Section 5.15 of the Outline

140
00:10:35,280 --> 00:10:39,090
Construction Traffic Management Plan commits to coordination with High Grove as

141
00:10:39,120 --> 00:10:42,480
well as any other cumulative schemes that come forward.

142
00:10:42,509 --> 00:10:46,830
And if there is overlap in the construction, then there would be a joint CTMP that

143
00:10:46,860 --> 00:10:52,260
would be prepared, and that would set out joint mitigation, joint working to

144
00:10:52,410 --> 00:10:56,280
minimize construction impacts. And I think that originally came from John's

145
00:10:56,311 --> 00:10:56,820
request.

146
00:10:58,500 --> 00:11:00,151

And then I think

147
00:11:02,220 --> 00:11:04,200
Alex, I need to defer back to you on the other two points.

148
00:11:04,290 --> 00:11:08,010
But we can take away the MOD point about the traffic numbers and come back in

149
00:11:08,040 --> 00:11:08,460
writing.

150
00:11:13,350 --> 00:11:16,410
Thank you. Alex Tressiden, have you got any other comments from the-

151
00:11:17,280 --> 00:11:21,570
No, sir. I think nothing further. I think the point about the MOD is one that's

152
00:11:21,600 --> 00:11:23,640
been discussed at length already.

153
00:11:24,090 --> 00:11:29,880
And we'll come back in writing on the potential transport impacts of the

154
00:11:29,940 --> 00:11:31,619
mitigation required there.

155
00:11:33,000 --> 00:11:34,590
I think that's the best solution for today.

156
00:11:35,340 --> 00:11:36,030
Okay. Thank you.

157
00:11:37,561 --> 00:11:41,835
And John Curtis, is there any other information that you require, or have you got

158
00:11:41,910 --> 00:11:42,990
all the information that you need?

159
00:11:43,830 --> 00:11:46,710
John Curtis, Norfolk County Council. No, I'm okay at this moment. Thank you.

160
00:11:46,800 --> 00:11:50,880
Okay. I just saw a hand go up. Two hands. Mike Bennett first, please.

161
00:11:54,420 --> 00:11:59,401
Thank you, sir. Mike Bennett, Slaughden with Bolgh Lane Parish Council.

162
00:12:01,200 --> 00:12:06,990
I'm probably going to put a completely different view

163
00:12:07,050 --> 00:12:12,990
on what appears to be general agreement over the

164
00:12:13,110 --> 00:12:16,170
issue with transport and access.

165
00:12:19,170 --> 00:12:25,020
I want to say this, that we welcome the CTMP's

166
00:12:25,080 --> 00:12:30,600
reference in Section 8 to a traffic management working group, which will be set up

167
00:12:30,720 --> 00:12:33,269
by the contractor engaged to construct the scheme.

168
00:12:34,530 --> 00:12:39,720
However, we are not at all sure how this might work if, as we suspect, figures on

169
00:12:39,750 --> 00:12:44,700
which the traffic survey is based underestimate significantly the numbers of

170
00:12:44,730 --> 00:12:48,496
construction traffic and deliveries, particularly with the likelihood of

171
00:12:48,540 --> 00:12:53,520
construction overlap between High Grove and the Droves and other schemes mentioned

172
00:12:53,580 --> 00:12:55,950
in our submission at Deadline Two.

173
00:12:56,955 --> 00:13:01,830
And since then, we've re-looked at the traffic figures we estimated in that

174
00:13:01,890 --> 00:13:06,990
submission. What appears to be the case is great differences in traffic numbers

175
00:13:08,670 --> 00:13:12,960
suggested by the applicant when compared with statements from neighboring projects

176
00:13:13,260 --> 00:13:14,580
who've been approached about this.

177
00:13:14,670 --> 00:13:20,340
For example, RWE High Grove is stating for transport across their 4,000-acre

178
00:13:20,551 --> 00:13:23,340
proposal, they will use 29 trucks per day.

179
00:13:23,880 --> 00:13:29,431
That is 58 journeys to and from build site across the area, 10 hours per day, six

180
00:13:29,490 --> 00:13:35,431
days per week for two years. That is 18,096 journeys

181
00:13:35,551 --> 00:13:39,121
per year across the five roads across the area which will come into play.

182
00:13:40,260 --> 00:13:46,080

Regen8, the Shipton Airfield project, is stating for their 260-acre solar and

183
00:13:46,110 --> 00:13:51,030
battery park, they will use 11 trucks a day, six days a week for 18 months.

184
00:13:51,780 --> 00:13:57,480
That is 6,864 truck journeys per year on the roads leading to the airfield.

185
00:13:58,350 --> 00:14:04,140
During the Euston Estate solar park build of a 500-acre solar development by IGP

186
00:14:04,170 --> 00:14:09,165
four years ago, 850 workers were used to build it, mostly from Germany.

187
00:14:09,750 --> 00:14:14,010
We assume the same build process will be used on the Droves, as the design of

188
00:14:14,040 --> 00:14:16,740
materials specified are more or less the same.

189
00:14:18,360 --> 00:14:23,685
RWE have stated they will use 350 workers, 200 foreign and

190
00:14:23,730 --> 00:14:29,490
150 local to build their project. Regen8 have stated 250 workers

191
00:14:30,240 --> 00:14:35,820
would build theirs. Between those projects, that is between 300 to 500 cars per day

192
00:14:35,835 --> 00:14:40,651
across the area for the workers, another 600 to 1,000 journeys per day.

193
00:14:43,230 --> 00:14:48,570
187,200 journeys per year just for the 600 cars.

194
00:14:49,830 --> 00:14:54,750
Now we move to larger loads. During the summer of 2026, the

195
00:14:54,810 --> 00:15:00,720
A47's been closed nine times for the oversized loads of transformers and

196
00:15:00,780 --> 00:15:06,720
materials involved with the RWE offshore infrastructure connection works in Necton,

197
00:15:07,500 --> 00:15:12,000
and the large new transformers moves going to the new Sizewell site.

198
00:15:12,780 --> 00:15:17,760
Based on this model, the cumulative impact of A47 closures across the large solar

199
00:15:17,820 --> 00:15:23,445
projects in the area would mean 44 road closures over the two-year build

200
00:15:23,551 --> 00:15:26,804
process for the Droves, High Grove, and Shipton together.

201
00:15:27,960 --> 00:15:33,599
Based on the truck numbers from RWE High Grove and the Droves, we estimate over 100

202
00:15:33,630 --> 00:15:36,599
delivery trucks per day down the A1065.

203
00:15:37,184 --> 00:15:40,560
The estimated turnaround time is 12 minutes per journey.

204
00:15:41,130 --> 00:15:46,110
12 minutes to find the site, unload, reload, exit site, and get back onto the

205
00:15:46,200 --> 00:15:52,140
A1065. Six times per hour, 10 hours per day, 52

206
00:15:52,155 --> 00:15:54,630
weeks of the year for two to three years.

207
00:15:54,661 --> 00:15:58,770
But this number does not allow for the road closures on the A47.

208
00:16:00,030 --> 00:16:04,815
We would request the applicant re-look at their transport numbers and seek further

209
00:16:04,830 --> 00:16:09,240
mitigation of its effects within its outline traffic management plans.

210
00:16:12,540 --> 00:16:18,090
They also need to take into account local season farm traffic and increased tourism

211
00:16:18,210 --> 00:16:24,030
traffic that has not been taken sufficiently into account, and IGP

212
00:16:24,301 --> 00:16:27,931
have chosen to use the lowest figures in their transport study.

213
00:16:29,040 --> 00:16:34,530
Swaffham Town already suffers from serious congestion during the peak tourist

214
00:16:34,590 --> 00:16:40,230
season, with traffic heading north on the A1065 towards the north Norfolk

215
00:16:40,320 --> 00:16:46,080
coast. Local infrastructure projects are currently running a seven-day-a-week

216
00:16:46,170 --> 00:16:50,760
transport schedule to deal with the limited local road network, and I think we did

217
00:16:50,820 --> 00:16:51,931
discuss this with

218
00:16:55,590 --> 00:16:59,431
the Droves and High Grove at our joint meeting in July.

219
00:17:00,301 --> 00:17:05,070
Local transport hauliers and national distribution businesses are actively moving

220
00:17:05,100 --> 00:17:09,750
and dropping off goods early morning and late evening, as the traffic number on key

221
00:17:09,840 --> 00:17:14,730
roads can drop up to 70% after 7:00 PM and before 6:00 AM.

222
00:17:17,130 --> 00:17:22,890
We believe the applicant has a legal responsibility to the local community to

223
00:17:22,905 --> 00:17:28,051
allow them freedom of movement during the build and during its ongoing operation.

224
00:17:28,080 --> 00:17:33,615
And we really seriously think that the applicant and

225
00:17:34,140 --> 00:17:39,361
the statutory consultees, in this case, National Highways

226
00:17:39,840 --> 00:17:42,900
and Norfolk County Council ought to rethink

227
00:17:44,160 --> 00:17:48,480
these traffic plans, because we don't see how these are going to work as they

228
00:17:48,540 --> 00:17:50,130
currently stand. Thank you.

229
00:17:51,780 --> 00:17:52,635
Thank you, Mr. Bennett

230
00:17:55,716 --> 00:17:56,526
Alex Tresserdin

231
00:17:58,447 --> 00:18:01,266
Thank you, sir. Alex Tresserdin on behalf of the applicant.

232
00:18:01,386 --> 00:18:06,711
I will give Claudio online a chance to respond to some of the points raised

233
00:18:07,656 --> 00:18:11,841
in a moment, and I suspect we may need to consider some of the points in writing,

234
00:18:12,096 --> 00:18:12,666
given that they've

235
00:18:13,956 --> 00:18:17,826
just been raised today. I think I would note a couple of points, though.

236
00:18:17,976 --> 00:18:23,226
The first being that each scheme is inherently different, and therefore, the

237
00:18:23,256 --> 00:18:28,551
numbers for traffic and transport associated with one scheme don't necessarily

238
00:18:28,566 --> 00:18:34,447
correspond with another scheme. I also note that the information received from

239
00:18:34,506 --> 00:18:40,056
Highgrove thus far is based on indicative figures associated

240
00:18:40,176 --> 00:18:45,816
with preliminary environmental information from their scheme, because that scheme

241
00:18:45,906 --> 00:18:50,346
hasn't yet been formally submitted as a DCO application.

242
00:18:51,546 --> 00:18:56,316
And thirdly, I'd note, as we touched on at the start of this agenda item, that

243
00:18:57,246 --> 00:19:01,956
we're very close, by the sounds of it, to agreeing all matters with the host

244
00:19:02,016 --> 00:19:06,606
authorities. And I note also that National Highways, in respect of transport

245
00:19:06,666 --> 00:19:10,506
matters, we've reached agreement with them on all matters.

246
00:19:10,550 --> 00:19:15,187
So the point is noted, and as I say, I will give Claudio a chance if he wants to

247
00:19:15,216 --> 00:19:18,486
come back on any of the points immediately, and we will consider the rest in

248
00:19:18,516 --> 00:19:24,066
writing. But agreement has been reached with various principal parties on the

249
00:19:24,126 --> 00:19:29,676
transport figures and the applicant, therefore, and as you can imagine, remains

250
00:19:29,766 --> 00:19:33,231
extremely confident in the robustness of its assessment in the environmental

251
00:19:33,276 --> 00:19:37,011
statement and the mitigation measures in the management plans.

252
00:19:39,966 --> 00:19:40,416
Thank you.

253

00:19:42,966 --> 00:19:45,996
Did your colleague Claudio Ritchie want to come in?

254
00:19:47,586 --> 00:19:51,891
Claudio Ritchie on behalf of the applicant. So yeah, there was a few points there.

255
00:19:51,996 --> 00:19:54,651
We'll come back in writing on anything we don't touch on today.

256
00:19:54,726 --> 00:19:59,976
But in terms of the data that's been used, so we undertook two lots of surveys.

257
00:20:00,036 --> 00:20:05,871
So we undertook an October 2024 baseline survey that follows best practice and

258
00:20:05,916 --> 00:20:09,396
was agreed with Norfolk. It's how you would usually do it.

259
00:20:09,486 --> 00:20:14,076
But from a lot of feedback we received during consultation from stakeholders and

260
00:20:14,136 --> 00:20:19,312
from Norfolk County Council, we also did a summer survey to pick up the harvest and

261
00:20:19,356 --> 00:20:20,736
people traveling to the coastline.

262
00:20:21,276 --> 00:20:26,016
So in terms of what actually followed through into the ES Chapter 9 assessment, we

263
00:20:26,076 --> 00:20:31,236
agreed to use the October 2024 baseline because the baseline traffic data was

264
00:20:31,296 --> 00:20:36,996
lower, so our overall traffic uplift would be more apparent on a lower baseline.

265
00:20:37,791 --> 00:20:43,191
But we did sensitivity tests in the ES, and the conclusions didn't change either

266
00:20:43,236 --> 00:20:47,976
way, but it presented our impact in the worst light using the lower data.

267
00:20:49,656 --> 00:20:55,326
And also touching on that point on overall cumulative uplift, a lot of the

268
00:20:55,386 --> 00:20:57,786
figures that were provided were daily flows.

269
00:20:58,266 --> 00:21:04,116
So within responses SPDC21 to SPPC23 in the

270
00:21:04,146 --> 00:21:07,835
applicant's response to written representations and deadline two submissions.

271
00:21:08,765 --> 00:21:14,197
The uplift that was referred to on the 1065 was around 14% to 16%, depending on

272
00:21:14,226 --> 00:21:20,166
which baseline data was used, which still falls within a negligible impact if

273
00:21:20,226 --> 00:21:25,506
you follow the Institute of Environmental Management and Assessment best practice

274
00:21:25,596 --> 00:21:31,161
guidance. And it would need to be in the region of 60% for a significant effect to

275
00:21:31,206 --> 00:21:34,536
occur, and the cumulative impact is significantly below that.

276

00:21:34,566 --> 00:21:39,336
And that was also echoed by National Highways and Norfolk County Council that they

277
00:21:39,396 --> 00:21:42,846
didn't think the cumulative impact was going to be significant.

278
00:21:43,836 --> 00:21:47,631
And I think there was another point as well which touched on the impact of closures

279
00:21:47,676 --> 00:21:53,391
on the A47. As my colleague Alex said, not all deliveries and closures and

280
00:21:53,437 --> 00:21:57,846
projects are the same. But in our instance, most of the abnormal load deliveries

281
00:21:57,906 --> 00:22:02,406
usually are temporary, and the closures take place out of hours, so disruption is

282
00:22:02,466 --> 00:22:07,146
minimized. And there's a formal process that has to be done with National Highways

283
00:22:07,447 --> 00:22:13,326
to get that abnormal load delivery signed off that is secured through the OCTMP.

284
00:22:13,776 --> 00:22:17,646
So yes, usually that is out of hours and disruption is minimized.

285
00:22:20,466 --> 00:22:23,796
And then I think if there's any of those other points that we've missed, we're

286
00:22:23,856 --> 00:22:25,086
happy to come back in writing.

287
00:22:27,846 --> 00:22:30,006
Okay. Thank you, Claudio Ritchie.

288
00:22:32,646 --> 00:22:36,066
Okay, I'm just going to go to Norfolk County Council and then National Highways to

289
00:22:36,187 --> 00:22:37,536
see if there are any further comments.

290
00:22:37,626 --> 00:22:41,556
I can see there's another hand raised, but I'll come to you later. Thank you.

291
00:22:41,646 --> 00:22:43,116
Yeah, John Coutts, Norfolk County Council.

292
00:22:43,266 --> 00:22:48,276
No, we're quite happy with what the applicant's provided at the moment.

293
00:22:48,697 --> 00:22:50,826
National Highways, Jeremy Bloom online.

294
00:22:54,756 --> 00:22:57,697
Jeremy Bloom on behalf of National Highways.

295
00:22:58,326 --> 00:23:02,136
Yes, we've had quite a few discussions with Mr. Ritchie.

296
00:23:03,876 --> 00:23:09,756
Our view is that the assessment is robust, and we note as well in the CTMP

297
00:23:09,876 --> 00:23:13,626
that the number of construction vehicles is capped.

298
00:23:14,046 --> 00:23:19,506
So as Mr. Tresserdin has said, we've agreed all

299
00:23:19,596 --> 00:23:25,356
transport matters. We're satisfied that from an SRN, strategic road network

300
00:23:25,370 --> 00:23:29,256
perspective, that there isn't a significant impact.

301
00:23:30,126 --> 00:23:33,906
In terms of the abnormal loads, as Mr.

302
00:23:33,966 --> 00:23:39,216
Ritchie said, there is a process called ESDAL that has to be followed,

303
00:23:39,426 --> 00:23:44,706
and it is normal or it is usual that abnormal loads

304
00:23:45,187 --> 00:23:49,266
movements will take place overnight when there's least disruption.

305
00:23:50,886 --> 00:23:52,131
If there are going to be closures,

306
00:23:53,796 --> 00:23:58,447
that's one of the functions of the SRN is to be able to accommodate those sorts of

307
00:23:58,476 --> 00:24:00,726
vehicles. So we do strive to

308
00:24:02,046 --> 00:24:07,671
manage that effectively. And then in terms of cumulative impacts, National

309
00:24:07,716 --> 00:24:11,646
Highways has not yet had any engagement on the Highgrove project.

310
00:24:12,697 --> 00:24:18,426
When we do so, when we see the application documents in due course, we'll obviously

311
00:24:19,506 --> 00:24:24,966
review those very closely and look at their impact and also

312
00:24:25,026 --> 00:24:29,706

consider the cumulative impact of that project in combination with this one.

313
00:24:29,766 --> 00:24:35,646
But from the information that we've seen for the droves, we're satisfied that there

314
00:24:35,676 --> 00:24:39,546
isn't a substantial significant impact on the SRN.

315
00:24:42,187 --> 00:24:47,616
Thank you. Can I just ask the applicant, so Jeremy Bloom mentioned that there was a

316
00:24:47,676 --> 00:24:51,576
cap in the construction traffic management plan.

317
00:24:51,756 --> 00:24:55,687
Could you just explain to us what would happen in that situation, please?

318
00:24:57,456 --> 00:24:59,256
Thank you. Alex Tresserdin on behalf of the applicant.

319
00:24:59,346 --> 00:25:03,276
I imagine Claudio is better placed to answer that than me, but I will just look for

320
00:25:03,306 --> 00:25:05,646
the reference for the commitment while he explains it.

321
00:25:05,676 --> 00:25:06,006
Thank you.

322
00:25:08,256 --> 00:25:10,116
Claudio Ritchie on behalf of the applicant.

323
00:25:10,266 --> 00:25:15,126
So there's a daily cap on construction vehicles and overall vehicles that are

324
00:25:15,156 --> 00:25:19,971

secured through the OCTMP. So when the contractor comes to implement this

325
00:25:19,986 --> 00:25:23,197
permission, they will have a cap that they need to forward in.

326
00:25:23,286 --> 00:25:27,546
So all daily vehicle activity on the site has to forward in this cap, and that's a

327
00:25:27,816 --> 00:25:31,101
legal requirement that they have to comply with as part of the DCO, so it's a

328
00:25:31,146 --> 00:25:36,187
criminal offense to breach that. And then there's also monitoring secured through

329
00:25:36,216 --> 00:25:42,006
the OCTMP to ensure that they are reporting it and keeping track of the

330
00:25:42,036 --> 00:25:46,177
daily vehicle counts each day. And then Norfolk County Council and National

331
00:25:46,236 --> 00:25:51,216
Highways can request the information at any time to ensure that it is being

332
00:25:51,246 --> 00:25:56,046
followed. But it is a legal requirement and criminal offense to breach the cap.

333
00:25:56,886 --> 00:26:01,851
And so that's found in Section 3.1 of the Outline Construction Traffic Management

334
00:26:01,927 --> 00:26:04,356
Plan, which is Ref 3-075.

335
00:26:06,966 --> 00:26:07,386
Thank you.

336
00:26:17,586 --> 00:26:19,716
And Dr. Harms, you had your hand up earlier.

337
00:26:19,896 --> 00:26:23,437
Thank you very much. Mark Holmes, local resident.

338
00:26:24,966 --> 00:26:28,851
Whether we're looking at applicant's figures or we're looking at Mike Bennett's

339
00:26:28,896 --> 00:26:34,836
figures, we are looking at a significant increase in an area of road

340
00:26:34,896 --> 00:26:39,396
that is probably infamous throughout East Anglia as one of the most dangerous

341
00:26:39,427 --> 00:26:44,226
stretches of road. The Castle Laker stretch of the A1065 is known to be an

342
00:26:44,286 --> 00:26:48,666
incredibly hazardous stretch of road. I've lived here for 30 years, so I know.

343
00:26:49,086 --> 00:26:51,996
My fellow friends here would agree with this.

344
00:26:52,896 --> 00:26:55,026
Only a month ago, we had four crashes

345
00:26:55,488 --> 00:26:59,178
fatality at the Newton by Castle Acre junction.

346
00:26:59,389 --> 00:27:04,639
Somebody died and four cars crashed. The road was closed for most of the day.

347
00:27:05,149 --> 00:27:10,008
And obviously, if there's a crash, there's always closures, particularly if it's a

348
00:27:10,038 --> 00:27:13,279
fatality. The road could be closed all day.

349
00:27:13,339 --> 00:27:17,253
So anything that adds to the traffic load for that stretch, particularly for the

350
00:27:17,298 --> 00:27:22,368
summer months, which for tourists in East Anglia is Easter to September.

351
00:27:22,458 --> 00:27:27,889
October becomes irrelevant. And the clash of multiple different

352
00:27:27,919 --> 00:27:32,927
harvests, depending on what crops we're talking about, with slow-moving tractors.

353
00:27:34,279 --> 00:27:38,419
So I can't believe that we're not talking more seriously about the dangerous impact

354
00:27:39,438 --> 00:27:44,598
on this stretch of road. So I would very much appreciate maybe Jeremy Bloom from

355
00:27:44,628 --> 00:27:46,128
the highways could comment on this.

356
00:27:46,279 --> 00:27:51,318
I'd be very grateful to hear some more information. Thank you.

357
00:27:56,779 --> 00:27:58,548
Jeremy Bloom from National Highways.

358
00:27:58,698 --> 00:28:04,202
And the A1065 is actually a local road managed by Norfolk County Council, so I'm

359
00:28:04,248 --> 00:28:08,779
not able to comment on the operational performance of that road.

360
00:28:09,468 --> 00:28:15,258
But in terms of the SRN, the A47, we're not aware of any specific

361
00:28:15,348 --> 00:28:17,448
concerns in that locality.

362
00:28:18,438 --> 00:28:18,828
Thank you.

363
00:28:19,669 --> 00:28:21,889
Can we get a comment from Norfolk County Council then, please?

364
00:28:21,978 --> 00:28:26,899
Yeah. If you can direct the questions to me, please, and then I'll decide who.

365
00:28:29,358 --> 00:28:30,303
Thank you. John Curtis. Thank you.

366
00:28:30,303 --> 00:28:31,248
John Curtis, Norfolk County Council.

367
00:28:32,238 --> 00:28:37,728
A long fact, I'm not too sure on the specific accident records, but as part of the

368
00:28:37,788 --> 00:28:43,654
construction management, there will be a 40-mile-an-hour TTRO, Temporary Traffic

369
00:28:43,698 --> 00:28:46,758
Regulation Order, on this stretch of road for the accesses.

370
00:28:48,798 --> 00:28:51,797
With regarding the wider thing, that's something that Norfolk County Council will

371
00:28:51,828 --> 00:28:57,468
need to look at if there is such an accident hotspot, as per comments.

372
00:28:58,098 --> 00:28:58,399
Thank you.

373
00:28:58,518 --> 00:29:02,658
Thank you. So the TTRO, how long would that be in force then for?

374
00:29:02,779 --> 00:29:04,399
For the construction period, so-

375
00:29:04,578 --> 00:29:04,848
Okay

376
00:29:04,863 --> 00:29:05,958
... 24 months at the moment.

377
00:29:06,048 --> 00:29:10,308
And what is the current speed limit? What would it be reduced to?

378
00:29:10,458 --> 00:29:11,779
60 to 40.

379
00:29:12,018 --> 00:29:12,408
Okay.

380
00:29:19,128 --> 00:29:23,868
And the extent of that along the A1065 is from where to where?

381
00:29:28,788 --> 00:29:34,158
It would be south of the southern access for the visibility from that.

382
00:29:34,458 --> 00:29:40,098
So what the 40 mile that would be, and then north as well, past the South Acre

383
00:29:41,178 --> 00:29:41,658
junction.

384
00:29:42,558 --> 00:29:44,718
Thank you. Any comments from the applicant?

385
00:29:46,518 --> 00:29:49,878
Thank you, Sir Alex Tresidder on behalf of the applicant. I'm conscious Mr.

386
00:29:50,089 --> 00:29:52,938
Hubbard's got his hand up as well, so I'll give him a chance to speak in a moment.

387
00:29:52,983 --> 00:29:56,508
And I think I'd just reiterate what I've said before about the confidence the

388
00:29:56,568 --> 00:30:00,078
applicant has in the robustness of this assessment, and crucially, that agreement

389
00:30:00,139 --> 00:30:04,698
with the local authorities and National Highways in this regard is important to

390
00:30:04,758 --> 00:30:05,029
note.

391
00:30:06,978 --> 00:30:10,308
Thank you. Would it be useful just to comment on the road safety audit as well,

392
00:30:11,389 --> 00:30:13,308
that's been undertaken?

393
00:30:14,058 --> 00:30:17,448
I'd be looking to Claudio in the line to comment on that, sir.

394
00:30:19,639 --> 00:30:21,798
Claudio Ricci on behalf of the applicant.

395
00:30:22,038 --> 00:30:26,748
So in the application documentation, there was two forms of safety assessment done.

396
00:30:27,108 --> 00:30:31,968
So the first one is in ES Appendix 9.2 with the traffic assessment.

397
00:30:32,389 --> 00:30:36,768
So that's a review of personal injury collision data over the last three years.

398
00:30:36,828 --> 00:30:40,383
So that effectively reviews all of the collisions that have taken place, whether

399
00:30:40,758 --> 00:30:44,942
slight, severe, or fatal, along the A1065.

400
00:30:45,348 --> 00:30:50,328
And from our review, there didn't appear to be any collision hotspots or clusters

401
00:30:50,358 --> 00:30:54,649
that are occurring above what would typically just take place from a road of this

402
00:30:54,678 --> 00:30:59,102
nature. And then the second component of safety is that we've undertaken a stage

403
00:30:59,178 --> 00:31:01,098
one road safety audit of the highway works.

404
00:31:01,578 --> 00:31:05,779
So this is the access junctions across the site and all relevant highway parts.

405
00:31:06,198 --> 00:31:10,399
And that's undertaken by an independent third party who's a qualified safety audit

406
00:31:10,458 --> 00:31:16,083
expert. And they've confirmed that there's no safety concerns or risks that they've

407
00:31:16,128 --> 00:31:21,498
identified. And then that safety audit progresses through the scheme as the design

408
00:31:21,529 --> 00:31:27,468
develops. So usually it's upgraded into a stage two onwards to all the way

409
00:31:27,498 --> 00:31:29,389
to stage four as it goes up to construction.

410
00:31:29,478 --> 00:31:33,649
So safety is paramount in all of the highway works, and it's reviewed throughout

411
00:31:33,678 --> 00:31:35,147
the construction process.

412
00:31:37,098 --> 00:31:40,008
Thank you, Claudio Ricci. Mr. Hubbard.

413
00:31:41,868 --> 00:31:44,567
Thank you, sir. Tim Hubbard, Castle Acre Parish Council.

414
00:31:45,768 --> 00:31:49,294
I fully appreciate there will be traffic management plans, and I hope you will

415
00:31:49,308 --> 00:31:54,738
appreciate that there are now so many documents on the portal that I certainly will

416
00:31:54,753 --> 00:32:00,708
never read all those documents. In terms of traffic safety, can we have

417
00:32:00,738 --> 00:32:06,048
some assurances that you have fully assessed the access and

418
00:32:06,139 --> 00:32:11,868
exiting from both, well, particularly from the Drove site, but the High Drove

419
00:32:11,988 --> 00:32:17,448
site could be added, because anything exiting the Drove

420
00:32:17,598 --> 00:32:22,008
site will be crossing the highway to travel south.

421
00:32:23,029 --> 00:32:25,938
So no traffic will be traveling north.

422
00:32:26,089 --> 00:32:31,878
So all traffic coming out of the site will be turning right and

423
00:32:32,328 --> 00:32:38,223
crossing the highway. And when obviously entering the site will be turning

424
00:32:38,223 --> 00:32:40,639
immediately left off the highway.

425
00:32:41,118 --> 00:32:46,248
So are sufficient provisions made for all the traffic

426
00:32:46,669 --> 00:32:50,448
actually exiting the site, which will be crossing the highway?

427
00:32:50,958 --> 00:32:55,848
I'm particularly concerned with the most northern accesses, which are close to

428
00:32:55,878 --> 00:33:01,639
Castle Muse Hills, where there is a stretch of road, and it's probably

429
00:33:01,938 --> 00:33:05,298
200, 250 meters before a bend in the road.

430
00:33:05,958 --> 00:33:11,568
And we need to ensure that safety concerns have been fully addressed for that

431
00:33:11,658 --> 00:33:17,478
area, in particular, when vehicles are actually exiting the site.

432
00:33:18,708 --> 00:33:22,728

Thank you. Alex Tresidder or Claudio Ricci.

433
00:33:23,057 --> 00:33:24,889
Thank you, sir. Alex Tresidder on behalf of the applicant.

434
00:33:25,279 --> 00:33:29,283
Rather than speak to his assessment for him, I'm going to pass over to Claudio on

435
00:33:29,328 --> 00:33:29,628
that one.

436
00:33:31,279 --> 00:33:33,317
Claudio Ricci on behalf of the applicant.

437
00:33:33,738 --> 00:33:38,433
So in terms of the access junction, so we've reviewed visibility splays from the

438
00:33:38,433 --> 00:33:43,368
access junction. So all of the access points have sufficient visibility splays to

439
00:33:43,428 --> 00:33:47,808
comply with the speed of the road and the industry standard guidance, which is the

440
00:33:47,868 --> 00:33:53,029
design manual for roads and bridges. So the access visibility is good.

441
00:33:53,089 --> 00:33:58,188
It's above what it needs to be. We've also reviewed a swept path analysis in ES

442
00:33:58,788 --> 00:34:01,024
Appendix 9.2, the traffic assessment.

443
00:34:01,368 --> 00:34:05,643
So there's a swept path analysis in there showing how the vehicles can access and

444

00:34:05,718 --> 00:34:10,218
egress from the site. And particularly in the design of the access itself, we've

445
00:34:10,279 --> 00:34:16,098
made sure that the radius of the curb and the width allows that you can have

446
00:34:16,248 --> 00:34:21,078
two vehicles to pass, and also that when those vehicles are turning in, they can

447
00:34:21,138 --> 00:34:25,158
avoid encroaching onto the opposing lane as much as possible.

448
00:34:25,188 --> 00:34:29,748
And then through measures such as is set out in the construction traffic management

449
00:34:29,779 --> 00:34:34,788
plan, there will be things like banksmen to assist with access and egress from the

450
00:34:34,848 --> 00:34:40,158
site access points. And also both access points were included in the safety audit,

451
00:34:40,218 --> 00:34:43,188
so that has been reviewed and approved by the auditor.

452
00:34:46,339 --> 00:34:51,048
Thank you. And would it be useful just to elaborate on the temporary traffic

453
00:34:51,108 --> 00:34:55,848
regulation order that Norfolk County Council talked about on the

454
00:34:55,908 --> 00:34:57,318
A1065?

455
00:34:59,688 --> 00:35:01,548
Claudio Ricci on behalf of the applicant.

456
00:35:01,848 --> 00:35:06,123
So as part of the temporary measures that we would seek to implement, there's a

457
00:35:06,123 --> 00:35:10,578
40-mile-an-hour temporary restriction on the A1065.

458
00:35:11,298 --> 00:35:16,548
It covers the extent of the order limits, effectively the frontage of the order

459
00:35:16,608 --> 00:35:22,338
limits along the 1065. And that's just to assist with construction traffic entering

460
00:35:22,368 --> 00:35:24,168
and leaving the site and also to improve safety.

461
00:35:27,708 --> 00:35:30,288
Thank you. Dr. Holmes again.

462
00:35:31,428 --> 00:35:35,553
Thank you, sir. I was just wondering whether the examiner could ask Norfolk County

463
00:35:35,628 --> 00:35:41,029
Council for their opinion on the safety record over the last 20, 30 years of

464
00:35:41,088 --> 00:35:45,933
this Castle Acre stretch of the A1065 rather than just the last three years, which

465
00:35:45,949 --> 00:35:49,458
has already missed a fatality which occurred in the last month. Thank you.

466
00:35:51,108 --> 00:35:53,808
John Curtis, do you have any comment on that?

467
00:35:54,949 --> 00:35:59,508
Not myself. I can take that away because that would be our network

safety team who

468
00:35:59,538 --> 00:36:02,838
would deal with all the accidents along that route, who have the history of it.

469
00:36:04,158 --> 00:36:05,568
And I can come back to you

470
00:36:06,846 --> 00:36:07,177
Thank you.

471
00:36:08,706 --> 00:36:09,216
Thank you, sir.

472
00:36:11,346 --> 00:36:11,797
Thank you.

473
00:36:13,266 --> 00:36:16,927
Are there any other further comments in the room regarding transport and access?

474
00:36:19,986 --> 00:36:22,116
No, I'm not seeing any hands in the room.

475
00:36:23,317 --> 00:36:24,216
Nothing online.

476
00:36:26,106 --> 00:36:27,126
Okay, thank you. So

477
00:36:28,896 --> 00:36:30,486
I think I've got two actions here.

478
00:36:32,976 --> 00:36:38,616
First one is for the applicant to respond in writing regarding any change to the

479
00:36:38,797 --> 00:36:42,096
traffic figures for the mitigation works for the MOD.

480

00:36:43,896 --> 00:36:46,416
And then the second one that we just talked about,

481
00:36:47,946 --> 00:36:50,181
if Norfolk County Council could respond on Dr.

482
00:36:50,496 --> 00:36:56,076
Harms's point about the traffic figures for the last 20 to 30 years.

483
00:36:58,356 --> 00:37:00,817
Any further comments from the applicant?

484
00:37:01,896 --> 00:37:02,976
Thank you, sir. No, nothing further.

485
00:37:05,226 --> 00:37:07,146
Okay, thank you.

486
00:37:17,976 --> 00:37:21,306
Okay, the next item is land and soil then.

487
00:37:22,266 --> 00:37:26,616
Could the applicant provide an update on discussions with Natural England on its

488
00:37:26,677 --> 00:37:31,056
outstanding concerns, particularly in relation to demonstrating how impacts,

489
00:37:32,556 --> 00:37:36,576
including cumulative to Best and Most Versatile land, have been avoided where

490
00:37:36,636 --> 00:37:41,166
possible, and that the siting and design has minimized permanent loss of

491
00:37:41,226 --> 00:37:47,001
BMV land. Also, the thresholds used for determining the significance of

492
00:37:47,047 --> 00:37:50,106

effect of permanent land take on soils.

493
00:37:50,677 --> 00:37:53,466
Thank you, sir. Alex Dresden on behalf of the applicant.

494
00:37:53,736 --> 00:37:57,516
Having said in my introduction this morning that our soils expert is unavailable

495
00:37:57,547 --> 00:38:01,641
until 3:30, I now believe that I'm corrected on that matter because I think he's

496
00:38:01,686 --> 00:38:04,476
managed to extract himself from his other hearing.

497
00:38:04,536 --> 00:38:08,556
So I'm hoping that Tony Kernan is online for this response.

498
00:38:09,366 --> 00:38:11,106
I think I saw him join.

499
00:38:11,541 --> 00:38:12,186
Yes, sir, I am. Can you hear me?

500
00:38:15,006 --> 00:38:16,297
Yes, we can hear you. Thank you.

501
00:38:16,806 --> 00:38:20,196
Perfect. Sorry, I'm in the post room in Warrington Borough Council, so

502
00:38:21,576 --> 00:38:27,336
pretty exciting circumstances. So in terms of the first issue, which

503
00:38:27,427 --> 00:38:31,896
is demonstrating how we've minimized impact on BMV.

504
00:38:33,096 --> 00:38:38,826
I think it's agreed by all parties, and it's in the NPS EN1 and EN3 that you should

505
00:38:38,886 --> 00:38:41,826
seek to minimize impacts on BMV.

506
00:38:43,956 --> 00:38:46,177
In context, at a high level,

507
00:38:47,616 --> 00:38:53,166
as set out in the environmental statement, which is AS080, chapter 11.

508
00:38:53,766 --> 00:38:56,797
You will have seen that at the time they were looking for sites, we had the

509
00:38:56,856 --> 00:39:02,601
provisional ALC map and then the predictive likelihood of Best and Most Versatile

510
00:39:02,677 --> 00:39:06,216
maps, which is the pink and purple rather gaudy map.

511
00:39:06,786 --> 00:39:11,481
Both of those identified this general area as effectively the poorest quality or

512
00:39:11,496 --> 00:39:15,246
some of the poorest quality in Norfolk.

513
00:39:15,366 --> 00:39:18,547
So that was what was available then.

514
00:39:19,806 --> 00:39:24,922
Some 37 years after they modified the land classification methodology,

515
00:39:25,686 --> 00:39:30,126
in April this year, first announcement of the land use framework.

516
00:39:31,836 --> 00:39:34,686
Of course, now Defra have produced new maps.

517

00:39:35,286 --> 00:39:39,786
Those are set out in our AS chapter 11, the updated one,

518
00:39:39,817 --> 00:39:44,976
AS080 at pages 1144 and

519
00:39:45,006 --> 00:39:46,476
1145.

520
00:39:48,547 --> 00:39:52,056
Those now predict subgrades of grade three.

521
00:39:53,256 --> 00:39:56,047
As set out in the document that we supplied,

522
00:39:57,696 --> 00:40:01,927
the expectations of Best and Most Versatile across Norfolk have been modified very

523
00:40:01,986 --> 00:40:07,746
significantly. They don't publish the statistics, but the best

524
00:40:08,106 --> 00:40:12,876
breakdown we can work to ensure is accurate is that it's about 94% of the

525
00:40:12,936 --> 00:40:17,436
agricultural land in Norfolk that's now predicted to be in grades one, two, and 3A.

526
00:40:17,556 --> 00:40:23,526
So it's quite significant. And this site is now predicted to

527
00:40:23,556 --> 00:40:29,166
be 3A. So again, within Norfolk, it's still coming out as generally the poorest

528
00:40:29,586 --> 00:40:34,177
quality available with the exception of sort of small river areas, and you'll see

529
00:40:34,206 --> 00:40:37,656

that the subgrade 3B areas are quite limited.

530
00:40:38,736 --> 00:40:42,936
I think the issue with Natural England, and the reason we haven't reached agreement

531
00:40:42,966 --> 00:40:46,986
at this stage, or why it's amber, it's probably something that we won't really

532
00:40:47,076 --> 00:40:52,896
change from amber. And that is that from their perspective, they would prefer

533
00:40:52,956 --> 00:40:58,686
that the substation, which is seen as the fixed infrastructure in particular, was

534
00:40:58,776 --> 00:41:04,056
not in field 27, which is a mixed BMV and non-BMV

535
00:41:04,686 --> 00:41:09,531
field. And their position seems to be that they would prefer that that would,

536
00:41:09,636 --> 00:41:14,886
understandably, that they would prefer that to go into a different field, because

537
00:41:14,946 --> 00:41:16,536
that's BMV.

538
00:41:17,946 --> 00:41:21,786
Within the works plans, and my reference to this latest one is

539
00:41:22,236 --> 00:41:27,666
REP3004, there is flexibility for the Best.

540
00:41:27,817 --> 00:41:33,006
The parameters allow for the Best to be sited in field 24 to the south,

541

00:41:33,726 --> 00:41:38,526
which is level and is subgrade 3B. But the national grid

542
00:41:38,616 --> 00:41:44,286
substation is proposed in field 27, which does have an adverse impact

543
00:41:44,466 --> 00:41:50,106
on BMV. But that obviously has to be balanced with many other factors.

544
00:41:50,526 --> 00:41:53,226
From a purely agricultural point of view, and I think that's where Natural

545
00:41:53,286 --> 00:41:54,951
England's comments are coming from.

546
00:41:54,996 --> 00:42:00,366
They're saying that we're not minimizing the impact on BMV because of

547
00:42:00,456 --> 00:42:02,466
that impact. Just before

548
00:42:03,696 --> 00:42:08,286
I pass back, because somebody else needs to explain why it needs to be in field

549
00:42:08,406 --> 00:42:10,086
27.

550
00:42:12,096 --> 00:42:16,476
In context, it is only, I think it's four and a half hectares of permanent land

551
00:42:16,746 --> 00:42:22,386
take. So it's a small area of land that is a BMV, but it is proposed as a

552
00:42:22,656 --> 00:42:27,186
permanent impact and therefore it needs to be considered and has been considered as

553
00:42:27,216 --> 00:42:29,136
such in the EAS.

554
00:42:32,436 --> 00:42:36,111
Sir, and just to continue that response, I'm going to pass over to my colleague,

555
00:42:36,396 --> 00:42:37,190
Mr. Robert Pyle.

556
00:42:38,736 --> 00:42:42,351
Thank you. Sir, I thought it would be useful just to explain, as my colleague has

557
00:42:42,366 --> 00:42:47,346
just touched upon, is kind of the overarching design approach that we've taken to

558
00:42:48,366 --> 00:42:53,121
developing the scheme layout. We have established the design framework, which has

559
00:42:53,136 --> 00:42:57,576
been set out in the design approach document, which is AS009 to

560
00:42:58,146 --> 00:42:59,736
AS0011.

561
00:43:02,736 --> 00:43:06,606
This framework, along with design principles which are set out in that document,

562
00:43:07,056 --> 00:43:11,076
have been used to help shape and guide the layout of the scheme,

563
00:43:12,456 --> 00:43:17,302
and in accordance with policy requirements for good design and the PIN's good

564
00:43:17,376 --> 00:43:22,956
design advice notes. I think as part of that process, we have

committed to an

565
00:43:22,986 --> 00:43:27,111
environmentally led design approach and have had to consider a number of different

566
00:43:27,126 --> 00:43:32,286
environmental matters as we've gone through the project in considering the

567
00:43:32,317 --> 00:43:37,086
location of the national grid substation and customer substation.

568
00:43:37,236 --> 00:43:43,206
One of those design principles is around reducing the impact on BMV lands,

569
00:43:43,386 --> 00:43:47,616
and one of the commitments at the micro level that the applicant has made was the

570
00:43:47,646 --> 00:43:53,061
removal of field 31, I believe was the numbering, which was one of the fields that

571
00:43:53,106 --> 00:43:57,966
was identified as having predominantly grade one and a bit of grade two within.

572
00:43:58,026 --> 00:44:03,726
And that field was excluded from the scheme in its entirety to reduce the impact on

573
00:44:03,756 --> 00:44:04,266
BMV.

574
00:44:06,786 --> 00:44:12,636
And in terms of our reasoning for the decisions we've made, they are set out within

575
00:44:12,696 --> 00:44:16,626
EAS chapter 4, Reason, Alternatives, and Design Evolution,

576
00:44:16,956 --> 00:44:22,746
REP3028. And that explains the rationale for the

577
00:44:22,806 --> 00:44:27,126
decisions that we've made along the way in terms of siting the national grid

578
00:44:27,156 --> 00:44:32,047
substation within field 27. And I think to kind of summarize the other elements we

579
00:44:32,106 --> 00:44:34,506
have considered alongside BMV,

580
00:44:35,797 --> 00:44:41,016
these relate to co-locating the customer substation and national grid substation

581
00:44:41,076 --> 00:44:46,056
within close proximity of the overhead lines to prevent environmental impacts

582
00:44:46,177 --> 00:44:51,156
extending over a wider area, which is in line with principle 7.1.

583
00:44:52,446 --> 00:44:56,586
Limiting the extent of the substation infrastructure at the edge of the plateau and

584
00:44:56,616 --> 00:45:01,866
valley slopes in respect of landscape and heritage receptors associated with the

585
00:45:01,896 --> 00:45:07,116
Nare Valley, which is in accordance with design principles 2.1 and 2.5

586
00:45:07,860 --> 00:45:11,954
The degree of containment from the wider landscape of residential properties

587
00:45:12,030 --> 00:45:17,221

located in South Acre due to the existing woodland blocks located at the northern

588
00:45:17,280 --> 00:45:22,710
and southern extents of Field 27, which is in line with principle 2.7.

589
00:45:23,460 --> 00:45:28,320
Reducing construction and operational impacts on local roads and public rights of

590
00:45:28,410 --> 00:45:33,840
way, including Peddars Way through direct access from the A1065,

591
00:45:34,590 --> 00:45:38,101
which again, is in line with principles 2.8 and 2.9.

592
00:45:38,835 --> 00:45:44,010
And also responding to statutory consultation feedback regarding the two locations

593
00:45:44,070 --> 00:45:47,790
that were consulted upon at statutory consultation stage.

594
00:45:48,630 --> 00:45:54,270
So the applicant has taken an approach that delivers good design,

595
00:45:55,200 --> 00:45:59,430
which is as much about the process as it is the outcome, and the applicant has

596
00:45:59,491 --> 00:46:05,355
considered all of these factors along with BMV in selecting the location for the

597
00:46:05,400 --> 00:46:09,420
custom substation and National Grid substation in Field 27.

598
00:46:10,860 --> 00:46:15,930
And Alex Preston, on behalf of the applicant, conscious you also asked about the

599

00:46:15,991 --> 00:46:20,790
thresholds used for determining the significance of effect on permanent land take

600
00:46:20,851 --> 00:46:23,010
on soil. So I think I'll pass back to Mr.

601
00:46:23,250 --> 00:46:26,460
Kernan online for a response on that, if that's acceptable.

602
00:46:27,090 --> 00:46:27,601
Thank you.

603
00:46:29,160 --> 00:46:30,120
Thank you, sir. Yes.

604
00:46:32,190 --> 00:46:37,320
By dating the day, Natural England have raised that the thresholds used in the

605
00:46:37,351 --> 00:46:43,050
environmental statement are different to those raised in what was IEMA when they

606
00:46:43,110 --> 00:46:48,075
published it, now the Institute for Sustainability and Environmental Professionals'

607
00:46:48,180 --> 00:46:53,190
new perspective on land and soil in environmental impact assessment.

608
00:46:53,640 --> 00:46:57,810
So that, I've been doing this for about 40 years, I've been doing environmental

609
00:46:58,260 --> 00:47:02,580
assessments, and that document, when it came in, set some slightly different

610
00:47:03,180 --> 00:47:08,580
thresholds to the ones that I've personally, for example, used for the last 40

611
00:47:08,610 --> 00:47:08,880
years.

612
00:47:10,110 --> 00:47:12,390
It seems to me that the

613
00:47:14,700 --> 00:47:19,680
objective of or the purpose of an environmental assessment is to provide a fair and

614
00:47:19,770 --> 00:47:22,950
reasonable assessment of the significance of an impact.

615
00:47:23,491 --> 00:47:29,370
So it should be a reasonable conclusion on the significance of an effect.

616
00:47:32,340 --> 00:47:37,920
The threshold that is used in the IEMA guide, to my

617
00:47:38,221 --> 00:47:44,040
mind, does not accurately reflect the severity, the significance of

618
00:47:44,070 --> 00:47:48,885
certain impacts. So it, for example, sets minor, moderate, and major thresholds at

619
00:47:48,960 --> 00:47:54,870
less than five hectares, five to 20, and major at more than 20, whereas

620
00:47:54,900 --> 00:47:59,130
the ones that we've used in our assessment are nought to 20, 20 to 50, and then

621
00:47:59,190 --> 00:48:00,480
plus 50.

622
00:48:01,770 --> 00:48:05,700
The ISEP guide is a guide. It isn't mandatory.

623

00:48:06,390 --> 00:48:11,520
Because it places grades one and two in a very high sensitivity rather than just

624
00:48:11,550 --> 00:48:17,520
high sensitivity, it has the effect that one hectare of grade two

625
00:48:18,210 --> 00:48:19,949
would become a moderate or large

626
00:48:22,230 --> 00:48:27,930
significant effect. Now, the ISEP guide does say that that is

627
00:48:27,960 --> 00:48:32,760
likely to be material in the environmental assessment process.

628
00:48:32,971 --> 00:48:36,974
Normally, we have moderate or greater, which seem to be significant in

629
00:48:37,351 --> 00:48:42,420
environmental terms. So one hectare of grade two coming out as a significant

630
00:48:42,480 --> 00:48:47,640
adverse impact in terms of impacts on agriculture seems to me to be wrong.

631
00:48:48,030 --> 00:48:53,250
Similarly, if it was six hectares of grade two, it becomes large and very large, so

632
00:48:53,640 --> 00:48:59,610
right to the top category, and yet that's such a small quantity of

633
00:48:59,670 --> 00:49:00,000
land.

634
00:49:02,520 --> 00:49:08,340
To be realistic, quite my opinion, and that's why we've adjusted them in this

635

00:49:08,370 --> 00:49:11,400
and all the other ESs I'm involved with.

636
00:49:12,540 --> 00:49:17,430
The threshold for consultation with Natural England is where a development does or

637
00:49:17,491 --> 00:49:21,689
could affect more than 20 hectares of best and most versatile land.

638
00:49:22,425 --> 00:49:25,846
Below that, Natural England don't even need to be consulted.

639
00:49:26,310 --> 00:49:32,054
So it makes sense to me that that's the threshold at which something could be seen

640
00:49:32,070 --> 00:49:32,851
as significant.

641
00:49:35,430 --> 00:49:39,210
The assessment process that we followed and the thresholds we followed is such that

642
00:49:39,241 --> 00:49:43,530
therefore 20 hectares or more of best and most versatile land becomes a moderate

643
00:49:43,590 --> 00:49:46,471
adverse effect, and therefore that's significant.

644
00:49:47,971 --> 00:49:53,580
It means that 50 hectares or more is a major adverse effect and therefore is

645
00:49:53,670 --> 00:49:59,221
significant. We also have it that 50 hectares or more of sub grade 3B becomes a

646
00:49:59,280 --> 00:50:04,304
moderate adverse effect. So we've set those thresholds to what, in my professional

647
00:50:04,320 --> 00:50:09,690
opinion, I think is a fair and balanced assessment of what the losses are, because

648
00:50:09,810 --> 00:50:15,210
if Natural England need to be consulted, that seems to be a reasonable basis to use

649
00:50:15,660 --> 00:50:18,974
for significance. And it's widely used elsewhere.

650
00:50:19,050 --> 00:50:23,144
I've just come out of a hearing on a solar farm where it involved 50 hectares of

651
00:50:23,221 --> 00:50:27,510
best and most versatile land. Not necessarily 50 hectares lost, but the local

652
00:50:27,540 --> 00:50:32,190
authority said that's not a significant development manage return in terms of the

653
00:50:32,250 --> 00:50:36,330
use of agricultural land because they're using the Natural England 20-hectare

654
00:50:36,390 --> 00:50:36,960
threshold.

655
00:50:38,460 --> 00:50:44,310
We do know from the new predictive map that the figures are an estimated 94%

656
00:50:44,370 --> 00:50:48,450
of the agricultural land in Norfolk is of BMV quality.

657
00:50:49,860 --> 00:50:50,160
And

658
00:50:51,390 --> 00:50:55,545
given that 24% of agricultural land in England, so the whole of

England, is

659
00:50:55,590 --> 00:50:59,596
predicted to be in grades one or two, and overall, as set out in that update note,

660
00:50:59,730 --> 00:51:05,430
just over 50%, 50.9, so almost 51% of agricultural land in England is now

661
00:51:05,460 --> 00:51:11,430
predicted to be BMV. It seems wrong that the thresholds are so like that

662
00:51:11,700 --> 00:51:16,410
one hectare or five hectares would be seen as significant, and that's the reason

663
00:51:16,471 --> 00:51:18,840
that we've adjusted those thresholds then.

664
00:51:21,240 --> 00:51:25,620
Okay, thank you. Could I just comment on Natural England's concern then?

665
00:51:25,680 --> 00:51:31,620
Because they're saying that established ISEP guidance should be followed as it

666
00:51:31,650 --> 00:51:35,820
provides the established industry-standard methodology and ensures a consistent,

667
00:51:35,925 --> 00:51:41,221
transparent, and comparable assessment of effects across the developments.

668
00:51:43,680 --> 00:51:45,285
Yes. So as I said, it's not mandatory,

669
00:51:46,650 --> 00:51:46,875
and

670
00:51:48,690 --> 00:51:53,280
I've tried all sorts of different ways to get it to what I think is a reasonable

671
00:51:53,670 --> 00:51:58,891
answer, and it doesn't get to a reasonable answer unless you are to say that

672
00:51:59,190 --> 00:52:04,981
only a major impact or very high significance, sorry, a very high

673
00:52:05,040 --> 00:52:10,545
sensitivity is the only one which is triggered as a significant in environmental

674
00:52:10,590 --> 00:52:15,180
assessment terms threshold. Because otherwise, we

675
00:52:15,270 --> 00:52:20,971
are providing environmental assessment analysis which will

676
00:52:21,060 --> 00:52:21,930
have

677
00:52:23,701 --> 00:52:28,516
significant impacts at very small quantities of agricultural land in terms of land

678
00:52:28,620 --> 00:52:30,840
use planning. That would be, for example,

679
00:52:33,120 --> 00:52:38,430
something that was not seen in, say, a housing application involving 10, 15

680
00:52:38,460 --> 00:52:43,650
hectares of BMV. Wouldn't have seen that as a significant environmental impact.

681
00:52:43,860 --> 00:52:46,440
Wouldn't probably submit an environmental assessment.

682
00:52:46,590 --> 00:52:51,870
It seems wrong that you have an environmental assessment methodology that would say

683
00:52:51,900 --> 00:52:57,270
on larger schemes, that kind of small amount of land is significant.

684
00:52:57,780 --> 00:52:57,960
So

685
00:52:59,760 --> 00:53:05,250
lots of people are using it because it's been produced, but I firmly think that

686
00:53:05,310 --> 00:53:10,305
their figures are wrong. If we were to apply it, and I'm

687
00:53:10,380 --> 00:53:11,400
not

688
00:53:14,280 --> 00:53:16,110
against applying it if that's

689
00:53:18,360 --> 00:53:21,585
what you felt you wanted to know what the assessment was, so we can just redo the

690
00:53:21,601 --> 00:53:27,391
figures. But I think it would have to be that only a very large impact would become

691
00:53:27,420 --> 00:53:30,451
significant, because otherwise you're going to be recording things that just don't

692
00:53:30,510 --> 00:53:35,701
seem realistic when over half the country is BMV.

693
00:53:36,420 --> 00:53:39,360
We're looking at sort of 4.5 million hectares of BMV.

694

00:53:40,770 --> 00:53:43,560
We need to get an assessment which is realistic.

695
00:53:45,721 --> 00:53:49,320
Okay, thank you. I think at the moment, the statement of common ground, it does

696
00:53:49,380 --> 00:53:55,050
refer to the disagreement in thresholds, but I think there isn't the same amount of

697
00:53:55,110 --> 00:53:57,840
detail that you've just gone into, Mr.

698
00:53:58,050 --> 00:53:59,565
Kernan, so it'd be useful for

699
00:54:00,840 --> 00:54:04,860
me to see those two side by side in the statement of common ground so I understand

700
00:54:04,891 --> 00:54:05,430
the difference.

701
00:54:05,790 --> 00:54:09,660
Thank you. So Alex, just on behalf of the applicant, so just to clarify, you'd like

702
00:54:10,290 --> 00:54:14,070
what's just been discussed to be included in the statement of common ground as well

703
00:54:14,130 --> 00:54:16,320
as our summary of this hearing?

704
00:54:16,908 --> 00:54:19,699
But I think at the moment, the way the statement of common ground is set up,

705
00:54:19,998 --> 00:54:24,228
there's one line in it, the first line, and that includes a variety of topics.

706
00:54:24,739 --> 00:54:28,699
But this particular issue, the thresholds, if that could be separated out so I

707
00:54:28,758 --> 00:54:33,199
understand what Natural England would prefer and I understand what you've done,

708
00:54:34,008 --> 00:54:34,668
that would help me.

709
00:54:34,968 --> 00:54:36,079
Thank you, sir. Yeah, we can do that.

710
00:54:37,308 --> 00:54:40,007
Yes, I think it's risen quite late in the day.

711
00:54:40,938 --> 00:54:44,824
Otherwise, I'd have tried to get some more correspondence going, but only you

712
00:54:44,838 --> 00:54:48,288
raised it a month ago, so it's quite new, I'm afraid.

713
00:54:50,329 --> 00:54:51,018
Okay. Thank you.

714
00:54:53,538 --> 00:54:54,858
So on a related point,

715
00:54:57,378 --> 00:55:00,318
with reference to the thresholds that we used,

716
00:55:03,199 --> 00:55:07,818
could the applicant explain in relation to ES chapter 18?

717
00:55:08,058 --> 00:55:13,098
Sorry, I'm going to start again. With reference to

718
00:55:13,548 --> 00:55:19,098
environmental statement ES chapter 11, soils and agriculture, that

has been

719
00:55:19,128 --> 00:55:23,478
updated and has changed from a significant cumulative residual effect for

720
00:55:23,508 --> 00:55:27,408
decommissioning to a minor effect.

721
00:55:27,978 --> 00:55:32,898
And the environmental statement chapter 18 summary of effects, that hasn't been

722
00:55:32,929 --> 00:55:33,498
updated

723
00:55:34,818 --> 00:55:36,018
to reflect that change.

724
00:55:38,508 --> 00:55:42,168
Yes, thank you, sir. Alex Drayson on behalf of the applicant.

725
00:55:42,228 --> 00:55:47,058
We'd be happy to make that amendment to ES chapter 18 to reflect that new

726
00:55:47,088 --> 00:55:47,628
conclusion.

727
00:55:48,138 --> 00:55:52,817
Okay. But I think a narrative behind why it's changed from

728
00:55:54,317 --> 00:55:58,097
decommissioning to operation phase.

729
00:55:58,548 --> 00:56:01,788
I think so. Sorry, Tony Cohen on behalf of the applicant.

730
00:56:01,878 --> 00:56:07,728
I think I didn't put a subheading in, and I think when they pulled out chapter

731
00:56:07,758 --> 00:56:12,138
18, they thought my comment was only in relation to decommissioning, whereas I

732
00:56:12,168 --> 00:56:17,388
think the paragraph they'd used related to the full three stages.

733
00:56:17,403 --> 00:56:19,518
So I think that's where that,

734
00:56:20,989 --> 00:56:24,829
rather than anything more complicated, just me not putting a subheading in.

735
00:56:26,268 --> 00:56:32,028
Okay, so rather than a change, it's a lack of clarity in the first instance, is

736
00:56:32,058 --> 00:56:32,298
it?

737
00:56:34,788 --> 00:56:36,304
Sorry. Tony Cohen on behalf of the applicant.

738
00:56:36,378 --> 00:56:39,888
Yes, I'm pretty certain when I was discussing, you said, "Well, you've said that in

739
00:56:39,918 --> 00:56:44,388
respect of decommissioning." And I think what I've intended it to be for all of

740
00:56:44,418 --> 00:56:47,748
them, so yes, lack of clarity for which I put my hands up.

741
00:56:48,709 --> 00:56:50,568
I think so. Alex Drayson on behalf of the applicant.

742
00:56:50,598 --> 00:56:55,248
We're happy to take an action point away to look at chapter 11, i.e.

743

00:56:55,308 --> 00:56:57,798
the assessment itself, and then chapter 18, i.e.

744
00:56:57,858 --> 00:57:00,228
the summary, to just check that that all marries up.

745
00:57:00,243 --> 00:57:03,679
And if there is anything that has significantly changed, which I don't believe that

746
00:57:03,709 --> 00:57:05,718
there has, then we'd obviously provide a narrative for that.

747
00:57:05,748 --> 00:57:07,489
But I think it's just a formatting point.

748
00:57:08,748 --> 00:57:09,528
Okay. Thank you.

749
00:57:12,618 --> 00:57:16,398
Moving on to the next question. Could the applicant provide an update to address

750
00:57:16,518 --> 00:57:20,538
outstanding concerns from Breckland District Council relating to the national-

751
00:57:21,679 --> 00:57:22,699
Sorry. Yeah,

752
00:57:23,959 --> 00:57:24,558
Mr. Hubbard?

753
00:57:25,429 --> 00:57:26,298
Yeah. Thank you, sir.

754
00:57:28,068 --> 00:57:29,388
I'm confused, to be honest.

755
00:57:30,618 --> 00:57:35,808
In terms of the latest land classification processes, would the applicant

756
00:57:36,709 --> 00:57:42,438
would be able to confirm the amount of BMV land that is actually now on

757
00:57:42,588 --> 00:57:47,508
site? Because we've been led to believe that it's now over 50% of the site under

758
00:57:47,538 --> 00:57:53,268
the new classification. So can we have an actual figure, please, as to what is

759
00:57:53,298 --> 00:57:55,728
BMP land within the Droves development site?

760
00:57:56,028 --> 00:57:56,808
Okay. Thank you.

761
00:57:58,248 --> 00:58:03,018
Alex Drayson, if you could give us references to where we could find that.

762
00:58:03,108 --> 00:58:06,768
Thank you. Yeah. Mr. Cohen may have it off the top of his head.

763
00:58:07,398 --> 00:58:12,558
He's welcome to jump in if he does. I'm certain it's in the environmental statement

764
00:58:12,588 --> 00:58:15,858
chapter 11, which is AS-080. But if Mr.

765
00:58:15,918 --> 00:58:18,378
Cohen has it on top of his head, then please do jump in.

766
00:58:21,228 --> 00:58:22,728
And for

767
00:58:24,168 --> 00:58:30,018
clarity, the percentage of land quality within the

768
00:58:30,618 --> 00:58:35,808
site has not changed. So the figure in the environmental assessment and in the

769
00:58:35,838 --> 00:58:39,618
agricultural land classification has not changed.

770
00:58:42,829 --> 00:58:47,329
Where this 50% figure comes from, and just for the member of the public, is that

771
00:58:48,739 --> 00:58:49,728
for

772
00:58:52,008 --> 00:58:55,728
my professional career, we've had something called the Provisional Agricultural

773
00:58:55,788 --> 00:59:01,143
Land Classification maps, which were done at a 1 to 250,000 scale, and they were

774
00:59:01,218 --> 00:59:05,179
done in the '70s. And even when they amended the agricultural classification

775
00:59:05,239 --> 00:59:09,858
methodology in 1988, they didn't attempt to amend those plans.

776
00:59:11,329 --> 00:59:16,202
They did in 1987 produce those gaudy likelihood of best and most versatile, which

777
00:59:16,278 --> 00:59:22,188
was less than 20%, 20% to 60% likelihood, more than 60% likelihood.

778
00:59:24,258 --> 00:59:29,584
Quite excitingly, but as I say, 37 years after they amended the methodology, from

779
00:59:29,598 --> 00:59:35,223
May this year, we've been able to access predictive best and most

780
00:59:35,239 --> 00:59:39,408
versatile land maps, and those now predict the different subgrades.

781
00:59:40,218 --> 00:59:43,518
Those are the ones which, if you follow the research report that's published

782
00:59:43,548 --> 00:59:49,398
alongside it, predict 50.9% of all agricultural land in

783
00:59:49,489 --> 00:59:52,068
England to be of best and most versatile.

784
00:59:52,608 --> 00:59:58,128
And as we set out in that update report, the changes, particularly in respect

785
00:59:58,218 --> 01:00:00,888
of Norfolk, are quite significant.

786
01:00:00,918 --> 01:00:04,473
They've actually boxed out and put the little red dots for all the areas that

787
01:00:04,489 --> 01:00:09,498
they've expected land quality to be better than they predicted it previously.

788
01:00:10,068 --> 01:00:14,838
So the figures for the amount of best and most versatile within the site, which

789
01:00:14,868 --> 01:00:19,008
have been done by detailed survey, are unchanged.

790
01:00:19,788 --> 01:00:25,459
But the proportion of land which is predicted, not surveyed, but

791
01:00:25,518 --> 01:00:31,459
predicted to be of better quality land across Norfolk has risen significantly

792
01:00:31,518 --> 01:00:34,878
from those that were set out when we first did the environmental statement.

793
01:00:34,998 --> 01:00:38,239
But that's now been set out in the update for you.

794
01:00:41,088 --> 01:00:42,348
Does that help?

795
01:00:45,407 --> 01:00:50,838
I think in your summary of today's meeting, if you can make it clear the

796
01:00:50,868 --> 01:00:56,418
reference to the relevant tables and the relevant chapters, I think that would be

797
01:00:56,478 --> 01:00:57,558
beneficial.

798
01:00:57,574 --> 01:00:57,574
Yes.

799
01:00:57,798 --> 01:01:00,438
Unless we're able to show that now.

800
01:01:03,618 --> 01:01:05,148
Sorry.

801
01:01:06,498 --> 01:01:09,168
Tony Cohen on behalf of the applicant.

802
01:01:09,228 --> 01:01:15,108
So table 11.4 is the ALC

803
01:01:15,199 --> 01:01:19,489
survey results. So this is in chapter 11, so

804
01:01:19,608 --> 01:01:25,308

AS080. So table 11.4 is the one which

805
01:01:25,338 --> 01:01:30,018
sets out the results of the agricultural land classification survey.

806
01:01:30,168 --> 01:01:33,978
Okay. Could we present that on the screen just to help you talk through it?

807
01:01:36,108 --> 01:01:36,468
Thank

808
01:01:40,368 --> 01:01:51,079
you.

809
01:01:51,709 --> 01:01:55,818
So it's 11.4 on top of page 14.

810
01:01:58,848 --> 01:02:01,668
I think you may have passed it, but-

811
01:02:01,699 --> 01:02:02,688
You got it.

812
01:02:02,718 --> 01:02:02,898
Yeah.

813
01:02:03,888 --> 01:02:05,614
That's the one. So that

814
01:02:07,579 --> 01:02:10,398
shows the agricultural classification grade.

815
01:02:10,459 --> 01:02:15,723
This is the results of the surveys, a description, and then the area in hectares,

816
01:02:16,368 --> 01:02:20,058
and then the proportion. So the proportion there

817
01:02:21,378 --> 01:02:26,028

of best and most versatile is 3,319 and two, those two together.

818
01:02:28,308 --> 01:02:33,888
So it is just over 50%. And the other grades are as

819
01:02:33,949 --> 01:02:39,288
listed there. So the predictive map that's come out has not

820
01:02:39,438 --> 01:02:44,268
changed those results because those are the results of the field survey.

821
01:02:44,418 --> 01:02:48,048
The predictive map is a replacement for the old provisional map.

822
01:02:51,648 --> 01:02:52,998
Okay. Thank you.

823
01:02:54,648 --> 01:02:57,018
I'm conscious I've got three more questions.

824
01:02:58,218 --> 01:03:01,758
Is this related to your earlier question, Mr. Hubbard?

825
01:03:01,878 --> 01:03:02,418
Yes, sir.

826
01:03:02,508 --> 01:03:04,878
Okay. Do you want to go first then?

827
01:03:05,388 --> 01:03:09,888
Yes, if I may. Just with the greatest respect, the figures we've just been shown

828
01:03:10,368 --> 01:03:15,528
shows that grade one, two, and three are 54%, I think, of the site area.

829
01:03:16,429 --> 01:03:21,679
But to us, this is absolutely key. National policy dictates that solar

830
01:03:21,709 --> 01:03:27,033
developments should avoid best and most versatile land, agricultural land,

831
01:03:28,668 --> 01:03:34,593
as far as possible. And this is a huge proportion of the site which, with

832
01:03:34,638 --> 01:03:40,398
the applicant's own work, represents over 54% or 54% is

833
01:03:40,429 --> 01:03:42,574
BMP land. Thank you

834
01:03:48,213 --> 01:03:49,143
Alex Trusdon.

835
01:03:50,913 --> 01:03:51,423
Thank you, sir.

836
01:03:52,653 --> 01:03:54,709
Sorry, Alex Trusdon on behalf of the applicant. Unless Mr.

837
01:03:54,903 --> 01:03:58,653
Kernan has anything further to say on this, I would note that these figures haven't

838
01:03:58,683 --> 01:04:02,913
changed since the initial assessment submitted with the application, which was a

839
01:04:02,973 --> 01:04:08,554
while ago, and therefore, we'd point to the conclusion of that assessment, which

840
01:04:08,584 --> 01:04:12,183
remain accurate in our opinion. And also the fact that this is a matter for the

841
01:04:12,213 --> 01:04:16,668
planning balance to consider, and that is therefore described and assessed and

842
01:04:16,713 --> 01:04:20,253
concluded upon in detail in the planning statement.

843
01:04:22,623 --> 01:04:24,228
Sorry. Tony Kernan on behalf of the applicant.

844
01:04:24,304 --> 01:04:25,834
Just to follow that on, what those

845
01:04:28,533 --> 01:04:34,023
statistics do also indicate that now that they are predicting that 94% of

846
01:04:34,923 --> 01:04:39,093
Norfolk is Best and Most Versatile, this is still indicating that within the

847
01:04:39,183 --> 01:04:44,433
county, this is probably the lowest proportion of Best and Most Versatile that

848
01:04:44,463 --> 01:04:48,903
you're likely to find. We won't know for certain unless you go and survey the whole

849
01:04:48,993 --> 01:04:53,883
county. But on the basis, it's about 10 hectares per man-day.

850
01:04:54,183 --> 01:04:55,804
That's obviously an impossible task.

851
01:04:55,893 --> 01:05:01,593
But the indications are that this follows on from the provisional map, that

852
01:05:01,683 --> 01:05:05,688
this part of Norfolk is likely to be some of the poorest quality

853
01:05:06,033 --> 01:05:11,584
statistically that you will find within the county.

854
01:05:12,603 --> 01:05:16,834
Okay, thank you. I'm going to continue with my questions for now, and then we'll

855
01:05:16,893 --> 01:05:19,233
come back to you at the end. Thank you.

856
01:05:22,173 --> 01:05:26,508
Could the applicant provide an update to address outstanding concerns for Breckland

857
01:05:26,554 --> 01:05:30,963
District Council relating to the National Grid substation being proposed to be

858
01:05:30,993 --> 01:05:36,963
located within Field 27, which includes Grade 2 agricultural land

859
01:05:37,114 --> 01:05:37,923
classification?

860
01:05:39,693 --> 01:05:42,243
Thank you, Sir Alex Trusdon on behalf of the applicant.

861
01:05:42,304 --> 01:05:46,443
This is essentially the same point that we've discussed as raised by National

862
01:05:46,503 --> 01:05:50,853
England in relation to siting design that has been touched upon by Messrs.

863
01:05:50,913 --> 01:05:52,563
Kernan and Parr previously.

864
01:05:54,963 --> 01:05:57,753
Tony, feel free to jump in if there's anything further you'd like to say.

865
01:05:58,864 --> 01:06:04,188
This is a design principle of the applicants, and the National Grid substation has

866
01:06:04,204 --> 01:06:09,003
been sited in Field 27 for the reasons given, and that's an adverse effect that's

867
01:06:09,063 --> 01:06:11,584
been recorded and which can't be mitigated.

868
01:06:11,913 --> 01:06:11,929
Simon

869
01:06:14,584 --> 01:06:16,054
Wood, do you have any further comment?

870
01:06:17,883 --> 01:06:19,983
I'll hand over to my colleague, Michael Doyle, sir.

871
01:06:23,704 --> 01:06:25,713
Michael Doyle on behalf of Breckland Council.

872
01:06:27,243 --> 01:06:30,723
Yes, I agree that the point is essentially what's just been discussed.

873
01:06:32,343 --> 01:06:35,358
Similarly, the National England, the council's concern is whether the siting of

874
01:06:35,373 --> 01:06:39,978
permanent infrastructure on higher quality land has been adequately minimized and

875
01:06:39,993 --> 01:06:43,324
whether sufficient weight has been given to local agricultural implications.

876
01:06:44,493 --> 01:06:48,993
As the applicant has just said there, really it's a matter for the planning

877
01:06:49,023 --> 01:06:52,143
balance, really, and the council just wants to highlight concerns in

that regard.

878
01:06:58,593 --> 01:07:11,943
Okay.

879
01:07:13,263 --> 01:07:17,493
Next question. Could the applicant provide an update to address concerns from

880
01:07:17,523 --> 01:07:22,128
Breckland District Council that the cumulative agricultural implications should be

881
01:07:22,204 --> 01:07:26,358
viewed in the context of the wider pattern of renewable energy development coming

882
01:07:26,403 --> 01:07:27,739
forward across the county?

883
01:07:32,103 --> 01:07:34,998
Thank you, sir. Alex Trusdon on behalf of the applicant. I'll pass over to Mr.

884
01:07:35,193 --> 01:07:36,423
Kernan for a response on that.

885
01:07:38,283 --> 01:07:40,804
Thank you, sir. Tony Kernan on behalf of the applicant.

886
01:07:43,143 --> 01:07:45,213
So the ES chapter

887
01:07:46,503 --> 01:07:52,263
has set out the cumulative impact really on the two local NSIP so far

888
01:07:52,383 --> 01:07:55,623
proposals. We have produced the

889
01:07:57,574 --> 01:08:01,983
applicant's updated note on published information and cumulative

assessment of

890
01:08:02,013 --> 01:08:06,364
agricultural land quality, and I simply title as a Rep

891
01:08:06,633 --> 01:08:12,093
1072, and that has looked at a wide raft of other development,

892
01:08:12,873 --> 01:08:14,554
including draft housing applications.

893
01:08:15,093 --> 01:08:20,329
Just responding to the specifics, though, just to set cumulative agricultural

894
01:08:20,404 --> 01:08:22,623
impacts in context.

895
01:08:24,033 --> 01:08:28,924
Government doesn't have a policy requiring agricultural land to be harmed, and it

896
01:08:28,954 --> 01:08:33,243
doesn't have a policy requiring a certain amount of food to be produced.

897
01:08:33,753 --> 01:08:38,209
And we know from things like the land use framework that agricultural lands have

898
01:08:38,223 --> 01:08:41,614
many functions it needs to serve, including food production, biodiversity

899
01:08:41,674 --> 01:08:46,143
production, energy provision, landscape enhancement, leisure, minerals, water

900
01:08:46,233 --> 01:08:47,102
storage, et cetera.

901
01:08:48,933 --> 01:08:54,093

What tends to happen when you look at all these competing factors is they're not

902
01:08:54,123 --> 01:08:59,959
really a local matter. So national documents, say, like the land use framework,

903
01:09:00,364 --> 01:09:02,253
set out how land use must be balanced.

904
01:09:02,674 --> 01:09:07,758
Documents such as the Solar Roadmap set out broad objectives for the provision from

905
01:09:07,803 --> 01:09:12,393
domestic and commercial rooftops and from large-scale providers, most likely on

906
01:09:12,424 --> 01:09:15,093
agricultural land. They're all not locally set.

907
01:09:16,293 --> 01:09:20,013
What tends to happen when you're making cumulative assessments on agricultural land

908
01:09:20,343 --> 01:09:24,543
tends to be typically no more complicated than just adding together the amounts of

909
01:09:24,603 --> 01:09:26,523
land involved.

910
01:09:28,204 --> 01:09:31,983
So if you've got two, three, four developments nearby, you just add up the

911
01:09:32,013 --> 01:09:37,579
hectares, and it always gets more adverse because you're just adding them up, even

912
01:09:37,593 --> 01:09:39,543
though they may be completely unconnected.

913
01:09:42,243 --> 01:09:46,623
And then in terms of assessing what the significance of that, there's no specific

914
01:09:46,743 --> 01:09:51,963
benchmarks other than the environmental assessment thresholds that we use for

915
01:09:51,993 --> 01:09:52,533
individual

916
01:09:55,623 --> 01:09:57,183
assessments, individual proposals.

917
01:09:57,363 --> 01:10:00,183
There's nothing to say what's cumulatively important.

918
01:10:00,334 --> 01:10:03,543
As I say, it's a national consideration, the use of agricultural land.

919
01:10:03,603 --> 01:10:09,483
So even if 5% of Norfolk has gone to biodiversity, is that a significant

920
01:10:09,513 --> 01:10:14,403
impact? Those are the considerations that government makes rather than local

921
01:10:14,418 --> 01:10:20,283
authority makes, and therefore, it's very hard for individual assessments to

922
01:10:20,973 --> 01:10:23,853
set out cumulative impact other than it just gets worse.

923
01:10:24,334 --> 01:10:24,513
So

924
01:10:25,924 --> 01:10:31,443
that was the reason that we looked at the big NSIPs, but we have also gone through

925
01:10:31,503 --> 01:10:35,613
the full list including all housing allocations.

926
01:10:35,643 --> 01:10:39,273
So for example, the housing allocations, I think it was 530 hectares.

927
01:10:39,303 --> 01:10:45,153
It's certainly over 500 hectares of Best and Most Versatile land is proposed to

928
01:10:45,213 --> 01:10:50,043
go out for housing across Norfolk, but each local authority is looking at its own

929
01:10:50,163 --> 01:10:51,709
areas and individual applications.

930
01:10:51,753 --> 01:10:53,013
They're not looking at it on that

931
01:10:54,753 --> 01:10:59,463
cumulative countywide basis. So we've looked at the long list.

932
01:10:59,493 --> 01:11:01,143
We've looked at all the draft allocations.

933
01:11:02,584 --> 01:11:06,993
Those indicate that just under 1% of the agricultural land on holdings in Norfolk

934
01:11:07,293 --> 01:11:12,243
will be affected by all of those. The applicant, I don't certainly consider that to

935
01:11:12,303 --> 01:11:14,674
be significant on a county basis.

936
01:11:17,223 --> 01:11:21,738
The land used solar is still capable of being farmed in combination, so you can

937
01:11:21,783 --> 01:11:27,334
still put sheep underneath it. It does give rise to land-based management

938
01:11:27,783 --> 01:11:33,123
work. Sheep use a lot more labor than most arable enterprises other than

939
01:11:33,903 --> 01:11:37,953
potatoes or sugar beet, so that the per hectare labor is more.

940
01:11:38,283 --> 01:11:40,113
There's main panel maintenance work.

941
01:11:40,893 --> 01:11:46,443
Somebody that I employ, her partner is an agricultural contractor that spends six

942
01:11:46,473 --> 01:11:48,453
weeks or so every year cleaning panels.

943
01:11:48,513 --> 01:11:53,013
So the agricultural contractors have moved into that sort of maintenance work.

944
01:11:53,103 --> 01:11:56,733
So there is work, there is income secured.

945
01:11:56,793 --> 01:12:00,993
And in respect of that cumulative assessment, even adding up all of

946
01:12:01,053 --> 01:12:06,603
the parcels together, it doesn't come to a very big

947
01:12:07,053 --> 01:12:12,003
proportion, less than 1%, including all the smaller terms as well of Norfolk.

948
01:12:15,663 --> 01:12:19,893
Okay. Thank you, Mr. Kernan. Breckland District Council, Simon Wood.

949
01:12:21,843 --> 01:12:23,163
We have nothing more to add, sir.

950
01:12:24,753 --> 01:12:25,773
Okay. Thank you.

951
01:12:28,203 --> 01:12:29,883
Andrew Serokowski.

952
01:12:30,513 --> 01:12:34,233
Thank you, sir. Andrew Serokowski for Norfolk County Council.

953
01:12:35,373 --> 01:12:36,243
Sir, I might just

954
01:12:38,343 --> 01:12:42,437
Make a bit of comment that might help you just in terms of the issue we've just

955
01:12:42,483 --> 01:12:46,773
been talking about, which is if you like, what kind of indicators are there?

956
01:12:47,463 --> 01:12:51,799
You'll be aware from Norfolk County Council submission set out in its relevant REP,

957
01:12:51,799 --> 01:12:56,523
which is RN043, and its local impact report, which is

958
01:12:56,643 --> 01:13:02,342
REP.1094. We've raised the issue about the cumulative impact on

959
01:13:02,433 --> 01:13:04,174
agricultural land across Norfolk.

960
01:13:05,493 --> 01:13:10,053
I think we actually have a quick quote here, which I was about to quote, which is

961
01:13:10,443 --> 01:13:15,873

the amount of agricultural land across Norfolk that's currently affected by

962
01:13:15,933 --> 01:13:20,642
proposals for solar PV DCO applications.

963
01:13:21,513 --> 01:13:25,953
What might help you, sir, is that there's been the Secretary of State's decision

964
01:13:26,073 --> 01:13:28,233
letter in Breckenham Fen Energy Park

965
01:13:29,553 --> 01:13:33,723
application, which is ENO.10151.

966
01:13:34,713 --> 01:13:35,823
And in that-

967
01:13:37,053 --> 01:13:42,213
Sorry to interject. Could you just speak-- I think, sorry, Tony Kernan speaking.

968
01:13:42,243 --> 01:13:42,453
Yeah.

969
01:13:42,903 --> 01:13:44,538
You're bouncing in and out, I think.

970
01:13:44,553 --> 01:13:47,343
Am I? Sorry. I'll try and stay closer to the microphone.

971
01:13:47,433 --> 01:13:50,013
I'm looking, can see the very small print on my screen.

972
01:13:50,163 --> 01:13:52,667
You don't have me to answer, and I can't hear what you said.

973
01:13:52,667 --> 01:13:53,058
No, that's fine.

974

01:13:53,299 --> 01:13:54,813
It's very loud for me now.

975
01:13:55,084 --> 01:13:55,443
Is it?

976
01:13:56,943 --> 01:14:02,523
I can't read. Yes, I was just going to point you to the decision of the Breckenham

977
01:14:02,613 --> 01:14:07,924
Fen Energy Park application, which is ENO.10151

978
01:14:08,613 --> 01:14:14,253
which gave great weight to the cumulative effect of the development in that

979
01:14:14,343 --> 01:14:14,643
case.

980
01:14:16,713 --> 01:14:17,463
And,

981
01:14:18,813 --> 01:14:22,924
I think the particular paragraphs in that are 4.68 and 4.69.

982
01:14:23,493 --> 01:14:27,334
And in that case, which is in Lincolnshire, the cumulative

983
01:14:28,743 --> 01:14:32,793
area of land amounted to 2% of the agricultural land in Lincolnshire.

984
01:14:33,903 --> 01:14:36,003
Just from the figures that we've got in Norfolk,

985
01:14:38,373 --> 01:14:44,283
I think we just had the figure of just over 1.1% of agricultural land affected.

986
01:14:44,823 --> 01:14:48,198
We've actually done the calculation at actually 1.2%, but I think

it's actually

987
01:14:48,213 --> 01:14:51,603
between 1.1% and 1.2%, and it rounds up to 1.2%.

988
01:14:52,023 --> 01:14:54,123
So it was really just to draw your attention to the fact that

989
01:14:55,743 --> 01:15:00,273
it's probably worth just looking at that decision in the Fen Energy Park decision,

990
01:15:01,113 --> 01:15:01,893
where, as I say,

991
01:15:04,023 --> 01:15:08,988
the conclusion was that great negative weight could be given to a 2% loss as

992
01:15:09,033 --> 01:15:12,453
opposed to what we've got in Norfolk here at the moment with the current proposals

993
01:15:12,483 --> 01:15:15,123
on the table, it'd be a 1.2% figure.

994
01:15:18,153 --> 01:15:22,084
Thank you. We'll put that in writing for you. Mr. Sherikowski.

995
01:15:28,143 --> 01:15:30,723
Would you like me just to comment on that, sir? Tony Kernan speaking.

996
01:15:30,903 --> 01:15:32,013
Yes, please. Thank you.

997
01:15:32,733 --> 01:15:32,913
Yes.

998
01:15:36,243 --> 01:15:42,213
So we don't have a government target for producing a certain amount of

999
01:15:42,273 --> 01:15:42,543
food.

1000
01:15:43,924 --> 01:15:47,283
We do have the various statements, which is the government's objective is to

1001
01:15:47,343 --> 01:15:51,513
broadly maintain the current level of food production and self-sufficiency.

1002
01:15:52,834 --> 01:15:58,203
Just when we're talking about some of these figures in context, and we are looking

1003
01:15:58,233 --> 01:16:02,778
at a long-term scheme here, but just looking at current figures, for example, as

1004
01:16:02,823 --> 01:16:04,053
was set out in the

1005
01:16:06,513 --> 01:16:11,433
environmental assessment chapter, sir, as of June last year, nationally, some

1006
01:16:11,613 --> 01:16:17,568
444,000 hectares of arable land was in funded agri-environmental schemes, or

1007
01:16:17,568 --> 01:16:21,903
received funding for agri-environmental schemes, and a further 100,000 hectares was

1008
01:16:21,933 --> 01:16:24,753
not being farmed. That's the arable land.

1009
01:16:25,337 --> 01:16:31,068
And if we looked at the same statistical set for Norfolk, the figure was at

1010

01:16:31,233 --> 01:16:33,828
45,138 hectares,

1011
01:16:35,343 --> 01:16:41,238
which I've got as 10.8% of the total area of holdings. I can give you the figures.

1012
01:16:41,283 --> 01:16:42,603
I'll put them in writing afterwards, sir.

1013
01:16:42,993 --> 01:16:48,843
But 22.1% of the total arable area of Norfolk last year was

1014
01:16:48,903 --> 01:16:54,257
in uncropped uses. And if we looked at the

1015
01:16:56,553 --> 01:17:00,813
Breckland and South Norfolk, the two are combined for statistical terms, the figure

1016
01:17:00,843 --> 01:17:03,543
was 20,353 hectares.

1017
01:17:05,643 --> 01:17:11,523
That figure is 25 times larger than the whole of the Droves solar scheme.

1018
01:17:11,613 --> 01:17:15,483
The figure for Norfolk is 56 times larger.

1019
01:17:15,543 --> 01:17:15,723
So

1020
01:17:17,283 --> 01:17:22,983
when we're seeing these things in context, the amount of land which is

1021
01:17:23,013 --> 01:17:28,413
currently not being used in production is very much larger

1022
01:17:29,343 --> 01:17:33,903
than the impacts that would be resulting from this particular

proposal.

1023
01:17:35,883 --> 01:17:39,334
We don't expect there to be a significant drop in labor.

1024
01:17:39,753 --> 01:17:44,163
As I said, the combination of sheep management, which is more labor-intensive than

1025
01:17:44,223 --> 01:17:45,363
most arable cropping.

1026
01:17:47,373 --> 01:17:51,063
I appreciate there are some pigs, but they're going to move on to other sites here.

1027
01:17:51,993 --> 01:17:56,253
But the labor is not expected to go down significantly.

1028
01:17:56,553 --> 01:17:58,263
The economic implications,

1029
01:18:00,273 --> 01:18:03,677
where you put in place all the land management, et cetera, with it and the panel

1030
01:18:03,723 --> 01:18:09,573
maintenance, panel washing, et cetera, means I don't anticipate a significant drop

1031
01:18:09,603 --> 01:18:13,263
in the amount of land-based labor that's involved here.

1032
01:18:15,213 --> 01:18:18,273
Yes, the schemes and

1033
01:18:19,834 --> 01:18:25,593
other developments, much of which is permanent, amounts to that 1.1%, 1.2%, which

1034
01:18:25,683 --> 01:18:25,834
is,

1035
01:18:27,153 --> 01:18:31,713
when you look across a county, is a relatively small proportion, but it's a big

1036
01:18:32,223 --> 01:18:32,733
county.

1037
01:18:33,993 --> 01:18:37,533
I don't think they're significant in context with what else is happening in the

1038
01:18:37,623 --> 01:18:41,733
rural economy. They're certainly not significant in my opinion, sir.

1039
01:18:43,174 --> 01:18:48,963
Okay. Thank you. I'm conscious there are a lot of statistics in your

1040
01:18:49,023 --> 01:18:54,783
submission there. Would we find those in REP.1072?

1041
01:18:57,483 --> 01:19:00,843
And could you just remind me what that document itself is called as well?

1042
01:19:04,053 --> 01:19:09,963
I think all of them, the 444,000 hectares certainly

1043
01:19:09,993 --> 01:19:11,523
is in ES chapter 11.

1044
01:19:17,073 --> 01:19:20,523
I'm not sure that the Breckland statistics was.

1045
01:19:20,584 --> 01:19:21,723
I think I only

1046
01:19:23,433 --> 01:19:27,513
pulled that out a few weeks ago when they said what was-- They were asking about

1047

01:19:27,633 --> 01:19:30,873
the local impact. I think I was telling you that we're trying to cover that off in

1048
01:19:30,903 --> 01:19:35,013
the statements of common ground. But what I'll do, sir, is we can do a note and--

1049
01:19:35,463 --> 01:19:41,328
Well, we're anticipating that the ES chapter, I think will be updated anyway when

1050
01:19:41,373 --> 01:19:44,943
we see where we get to with Natural England on thresholds, et cetera.

1051
01:19:45,003 --> 01:19:48,543
So I can make sure they all go into that so we can fully reference them for you.

1052
01:19:48,573 --> 01:19:49,924
Would that be the most helpful?

1053
01:19:50,013 --> 01:19:55,533
Thank you. Yeah. Yes. Okay. Any further

1054
01:19:55,593 --> 01:19:58,983
comment? Let's move on to the next question.

1055
01:19:59,943 --> 01:20:02,343
There will be time for questions at the end.

1056
01:20:03,693 --> 01:20:07,158
Could the applicant provide an update on discussions with Breckland District

1057
01:20:07,233 --> 01:20:11,313
Council on its outstanding concerns relating to the effects of the proposed

1058
01:20:11,343 --> 01:20:15,933
development on agricultural land use beyond the plan classification alone

1059
01:20:17,013 --> 01:20:18,603
require further consideration?

1060
01:20:19,503 --> 01:20:23,043
Thank you, sir. Alex Rosen on behalf of the applicant. I believe Mr.

1061
01:20:23,073 --> 01:20:28,683
Kernan is going to take this sub-item of the

1062
01:20:28,773 --> 01:20:33,963
agenda and the following sub-item, which is the effects on food production in the

1063
01:20:33,993 --> 01:20:38,733
rural economy at a local level, being not fully evidenced and requiring further

1064
01:20:38,808 --> 01:20:41,163
examination as a collective response.

1065
01:20:41,253 --> 01:20:44,523
So if it's okay, I think he'll respond to both of those points now.

1066
01:20:45,093 --> 01:20:48,573
Okay. Is that okay with Breckland, Simon? Yeah.

1067
01:20:49,924 --> 01:20:50,403
Yes, sir.

1068
01:20:50,463 --> 01:20:53,313
Okay. Thank you. Yes. Go ahead, Mr. Kernan.

1069
01:20:54,663 --> 01:20:56,403
Thank you, sir. And some of the figures

1070
01:20:57,993 --> 01:20:59,013
we've already mentioned. So

1071
01:21:02,373 --> 01:21:07,217
in respect to the effects on the farm businesses, those are all

considered in the

1072
01:21:07,263 --> 01:21:12,963
ES chapter, sir. That's chapter 11, which is ESO80 from

1073
01:21:13,053 --> 01:21:17,448
11.8.87 through to 11.8.93.

1074
01:21:18,424 --> 01:21:22,593
And the baseline conditions are all described in Section 11.6.

1075
01:21:22,653 --> 01:21:26,898
So they are covered in the ES chapter.

1076
01:21:27,753 --> 01:21:33,183
And the wider effects, I've got the reference here of 11.8.94 through to

1077
01:21:33,303 --> 01:21:34,188
114.

1078
01:21:36,753 --> 01:21:38,643
That, sir, is the analysis that

1079
01:21:40,053 --> 01:21:41,523
has led me to conclude that the

1080
01:21:44,247 --> 01:21:49,347
Economic implications, assuming that there's, and I did in that case a worst case

1081
01:21:49,497 --> 01:21:52,468
as well as a likelihood of sheep, that the

1082
01:21:53,097 --> 01:21:59,187
assessment

1083
01:21:59,247 --> 01:22:00,867
set out that there's no significant

1084
01:22:02,457 --> 01:22:04,797

adverse effects in terms of labor.

1085
01:22:05,037 --> 01:22:09,266
In terms of the particulars, I think, and that's the management of the

1086
01:22:11,607 --> 01:22:17,218
council's particular concern. The chapter 11 does describe how the land's

1087
01:22:17,247 --> 01:22:22,647
currently being farmed. So that's section 11.6.24.

1088
01:22:23,307 --> 01:22:28,107
And much of the land is arable crops of cereals, oilseed rape.

1089
01:22:28,737 --> 01:22:31,212
There are some vining peas, which are done by contractors.

1090
01:22:31,258 --> 01:22:35,367
There are potatoes, which specialist contractors rent on a typically on a

1091
01:22:37,468 --> 01:22:42,417
one in seven year rotation. There's some carrots and there's some parsnips in small

1092
01:22:42,478 --> 01:22:46,737
parts, both of which are done by specialist contractors.

1093
01:22:47,277 --> 01:22:52,557
And those all work if there's enough rain because it's the sandy-like nature of the

1094
01:22:52,617 --> 01:22:57,792
soil. There are outdoor pigs, and some of them are photographed in the

1095
01:22:57,837 --> 01:23:03,657
ESSA, and there's sheep, which cover most of it, or some of the land rather in

1096

01:23:03,718 --> 01:23:07,587
winter. And the impacts on those are described in the ESSA.

1097
01:23:07,647 --> 01:23:07,827
The

1098
01:23:09,567 --> 01:23:14,502
continuation of combinable crops and short-term vegetable growing won't be

1099
01:23:14,502 --> 01:23:19,872
possible. As you can imagine with the panels there, those arable cropping will not

1100
01:23:20,097 --> 01:23:25,872
be able to continue. The outdoor pig units, talking to the landowners, they

1101
01:23:25,947 --> 01:23:30,957
have this is part of a much bigger estate, and those enterprises move anyway.

1102
01:23:31,017 --> 01:23:34,617
They tend to be three years in one position and then move on.

1103
01:23:35,067 --> 01:23:40,362
And we're advised that those units will just move to other areas within the overall

1104
01:23:40,527 --> 01:23:41,726
estate.

1105
01:23:42,927 --> 01:23:48,478
The sheep enterprises which currently graze over the stubbles, et cetera,

1106
01:23:49,857 --> 01:23:53,127
those will obviously be able to continue and those will be able to expand.

1107
01:23:53,187 --> 01:23:53,367
So

1108
01:23:55,767 --> 01:23:56,457
in terms of the

1109
01:23:58,978 --> 01:24:04,932
concern of the council that the proposed land use is under place or is

1110
01:24:04,978 --> 01:24:10,258
not an optimal use of agricultural land, which I think is the way they phrased it.

1111
01:24:11,728 --> 01:24:15,072
There is no policy, as I said before, which requires agricultural land to be farmed

1112
01:24:15,087 --> 01:24:18,027
to any particular intensity, whether it's best and most versatile, whether it's

1113
01:24:18,087 --> 01:24:21,777
border botulism, nobody says you have to farm it with any particular crops.

1114
01:24:21,837 --> 01:24:27,267
You can do it organically, you can do it minimum tillage, you can pump it with

1115
01:24:27,297 --> 01:24:31,167
fertilizers. Unless you start reaching any other problems such as

1116
01:24:32,697 --> 01:24:37,047
runoff into rivers, et cetera, there's nothing to say how hard or light you should

1117
01:24:37,077 --> 01:24:39,537
farm the land, whether you farm it at all, whether you go agroenvironmental,

1118
01:24:39,627 --> 01:24:40,917
whether you go rewilding,

1119
01:24:42,297 --> 01:24:47,427

and grazing types. There's no policy impacts from any of those.

1120
01:24:48,027 --> 01:24:48,266
The

1121
01:24:51,297 --> 01:24:56,186
relative impact in terms of the local, and I was just giving some of those figures

1122
01:24:57,087 --> 01:25:00,508
a moment ago, so I mean, and I will put these in writing to you afterwards.

1123
01:25:01,107 --> 01:25:01,272
The

1124
01:25:03,027 --> 01:25:08,877
uncropped land in 2025 in Breckland and South Norfolk was

1125
01:25:09,057 --> 01:25:14,427
20,353 hectares. So that's 25 times

1126
01:25:14,997 --> 01:25:19,917
larger, if my math's right, than the 799 hectares of agricultural land within the

1127
01:25:20,008 --> 01:25:23,037
site. In context,

1128
01:25:24,927 --> 01:25:29,187
we have to be sensible about how we see these effects. That may change.

1129
01:25:31,017 --> 01:25:35,277
We don't know to what extent agroenvironmental schemes will disappear because

1130
01:25:36,087 --> 01:25:37,737
government takes away the funding.

1131
01:25:37,797 --> 01:25:41,367
They've certainly got big targets to achieve biodiversity, et

cetera.

1132
01:25:41,427 --> 01:25:41,666
So,

1133
01:25:43,587 --> 01:25:47,277
it will be the intention to keep those schemes running.

1134
01:25:47,337 --> 01:25:52,047
But we're obviously in straightened times in terms of overall crops, so that may

1135
01:25:52,077 --> 01:25:57,357
well change. Farming has been struggling to make money on most crops for a long

1136
01:25:57,417 --> 01:26:02,758
time. Only if that changes, I think will we see a significant increase in the

1137
01:26:02,817 --> 01:26:08,487
amount of production going on. So I believe we've looked at the

1138
01:26:08,517 --> 01:26:12,387
local effects, speaking to both those questions together, sir.

1139
01:26:13,017 --> 01:26:17,697
I don't think that the effects on food production and the rural economy at a local

1140
01:26:17,758 --> 01:26:23,157
level will be significant. And certainly when you look in the context of

1141
01:26:23,817 --> 01:26:27,777
all this other land which is going into different uses, different crops, I mean,

1142
01:26:28,347 --> 01:26:29,457
sugar beet's disappearing.

1143
01:26:30,957 --> 01:26:35,247

We're going down to three sugar beet belts instead of four nationally.

1144
01:26:35,667 --> 01:26:41,157
So there's all sorts of other changes, and in context, the implications and the

1145
01:26:41,187 --> 01:26:45,867
significance of the impacts from this particular scheme won't be significant.

1146
01:26:48,567 --> 01:26:51,837
Okay. Thank you, Mr. Conan. Simon Ward.

1147
01:26:53,547 --> 01:26:56,427
Thank you, sir. I'll come back on this.

1148
01:26:57,807 --> 01:26:58,587
I note what's

1149
01:27:00,177 --> 01:27:06,027
been said, but whilst we recognize that the land may well remain in

1150
01:27:06,057 --> 01:27:10,617
agricultural use, I think our concern is that agricultural use, agricultural

1151
01:27:11,008 --> 01:27:13,647
output, they're not necessarily the same thing.

1152
01:27:14,097 --> 01:27:18,957
Particularly where you have land transitioning from arable and specialist crops to

1153
01:27:19,107 --> 01:27:23,607
low intensity grazing and that was referred to within the

1154
01:27:24,747 --> 01:27:29,457
statement there. I think our concern has always been about those wider cumulative

1155
01:27:29,517 --> 01:27:35,157

agricultural effects, given the pressure that is on agricultural land at the moment

1156
01:27:35,218 --> 01:27:41,082
from housing development, ecological development, energy development, et cetera.

1157
01:27:41,412 --> 01:27:42,642
And to make sure that

1158
01:27:43,947 --> 01:27:49,737
the benefits of this scheme and the loss of BMP land is seen in the round

1159
01:27:50,037 --> 01:27:55,887
and as a whole. I think we're still concerned that there

1160
01:27:55,917 --> 01:28:00,597
isn't yet a real full understanding of those wider cumulative agricultural

1161
01:28:00,627 --> 01:28:03,147
implications across Norfolk and Breckland.

1162
01:28:03,567 --> 01:28:06,746
But understand, sir, that that's something that you will need to put into the

1163
01:28:06,777 --> 01:28:07,677
planning balance.

1164
01:28:10,017 --> 01:28:10,527
Thank you.

1165
01:28:15,837 --> 01:28:20,517
And is there any further information that you require from the applicant?

1166
01:28:24,207 --> 01:28:27,267
No, sir. I think most of the information is there.

1167
01:28:27,327 --> 01:28:31,587

We will consider as part of the next iteration of the statement common ground.

1168
01:28:35,997 --> 01:28:36,627
Thank you.

1169
01:28:44,547 --> 01:28:48,072
Okay. Any further comments from the applicant? No.

1170
01:28:48,087 --> 01:28:52,167
I'll now take questions from the room. Mr. Harvey. Thank you.

1171
01:28:53,907 --> 01:28:59,307
Yeah. Thank you, sir. I think the key thing, is that this site cannot be taken in

1172
01:28:59,367 --> 01:29:02,728
isolation on its own. It's the cumulative effect.

1173
01:29:03,267 --> 01:29:08,547
If you look at the immediate local area, we already have two approved smaller

1174
01:29:08,607 --> 01:29:13,827
sites. We have a potential high growth site coming forward as well.

1175
01:29:13,887 --> 01:29:19,707
There is a biodigester plant and the associated areas with crops grown to support

1176
01:29:19,737 --> 01:29:23,307
that biodigester plant. We have the wind farms.

1177
01:29:23,728 --> 01:29:28,107
We have carbon capture compounds. We have rewilding.

1178
01:29:28,527 --> 01:29:33,478
This is all creating a huge cumulative effect, particularly in the local area.

1179
01:29:34,617 --> 01:29:40,317
And this is our concern. So I support and agree with what the

1180
01:29:40,377 --> 01:29:41,097
Council have said.

1181
01:29:46,197 --> 01:29:50,367
Okay. Dr. Mark Holmes.

1182
01:29:52,857 --> 01:29:55,767
Thank you. Dr. Mark Holmes, local resident. Thank you, sir.

1183
01:29:57,327 --> 01:30:01,722
With due respect to Mr. Curtis, he failed to mention the extensive irrigation

1184
01:30:01,767 --> 01:30:04,737
that's provided to the land on the road site,

1185
01:30:06,177 --> 01:30:08,367
through reservoirs and other facilities.

1186
01:30:08,397 --> 01:30:08,877
Hence,

1187
01:30:10,617 --> 01:30:12,327
I don't think he mentioned on his list onions.

1188
01:30:12,792 --> 01:30:17,307
The onion crops need a lot of irrigation, and they've grown very successfully this

1189
01:30:17,367 --> 01:30:17,532
year.

1190
01:30:18,957 --> 01:30:23,802
So there is irrigation, and thereby we have highly productive land in this area,

1191
01:30:25,047 --> 01:30:30,327
as well as the fact that the ratings of the high percentage of good quality farming

1192
01:30:30,357 --> 01:30:33,807
land that we've referred to. So that was one issue.

1193
01:30:34,047 --> 01:30:36,478
The other issue was the fact that Mr.

1194
01:30:36,508 --> 01:30:40,707
Curtis, with due respect, said that Natural England were wrong in their assessment

1195
01:30:40,767 --> 01:30:44,667
of the soils. And I would take issue with that statement because on the one hand-

1196
01:30:45,693 --> 01:30:50,433
IGP are happy to accept Natural England's opinion when it comes to their survey

1197
01:30:50,493 --> 01:30:53,463
data from 2024, which I suggest is out of date.

1198
01:30:53,793 --> 01:30:57,572
But they're not happy to accept Natural England's opinion on soil quality.

1199
01:30:57,933 --> 01:31:02,913
This is difficult both ways, if you don't mind me saying, with respect. Thank you.

1200
01:31:07,893 --> 01:31:09,453
Mr. Tressiden. Thank you.

1201
01:31:09,633 --> 01:31:11,853
Thank you, Sir. Alex Tressiden on behalf of the applicant.

1202
01:31:12,213 --> 01:31:15,678
A few points to consider there. I think what I'll do is I'll let Mr.

1203
01:31:15,933 --> 01:31:19,549
Kernan come back on the points raised by Dr.

1204

01:31:19,713 --> 01:31:23,253
Holmes, and then I'll touch on the points raised by Mr. Hubbard.

1205
01:31:23,299 --> 01:31:24,978
I would just note at the outset that

1206
01:31:26,403 --> 01:31:31,834
if one reads ES Chapter 11, AS-080,

1207
01:31:32,674 --> 01:31:36,663
onions are mentioned at paragraph 11.6.25.

1208
01:31:36,723 --> 01:31:38,584
So that hasn't been missed, but I'll let Mr.

1209
01:31:38,793 --> 01:31:42,213
Kernan come back on the other points before making my point more generally

1210
01:31:42,243 --> 01:31:43,023
afterwards, please.

1211
01:31:46,983 --> 01:31:49,788
Yes. Sorry, Tony Kernan on behalf of the applicant.

1212
01:31:50,223 --> 01:31:53,959
When I was just going through that, I saw out of the corner of my eye that I hadn't

1213
01:31:53,973 --> 01:31:58,053
mentioned onions, and I thought, "Should I butt in?" And I didn't. I didn't.

1214
01:31:58,067 --> 01:32:03,903
Onions is definitely on the list. In respect to the irrigation scope, there's

1215
01:32:03,933 --> 01:32:04,172
no

1216
01:32:05,584 --> 01:32:07,924
irrigation reservoir within the site.

1217
01:32:07,983 --> 01:32:13,713
The irrigation pipes which run along the north

1218
01:32:13,773 --> 01:32:17,493
edge of the land will serve other parts of the

1219
01:32:18,723 --> 01:32:22,623
holding. I will do you a note, I think is probably the easiest thing on irrigation,

1220
01:32:22,712 --> 01:32:28,203
sir, because it's rather than try and look through my handwritten notes at the back

1221
01:32:28,233 --> 01:32:28,773
at the moment.

1222
01:32:30,993 --> 01:32:33,033
Just make a point to do that.

1223
01:32:35,313 --> 01:32:40,893
But certainly think there are specialist vegetables being grown in the ground.

1224
01:32:42,424 --> 01:32:43,143
These soils,

1225
01:32:45,153 --> 01:32:48,723
without water, because they're sandy, they're very...

1226
01:32:49,683 --> 01:32:51,843
I must point out better quality land comes through the middle.

1227
01:32:51,993 --> 01:32:56,703
They're flexible because you don't have stones, you don't have so much in the way

1228
01:32:56,733 --> 01:32:56,778
of

1229

01:32:59,613 --> 01:33:01,653
limitations for bringing in tractors, et cetera.

1230
01:33:01,924 --> 01:33:04,532
But you do have growing limitations if it doesn't rain.

1231
01:33:04,983 --> 01:33:10,053
So in dry years, and we've had a couple now, they tend to crop very poorly.

1232
01:33:11,763 --> 01:33:17,358
On the other issue, in terms of Natural England's wrong, and I think Dr.

1233
01:33:17,523 --> 01:33:21,123
Holmes said why I took the Natural England wrong in terms of the assessment of the

1234
01:33:21,183 --> 01:33:21,633
land.

1235
01:33:24,903 --> 01:33:29,373
Just really for your benefit, sir, and for his, if I haven't explained it

1236
01:33:30,813 --> 01:33:36,678
properly, the land quality that is in the environmental statement, and

1237
01:33:36,843 --> 01:33:42,078
as shown is on the maps, is as a result of a physical agricultural land

1238
01:33:42,183 --> 01:33:46,593
classification survey. So that has meant every 100 meters, somebody has augered

1239
01:33:46,653 --> 01:33:49,834
down to 1.2 meters if they could get there.

1240
01:33:49,863 --> 01:33:52,459
They've recorded the soil, they've put it through the agricultural land

1241
01:33:52,473 --> 01:33:57,424
classification, and that's what produces those, they can be quite complex, pattern

1242
01:33:57,573 --> 01:34:02,763
across the site that you will see in the plans and which resulted in the figures in

1243
01:34:02,823 --> 01:34:03,723
that table.

1244
01:34:04,953 --> 01:34:10,473
The other figures which Natural England have produced more recently

1245
01:34:12,603 --> 01:34:16,924
is a predictive agricultural land classification map for England.

1246
01:34:17,643 --> 01:34:22,953
That's a prediction, as it says in the title. It's not the result of field survey.

1247
01:34:23,043 --> 01:34:28,084
So it is their update on the old provisional map, which just had grades.

1248
01:34:28,293 --> 01:34:30,813
We didn't even attempt to subdivide it into subgrades.

1249
01:34:31,263 --> 01:34:36,557
This is a new mapping with a lot more computer science gone into it, but it is

1250
01:34:36,723 --> 01:34:42,093
still a prediction. And that's one that predicts 94% of the agricultural land in

1251
01:34:42,153 --> 01:34:42,603
Norfolk.

1252
01:34:44,793 --> 01:34:50,283
It predicted the whole of this site to be subgrade 3A.

1253
01:34:51,273 --> 01:34:53,643
He says just checking the plan in the update, but

1254
01:34:55,863 --> 01:34:59,943
we know from detailed survey that it's a more complicated pattern
than that.

1255
01:35:00,003 --> 01:35:02,223
Actually, it predicted, it's

1256
01:35:03,543 --> 01:35:06,063
plate 1144 on page

1257
01:35:07,293 --> 01:35:09,693
11 of the environmental assessment.

1258
01:35:10,263 --> 01:35:15,903
So it's where we've provided the new update, and it predicts most of
this area to

1259
01:35:15,963 --> 01:35:18,213
be subgrade 3A, with grade 2

1260
01:35:19,653 --> 01:35:24,813
up in the northeast corner. So near where the points of connection
are, and grade

1261
01:35:25,113 --> 01:35:30,723
2 halfway along the southwest

1262
01:35:30,993 --> 01:35:34,563
border. Interestingly enough, the grade 2 is-

1263
01:35:34,683 --> 01:35:37,113
I'm sorry to interrupt, Mr. Kernan

1264
01:35:37,323 --> 01:35:38,432
... grade 4 before.

1265
01:35:38,853 --> 01:35:42,603

Sorry to interrupt you. I'm just wondering if it would help others to either see

1266
01:35:42,663 --> 01:35:45,093
what you're reading or to help us visualize

1267
01:35:46,503 --> 01:35:48,033
the information that you're giving out.

1268
01:35:48,063 --> 01:35:51,723
Is there a specific document that we could look

1269
01:35:51,783 --> 01:35:55,023
at?

1270
01:35:57,933 --> 01:36:02,463
Okay. Yep. That's helpful. I can now see plate 1145.

1271
01:36:02,883 --> 01:36:04,683
You've gone to mute, unfortunately.

1272
01:36:06,753 --> 01:36:06,993
Sorry.

1273
01:36:07,053 --> 01:36:10,203
Is that the document? Yep.

1274
01:36:10,233 --> 01:36:12,573
If we go up about three pages, sir.

1275
01:36:12,873 --> 01:36:14,313
Okay. I'll let you guide.

1276
01:36:17,103 --> 01:36:18,153
Yep. Keep going up.

1277
01:36:21,123 --> 01:36:26,613
That's what the old provisional ALC map showed.

1278
01:36:26,643 --> 01:36:32,343
So that predicted that there was a bit of grade 2 in the southeast

corner, and then

1279
01:36:32,613 --> 01:36:37,203
there were some areas of grade 4 along the southern boundary and over on the far

1280
01:36:37,263 --> 01:36:43,053
west. And otherwise, it was predicted to be undifferentiated grade 3.

1281
01:36:43,263 --> 01:36:47,973
So these are the 1970 maps that were in force until April this year.

1282
01:36:48,783 --> 01:36:52,533
The next map down, so plate 112,

1283
01:36:53,793 --> 01:36:57,799
are then the ones I was talking about, the rather gaudy likelihood of best and most

1284
01:36:57,843 --> 01:37:02,973
fertile. And they're the ones which predicted that most of the border limits was in

1285
01:37:03,063 --> 01:37:08,463
the low likelihood, so less than 20% by area of best and most

1286
01:37:08,523 --> 01:37:11,073
fertile. So they're expecting in that light

1287
01:37:12,573 --> 01:37:15,483
pink color, they're expecting best and most fertile land to be there, but it is

1288
01:37:15,512 --> 01:37:21,363
less than 20% by land area. The next plate down

1289
01:37:23,073 --> 01:37:26,853
is that one. So that's now the new predictive ALC.

1290
01:37:26,943 --> 01:37:28,353
So this is now

1291
01:37:29,584 --> 01:37:34,908
2026 predictions from Defra, which replaced the two that we've just looked at, and

1292
01:37:34,953 --> 01:37:39,213
that's predicting subgrade 3A, as you can see from where the cursor is there,

1293
01:37:39,693 --> 01:37:42,093
across most of the border limits.

1294
01:37:43,533 --> 01:37:48,978
And a bit of grade 2 down in the southwest, which two maps ago we were looking at,

1295
01:37:49,023 --> 01:37:52,053
was predicted to be grade 4. It's now predicted to be grade 2.

1296
01:37:52,713 --> 01:37:58,623
And in the top corner, the northeast corner, which is now predicted to be grade 2.

1297
01:37:59,209 --> 01:38:02,163
So these are Defra's predictions.

1298
01:38:03,963 --> 01:38:05,643
Those are not subject to

1299
01:38:07,084 --> 01:38:07,743
particular

1300
01:38:09,783 --> 01:38:14,853
assessment. The map that you've now got there, sir, is the one that shows you can

1301
01:38:14,883 --> 01:38:17,133
see that site is actually red.

1302
01:38:19,563 --> 01:38:25,248
That is showing that basically Norfolk is now predicted to be grade 1, which is the

1303
01:38:25,323 --> 01:38:27,783
dark blue, grade 2, which is light blue.

1304
01:38:28,293 --> 01:38:31,683
Also grade 3A, which is the dark green, just as we've been looking at for the

1305
01:38:31,713 --> 01:38:37,563
previous one. And that there's relatively small areas of light

1306
01:38:37,683 --> 01:38:39,663
green, which is the

1307
01:38:40,893 --> 01:38:46,338
subgrade 3B. There are, I think the statistics, there's about 1,000

1308
01:38:47,733 --> 01:38:52,353
hectares splattered across the whole of Norfolk, adding all of those together, of

1309
01:38:52,383 --> 01:38:55,893
subgrade 3B, and there's about the same of grade 4,

1310
01:38:57,183 --> 01:39:02,613
I think, on the statistics. I'll put those figures in the note because we now work

1311
01:39:02,643 --> 01:39:05,913
out how to pull them with confidence off their

1312
01:39:07,413 --> 01:39:13,203
GIS system, sir. But that's why now 94% of the agricultural

1313
01:39:13,233 --> 01:39:17,433
land, so that's excluding the non-agricultural and the urban, is now predicted to

1314
01:39:17,493 --> 01:39:20,808
be grade 1, 2, or 3A within Norfolk.

1315

01:39:21,603 --> 01:39:26,883
Obviously, the next plate down, sir, shows what we've found for the site,

1316
01:39:27,753 --> 01:39:30,753
and that's the one that's the result of detailed survey.

1317
01:39:30,813 --> 01:39:33,334
So that hasn't changed because of the new predictive map.

1318
01:39:33,843 --> 01:39:39,138
The predictive map is only giving you predictions for the rest of

1319
01:39:39,633 --> 01:39:40,233
Norfolk.

1320
01:39:41,463 --> 01:39:44,613
And interestingly, where they've gone from that southwest corner where they

1321
01:39:44,703 --> 01:39:46,443
previously had provisional grade 4,

1322
01:39:47,913 --> 01:39:50,913
now gone to predictive grade 2, when in fact it is grade 4.

1323
01:39:51,093 --> 01:39:55,653
So there are limitations, obviously, with those maps, but they're better than the

1324
01:39:55,683 --> 01:40:01,026
old ones, but they are still predictions So I hope that's answered Dr.

1325
01:40:01,131 --> 01:40:02,841
Holmes' question. I'm not

1326
01:40:04,071 --> 01:40:07,041
saying that Natural England got the land quality wrong.

1327
01:40:07,131 --> 01:40:11,796
I'm saying that we've got predictions, and then we've got known

survey results, and

1328
01:40:11,841 --> 01:40:13,551
these are the ones for this particular site.

1329
01:40:14,272 --> 01:40:17,991
Okay. Thank you. And that was the environmental statement we could see was chapter

1330
01:40:18,022 --> 01:40:22,041
11. Have you got the examination library reference for that?

1331
01:40:22,161 --> 01:40:24,951
Yes. So it's AS-080.

1332
01:40:29,871 --> 01:40:30,381
Okay, thank you.

1333
01:40:31,671 --> 01:40:35,661
Sir, I do have one further point to make, but I'm happy to see if anyone else wants

1334
01:40:35,721 --> 01:40:38,151
to make submissions before doing so because that will be my final point.

1335
01:40:38,166 --> 01:40:40,821
Okay. Let's take Mr. Hubbard first. Thank you.

1336
01:40:40,851 --> 01:40:45,321
Yeah. Sir, thank you. Tim Hubbard, Castle Acre Parish Council.

1337
01:40:45,531 --> 01:40:48,171
Just in terms of helping practically,

1338
01:40:49,941 --> 01:40:54,291
there is an irrigation reservoir immediately to the west of the site.

1339
01:40:55,731 --> 01:41:00,201
Underground mains service most of the site.

1340
01:41:00,441 --> 01:41:05,601
Indeed, there were potatoes grown on the most eastern side of the site along the

1341
01:41:05,691 --> 01:41:11,661
A1065 this year. And I think one has to realize that with

1342
01:41:11,721 --> 01:41:16,596
land classifications, some of the, what you will call the lower grade land

1343
01:41:16,641 --> 01:41:21,861
classifications, are absolutely key for the production of some of the intense

1344
01:41:22,461 --> 01:41:26,781
irrigated crops such as potatoes, carrots, onions.

1345
01:41:27,216 --> 01:41:33,081
Because what it does is that, if these are irrigated, it allows much

1346
01:41:33,111 --> 01:41:36,051
better management of these crops throughout the season.

1347
01:41:36,411 --> 01:41:41,871
Because if these crops are grown on higher grade soils, harvesting can be extremely

1348
01:41:41,901 --> 01:41:46,971
difficult. So the lower grade land is extremely important, or the irrigated lower

1349
01:41:47,031 --> 01:41:52,611
grade land is extremely important for the production of these crops so that they

1350
01:41:52,701 --> 01:41:57,981
can, take for instance, carrots, they can be harvested right through the winter

1351
01:41:58,041 --> 01:42:03,351
months. And so some of this lower grade land, in terms of

classification, is

1352
01:42:03,471 --> 01:42:08,721
absolutely key for some of these higher grown crops, and are indeed highly

1353
01:42:08,781 --> 01:42:11,241
productive and can be highly profitable.

1354
01:42:13,851 --> 01:42:16,761
Okay, thank you. Any further hands in the room?

1355
01:42:19,461 --> 01:42:19,671
No.

1356
01:42:20,901 --> 01:42:24,532
I'll just go online. Any further hands online?

1357
01:42:26,482 --> 01:42:29,211
Not seeing any. Mr. Alex Tresadern.

1358
01:42:29,901 --> 01:42:32,631
Thank you, sir. Alex Tresadern on behalf of the applicant.

1359
01:42:32,661 --> 01:42:37,011
I'd just like to make a couple of final points on this matter.

1360
01:42:37,401 --> 01:42:41,796
The first being, I appreciate there are a lot of documents submitted into the

1361
01:42:42,321 --> 01:42:46,761
examination with various lengthy examination library references, but a key one is

1362
01:42:46,852 --> 01:42:51,651
the planning statement, which I would encourage all interested parties to read in

1363
01:42:51,681 --> 01:42:53,871
full if you've not done so already.

1364
01:42:53,931 --> 01:42:58,551
And when doing so, they will note at paragraph

1365
01:42:58,852 --> 01:43:04,836
8.3.218 that the applicant has concluded that agricultural land and

1366
01:43:04,852 --> 01:43:09,111
the effects thereon should be given a negative weight in the planning balance.

1367
01:43:09,171 --> 01:43:12,500
So the applicant isn't suggesting that what it's doing to the land should be

1368
01:43:12,532 --> 01:43:15,801
considered positively in the planning balance, nor indeed neutrally.

1369
01:43:15,891 --> 01:43:20,105
It is acknowledged that that is given a negative weight, which should be considered

1370
01:43:20,121 --> 01:43:23,181
in the planning balance when the Secretary of State makes his decision.

1371
01:43:23,647 --> 01:43:29,511
And I further refer to the recently granted Beacon Fen Energy Park

1372
01:43:29,782 --> 01:43:35,151
solar DCO, which was granted as recently as the 21st of August of this year.

1373
01:43:35,542 --> 01:43:40,251
And in that decision letter, the examining authority concluded that

1374
01:43:42,561 --> 01:43:47,571
the applicant's assessment there had a greater impact

1375
01:43:47,721 --> 01:43:49,417
on both

1376

01:43:51,232 --> 01:43:56,091
BMV loss from the development itself, approximately in the region of 30 hectares,

1377
01:43:56,361 --> 01:44:00,681
and nearly double the cumulative loss that the scheme here is demonstrating.

1378
01:44:01,011 --> 01:44:06,471
And that was given a great negative weight in the overall planning balance, and the

1379
01:44:06,532 --> 01:44:09,861
scheme was still consented. So there is precedent for what the applicant is doing

1380
01:44:09,891 --> 01:44:11,661
here in terms of what gets

1381
01:44:12,951 --> 01:44:14,602
consented and agreed. Thank you.

1382
01:44:18,081 --> 01:44:18,532
Thank you.

1383
01:44:21,561 --> 01:44:25,282
So we'll move on to item four, which is next steps.

1384
01:44:25,792 --> 01:44:30,861
So we have been summarizing action points as we've gone along through each topic,

1385
01:44:31,011 --> 01:44:32,931
so I'm not intending to go through those again.

1386
01:44:34,431 --> 01:44:36,171
In terms of land and soil,

1387
01:44:37,431 --> 01:44:41,841
picked up a couple of actions. So one was for the statement of common ground with

1388

01:44:41,871 --> 01:44:47,451
Natural England to separate out the item about the thresholds so that we're clear

1389
01:44:47,511 --> 01:44:47,661
on

1390
01:44:49,551 --> 01:44:51,022
the different positions.

1391
01:44:52,341 --> 01:44:54,891
And then I think there was another note

1392
01:44:56,691 --> 01:45:01,251
that Mr. Kernan said that he would do for Dr.

1393
01:45:01,282 --> 01:45:04,131
Holmes about highly productive land.

1394
01:45:08,511 --> 01:45:11,782
Are there any other points? No.

1395
01:45:13,792 --> 01:45:18,051
Okay. So I think there's a general action point as well regarding statement of

1396
01:45:18,111 --> 01:45:22,191
common grounds. Keep those up to date and make sure that it's clear on what the

1397
01:45:22,221 --> 01:45:28,102
areas of disagreement are. I'll now move on to item five, which

1398
01:45:28,161 --> 01:45:29,331
is to close the hearing.

1399
01:45:30,891 --> 01:45:32,001
If there are no other ma-

1400
01:45:33,081 --> 01:45:36,232
Sorry, sir. I appreciate we've just gone through the action points.

1401
01:45:36,321 --> 01:45:40,191
If I could perhaps be a bit cheeky and ask for an action point of my own.

1402
01:45:40,671 --> 01:45:46,282
Given that deadline for is taking place next Wednesday, the 16th of September, and

1403
01:45:46,311 --> 01:45:47,272
as part of this,

1404
01:45:48,561 --> 01:45:53,032
and indeed the hearings that will happen tomorrow, all parties are required to

1405
01:45:53,151 --> 01:45:57,861
submit a written summary of everything that they've said in those hearings.

1406
01:45:58,251 --> 01:46:02,991
If it would be possible, please, for the transcripts and recordings of the hearings

1407
01:46:03,051 --> 01:46:05,032
to be published as soon as possible.

1408
01:46:05,091 --> 01:46:09,066
That would benefit not only the applicant, but other interested parties as well,

1409
01:46:09,141 --> 01:46:14,272
I'm sure, in order to cross-check action points and various areas of discussion as

1410
01:46:14,301 --> 01:46:17,542
soon as possible, given that deadline of Wednesday next week, please.

1411
01:46:20,451 --> 01:46:22,566
Yes, we'll take that away and

1412
01:46:23,811 --> 01:46:26,241

confirm when those are likely to be issued.

1413
01:46:28,701 --> 01:46:34,626
Okay, so moving to item five. If there are no other matters, I'm just

1414
01:46:34,671 --> 01:46:37,191
looking very carefully for hands in the room.

1415
01:46:38,032 --> 01:46:41,631
If there are no other matters that anyone wishes to raise, I shall now close the

1416
01:46:41,647 --> 01:46:41,991
hearing.

1417
01:46:43,431 --> 01:46:46,522
Thank you for your attendance and participation in this hearing.

1418
01:46:47,421 --> 01:46:51,471
The time is now 15:32, and the hearing is closed.

1419
01:46:51,532 --> 01:46:51,831
Thank you