

Representation at Deadline 4 – Following ASI

Sporle with Palgrave Parish Council represented by [REDACTED] - [REDACTED]

Following the ASI made on Thursday 10th September Sporle with Palgrave Parish Council (PC) wish to make the following submission to develop the points made in the ASI and documents referred to below:

- Sporle with Palgrave Parish Council response to Statutory Consultation
 - Draft Itinerary for ASI. AS-084
 - Comments made by PC and Breckland District Council in ISH3 agenda item 3.1 Landscape and Visual
 - 6.3 Environmental Statement Figure 6.7: Visual Receptor Groups. APP-084
 - Representation by Sporle with Palgrave Parish Council RR-054
 - Sporle with Palgrave Parish Council request for an accompanied site visit PDA-004
 - Q11.0.7 ExQ1 for Deadline 1 - Question for Sporle with Palgrave Parish Council ref unaccompanied site inspection request. REP1-097
 - ISH1 – Summary of oral representation made under agenda 3.5 – Landscape and Visual. REP1-098
 - Comments for Deadline 2 – Draft Itinerary for Accompanied Site Inspection (ASI). REP2-038
 - Comments on the Deadline 1 submissions and any other information requested by the ExA for Deadline 2. REP2-039
 - Technical Information Note – Landscape and Visual. REP3-083
1. In PDA – 004 the PC made a request for an accompanied site inspection and were grateful that the ExA and Applicant agreed largely to the viewpoints we wished to include. These were updated and published in AS-084; the location points on the map in Annex B being generally referred to in this submission.
 2. Locations 3,4,5,6,9,10 are all in Visual Receptor Group 4 (VRG4) as shown on the plan shown in APP-084. This group is outside the Order Limits. The location points include the viewpoints described in REP1-097 as:
 - N3 – Location 4
 - View 7 – Location 6
 - VP46 – Location 9
 - L2, L3, VP4, L5, L6 – walking along Sporle with Palgrave BR5 PRoW to Location 10
 3. In the ASI, I was requested to speak to what we were seeing and attempted to show the extent of cumulative impacts of the scheme with the proposed High Grove scheme as also described initially in our response to the Statutory Consultation and further in RR-054, PDA-004, REP1-098, and REP2-038.
 4. At Location 6 there is no visible potential impact from High Groves however it is impacted by views of the Drovers (fields 14 and 15 up to the horizon along Petticoat Drove). Although this is a minor road (from Sporle to Newton by Castle Acre) it is used by many people walking out from Sporle village.
 5. As mentioned in point 2 above all these view points are outside the Order Limits. The Applicant states in response to CAPC20. *‘There are no potential long term significant adverse landscape effects beyond the Order limits.’* (REP2-039).

6. We contend that the ASI and the views from these locations back up the Breckland District Council's position as stated in their representations in ISH3 agenda item 3.1.
 - Breckland Landscape Classifications are 20 years old and are largely out of date, are broad brush and, for example, do not include the large number of energy structures already in place such as the Necton substations, North Pickenham wind farm and the wind turbines on the north side of Swaffham.
 - E6 North Pickenham Plateau within which the site is situated is a very large area and the site is at the west end and has little interaction with the other parts.
 - That there should have been work done in classifying the site and its surrounds into LLCA's which would have then straddled the borders and provided a more realistic LVIA. Mr Richards alluded to a 'ripple effect' – adverse ripples into surrounding countryside.
7. The impacts on VRG4 and the view points seen on the ASI could have been addressed better with LLCA's as seen for example with Location 9 which the PC has attempted to show from their Statutory Consultation Response through RR-054, REP1-097, REP1-098, REP2-038, REP2-039 to our representations at ISH3 agenda item 3.1. This would have dealt with the cumulative impacts better with High Grove. They are presently at PEIR stage, but in the future, when and if they, submit a DCO application this would have more likely met our current concerns.
8. This would have also had an impact on the assessment which currently only states the significant adverse effects being in the construction phase. We would continue to contend that these impacts will also be significant and adverse in the operational phase, particularly in the first few years until any mitigation hedging and trees reach significant height. We recognise the Applicant in REP3-083 has shown impressions of how this mitigation might look at various viewpoints after 15 years. But this only shows how this whole scheme will change the landscape character for ever as it is unlikely the mitigation will be removed at decommissioning.
9. As stated in a number of the PC's representations this is an area of open sloping landscape with long views. This was also referred to by Breckland District Council in ISH3 agenda item 3.1 with particular reference to the impact of mitigation hedging along the A1065 and its impact in changing the landscape character. The Applicant's response that this should be seen in the sequential nature of traffic passing through a series of views of gaps and hedges and trees as at present lessens the impact. They also used the same answer in relation to walkers using PRow.
10. The PC would contend that in relation to the impact along the A1065, which was not viewed at the ASI, they would agree with the position taken by Breckland District Council and Castle Acre Parish Council.
11. However, in relation to the Peddars Way and Location 9, the Applicant made the point that what we were viewing was only part of the sequential effect and further down the path there were hedges and trees obscuring the view. This maybe correct but walkers do stop to take in the view at gaps and this argument cannot be made on PRow.
12. As mentioned in item 4 above, Location 6 is only a representative view from Newton Road along which there are several points where the Drovers can be viewed, which is why several points were requested in PDA-004. Again the same argument was made by the Applicant but this is a largely open road so does not apply.

13. Walking along BR5 to Location 10 we looked in several gaps in the hedge or field gateways. These were largely to show the impact of the three most northerly fields of the Central Area of the High Grove development as shown in their plans at PEIR stage. These showed the considerable impact of views from Castle Acre and particularly the castle ramparts.
14. If the High Grove development obtains its DCO in its current form these gaps in the high hedges, which are both sides of BR5, will likely be gapped so presenting a continuous hedge all the way along to the A1065. Both gapping and/or 3m high solar arrays will destroy the amenity value of the PRow as the current open landscape views will no longer be available.
15. Although not related to the ASI and the above statements the PC is equally concerned with the proposed mitigation required by the MOD. We are assured that the Applicant's insistence that the mitigation suggested cannot be higher than 4.5m which is obviously the maximum height allowed for the solar arrays and controlled by the DCO. However, until the detail of what mitigation is proposed, whether earth bunds or fencing or both, we cannot make a judgement, along with Breckland District Council, Norfolk County Council and Castle Acre Parish Council, on the landscape and visual impacts, despite the Applicant's assurances that it will not change their assessment. This is coupled with the fact that we will not see any plans till Deadline 5 and then only outline ones. We contend that the ExA as well as ourselves and those bodies mentioned above, will not have time to fully respond nor question in any depth the impact of such mitigation proposed before the end of the Examination, thereby significantly weakening its rigour and integrity.
16. The Applicant made the point in their final comments in ISH3 agenda item 3.1 Landscape and Visual that the planning balance for landscape and visual in its entirety is moderately negative. All the points made above will surely increase this negativity and as we hope help to turn the balance in favour of the DCO application being rejected.