

Written Representation: Site 7 and Public Rights of Way

EAST PYE SOLAR (EN0110014)

Ref FE5EC9CAB

'The footpaths between Saxlingham and Hempnall have been in continuous use for centuries. For each successive generation, their use and enjoyment has been woven into the fabric of rural life. They are not simply tracks to get from A to B but a window into the landscape.'

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Summary

1. I object to the inclusion of site 7 in the East Pye Solar Scheme and ask the Examining Authority to consider its complete removal or substantial reduction. My focus is the public rights of way (PRoW) network and its recreational function. I have concentrated on this issue because I have undertaken detailed local research, including a survey of 135 respondents gathered over 16 days; analysis of route use; site photographs; and a collation of independent evidence of recreational walking. While this submission focuses on PRoWs, it also highlights that the potential harm to the PRoW network converges with other site 7-specific constraints and impacts.
2. Site 7 contains an unusually important, interconnected and well-used recreational network whose value depends substantially on the rural landscape through which it passes. The scheme as currently proposed would occupy a large part of the landscape between Saxlingham Nethergate/Saxlingham Green and Hempnall, leaving PRoW users with no unaffected alternative for travelling between these areas. The central planning question is one of avoidance and proportionality. Screening and setbacks may mitigate individual effects, but they do not address the combined change to the recreational landscape.
3. The PRoWs at site 7 should not be assessed simply as individual paths or viewpoints. They connect Saxlingham Nethergate, Saxlingham Green, Hempnall and the surrounding countryside, with links to the Boudicca Way, and are combined into circular walks and practical journeys. The survey indicates frequent use, with most respondents reporting daily or weekly use, for functional journeys as well as recreation. Respondents described walking, running, dog walking, horse riding, wildlife watching and making journeys to amenities and work. They highly valued openness, long views, tranquillity, woodland, wildlife, churches, heritage and historic features. Health and wellbeing benefits of the network were also spontaneously volunteered. The results demonstrate the amenity and function of the PRoW network within its landscape. PRoW users were extremely concerned about the proposed development on the experience of using PRoWs, particularly in relation to rural character, heritage, views, wildlife and practical access to amenities. They also anticipated considerable negative effects during construction. Overall, the survey results indicate that if the scheme is approved as currently designed, this would result in a significant reduction in amenity for PRoW users.
4. This local evidence is independently corroborated. The Saxlingham–Hempnall–Shotesham area has repeatedly been selected and recommended for walking by regional publications, the Ramblers and other walking groups, village walking guides, specialist walking websites, social media and route-sharing platforms. In 2017 Norfolk Magazine featured a walk recommended by Norfolk Ramblers for its 'attractive views', incorporating SN-FP9 and SN-FP10 in a 5¾-mile circuit. A 2026 Norfolk Magazine article describes a circuit incorporating five of the PRoWs considered in this representation: HP-BR30, SN-FP14, SN-FP9, SN-FP27 and HP-FP3. This supports the survey evidence that the area is known as a destination for walking and that the paths function collectively as an established walking landscape rather than as isolated routes.
5. The effects of the proposed development require scrutiny because maintaining a path on its existing alignment does not preserve its recreational amenity. Solar development and mitigation planting would alter open rural outlooks and the sequential experience of moving between enclosed and open sections of the network. Screening is also less effective seasonally. The Applicant should therefore distinguish between maintaining access and preserving recreational quality, and should demonstrate whether the proposed permissive path and community-accessible land provide equivalent amenity when connectivity, circular routes, rurality, views, openness and tranquillity are considered.
6. Construction effects are also important. I am particularly concerned about proposed closure and diversion of the principal pedestrian connections between Saxlingham Nethergate and Hempnall, including SN-FP14 and HP-BR30. This route is used not only for leisure but for practical journeys, including access to

shops and medical services. Diversions should be assessed as complete journeys from the start to the end of the closure, including road sections and interaction with construction traffic. The Applicant should also explain what 'open but managed' means in practice and provide clear information on every haul route or operational-access crossing of a site 7 PRow, including the permanent access associated with the proposed substation at 7F.

7. The PRow evidence is the focus of this representation, but there is a significant convergence of impacts in site 7. The site is affected by landscape, heritage, ecological, agricultural, residential and access constraints. Development would occupy a substantial part of the rural landscape separating Saxlingham and Hemphall; it would also affect approaches to the Saxlingham Nethergate and Saxlingham Green conservation areas and the setting in which historic features and recreational routes are experienced, including the Grade II* listed ruined Church of St Mary. Areas of protected woodland lie close to parts of the site, while the wider area contains hedgerows, ditches, mature trees and other ecological corridors. A substantial proportion of site 7 is best and most versatile (BMV) agricultural land. The proposed substation at 7F would place fixed infrastructure and permanent access works on BMV land and necessitate abnormal-load requirements through a constrained local highway network.
8. The Applicant should demonstrate the generating contribution of site 7, the need for the 7F substation in its proposed location, the alternatives and smaller site 7 configurations that were tested, and whether generation or electrical infrastructure could be accommodated differently. Land availability or landowner willingness should not substitute for a proper comparison of preferable alternatives.
9. I ask the Examining Authority to consider whether retaining site 7 at its proposed scale is justified when complete removal, substantial reduction and/or relocation of the 7F substation could avoid a particular concentration of harm. The case for doing so does not depend on any single effect. It arises from the exceptionally well-evidenced recreational function of the site 7 PRow network, the importance of its rural setting to that experience, and the convergence of those impacts with other constraints in the same location.

Introduction and scope

10. This submission focuses on the public rights of way at site 7 and their recreational function. I have concentrated on this issue because I have undertaken detailed local research, including a survey of 135 PRoW users, analysis of the routes people use (Appendix 1 and 3), photographs of important viewpoints (Appendix 2) and a collation of independent evidence of recreational walking in the area (Appendix 4). I identify some additional site 7-specific considerations where they are relevant to the overall planning balance. My central submission is that the exceptionally important recreational function of the PRoW network, when considered alongside these other impacts, provides a strong case for removing site 7 from the scheme or, alternatively, substantially reducing its extent.
11. This representation focuses particularly on site 7 because a range of constraints converge there. The question is not simply whether each individual effect can be mitigated, but whether the location has sufficient capacity to accommodate development at the proposed scale without an unacceptable concentration of impacts.

Public rights of way and amenity

The PRoW network as a whole

12. The 2001 South Norfolk Landscape Assessment states that the Tas Tributary area is characterised by open fields, 'small blocks of deciduous woodland of high ecological and visual quality', 'framed open views' across the countryside, and a network of recreational footpaths. In site 7, the combination of accessible routes and framed open rural views is central to the amenity experienced by users (see photographs in Appendix 2).
13. Norfolk County Council's Norfolk Access Improvement Plan recognises that the value of PRoWs extends beyond the simple availability of paths. Its objectives include improving understanding of Norfolk's landscape and promoting 'the outstanding countryside and heritage that can be reached from it'. The plan also states that the Council will seek to ensure 'no, or minimal, adverse effects on Public Rights of Way arising from developments'. The plan recognises the importance of PRoWs as an interconnected resource for recreation and active travel. This supports consideration of PRoWs in site 7 as a network, and assessment of the scheme in relation to the quality of recreational amenity, including the landscape and countryside experienced from the network.
14. Site 7 contains a particularly well-connected network of PRoWs between Saxlingham Nethergate, Saxlingham Green, Shotesham and Hempnall, with close connections to the Boudicca Way. The value of the PRoW network derives not only from individual PRoW characteristics but from route choice, circular walks and the experience of moving through a coherent and particularly attractive rural landscape (see Appendix 2 for photographs and Appendix 4 for independent evidence of the importance of the area as a walking destination). A local survey of PRoW users demonstrates that the PRoWs have considerable value to users as interconnected routes, providing high levels of route choice and the ability to combine individual PRoWs with the Boudicca Way (Appendix 1).
15. The survey indicates that the PRoWs in the area are well-used, with a large majority of respondents reporting daily or weekly use (Appendix 1; see also Appendix 2, image 20, demonstrating a well-used path). They are used for recreation but also for travelling between areas to access amenities, such as the shop, doctor's surgery and garage. They are used for commuting on foot, particularly where roads are unsuitable for pedestrian use. The routes between Saxlingham Nethergate and Hempnall, particularly the SN-FP14/HP-BR30 route, are particularly frequently referred to in relation to functional journeys (Appendix 1).
16. PRoW users highly value the ability to travel through a rural landscape on foot. Open, far-reaching views, tranquillity and interaction with wildlife and nature are integral parts of this experience, as is the link to the culture and heritage of the area (Appendix 1).
17. 98% of PRoW users anticipated that the scheme as proposed would have a negative or very negative impact on their experience of using PRoWs. This suggests a significant reduction in amenity if the

scheme is approved. They report concern about a range of aspects, but the effects on open views, rural character and wildlife were particularly prominent: all respondents said they were 'very' or 'extremely' concerned about loss of these amenities (Appendix 1).

18. The paths have historic and cultural value as longstanding connections between settlements and features including the remains of St Mary's Church, the former brickworks next to St Mary's and the historic settlement at Mud Hole/Hall, with routes continuing towards Foxhole, Saxlingham Green and Hempnall. Hempnall FP2 is known as the Packway, and was a route used to take livestock to Hempnall Fair. A sense of historic continuity contributes to the character of the network and should be recognised alongside its present recreational and transport functions. PRow users prize the heritage value of what one respondent described as 'old trackways', with HP-BR30 repeatedly identified as an important historic route (Appendix 1).
19. There is considerable evidence that the area is known as a destination for attractive landscapes and walking. In November 2017, Norfolk Magazine published 'Walk: a pretty route in Saxlingham Nethergate', recommended by Norfolk Ramblers. The 5¾-mile circular walk starts at Saxlingham Nethergate and passes through Saxlingham Green and the Shotesham countryside, including the Boudicca Way. The accompanying map shows the route incorporating SN-FP9 and SN-FP10. The article describes the walk as having 'attractive views' and draws attention to its woodland and historic church setting. This provides evidence not only of established recreational use, but of the landscape and historic environment forming part of the attraction of the walk.
20. A further countryside walk was published by Norfolk Magazine in 2026 between Hempnall and Saxlingham Nethergate. Its accompanying route map shows that the recommended circular walk incorporates five of the PRowS considered in this submission: HP-BR30, SN-FP14, SN-FP9, SN-FP27 and HP-FP3. It provides an independent example of these paths being into a longer recreational circuit between the villages. The article is also illustrated with a photograph of an open view across the landscape experienced from the route.
21. These are not isolated examples. Other identified online material includes repeated walks from different Ramblers groups in the area; articles from local and national publications; recommendations from specialist walking websites; parish and community walks; social media recommendations; and publicly shared walking and running routes. The area is described in these accounts as 'attractive' and 'unspoilt', with 'beautiful countryside'. The beauty of Saxlingham Green was captured by the renowned artist Michael Andrews, RA in the 1980s: 'Sax A.D. 832, First Painting' features a view of Saxlingham Green, with the wider countryside featured in the distance. A collation of some independent evidence of the area as a destination for walking is provided at Appendix 4.
22. This external material is significant because it corroborates the survey findings and indicates that the area around Saxlingham, Shotesham and Hempnall is known beyond the immediate locality as an attractive destination for walking. The convergence between the survey responses and independently published material supports the conclusion that the recreational value of these PRowS lies in their function as an established walking network through an attractive natural landscape.
23. This is important, because the scheme does not affect isolated footpaths. Development on both sides of Broaden Lane would alter the outlook and character experienced across the whole walking network between Saxlingham and Hempnall. All routes between the villages would be affected by arrays and associated infrastructure, as well as the loss of open, rural views (see photographs in Appendix 2). The scheme as currently designed does not provide PRow users between Saxlingham Nethergate/Saxlingham Green and Hempnall with an unaffected alternative.

Open views, screening and seasonal effects

24. The Applicant's assessment appears to give insufficient weight to open outlooks from the PRow network. Openness, long-distance views, rural character and tranquillity form part of the recreational experience. The survey reports that views and rurality are particularly important to users of these paths (Appendix 1).

25. Saxlingham Nethergate FP10 is a clear example. Much of the route presently provides an open rural walking experience, including views across pasture towards Saxlingham Grove and the surrounding countryside (see Appendix 2, images 2-5). Introducing arrays, a substation and other infrastructure into that outlook would fundamentally change the experience even if the path remains accessible.
26. The landscape is experienced sequentially by PRow users. A path may pass through woodland or beside a hedgerow and then emerge into an open field with expansive views. Existing woodland and field boundaries should not therefore be treated as though they make the whole route visually contained.
27. Screen planting is not equivalent to retaining an existing open outlook. In relation to FP12, the Applicant acknowledges that mitigation would change previously open views into enclosed views (Appendix 2, images 10-12). This illustrates the tension inherent in the scheme: the design relies heavily on screening, which has its own deleterious effect on the existing landscape experience.
28. The effectiveness of deciduous screening is reduced in winter. This is highly relevant for PRow users in the survey, a majority of whom reported daily or weekly use. Seasonal loss of leaf cover should be considered when assessing visual effects on PRow users and the extent to which planting can mitigate those effects (see Appendix 2, image 19, demonstrating an area of thin deciduous cover on HP-BR30).
29. If site 7 is retained, PRow mitigation should not be limited to minimum setbacks from individual paths and deciduous screening. The layout should be designed to avoid the experience of users repeatedly walking alongside solar panels and security fencing over the course of a journey. In particular, the Applicant should consider greater setbacks, design that includes winter cover, retaining open land, and removing development in selected areas to preserve meaningful stretches of open countryside and important views. The effectiveness of mitigation should be assessed across commonly used circular routes and the wider network, rather than at individual PRow sections in isolation.

Claimed benefits of permissive paths and accessible land

30. The proposed additional permissive path and community-accessible land in site 7 should not be treated as equivalent compensation simply because they add path length or accessible area. The existing network provides interconnected rural routes, circular walks, open rural views and a sense of being within undeveloped countryside. Community-accessible land is a different form of recreational provision from a network of historic, rural paths.
31. The Applicant should demonstrate the amenity gain of the proposed accessible land by identifying the number and approximate length of circular walks available before and after development, the extent to which any new route compensates for the loss of open views by providing new open views, and the additional recreational function provided by community-accessible land, particularly in areas where common land is already available and the experience of using paths in open landscapes will be lost.
32. The continued availability of a PRow should not be treated as equivalent to preservation of its recreational amenity. The planning balance should distinguish between maintaining access and maintaining cultural heritage, landscape quality, openness, views, tranquillity, connectivity and route choice.

Temporary closures, diversions and traffic

33. I am particularly concerned by the proposed closure of Saxlingham FP14 and Hempnall BR30; and Saxlingham FP25 and Hempnall FP2 during construction. These routes constitute the pedestrian connection between Saxlingham Nethergate and Hempnall, since Broaden Lane is not suitable for pedestrian use.
34. The effect of closures is particularly important for people who use the network for practical journeys, including access to employment, shops and medical services, rather than solely for leisure. A diversion that preserves a technical connection may nevertheless significantly reduce the practical convenience and reliability of the route. Local users report that PRowS are essential for such journeys (Appendix 1).
35. The Applicant should assess the interaction between PRow diversions and traffic displaced by concurrent construction activity or road restrictions. The proposed pedestrian diversion from FP14/BR30 and

FP25/FP2 to footpaths via Saxlingham Green would mean people starting in Saxlingham Nethergate walking first to Saxlingham Green, usually via Hall Lane. Local experience indicates that restrictions on Broaden Lane displace vehicles onto Hall Lane and through Saxlingham Green (also the route of the Boudicca Way). Diverting pedestrians onto narrow roads that are also used by displaced traffic requires explicit assessment of the impact on pedestrians.

36. Fairstead Lane forms part of the connection between the two principal PRow routes used between Saxlingham Nethergate and Hempnall, but is also proposed as an HGV access route for sites 7A–F. Many survey users reported using Fairstead lane to make a loop between the PRowS or to complete routes to or from Hempnall village centre. An assessment of the impact of routing HGVs via Fairstead Lane should include the safety implications and amenity impact for pedestrians, cyclists and horse-riders. This should include consideration of children.

Internal access and haul-route crossings

37. The effects of internal haul and operational access routes on PRowS require separate scrutiny from visual effects. A new crossing can alter the physical character and recreational amenity of a path through surfacing, fencing, gates, signage, hedgerow openings and vehicle movements even where operational traffic is infrequent.
38. FP10 within 7F is of particular concern because permanent access to the proposed substation appears to require an internal route from Broaden Lane. The Applicant should identify precisely where this route intersects FP10 and any other PRowS, whether a vehicular crossing exists at present, and whether the proposed crossing would be temporary or permanent.
39. Across site 7, the Applicant should provide a plan of every proposed haul or operational access crossing a PRow and identify the width and surfacing, vegetation removal, fencing or gates, and anticipated construction and operational vehicle movements. These physical changes should also be assessed cumulatively across the network.

Landscape, heritage and rural settlement character

40. Site 7 lies within a landscape where open fields, woodland, hedgerows, lanes and recreational routes combine to create rural character. The potential effect of the scheme is not limited to the visibility of panels: security fencing, substations and other infrastructure can change how the landscape and village approaches are experienced.
41. The approaches to the Saxlingham Nethergate and Saxlingham Green conservation areas would be significantly affected by the scheme. These rural approaches provide a transition from open countryside into historic, protected settlements characterised by lanes, mature vegetation and historic buildings. Extensive solar infrastructure alongside these approaches would materially alter that experience even where individual listed buildings are screened.
42. Site 7D would introduce large-scale solar infrastructure close to the Grade II* remains of St Mary's Church, which is still consecrated and used for outdoor worship (see Appendix 1 for survey findings relating to the ruined church and Appendix 3 for a photograph submitted by a respondent). The assessment should therefore address whether development of the surrounding landscape affects the use and setting of this medieval heritage asset, not merely whether the panels are directly visible from it. It should also assess whether the experiences of services will be affected by the construction and operational noise associated with the development.

Woodland, ecology and ecological connectivity

43. Site 7 lies immediately adjacent to important ancient woodland and designated ecological habitat. The wider area contains hedgerows, ditches, mature trees and connected habitats that contribute to ecological function as well as landscape character.
44. The spatial relationship between development, PRowS and ecological corridors is important. The effectiveness of individual setbacks should be considered in the context of the overall site 7 layout,

including whether the remaining concentration of infrastructure preserves sufficient openness, ecological connectivity and the recreational quality of the PRow network.

45. The survey of PRow users noted observations of brown hare, badger, hedgehog, bats, skylark, barn owl and other raptors, amongst other wildlife.

Best and most versatile agricultural land

46. Much of site 7 comprises Grade 2 and Grade 3a land within the BMV category. Scrutiny is required for fixed infrastructure at 7F, because a substation and the associated infrastructure is different from the solar arrays themselves.
47. The Applicant should demonstrate how lower-quality agricultural land was considered for fixed infrastructure; whether alternative site 7 boundaries or parcel combinations were tested after the detailed agricultural survey became available; and how agricultural land quality was weighed against landowner willingness, access, PRowS, landscape and residential amenity.

7F substation, abnormal loads and local highways

48. The proposed substation at 7F requires abnormal indivisible loads to pass through the local road network. The Applicant's material identifies constraints through Saxlingham Nethergate, including highway works and parking suspension.
49. Temporary loss of on-street parking can impose a significant burden where residents have no off-street provision, while abnormal-load movements may involve road closures, lighting, noise and disruption to ordinary movement through the village.
50. The fact that an abnormal-load route can be engineered does not establish that the substation location is appropriate. The exceptional access requirement is relevant to the choice of location, particularly when considered with the PRow network, landscape and visual effects, BMV land, ecological constraints and residential impact.
51. The Applicant should identify the Highway Authority evidence supporting the suitability of the abnormal-load route, including constrained locations in Saxlingham Nethergate.
52. The Applicant should also confirm which generating sub-sites require the 7F substation and whether the substation would remain necessary if site 7 were removed or reduced. If the 7F substation is a consequence of site 7, the environmental and highway effects of the substation should be treated as part of the assessment of site 7 feasibility.

Site 7 convergence of constraints and alternatives

53. Site 7 is particularly sensitive because multiple constraints converge in the same area. The site extends across a large part of the landscape between Saxlingham Nethergate and Saxlingham Green to the north and Hempnall to the south. The Applicant's own visual baseline describes a dense network of PRowS connecting these settlements through the surrounding rural landscape. Saxlingham and Hempnall are neighbouring communities with close practical and social connections, and the countryside between them is therefore part of the everyday landscape for residents as they travel between the villages.
54. At present, the villages are separated by agricultural countryside and woodland. Site 7 would introduce extensive solar and associated electrical infrastructure across a large part of that intervening landscape, changing the character of the countryside between the communities from predominantly open agricultural land to a landscape substantially occupied by energy infrastructure.
55. This makes the effects unusually difficult for the local population to avoid. They would be experienced not only from properties adjoining the site, but on routes between the settlements, including the PRow network that connects them. This differs from development situated principally beyond a settlement, which residents may encounter only infrequently. The impact on the rural character of the area should therefore be assessed cumulatively, from the perspective of PRow users moving through the landscape as well as from fixed viewpoints. The survey findings demonstrate that the PRow network is heavily used

by people travelling between settlements and the rural character of the landscape is extremely important to users (Appendix 1).

56. The various constraints within the site interact. The issue is therefore not simply whether each individual effect can be mitigated, but whether the scale and design of site 7 adequately reflect both the concentration of constraints and the sensitivity of occupying the countryside between two closely related villages. In my view, those circumstances warrant greater emphasis on avoidance and reduction of development within site 7, rather than reliance predominantly upon mitigation.
57. In light of the unusually dense and well-used PRow network, its recreational and functional value, landscape and visual effects experienced from those routes, and the other environmental and heritage constraints identified at site 7, the Applicant should explain why further avoidance through the reduction or removal of development at site 7 would not be an appropriate response under the mitigation hierarchy. Screening and setbacks may mitigate particular effects, but they do not avoid or reduce the underlying change from open rural landscape to extensive energy infrastructure.
58. The Applicant should also explain whether the evidence now before the Examination concerning the intensity and nature of use of the site 7 PRow network alters its assessment of the case for further avoidance.
59. The national need for renewable generation does not by itself demonstrate that every proposed development site is necessary to deliver the scheme. The Applicant should explain why a lower-impact configuration of site 7 has not been preferred.

Matters on which clarification or further evidence is requested

60. To assist the Examination, I respectfully request that the Examining Authority consider whether the following points require clarification or further evidence from the Applicant. Responses should distinguish between matters considered during site selection, subsequent design evolution and mitigation introduced after a site had been selected.

Site selection and alternatives

61. Please identify which alternative sites, if any, were environmentally and technically capable of accommodating development that could have replaced or reduced site 7. For each alternative, state the reason for rejection and whether land availability or landowner willingness was also a material reason. Where an otherwise potentially suitable alternative was rejected because the land had not been made available, please state this.
62. The Applicant has stated that land availability and landowner willingness were material considerations in site selection. Please identify any land that progressed sufficiently to be regarded as environmentally and technically potentially suitable but was excluded from further consideration because a voluntary agreement had not been, or was not expected to be, secured. Please also explain how that consideration was weighed against PRow density and use, landscape and heritage sensitivity, BMV agricultural land, residential amenity, ecology and highway constraints. Identify whether any alternative area with fewer PRows or lower landscape sensitivity than site 7 was rejected because of land availability.
63. Provide a plan or schedule identifying each different boundary, parcel combination or reduction of site 7 tested, including any reconsideration after the detailed agricultural land classification survey became available. For each option, identify the land removed or retained and the reason for rejection. If no smaller configuration was tested after the detailed survey, confirm this and explain why.
64. To enable the benefits and impacts of site 7 to be properly weighed, the Applicant should identify its approximate contribution to the scheme's generating capacity and explain the consequences of reducing or removing development from it. It should clarify whether this would principally reduce the scheme's overall generating capacity or whether it would have wider consequences for the technical operation or deliverability of the scheme.

Site 7 PRow network and recreational amenity

65. The Applicant should explain whether the overall effect of the scheme on the recreational amenity of the site 7 PRow network has been assessed and, if so, identify the resulting magnitude and significance of effect. This should take account of commonly used circular and inter-village journeys, connections with the Boudicca Way, repeated or sequential exposure to different development parcels, and effects on openness, long views, heritage, rural character and tranquillity. If no network-level assessment or significance judgement has been undertaken for site 7, please confirm this.
66. Quantify the impact of the proposed scheme on network-level PRow amenity. This should include the proportion of the network from which solar infrastructure would be visible or experienced in close proximity, the extent of routes with development on one or both sides, and the extent to which currently open rural surroundings would be retained or lost, at Year 1 and Year 15.
67. For any site 7 PRow for which a change in view is identified, state: (a) the existing characteristics contributing to recreational amenity; (b) whether mitigation preserves an existing open outlook or replaces it with a more enclosed view; (c) what elements of amenity will not be mitigated under current proposals (for example tranquillity, rural/historic character, views of wildlife); and (d) what avoidance measures (including panel removal, relocation, increased setback or an undeveloped view corridor) were tested before relying on screening. Identify how winter conditions and reduced deciduous screening were accounted for. If no avoidance option or separate winter consideration was undertaken, confirm this.
68. The Applicant should clarify whether the reported landscape and visual effects, including those at construction, Year 1 and Year 15, have been assessed using winter conditions. If not, it should identify the seasonal assumptions used and explain how reduced winter screening by existing and proposed vegetation has been considered when determining magnitude and significance of effect. Where the significance of an effect depends on deciduous vegetation providing screening, the Applicant should identify whether the significance conclusion would differ under winter conditions.
69. Identify the basis for treating the proposed permissive path and community-accessible land as a recreational benefit capable of offsetting harm to the existing PRow network. The comparison should address connectivity, route choice, circular walks, heritage, landscape quality, openness, views, wildlife and tranquillity.

PRoW closures, diversions and construction access

70. Chapter 11 of the Environmental Statement states that existing pedestrian and cyclist activity on Fairstead Lane is 'low'. Identify the evidence supporting that conclusion and explain whether pedestrians using Fairstead Lane as part of linked PRow journeys were captured. Given the constraints of width and visibility, also explain how safe passage of pedestrians and cyclists when meeting construction HGVs has been assessed.
71. The Outline PRow Management Plan indicates that some routes would remain 'open but managed'. The Applicant should explain what this means in practice, including surfacing, fencing, construction crossings, banksman control, delay and accessibility, and how reliable passage would be maintained for users making time-sensitive journeys.
72. Where the Outline PRow Management Plan states that a route, including the Boudicca Way, will remain open 'wherever practicable', define the circumstances in which closure would be considered impracticable; who would make that decision; what approval or consultation would be required; and what provision would secure a safe alternative.
73. For each proposed PRow closure, the Applicant should identify the alternative route available to users, including where users leave and rejoin the existing route; the additional distance involved; the nature and accessibility of the alternative route; and whether it requires use of public roads.
74. Identify the avoidance measures considered before each PRow closure was proposed, including site redesign, construction phasing, temporary pedestrian corridors, relocation of haul routes. For each rejected measure give the reason. If a measure was not considered, state this.

75. Identify the traffic assessment relied upon for public roads forming part of a proposed PRow diversion, where construction works may displace traffic. Identify how any closure or restriction of Broaden Lane has been assessed in relation to Hall Lane, Saxlingham Green and Fairstead Lane, particularly during the same period that additional pedestrians may be diverted onto those roads. If this concurrent scenario has not been assessed, confirm this.

PRow crossings by haul and operational access routes

76. Multiple PRows in site 7 would be affected by internal access tracks and construction movements. For each crossing within site 7, please provide the precise crossing location; whether a vehicular track or crossing exists at that location at present; whether the proposed crossing is temporary or permanent; its proposed width and surfacing; any vegetation or hedgerow removal or interruption; any gates, fencing, signage or other infrastructure; and anticipated construction and operational vehicle movements. Existing agricultural movements elsewhere on a path should not be treated as the baseline where no vehicular crossing presently exists at the proposed location.
77. For the 7F substation, identify the precise permanent access route from Broaden Lane and every PRow intersection, including FP10. State whether a crossing exists at each location and identify the proposed permanent physical work. Also identify where the cumulative effect of new track crossings, gates, fencing, hedgerow openings and other engineered interventions across the connected site 7 walking network has been assessed. If it has not been assessed cumulatively, confirm this.

7F substation and associated alternatives

78. State which sub-sites are intended to feed the substation at 7F and provide a diagram of that electrical relationship. Confirm whether 7F would still be required if site 7 were (a) removed or (b) reduced.
79. Identify each alternative location considered for the 7F substation and the reasons for its rejection. For any alternative taken forward for comparative assessment, provide the comparison with 7F using comparable criteria, including BMV agricultural land, heritage, PRows, landscape and visual effects, ecology, residential amenity, construction access, abnormal-load access and engineering constraints. If no alternative location was assessed against 7F using comparable criteria, please state this and explain why no such comparative assessment was undertaken.
80. Identify the avoidance options considered for preventing construction haul routes and abnormal-load access associated with site 7 from affecting Saxlingham Nethergate and Saxlingham Green Conservation Areas and their setting, including relocation of the substation, reduction or removal of relevant site 7 parcels and alternative access arrangements. For each option rejected, identify the reason and comparative effects. If an option was not considered, state this.

Heritage, ecology and abnormal-load evidence

81. Identify the changes made to the selection, extent or layout of site 7 because of: (a) the setting, significance and usage of the Grade II* remains of St Mary's Church; (b) the rural approaches to Saxlingham Nethergate and Saxlingham Green Conservation Areas; and (c) the landscape separation and rural setting of Saxlingham Nethergate, Saxlingham Green and Hempnall. For each, identify any land or panel area removed, setback introduced, undeveloped corridor retained or alternative layout tested because of that constraint. Where reliance is instead placed on screening or separation distance, identify what greater avoidance or reduction was tested and why it was rejected. State whether each constraint influenced the original selection of site 7 or was addressed only after site 7 had been selected.
82. Given the survey evidence indicating local observations of hare, badger, raptor, skylark and other wildlife activity, I ask the Examining Authority to satisfy itself that the site 7 baseline remains representative and that avoidance and mitigation address habitat and functional use of the site.
83. Please provide sufficient non-confidential information to clarify how the skylark, owl and raptor breeding territories recorded are distributed between sites. The Applicant should clarify the dates on which breeding-bird surveys specifically covering site 7 were undertaken and which results informed the submitted assessment. Given more recent repeated observations of raptor activity in and around site 7,

please also confirm whether the Applicant considers the breeding baseline for site 7 to remain representative and whether any further survey is considered necessary.

84. Provide the highway authority evidence relied upon to conclude that the complete abnormal-load route to site 7F is practicable, including the constrained sections in Saxlingham Nethergate. Please identify the arrangements for:

- (a) maintaining emergency-vehicle access where the AIL movement or associated works occupy the available carriageway;
- (b) maintaining safe pedestrian access through or around affected sections, particularly where no continuous footway exists;
- (c) maintaining access to affected properties, including Saxlingham Nethergate primary school;
- (d) accommodating vehicles displaced by suspension of on-street parking, particularly for residents without off-street parking.

Where pedestrians would be required to wait or divert, please identify the proposed arrangements and any diversion route. If these matters remain to be determined, please identify through which document they will be resolved before AIL movements take place.

Requested mitigation and outcome

85. My primary request is that the Examining Authority examine removal of site 7 from the scheme as an application of the avoidance principle. If complete removal is not accepted, significant reduction and redesign should be considered before reliance is placed on screening and other secondary mitigation.
86. If site 7 is retained in any form, the Applicant should be required to minimise effects on the established PRoW network through reduction of scale; layout changes; protection of important open view corridors; safe and convenient construction-phase pedestrian routes, careful siting of access crossings and infrastructure, screening that takes into account the height of the proposed infrastructure and visibility from horseback, and measures that address winter as well as summer views.
87. Consideration should be given to whether the 7F substation can be relocated or avoided, thereby reducing permanent effects on PRoWs, BMV land and the abnormal-load impacts on Saxlingham Nethergate and the surrounding road network.
88. I also request a site inspection of the affected walking network, including the existing routes between Saxlingham and Hempnall and the proposed diversion, so that the Examining Authority can understand the relationship between the PRoWs and site 7 in their physical context.

Conclusion

89. Site 7 should not be assessed simply by asking whether individual impacts can be reduced through local mitigation. The more fundamental question is whether the Applicant has demonstrated that this is an appropriate location for development of this scale and for the associated substation.
90. Site 7 is exceptional because of the scale, connectivity and established use of its PRoW network and the extent to which the surrounding rural landscape forms part of that recreational experience. The survey and independent evidence demonstrate that these routes function together as a valued walking network rather than as isolated paths. That harm must then be considered alongside the other constraints and impacts affecting site 7.
91. The convergence of those considerations raises a question of proportionality: is retaining site 7 necessary and justified when removing it, or materially reducing its extent, would avoid a particular concentration of harm?

Sources referred to

Norfolk Magazine, Walk: a pretty route in Saxlingham Nethergate' (November 2017).

Norfolk Magazine, Norfolk countryside walk: Hempnall and Saxlingham Nethergate' (August 2026).

South Norfolk Landscape Assessment: Final Report; B1: Tas Tributary Farmland (2001).

Norfolk Access Improvement Plan 2019 - 2029, Norfolk County Council

AI-use statement

This written representation was edited with the assistance of an AI tool for structure, formatting, concision, removal of repetition and drafting style. The factual content, evidence, opinions and final submission have been reviewed and adopted by the Interested Party.

Appendix 1 – Local PRow survey report

Introduction and methodology

A local survey of PRow use was conducted in September and October 2026. The survey targeted PRow users around Saxlingham Nethergate, Saxlingham Green, Shotesham and Hempnall. Respondents were recruited via notices on PRow in Saxlingham Nethergate and Saxlingham Green; Saxlingham village newsletter; local community Facebook groups. The survey was open for 16 days. Responses were collected via Google Forms.

The survey gathered quantitative information regarding frequency and purpose of PRow use; valued characteristics of PRow; and expected impact of East Pye Solar construction and operation on PRow. Qualitative data was collected on which PRow were used and particularly valued aspects of PRow. Respondents also had the option to provide additional free text comments and to upload a map or photographs (see Appendix 3). Individual names were collected to ensure that any duplicate responses could be discarded, but were deleted before data analysis.

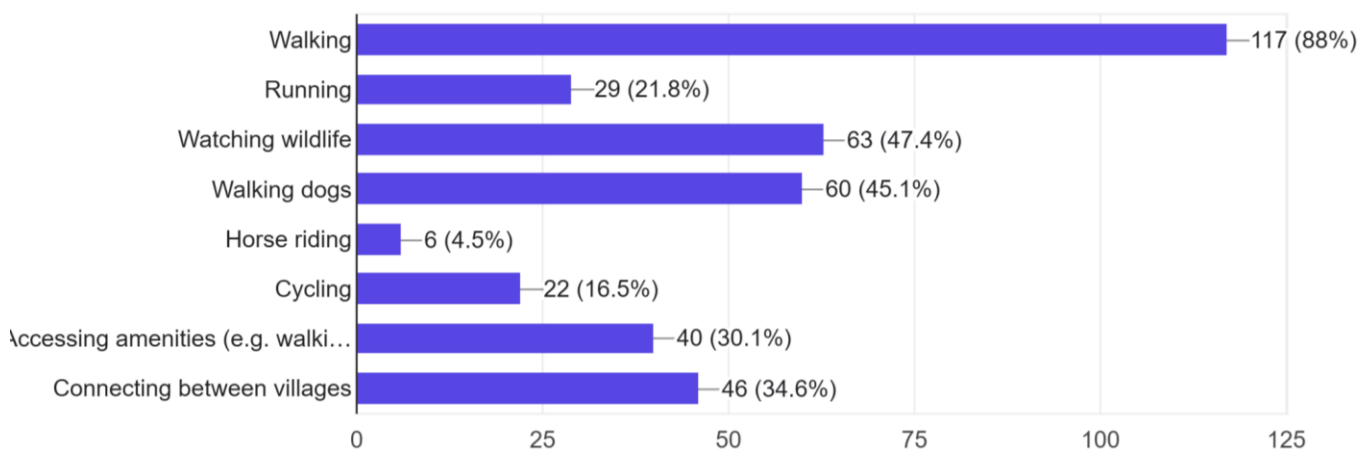
Analysis

Three duplicate responses were deleted. Names were removed for analysis. Charts were produced using Google Forms. Free-text responses were thematically analysed, with an AI tool used to organise and enumerate themes. This was a community survey undertaken and analysed by an individual within a limited timeframe, rather than a formal academic research exercise. The thematic counts are therefore intended to indicate the prevalence of recurring themes rather than provide precise statistical measurement. Where interpretation was required, a conservative approach was taken. Maps have only been included in Appendix 3 if they could be anonymised. Photographs have only been included when the location could be identified.

Results

A total of 133 responses, relating to 135 individuals, were analysed. One response was submitted on behalf of three named individuals. The additional responses were included in the overall total to give an accurate indication of the number of individuals represented but due to software limitations could not be incorporated into the analysis. All data reported therefore uses a denominator of 133.

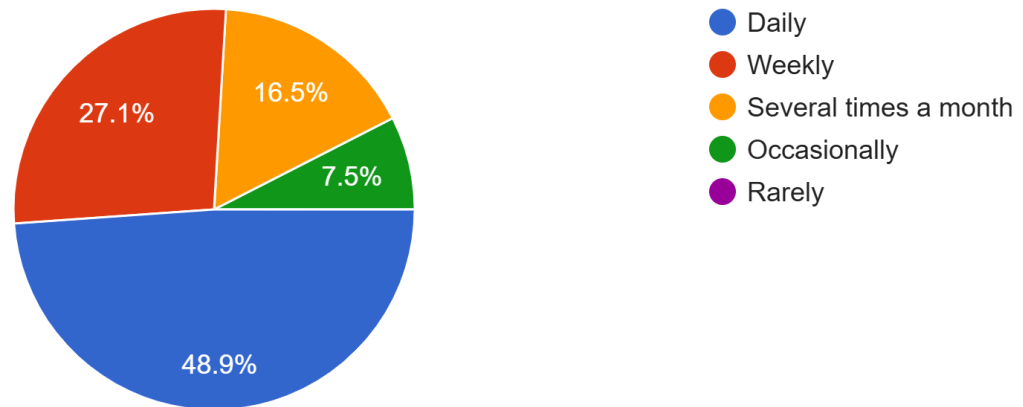
Chart 1. Reasons for using PRow in the area



All respondents reported that they used PRow in the areas around Saxlingham Nethergate, Saxlingham Green, Shotesham and Hempnall. Nearly half of respondents used PRow daily and a large majority used them either every day or every week (Chart 2). The most frequent use of the PRow was for walking (88%), however nearly half of respondents used the PRow to watch wildlife. Dog walking, cycling and running were also commonly reported (Chart 1). Respondents also reported using PRow for horse riding. 40 respondents

(30%) stated that they used PRowS to access amenities and 46 (35%) used them to travel between villages (see Chart 3).

Chart 2. Frequency of use



Routes

Analysis of the 117 respondents who provided information about the routes they use indicates that connected journeys are important. The most frequently identifiable connection is between Saxlingham Nethergate and Hempnall, reported by 36 respondents who clearly described walking between the villages. Within this corridor, two alternatives were described: the Saxlingham FP14– Hempnall BR30 route and the Saxlingham FP25–Hempnall FP2– Fairstead Lane route. 17 respondents specifically identify use of the former. 11 respondents use the latter route. A substantial additional group report travelling between Saxlingham and Hempnall without providing sufficient detail to determine which route they use.

Other frequently reported connections include Saxlingham–Shotesham (20 respondents), Saxlingham Nethergate–Saxlingham Green (19), and Saxlingham Green–Hempnall (19). Circular walks are also prominent, particularly around Saxlingham’s ruined church and Saxlingham/Saxlingham Green, as well as larger loops around Saxlingham Nethergate, Hempnall and Saxlingham Green. Examples can be seen in the submitted maps in Appendix 3.

Multiple-route and network-wide use is a particularly prominent feature of the responses. 43 respondents (37%) describe two or more distinguishable journeys, routes or circular walks. 45 respondents (38%) use language indicating broad or variable use of the path network, for example, saying that they use ‘all’, many’ or ‘various’ routes.

Taken together, the responses indicate that the rights of way are commonly experienced and used as a connected system. They are also used to travel between settlements.

Values and impact of development

The PRow network was highly valued for its natural views and tranquillity. For 133 respondents, natural views and landscape were ‘very’ or ‘extremely’ important. The same number reported that peace was ‘very’ or ‘extremely’ important. 133 also reported that watching wildlife was ‘very’ or ‘extremely’ important. 123 respondents reported that using circular routes was ‘very’ or ‘extremely’ important. For 104 respondents, the ability to use PRowS to travel between villages or access amenities was ‘very’ or ‘extremely’ important (see Chart 4).

Respondents were extremely concerned about all potential impacts of the development, with the vast majority expressing significant concern about the loss of open views, effect on wildlife and loss of rural character. All potential negative aspects of construction were also a significant concern (see Chart 4). The vast majority of

respondents expected that the solar project would impact their experience of using PRoWs ‘negatively’ or ‘very negatively’, both during construction and operation (Charts 5 and 6).

Respondents were asked if there was a particular route or view they wanted to mention. Of the 75 respondents answering this question, 17 referred to a church, church setting or church ruins, including 10 who specifically referred to the ruined church of St Mary’s in Saxlingham Nethergate: ‘Views around ruined church as not only is it historic but it is stillness as a place of worship’. One respondent also provided an image of St Mary’s (see Appendix 3).

Respondents identified views towards villages and far-reaching views across farmland, woodland and the historic rural landscape as being important. 48 respondents spontaneously referred in their free-text responses to views or the landscape, and its rural, scenic or unspoilt character. This was in addition to the survey’s separate structured questions on this subject:

The route from my home to the ruined church of St Marys then on through the green lane to Hempnall sums up the special nature of this historic landscape. It is an essentially rural combination of far-reaching views of fields and ancient woodland, together with the peace of old trackways and green lanes which have been unaltered for generations.

The words ‘peace’, ‘tranquillity’, ‘calm’ and associated expressions were mentioned by twenty respondents:

Pymars lane and Wah [sic] lane have a wonderful ancient feel... They are very peaceful and incredibly conducive to a feeling of personal wellbeing.

The footpaths were also important as a network placed within the landscape. Many responses highlighted network connections and respondents also frequently mentioned the value of being able to avoid walking on roads:

The best thing about the local footpaths is... how easy it is to explore the countryside completely off road through the comprehensive network of paths.

In total, fifty respondents mentioned wildlife or ecological themes in the free text sections of the survey. One respondent noted that SN-FP14 and HP-BR30 needed special consideration, as a route with ancient, pollarded trees that has been in use ‘for many hundreds of years to connect Saxlingham and Hempnall’. Respondents frequently made direct mention of specific species being observed around the PRoWs, with 16 respondents mentioning wild mammals including hares, badgers and hedgehogs. 14 respondents mentioned birds, including red kites, buzzards and skylarks. Several respondents associated these observations with specific rights of way:

HP-BR30 is particularly habitat rich and I have seen roe, red and muntjac deer, badgers, foxes, hares and many types of birds on this track.

HP-BR30 is also described as a ‘medieval roadway now a walking path’ with ‘trees and wildlife on both sides’. Hares were specifically reported on the SN-FP10/HP-FP3 route. Wildlife was also closely connected in respondents’ accounts with the wider experience of using the PRoW network: references frequently combine wildlife with woodland, open fields, views, seasonal change, tranquillity and wellbeing. One respondent described walking primarily for ‘the peace, flora and fauna and obviously lovely countryside’, while another referred to ‘noticing the seasonal changes, the wildlife, particularly, Barn Owls and bats’ as bringing ‘an immense sense of calm’. Another described the importance of ‘walking, watching and reconnecting with nature in a natural environment’.

Chart 3. Importance of the various aspects of PROWs in the area

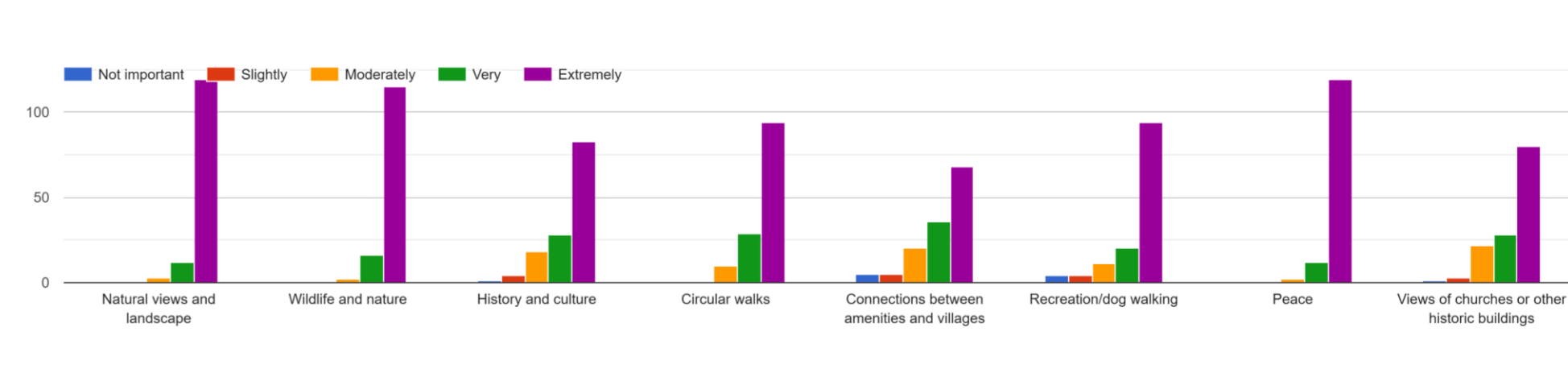


Chart 4. Concern about the impact of the proposed development on PROWs

How concerned are you about the following?

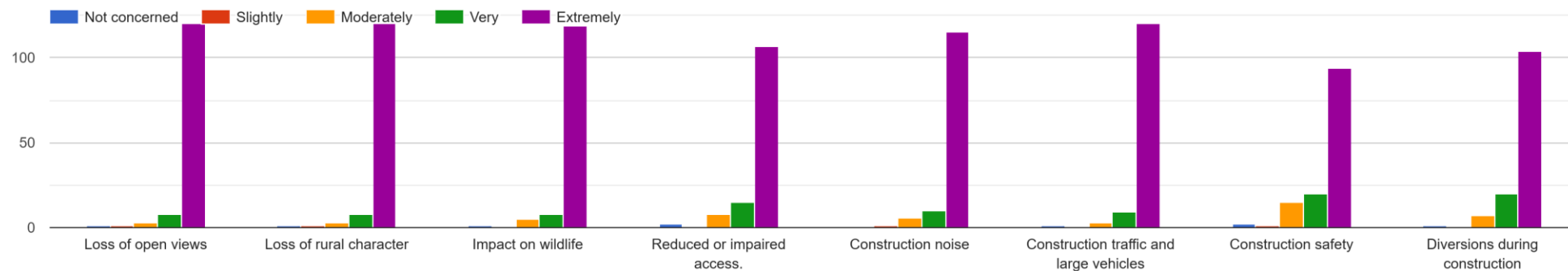


Chart 5. How do you expect the construction phase of East Pye to affect your use of the footpaths and bridleways?

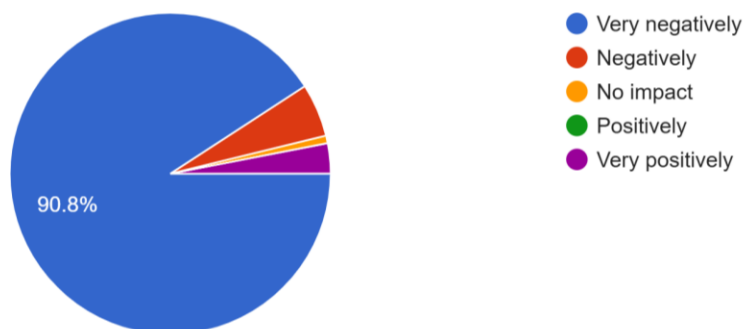
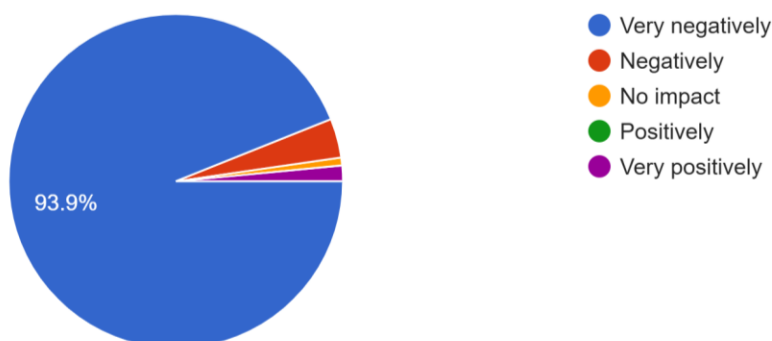


Chart 6. How do you expect East Pye to impact your experience of footpaths and bridleways once it is in operation?



At least 12 respondents expressed specific concerns in the free text about potential effects of the proposed development on wildlife or habitat, including disturbance and displacement during construction; fencing and restrictions on wildlife movement; and loss or alteration of habitat. The frequency and specificity of the responses demonstrate that encounters with wildlife and perceived ecological richness form a significant part of how many respondents experience and value the local PRow network: for some respondents this ecological experience is closely linked to the landscape, tranquillity and wellbeing benefits of using the paths.

The responses also demonstrate the functional role of the PRow. Respondents reported using paths to reach the shop, post office, village hall, play fields, garage, schools, bus stops, the GP surgery, friends and family, and for travel to work, with one response noting that 'the walk to Hempnall is very important as it connects the village to the closest shop on foot'. Another respondent reported using paths for 'practical

reasons (car repair, shop, post office)'. Another described children cycling 'to the shop and to the village playground' and walking home from the bus stop.

One respondent reported daily use of a route between Saxlingham Nethergate and Hempnall for commuting on foot: 'If the footpaths that I use to walk to work are closed during construction I will not be able to get to work.' These responses indicate that the paths function not only as recreational routes but also as active-travel connections between rural settlements and local amenities.

Respondents were offered the chance to make final free text comments. Several volunteered new themes not explored elsewhere in the survey. Health and wellbeing emerged as a notable theme despite respondents not being explicitly asked about these benefits. Respondents spontaneously described the rights-of-way network as supporting physical exercise, mental wellbeing, relaxation and connection with nature. One described 'the peace and being close to nature' as being 'of daily benefit to my mental health'. Using the PRoW network was noted as being helpful for specific medical conditions. Several respondents also independently recalled the importance of the paths during the COVID-19 lockdowns, with one stating that their value to 'both mental and physical health' became particularly apparent at that time. The spontaneous nature of these comments suggests that health and wellbeing are an important part of how some respondents experience the network, associated not simply with exercise but also with tranquillity, nature, wildlife and access to familiar countryside.

Twenty responses mentioned long-term or intergenerational attachments to the network. Respondents refer to using the paths since childhood, preserving them for children and grandchildren, and their continued use by successive generations. One respondent said: The footpaths between Saxlingham and Hempnall have been in continuous use for centuries. For each successive generation, their use and enjoyment has been woven into the fabric of rural life. They are not simply tracks to get from A to B but a window into the landscape.' Another remembered using the PRoWs as a child:

Right from childhood we were taken for walks along these paths from school to learn about our roots and this will be lost to the future generations.

The PRoWs were often mentioned in relation to culture, history and heritage. Two respondents referred to the relationship between Saxlingham Green and the artist Michael Andrews, who painted views of Saxlingham Green. Several PRoWs, most particularly Hempnall BR30, are repeatedly referred to as historic routes. Taken together, these responses indicate that some users experience the rights-of-way network not simply as access through a historic landscape, but as part of it.

Despite the survey not asking specifically about the Boudicca Way, it was mentioned by 21 respondents. References included its everyday and recreational use, landscape and wildlife qualities, accessibility and heritage significance.

The comments also raised a concern about the perceived safety of paths enclosed by development infrastructure. Several respondents specifically referred to women's or children's safety on paths bounded by fencing, including concern that they could become enclosed corridors with restricted visibility and limited opportunities to escape the path. Horse-rider safety was also raised, particularly in relation to horses being startled by unfamiliar infrastructure and where fencing might restrict the space available to regain control. These responses suggest that respondents understand accessibility in broader terms than whether a path is open: the perceived safety and character of the environment immediately surrounding a route also influence whether they consider it usable.

In addition, the final comments demonstrate that respondents experience PRoWs in connection with the road network. Quiet rural lanes are used to reach footpaths and to connect individual rights of way into circular walks. One respondent emphasised that 'walking along the quiet lanes to access footpaths is also important'. Respondents expressed concern that increased construction traffic, or ordinary traffic displaced onto narrow lanes by construction activity, could affect walking opportunities even where a particular public right of way remained open.

Conclusions

This survey provides a sample of views of PRow users in Saxlingham Nethergate, Saxlingham Green, Shotesham and Hempnall. A total of 135 responses were received in only 16 days. This does not constitute all users of PRow in the area, but the high number of responses received in the short timeframe available indicates a high level of concern.

The respondents to the survey made heavy use of PRow in the area, with most reporting use at least daily or weekly. The majority used the footpaths for walking, but a range of other activities were also reported, including watching wildlife. The PRow were important to respondents not just for recreational activities but for pedestrian access to villages and amenities. Around a third used PRow as functional routes. In the qualitative data, respondents described accessing the GP surgery, village shop and the garage using PRow. One respondent specifically mentioned using a PRow route to get to work. PRow routes are highly valued for their openness, tranquillity, rural character, access to wildlife, recreation benefits and network and connectivity benefits. Users place considerable importance on cultural and historic aspects of the PRow; intergenerational continuity; and health and wellbeing benefits. PRow routes are not experienced by users as individual paths, but as part of the landscape and of nature more broadly.

In general, respondents were extremely concerned about the proposed development across all domains, but loss of open views and rural character was particularly feared. Users anticipated significantly negative effects both during construction and operation. They identified practical issues during construction regarding traffic, safety, loss of amenity and the closure of pedestrian routes to amenities, friends and family and work. They also expressed deep concern about the long-term experience of using those routes once the arrays are in operation. Many mentioned a negative impact on open views and the peaceful, rural feeling of the area, particularly in relation to heritage assets like St. Mary's ruined church and ancient trackways. The free text comments noted in addition that mitigation screening could have negative impacts on the safety of users.

To conclude, this snapshot of the views of PRow users describes an exceptionally well-used and valued network. The responses show repeated and long-standing use, strong attachment to the views, landscape and wildlife experienced from the routes, and significant concern that the scale of development at site 7 would fundamentally alter the character and enjoyment of that network. The survey did not aim to predict future usage levels; some users may continue to use these routes despite experiencing a substantial reduction in their recreational amenity, while others may reduce their use of the PRow.

Strengths and Limitations

This was a focused survey on PRow users in site 7 and the immediate surrounding areas. Its strength is the elucidation of the views of a cohort of people who make heavy use of PRow in this specific area. The survey was able to quantify the frequency of use of the cohort and the main activities undertaken using PRow. It provides a useful insight into the function PRow serve in the lives of this cohort and the concerns users have about the proposed development. This is particularly valuable given that this cohort is not coherently represented elsewhere in the planning process.

The survey methodology was limited by significant time constraints, which prevented full qualitative data-gathering and formal thematic analysis. Statistical analysis of quantitative data was also limited. The survey was only open for just over two weeks, which limited the number of responses that could be gathered. It was only available to internet users and was advertised using a small number of channels, which is likely to have excluded a significant number of possible respondents. The cohort surveyed was self-selecting and it is possible that this created some response bias.

Appendix 2 – Photographs of affected views

1. View southwest from Saxlingham FP10 over site 7F, 24th September 2026.



2. View from Saxlingham FP10 east towards the woods west of Saxlingham Grove. Site 7F, 24th September 2026.



3. View from Saxlingham FP10 southeast, taking in Saxlingham Grove. Site 7F, 24th September 2026.



4. View from Saxlingham FP10 southeast towards Saxlingham Grove. Proposed site of substation. Site 7F, 24th September 2026.



5. View from Saxlingham FP10 east towards Saxlingham Grove, 24th September 2026. Proposed site of substation.



6. View from Saxlingham FP27 east towards Hempnall FP5 and Saxlingham Grove. Site 7E, with views to 7F and 7G, 24th September 2026.



7. View from Saxlingham FP27 east towards Hempnall FP5 and Saxlingham Grove. Site 7F, with views over 7G, 24th September 2026.



8. View from Saxlingham FP11 north over site 7F, 24th September 2026.



9. View from Saxlingham FP11 east over site 7F, 24th September 2026. Saxlingham Grove in the distance.



10. Saxlingham FP12 looking west over site 7D, 24th September 2026.



11. Saxlingham FP12 looking east over site 7D, 24th September 2026.



12. Saxlingham FP12 looking north over site 7D, 24th September 2026.



13. Saxlingham FP14 looking northeast over site 7D, towards Mud Hole, 24th September 2026.



14. Junction of Saxlingham Nethergate FP25 and Hempnall FP2, looking south over site 7C, September 27th 2026.



15. Hempnall FP2, looking west over site 7C, September 27th 2026. D'Oyly's Grove right of frame.



16. Hempnall FP2, looking north over site 7C, 27th September 2026.



17. Hempnall FP2 (the Packway) passing through 7C, looking south, 27th September 2026. D'Oyly's Grove left of frame.



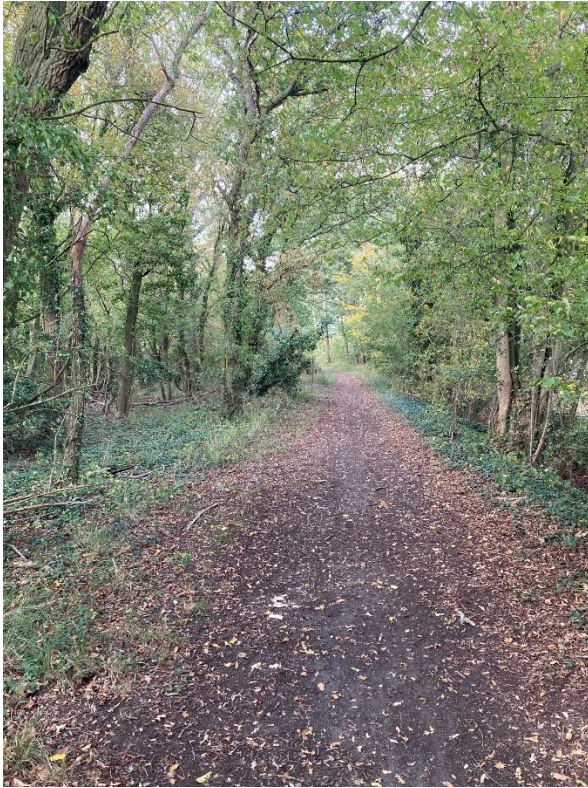
18. Junction of Hempnall FP2 and Fairstead Lane, looking south over 7B (traditional site of Hempnall Fair), 27th September 2026. Historic route of livestock from Saxlingham to Hempnall Fair via FP2 (the Packway).



19. Hempnall BR30, looking east over site 7C, 27th September 2026.



20. Hempnall BR30 looking north. Wear demonstrating a well-used path, 27th September 2026.



21. Saxlingham FP9, looking northwest over site 7F, 1st October 2026.



22. Saxlingham junction of FP9 and FP27, looking south over site 7E. 1st October 2026.

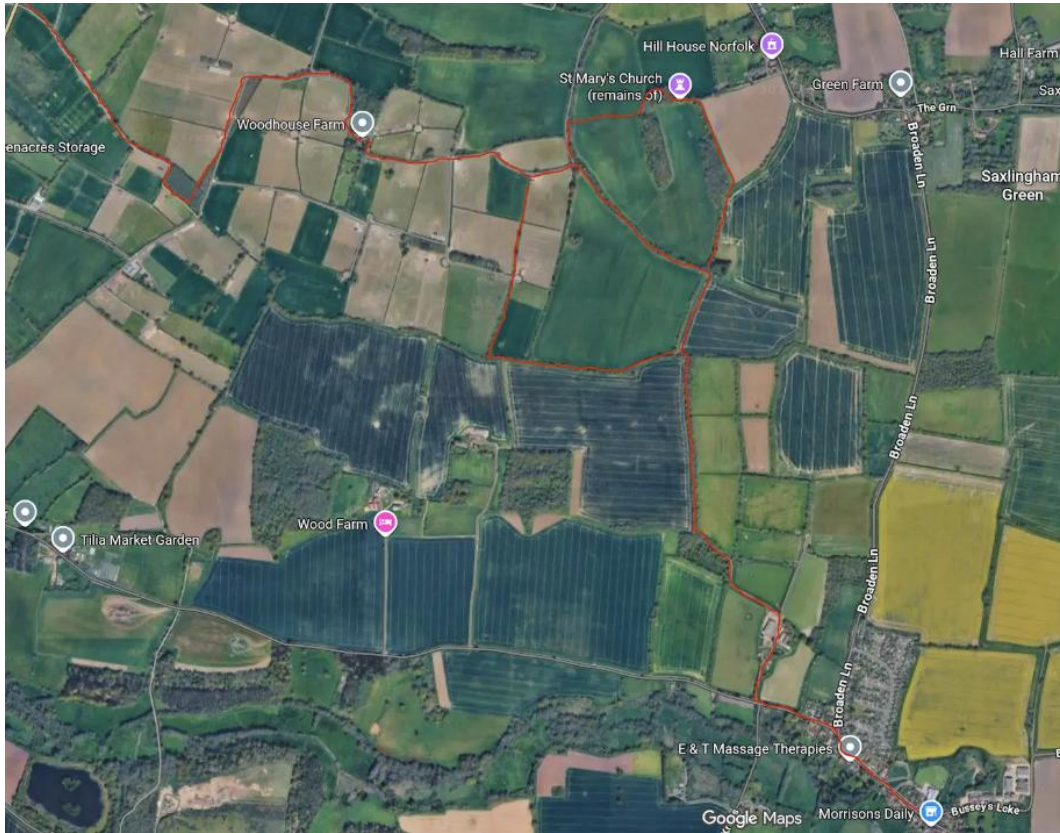


23. Saxlingham FP9. View west over site 7F. 1st October 2026.



Hand-drawn map of the Bouldice area, showing various land parcels, roads, and features. The map includes labels for roads like Bouldice Way, Henlaw Road, and Bussey's Lane. It also shows various parcels labeled with codes such as CRC11, CRC12, 7A, 7B, 7C, 7D, 7E, 7F, and 7G. Other features include 'Red Wings', 'Cable Route Haul Route', 'Foxhole', and 'The Kebab'. A legend in the top left corner defines line styles for 'Short Gravel Walk (+ Variations)', 'Walk to Facilities', 'Headwall', and 'Longer Gravel Walks'.

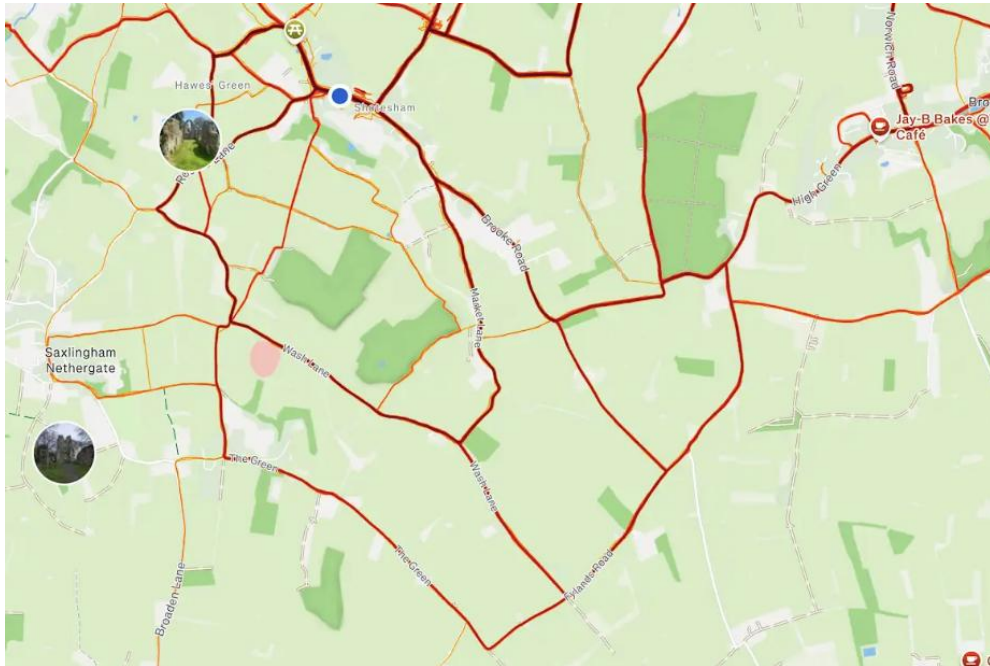
Map 3.



Map 4.



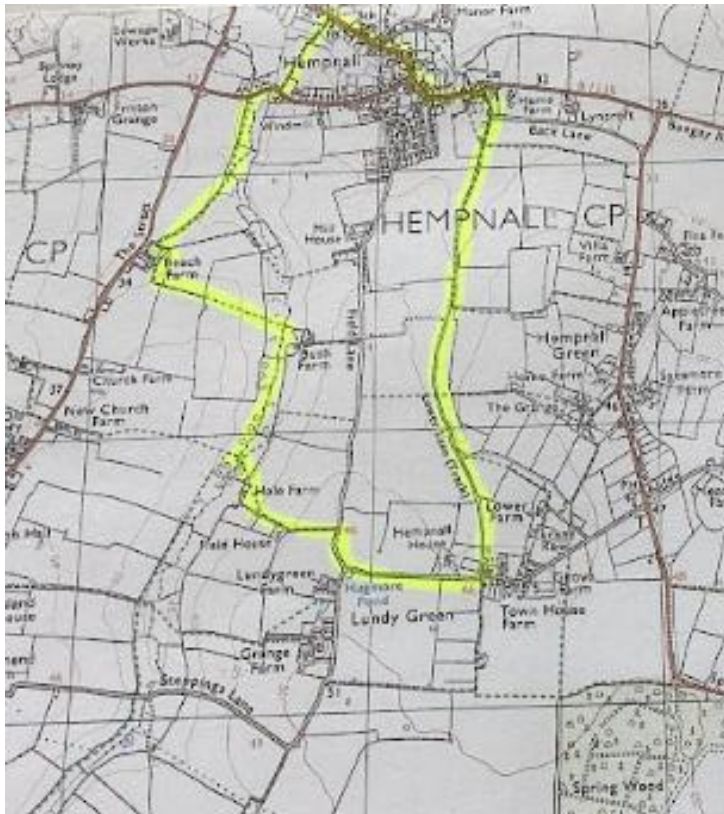
Map 5.



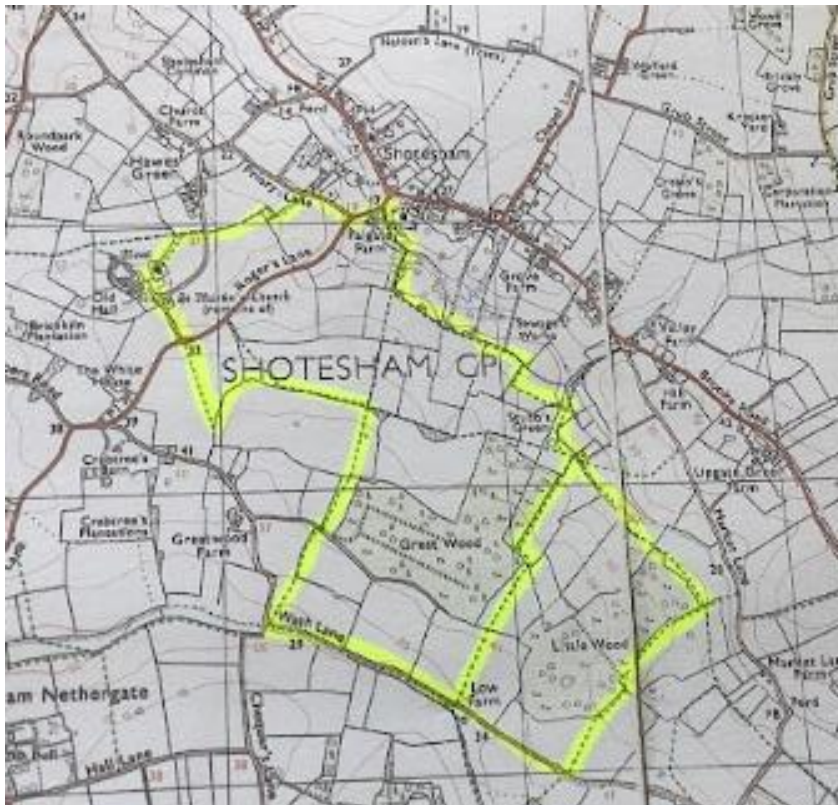
Map 6.



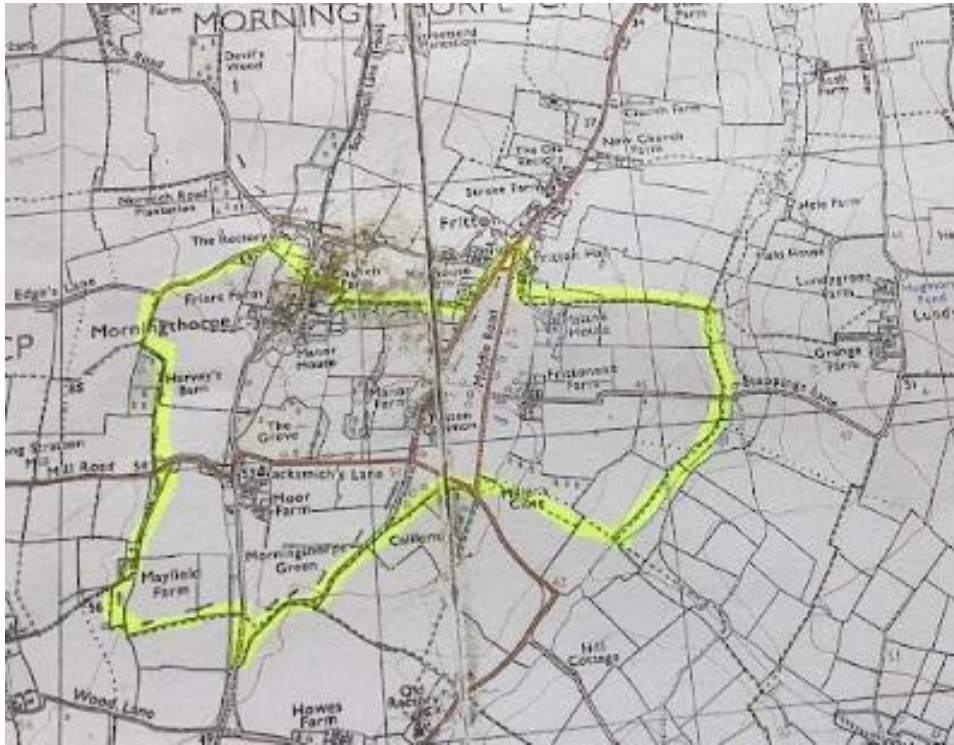
Map 7.



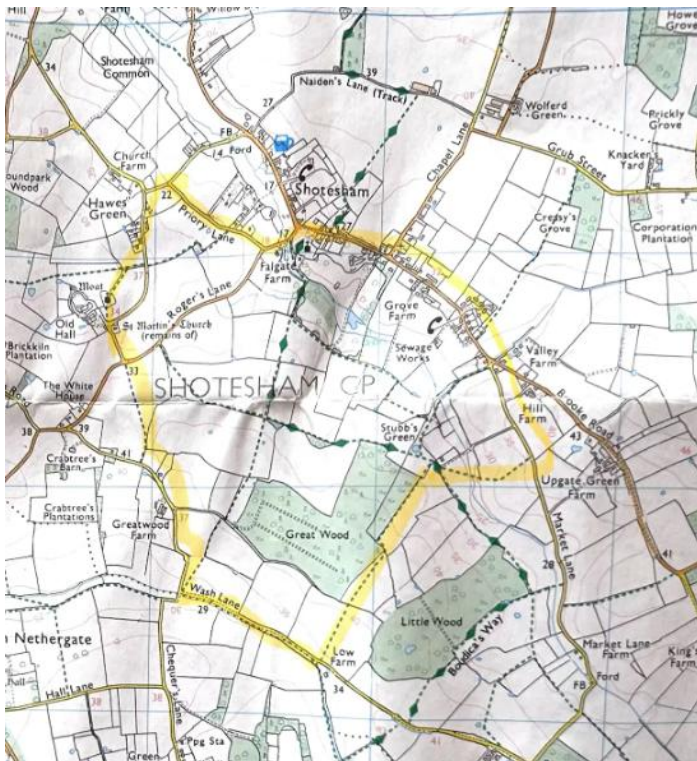
Map 7.



Map 8.



Map 9.



Photograph 1. View from FP9 west over site 7F. Submitted 24th September 2026.



Photograph 2. St. Mary's ruined church, Saxlingham Nethergate. Submitted 4th October 2026



Photograph 3. Saxlingham FP14, near St. Mary's ruined church. Submitted 4th October 2026.



Appendix 4 – Supporting evidence from walking organisations and other relevant bodies.

A non-exhaustive search identified the following publicly available material relating to recreational walking in the area. The table is intended to demonstrate the range and longevity of independent use and promotion of the local walking network; it is not intended to be a comprehensive catalogue. Public social media material cannot be searched comprehensively. The material is presented as evidence of the continuity and character of independent material concerning the area, rather than as a quantitative estimate of recreational users. The sources cited provide independent examples of the PRowS considered in the submission and in the area more generally being promoted and used as recreational circuits, consistent with the journeys described by survey respondents.

Category	Sources identified	What the material demonstrates
Regional press and magazine walking features	BBC Norfolk Saxlingham walking feature; Norfolk Magazine, Walk: a pretty route in Saxlingham Nethergate', November 2017; Norfolk Magazine, Norfolk walk: Saxlingham Nethergate and Redwings' (April 2023); Norfolk Magazine, Norfolk countryside walk: Hempnall and Saxlingham Nethergate' (August 2026); Eastern Daily Press Saxlingham–Shotesham walk; Local published accounts including The Sexton's Wheel (local publication in Long Stratton); Numerous local and national newspaper and magazine articles mentioning the Boudicca Way.	Repeated editorial selection of this small area for recreational walking. The 2017 route includes a map incorporating SN-FP9 and SN-FP10 and describes 'attractive views'. The 2026 Hempnall–Saxlingham route includes a map incorporating HP-BR30, SN-FP14, SN-FP9, SN-FP27 and HP-FP3 and illustrates an open view experienced from the route. Demonstrates the importance of the importance of the immediate context and wider PRow network to the experience of users of the Boudicca Way.
Ramblers and organised walking groups	Norfolk/Norwich/Wensum Ramblers walks from or through Saxlingham, Hempnall and Shotesham; Long Distance Walkers Association Hempnall Hike 2023; Solemates Norfolk Walks; Shotesham Walking Group; Saxlingham Walking Group; Hempnall community and group walks.	Repeated organised recreational use over several years, including circular and inter-village routes combining PRowS, Boudicca Way and quiet lanes.
Parish and community walking material	Saxlingham Nethergate Parish Council Village Walk; Saxlingham Tree Walk; Shotesham Walks guide and circular walks; Hempnall Group of Parishes walking material.	Local organisations actively promote the network for recreation. Shotesham Walks describes the extensive network as a 'wonderful amenity for walkers'.
Tourism and public-sector material	Visit Norfolk Boudicca Way material; Visit Waveney Valley material; Travel Norfolk connections between public transport and the Boudicca Way; Numerous mentions of the Boudicca Way across multiple travel and tourism	Wider public promotion of the area for walking, including Saxlingham Nethergate and Shotesham as places from which to access the countryside and Boudicca Way. The following description is used

Category	Sources identified	What the material demonstrates
	websites. Notably, the Boudicca Way was listed by Lonely Planet Traveller magazine as one of the world's 'Top 30 Travel Secrets' in 2013.	by Visit Norfolk: Boudicca Way passes through the rural, gently undulating countryside of south Norfolk and the Waveney Valley using public rights of way and quiet country roads, where visitors can find unusual wildlife and flora. Along the way, the trail passes picturesque villages such as Shotesham, Saxlingham Nethergate and Pulham Market. The area also has strong historical heritage, including Venta Icenorum, the Roman Town at Caistor St Edmund, which was the Roman administrative centre for the area.' Visit Waveney Valley promotes the Boudicca way in the following terms: 'It uses public rights of way and quiet country roads, stopping off at some very picturesque villages along the way. With its rural beauty, miles of meadows, clean air, big skies and abundant wildlife, the area is truly inspirational.' Demonstrates the importance of the immediate context and wider PRow network to the experience of users of the Boudicca Way.
Specialist and independent walking publications/websites	Walking World circuits; Walking Englishman; Walking Britain; Numerous Boudicca Way accounts.	Independent descriptions and recommendations of the same interconnected network. Walking World's 6.2-mile circuit links Shotesham, Saxlingham Green and Saxlingham Nethergate. Walking Englishman describes paths as 'excellent and well walked' and records families and dog walkers.
Family and dog-walking recommendations	Routes for Little Boots, 'Saxlingham Meadow & Ruins'; Norfolk Play Parks, 'Five Pretty Walks with a Play Park'; Wild Walking UK, 'Boudicca Way with children';	Shows informal recreational use extending beyond organised rambling, including families with young children, play/recreation visits and dog walking.
Social media recommendations	Nordic Walking Physio Facebook video recommendation; Instagram walking material; Escape Trails UK	Evidence of informal sharing and recommendation of the locality as somewhere to walk. Nordic Walking Physio recommends the

Category	Sources identified	What the material demonstrates
	recommendation subsequently referred to by Routes for Little Boots.	locality to South Norfolk residents as an 'amazing walking area'.
Video material	Independently published YouTube videos relating to walking in the area, together with social media video material.	Further evidence of routes and the landscape being recorded and shared with a wider recreational audience.
Route-sharing platforms	Komoot, Plotaroute, AllTrails, Visorando, Walk Highlands.	Numerous user-generated or shared recreational routes through the area, including circular walks and walking, running and cycling routes.