

Shotesham Site 8 – Sense of Space, Landscape, Recreation and Mental Health and Wellbeing

Interested Party Written Submission

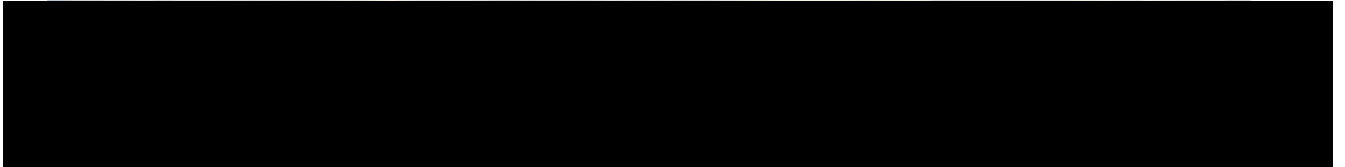
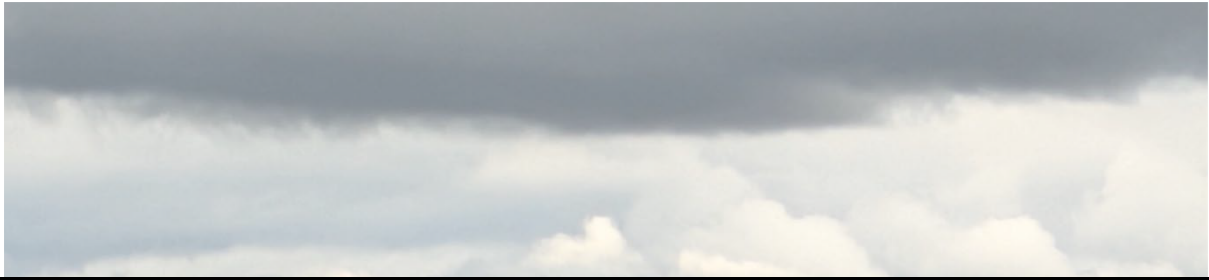
1. Introduction

This submission concerns the proposed East Pye Solar development across the whole of the scheme, but in particular at **Shotesham Site 8**, including Sub-Sites 8A and 8B, and particularly the effects on the experience of the surrounding countryside and on users of **Shotesham Footpath 22 (FP22)**. Footpath 16, Footpath 18 and Boudicca's Way.

I live in Shotesham and the surrounding countryside is integral to the nature of our conservation village. Shotesham offers an exceptional network of public footpaths, parish walks and bridleways with a higher path density than almost anywhere else in Norfolk.

I walk many of these footpaths daily, for my health, both physical and mental, and well-being which are now under threat as a result of this proposal. The footpaths are well-loved and used by the whole community, and the many visitors to our village as was demonstrated by a Community Walk in March 2025





My main concern is the impact on the Sense of Space that would be destroyed by the proposed East Pye development, not only in Shotesham but across the whole proposed site.

The sense of Space is defined as :

- **Visual openness** — being able to see fields, trees, sky and a relatively uninterrupted rural landscape.
- **Physical freedom** — being able to walk, exercise, garden or otherwise use familiar outdoor spaces.
- **Privacy and sanctuary** — having a home and garden that feel private rather than enclosed or overlooked by infrastructure.
- **Connection to nature** — maintaining everyday contact with countryside, wildlife and natural landscapes.
- **Orientation and familiarity** — retaining familiar views, paths and landmarks that help people feel connected to where they live.
- **Psychological breathing room** — the feeling that one's home environment provides somewhere peaceful to retreat from noise, activity and visual intrusion.
- **Choice and control** — being able to decide when and where to use outdoor spaces, rather than having access restricted or the character of those spaces substantially changed.
- **Community connection** — retaining established walking routes and connections between settlements rather than experiencing isolation or severance.

The principal issue for me is the relationship between:

- the existing open rural landscape;
- landscape character and visual amenity;
- openness and sense of space;
- tranquillity;
- recreation and walking;
- connection with nature;
- sense of place; and
- mental health and wellbeing.

The concern is not simply that solar panels would be visible from all the footpaths close to site 8A and 8B, but also from local houses and roads that run adjacent to them e.g Brooke Road, Baxters Lane, and Market Lane. It would effectively turn a tranquil rural environment into an industrial landscape, but the more profound and hidden consequences of such a development would be on individuals sense of space, and all that this involves.

East Pye's own evidence establishes that landscape character and visual amenity are relevant to **mental wellbeing, sense of place, recreation and connection to nature**. It also establishes that the proposed development would result in **significant adverse landscape and visual effects at Site 8** and, specifically, that even after 15 years of mitigation the sense of openness would be gone. Mitigation by tree and hedge planting simply attempts to screen the view of the panels, but effectively destroys the openness of the views across the rolling countryside..

ES Volume 1, Chapter 18 – Other Environmental Matters, APP/6.1.18, paragraph 18.6.111, p.126 states that landscape character and visual amenity are recognised determinants of health, are not necessarily matters of visual preference alone.

Thus influencing:

- mental wellbeing;
- sense of place;
- opportunities for recreation; and
- connection to nature.

The same paragraph recognises that changes to landscape and views can affect people's experiences of their surroundings, particularly nearby residential receptors and users of public rights of way and recreational routes. This is particularly significant to Shotesham Site 8.

These matters should therefore be considered together when assessing the effects of the Scheme.

East Pye Solar's Landscape and Visual Environmental Statement (ES Volume 1, Chapter 7 – Landscape and Visual, APP/6.1.7, Table 7.12, p.141.) identifies **Site 8 as a high-sensitivity landscape receptor**.

EPS acknowledge that Site 8 is particularly sensitive to the proposed changes, resulting in a Major Adverse effect which is assessed as **Significant**.

The topography of Site 8, makes it even more susceptible to change, and this is acknowledged by EPS, (**Consultation Report Appendix 10, APP/5.11, p.163**) due to the nature of the rolling hill, going down to the valley bottom on Market Lane, which enhances the sense of openness and extensive view. This topography is unusual, if not unique, for South Norfolk, and therefore makes it even more valuable and its loss even greater..

Specific Footpaths

Shotesham FP22 passes through **Sub-Site 8B**. FP16, 18 and Boudicca's Way are all clearly visible from Site 8

East Pye's visual assessment identifies the relevant viewpoint **VL6 – Origin of PRoW Shotesham FP22 on Brooke Road** on FP22 as:

- Medium value of views;
- Medium susceptibility to change; and
- Medium overall sensitivity.

These details are given in **ES Volume 3, Appendix 7.7 – Visual Assessment Tables, APP/6.3.7.7, VL6, p.87**.

- The significance of these routes should not, however, be assessed solely by the formal visual-receptor classification. The routes provide access through the rural landscape and therefore they have a wider function involving walking, exercise and contact with the countryside, all of which are represented in a Sense of Space definition. They connect individuals with their surroundings, which they experience in some cases, daily, and help people feel connected to where they live.

East Pye states that during construction:

- FP22 would be temporarily closed;
- there would be an increase in activity and noise;
- there would be close-range views of construction activities within Sub-Site 8B;
- construction activity would dominate the foreground;
- there would be an increase in human influence within an otherwise tranquil and rural landscape; and
- the composition of the view would be substantially changed.

ES Volume 1, Chapter 18, APP/6.1.18, paragraphs 18.6.111–18.6.114, pp.126–127.

The magnitude of this is assessed, as **Major with Significant adverse effects**.

ES Volume 3, Appendix 7.7, APP/6.3.7.7, VL6, p.87.

This is clearly relevant to wellbeing because the construction phase, which it is estimated would last for at least two years, would temporarily remove or substantially diminish the existing recreational experience of the route, and would definitely impact on the freedom.

- – **Choice and control** — being able to decide when and where to use outdoor spaces, rather than having access restricted or the character of those spaces substantially changed.

The change does not end when construction finishes.

For Year 1, East Pye states that users of FP22 would have a close-range and direct view of Sub-Site 8B, including the ancillary infrastructure, haul routes and solar PV arrays. This would also be true of users of other named footpaths.

- the solar arrays would appear large in scale;
- they would screen longer-distance views towards the valley;
- views towards King's Farm and Ringer's Grove would be screened;
- the panels would dominate the foreground;
- human influence within the otherwise tranquil rural landscape would increase; and
- the composition of the view would be substantially changed.

The effect is again assessed as: **Major Adverse – Significant**.

This is set out in **ES Volume 3, Appendix 7.7, APP/6.3.7.7, VL6, p.87**.

It is unclear how long this impact would be experienced by users of the footpaths., and local roadways. However, more important evidence for this submission concerns East Pye's Year 15 assessment.

It states that by Year 15 the proposed native hedgerow with trees adjacent to FP22 would be established., although this would be dependent on effective management of any new planting (see attached Biodiversity comments). It could be effective in screening the fencing and solar PV arrays. However EP acknowledges that

- the longer-distance view towards the valley would remain screened; and
- **the sense of openness would also reduce due to the hedgerow with tree planting.**

The resulting effect is assessed as: **Moderate Adverse – Significant**.

ES Volume 3, Appendix 7.7, APP/6.3.7.7, VL6, p.87.

So whilst the proposed mitigation may reduce the visibility of the solar panels, East Pye's own evidence demonstrates that it does **not restore the existing sense of openness** for all affected footpaths, thus severely impacting on the existing Sense of Space.

The purpose of the planting is to screen the development but this will not restore what has been lost in terms of open views and the sense of openness. The mitigation therefore changes the nature of the view rather than restoring the existing landscape experience

Indeed, screening can have a secondary effect: it can itself create enclosure and obstruct existing views which is recognised by East Pye. It would also create impenetrable corridors with 2.5 meter high deer fencing for walkers to walk through. **Also I would suggest this poses a significant risk to lone walkers, particularly women, children, elderly and those with limited mobility which has not been addressed or assessed by the Applicant.**

The evidence for FP22, and other affected footpaths, demonstrates that **openness is specifically predicted to reduce**, as are the existing wide open views across the countryside, the tranquillity of the area, the familiarity of the area (from a rural landscape to an industrial one), and the opportunities to connect with nature.

The issue for the Examination is therefore whether this loss has been adequately incorporated into the Applicant's consideration of health and wellbeing.

The existing footpath routes provides opportunities for walking through the rural landscape, linking communities together and allowing the user a close connection to nature. Whilst I may still be able to walk the route, I will be experiencing a substantially different environment.

The same principles apply to residents. The surrounding landscape forms part of the everyday environment experienced from:

- homes;
- gardens;
- local roads;
- footpaths; and
- other familiar locations.

The effect should therefore not be judged only from formal viewpoints selected for the Landscape and Visual Impact Assessment.

A resident's experience of the landscape may involve repeated exposure over many years.

- **Privacy and sanctuary** — having a home and garden that feel private rather than enclosed or overlooked by infrastructure.
- **Psychological breathing room** — the feeling that one's home environment provides somewhere peaceful to retreat from noise, activity and visual intrusion.

East Pye Chapter 18 assessment recognises that changes to landscape and views can affect people's experience of their surroundings, particularly nearby residential receptors. **APP/6.1.18, paragraph 18.6.111, p.126.**

The effects at Site 8 should also be considered as cumulative across the whole of the proposed area..

On my daily walks around the area, plus living within the overall site, I would experience:

- construction activity;
- noise and vehicle movements;
- temporary footpath closure;
- solar panels;
- fencing;
- ancillary infrastructure;
- loss of distant views;
- reduced openness;
- reduced tranquillity; and
- a permanent change from an agricultural landscape to an energy-infrastructure landscape.

These effects are cumulative and need to be considered as a whole and with an understanding of the overall change in the lived experience of the environment, not only personally, but for all residents of the affected parishes and visitors to South Norfolk. I feel strongly that as an individual, as a community and as a county, our Sense of Space is being threatened and violated.

Questions for the Examining Authority

In light of the evidence above, I respectfully ask the Examining Authority to require the Applicant to address the following questions.

Question 1 – Mental wellbeing

The Applicant states in **APP/6.1.18, paragraph 18.6.111** that landscape character and visual amenity influence mental wellbeing, sense of place, recreation and connection to nature.

How has the specific loss of openness and longer-distance views at Shotesham FP22, 16, 18 and Boudicca's Way been incorporated into the Applicant's health and wellbeing assessment?

Question 2 – Year 15

The Applicant's **APP/6.3.7.7, VL6, p.87** states that at Year 15 the sense of openness would reduce and the longer-distance valley view would remain screened.

How has this residual loss of openness been reflected in the Applicant's assessment of mental wellbeing and sense of place?

Question 3 – Effectiveness of mitigation

What evidence demonstrates that screening the solar infrastructure provides an equivalent recreational and wellbeing benefit to retaining the existing open rural landscape?

Question 4 – Recreational experience

How has the change to the character and quality of FP22, 16,18 and Boudicca's Way been assessed in relation to walking, exercise, recreation and connection to nature, rather than simply physical accessibility?

Question 5 – Health and Safety

Has the risk to lone walkers (in particular women, the elderly and children) walking in an enclosed corridor created by the solar panel safety fencing, been fully assessed?

Question 6– Construction

How has the temporary closure of FP22 and the predicted Major Adverse – Significant construction effect, been considered in relation to recreational and wellbeing interests?

Question 7 – Cumulative effects

How have construction activity, noise, access changes, landscape change, loss of openness, loss of distant views and increased human influence been considered cumulatively in relation to wellbeing across all the named footpaths

Question 8 – Screening versus openness

If the Applicant accepts that its mitigation will reduce the sense of openness, on what basis does it conclude that the mitigation adequately preserves the environmental qualities relevant to wellbeing?

16. Summary of the evidence

The following points are supported directly by the Applicant's published evidence:

- 1. Site 8 is assessed as a High-sensitivity landscape receptor.**
ES Chapter 7, APP/6.1.7, Table 7.12, p.141.
- 2. Site 8 has a Major Adverse – Significant landscape effect.**
APP/6.1.7, Table 7.12, p.141.

3. **The Applicant recognises landscape and visual amenity as relevant to mental wellbeing, sense of place, recreation and connection to nature.**
APP/6.1.18, paragraph 18.6.111, p.126.
4. **Construction at FP22 produces a Major Adverse – Significant effect.**
APP/6.3.7.7, VL6, p.87.
5. **Year 1 at FP22 produces a Major Adverse – Significant effect.**
APP/6.3.7.7, VL6, p.87.
6. **At Year 15, the longer-distance valley view remains screened.**
APP/6.3.7.7, VL6, p.87.
7. **At Year 15, the Applicant expressly states that the sense of openness will reduce.**
APP/6.3.7.7, VL6, p.87.
8. **The Year 15 residual effect remains Moderate Adverse – Significant.**
APP/6.3.7.7, VL6, p.87; APP/7.14, paragraph 8.2.48, p.60.
9. **A 20-metre setback from FP22 is part of the proposed mitigation.**
APP/6.1.7, paragraph 7.7.14, p.39.
10. **The Applicant acknowledges high susceptibility of Sub-Site 8B to this type of development because of its topography.**
APP/5.11, p.163.

Disclaimer: This material has been assembled by my own research, and AI cross-referencing

Biodiversity Gain

The principal quantitative measure is **Biodiversity Net Gain (BNG)**, using the **statutory Biodiversity Metric**.

How it is measured

The assessment broadly works in four stages:

1. Establish the ecological baseline

- Ecologists survey the habitats within the development area.
- Habitats are classified—for example grassland, arable land, hedgerows, woodland, ponds and watercourses.
- Their ecological condition and distinctiveness are assessed.
- East Pye's baseline is supported by habitat surveys undertaken in **2024–2026**, together with desk studies and river-condition surveys.
-

2. Convert habitats into "biodiversity units"

The statutory metric assigns numerical units to habitats based principally on:

- **area** of habitat;
- **distinctiveness** — how ecologically valuable the habitat is;
- **condition** — how good the habitat is;
- **strategic significance/location**; and
- for hedgerows and watercourses, separate calculations are made using the relevant metric.

Thus, **one hectare of high-value habitat is not equivalent to one hectare of ordinary agricultural land.**

3. Calculate the post-development position

The assessment models what happens to each habitat as a result of the solar scheme:

- habitats retained;
- habitats lost or degraded;
- habitats created;
- habitats enhanced;
- hedgerows retained/restored;
- woodland/tree planting;
- grassland/meadow management; and
- other ecological enhancements.

The metric also takes account of the **time required for new or enhanced habitats to reach their intended condition**, rather than treating newly planted habitat as immediately equivalent to established habitat.

East Pye has designed its proposal around a claimed **minimum 10% Biodiversity Net Gain**. The **10% figure does not mean that wildlife everywhere on the site will be 10% better**. It is a **metric calculation of habitat units**. That distinction is potentially important when assessing the proposal. So for example, a scheme could achieve 10% BNG by creating substantial areas of lower-value habitat while simultaneously causing the loss of a smaller amount of a much more valuable habitat.

More useful questions would be -

- **What is the baseline biodiversity-unit calculation, exactly which habitats generate the claimed gain, what habitats are lost, what particular species would be affected and what assumptions about condition, distinctiveness, time-to-maturity and long-term management are required to produce the claimed 10%?**
- **Has the Applicant demonstrated that every material baseline habitat classification and condition assessment is sufficiently evidenced and representative?**
- **Is the predicted extent, type and eventual condition of the proposed grassland realistically achievable across the operational solar site? Given the major component of net gain depends on agricultural land being converted into grassland**
- **Are the management prescriptions sufficiently specific, enforceable and monitored to justify the future-condition scores used in the calculation?**
- **EPS predicts 31.35% net gain for hedgerow, including substantial creation and restoration. Are the proposed hedgerow lengths, species composition, structure and target condition sufficiently secured to support the 290.03-unit gain?**
- **EPS propose habitat retention, enhancement and creation .Are the proposed habitats sufficiently connected and appropriately located to provide functioning ecological corridors rather than merely additional metric units?**
- **The BNG calculation is based on future outcomes. What precise DCO requirements, monitoring, reporting, remedial measures and enforcement mechanisms ensure that the predicted BNG is actually delivered and maintained?**

Therefore **Are the baseline classifications, future habitat condition, strategic-significance assumptions, habitat-creation assumptions and long-term management arrangements sufficiently evidenced and secured to justify the biodiversity units attributed to the proposed scheme.**

The Examining Authority should therefore satisfy itself that each material assumption underpinning the Statutory Biodiversity Metric is adequately evidenced and capable of being secured through the DCO before relying upon the predicted BNG outcome

Disclaimer: This material has been assembled by my own research, and AI cross-referencing