

Holme Hale Parish Council – Input to High Grove Solar Farm Statutory Consultation

Given the proposals documented to-date by RWE regarding the proposed High Grove Solar Farm development, the following is a summary of the concerns held by Holme Hale Parish Council (HHPC). In the main they relate to the proposed plans for the construction and subsequent operation of the proposed High Grove Southern Panel Area.

1. Proposed Routing of Construction Traffic

HHPC are of the view that both Lower Road and Brown's Lane are unsuitable for use by HGV traffic involved in construction of the Southern Panel Area. These are narrow single-track roads, whose carriageway width and underlying sub-base is incapable of accommodating and sustaining the frequent passage of HGV traffic. Lower Road also contains a NCC-designated Roadside Nature Reserve of ecological importance. As such we do not believe that these roads should be used as designated access routes for traffic associated with the High Grove development.

HHPC recommends that a more practicable option would be to route HGV construction traffic from the A47 via the North Pickenham Road (*past Petygards Hall*), this being the designated HGV access route from the A47 to the North Pickenham Industrial Area. It could then be routed along the C117 Station Road / Bradenham Rd to the Holme Hale, (West) Bradenham and Ashill access points of the Southern Panel Area (*see Blue line(s) on Fig.1*).

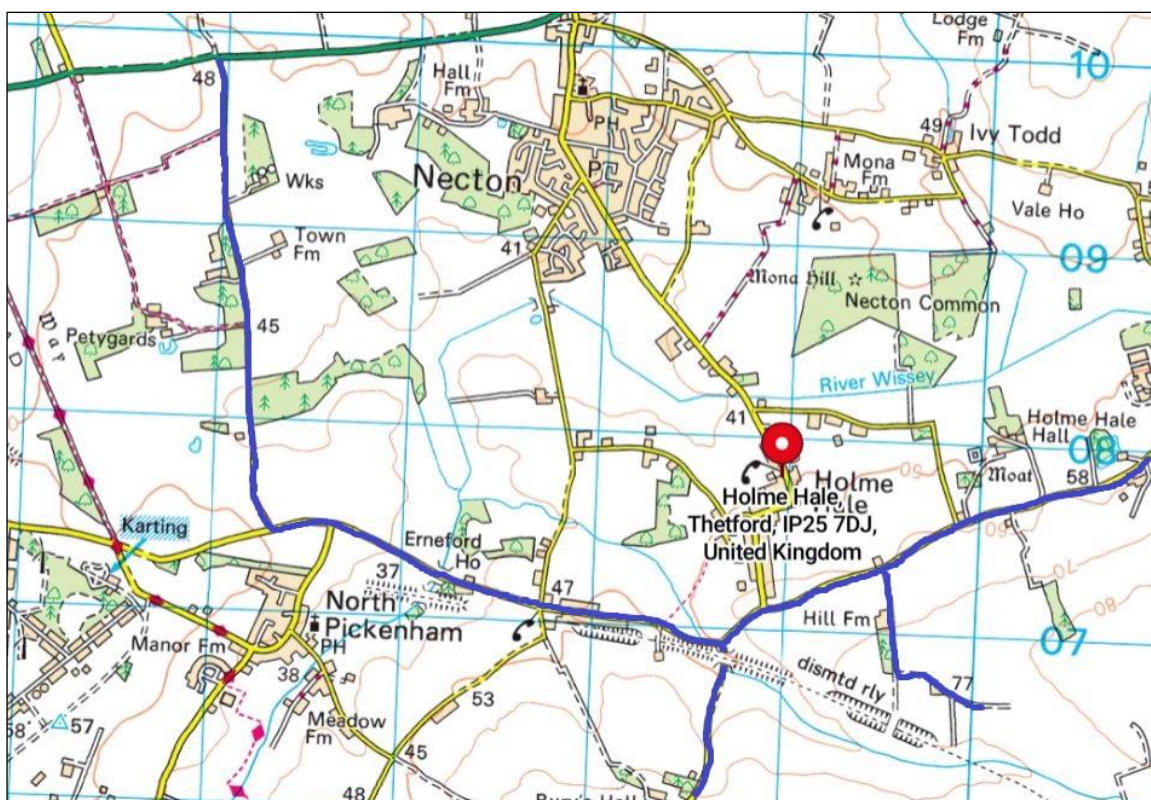


Fig.1 HHPC recommended access route(s) for High Grove Construction Traffic (*as denoted by Blue lines*)

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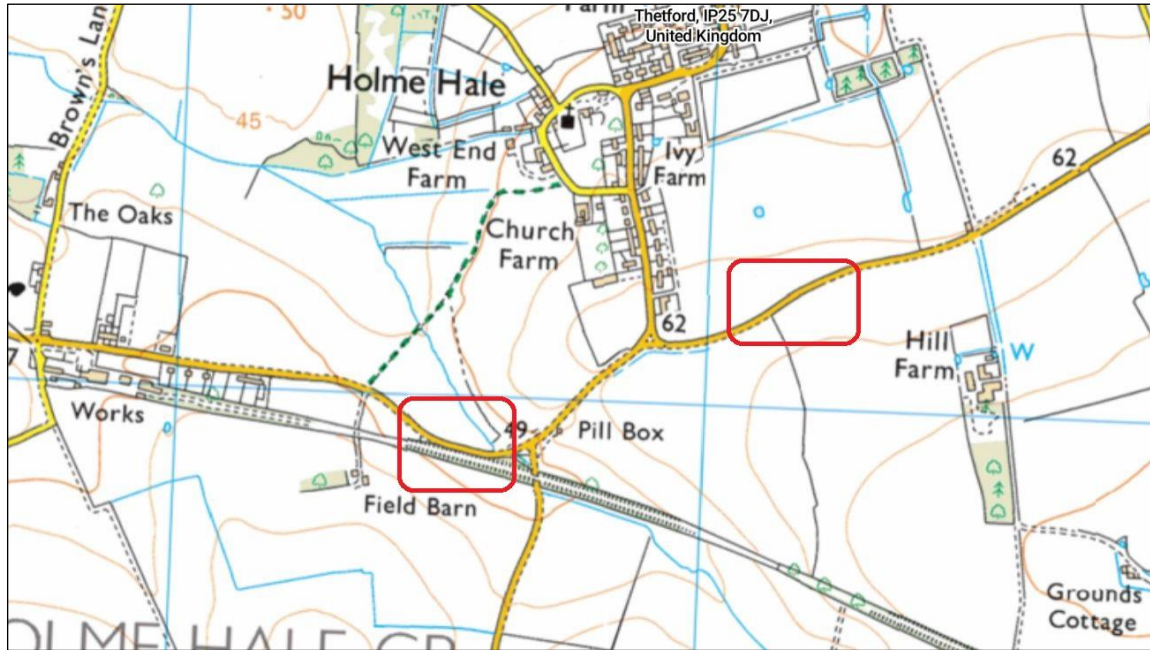


Fig.2 HHPC proposed locations for provision of additional HGV passing bays (as denoted by Red boxes)

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In order to go some way to mitigate disruption likely to result from the undoubted increase in HGV traffic along Station Road and Bradenham Road (Holme Hale), HHPC requests that RWE consider the installation of additional (HGV) passing bays in sections of this route within Holme Hale Parish (see Fig.2), specifically:

- i) On Station Road, before the Ashill / Hale Road junction (*where the road narrows*), and
- ii) In the particularly narrow section of the Bradenham Road (*incorrectly marked as Station Rd*) between the junction with School Road & the entrance to Hill Farm.

HHPC are also of the view that the likely increase in HGV traffic volumes along the residential area of Station Road, Holme Hale during the construction phase of the proposed development, will pose an increased safety risk to pedestrian traffic in this area. This is of particular concern given that Station Road links both to a network of Permissive Paths within the Parish and also to the Public Footpath which leads to Church Road. Consequently, pedestrian traffic within Station Road does not originate solely from residents of Station Road.

HHPC is therefore of the view that it would be appropriate for RWE to consider possible funding options for the installation of a roadside footpath in this location (*subject to resident consultation*).

(continued)

2. Provision of Additional Visual Mitigation Measures

HHPC are extremely concerned that areas of proposed Southern Development Area (*particularly parcels S-10 & S-11*) will have an adverse impact on the visual amenity of Holme Hale Residents when viewed from the following locations (*see Fig.3*):

- Holme Hale Pavilion Playing Field
- The roadside pedestrian footpath which extends around the eastern and southern periphery of the HH Playing Field
- The Permissive Paths which extend along the roadside field margins of the:
 - Bradenham Road (*incorrectly marked on maps as Station Road*)
 - Ashill Road, Holme Hale (*marked as Hale Road*).

HHPC is also concerned regarding the specific type of the solar panels that RWE proposes to install in the Southern Development Area; particularly whether they will be of ‘fixed’ or ‘tilting’ design. It is understood that ‘tilting’-type panels would have a far greater visual impact on the vicinity and therefore will require significantly greater visual mitigation. Is this the case?

HHPC asks for clarification of this aspect and also clear information regarding the overall height and likely on-site orientation of such ‘tilting’ panels, were they to be used.

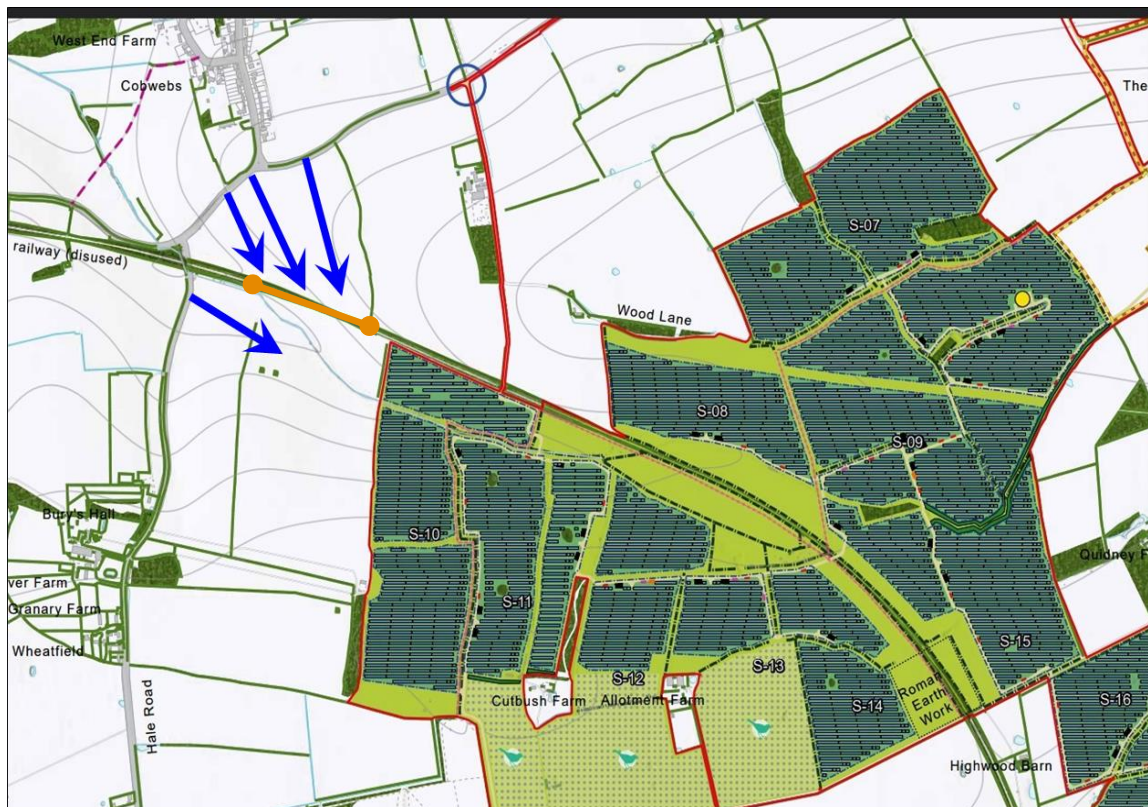


Fig.3 Viewpoints of concern to HHPC (*as denoted by the Blue arrows*)
- Orange line indicates location of proposed tree planting

HHPC notes and is appreciative of the recently-proposed hedge enhancement along the western boundary of the S-10 parcel and the proposed additional woodland planting in the north-west corner of S-10.

However, HHPC is of the view that, due to the elevated topography at the southern sections of the S-10 and S-11 parcels, the additional screening measures proposed by RWE within the site boundary (*at lower elevations*) will not provide sufficient visual mitigation from the majority of viewpoints cited. Additionally:

- Contrary to the recent suggestion by RWE, the existing trees on the eastern and southern periphery of the HH Playing Field **do not provide sufficient visual mitigation** of the proposed S-10 parcel area (*as illustrated by Fig.4: image taken at normal person head-height*)
- Due to their planting density and characteristic growth habit, the existing (ash) trees on the Disused Railway Line also **do not provide adequate visual mitigation** of the S-10 parcel, even when in full-leaf (*see Fig.5*). Furthermore, the high incident of 'Ash Dieback' disease amongst this species means that the existing trees in this location are indeed under threat.

HHPC therefore requests (*as previously discussed with RWE*), that RWE implements the establishment of additional screening outside of the proposed Draft Order Limits (DOL), to minimise the likely visual impact of the S-10 and S-11 parcels when viewed from the immediate locality of the HH Playing Field and adjacent Permissive Paths.

We are firmly of the opinion that these measures should include the establishment of an avenue of semi-mature trees (*a deciduous & evergreen mix*) along on the upper surface of the embankment of the Disused Holme Hale to Watton Railway Line (*see Orange line in Fig.3*). It is understood that the landowner in question is amenable to a development of this nature.

Please note that given the proposed 40 year operational period of the High Grove development, HHPC does not consider the RWE-proposed 15 year timescale for the adequate establishment of any such screening measures to be an acceptable time period.

An effective solution is required within a much shorter timescale.

(continued)



Fig.4 View towards the proposed S-10 parcel from Holme Hale Playing Field



Fig.5 View towards the S-10 parcel from roadside footpath on the periphery of Holme Hale Playing Field
- Note failure of existing ash trees to adequately screen the fields beyond (*proposed for development*)

3. Possible Impact on Local Archaeological Sites

HHPC is concerned regarding the possible adverse impact that the proposed development may have on site of the former medieval village of Holm. We note that the current High Grove PEIR documentation classifies the site as a 'non-designated monument of archaeological significance (MNF33817)' and states that it will lie outside of the infrastructure footprint.

However, the current PEIR plans show infrastructure to be present on this site and indicate it to be an integral part of the S-07 Panel Area (*see Fig.6*). Furthermore, according to the geophysical survey maps provided within the PEIR documentation, the site has not to-date been subject to a geophysical survey (*unlike all other such areas of archaeological significance*), and so it has not been evaluated in terms of its potential significance. This is of significant concern to HHPC.



Fig.6 Site of former medieval village of Holm (*Blue rectangle*), currently shown as part of the panel & infrastructure area

- Red arrows indicate potential direction of 132kV substation relocation to reduce its visual impact

HHPC understands that, as a consequence of its potential archaeological significance, this site was voluntarily removed by the Landowner from arable cultivation in the early 1990s and has been protected (*in a DEFRA-funded scheme*) as non-cultivated grassland since that time.

HHPC therefore requests that this important historical site be removed from the proposed High Grove (*infrastructure*) development, so that it may be preserved for future generations. Additionally, if the latter is possible, HHPC would like collaborate with RWE to explore the potential community benefit(s) which could result from the provision of public access to the site and the installation of some information boards, in order to highlight its history & importance.

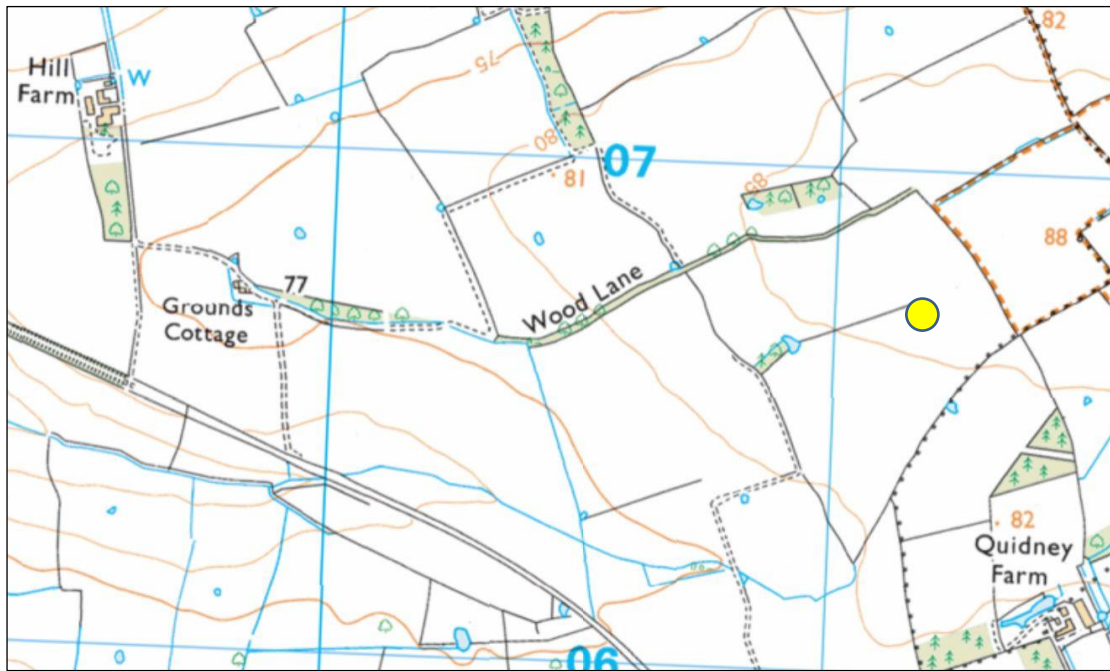


Fig.7 RWE proposed location substation infrastructure in Southern Development Area (Yellow circle)
 - Proposed site is almost on the highest available location in the locality (~86 m elevation)

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4. Potential for Light & Noise Emissions (during Construction & Operational Phases)

HHPC is concerned regarding the proposed location of the (Southern Area) 132kV substation. It is noted that at present RWE propose to site this permanent infrastructure within the S-09 Panel Area on almost the highest point in the local vicinity – at an elevation of ~86 metres (see Fig.7).

HHPC fears that this proposed siting will both increase the visual impact of the installation on the locality (in terms of remote visibility of light emissions) and potentially enhance the propagation of noise emissions from the infrastructure on the site.

HHPC therefore requests that RWE explores the possibility of relocating this substation installation to a lower point in the proposed field (i.e. in direction the Red arrows – Fig.6), to reduce the inevitable impact of light pollution on the locality and the propagation of noise emissions from the site.

HHPC also requests that RWE implements one or more of the following mitigation measures in order to address our very real concerns regarding the proposed siting of this infrastructure:

- The provision of a raised earth bund on the western side of the substation site
- The planting of a (semi-mature tree) screening belt on the northern, western & southern sides of the proposed infrastructure site
- Augmentation of the adjacent hedge which bisects the S-09 Panel Area **and** planting of additional woodland parcel(s) to the west of the proposed infrastructure site.

HHPC also requests that any on-site lighting employed during the Construction Phase of the development should not remain lit overnight, following the cessation of each day's work.

5. Potential for Surface Water Contamination / Run-Off (during Operational Phase)

HHPC has concerns regarding the potential for environmental (*surface water / groundwater & watercourse*) pollution in the event of a fire within an in-field Inverter/BESS installation.

This is of particular concern given the topography and limited infiltration capability of the land parcels which surround and feed into the RWE-designated Wissey Tributary 1 (WT1), in the Holme Hale – Ashill watershed.

HHPC would like to see greater provision made by RWE within the Southern Panel Area for the emergency containment of potentially contaminated surface run-off water in the immediate vicinity of the proposed BESS/Inverter installations.

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10th July 2025