

# The Drovers Solar Farm

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## **Appendix 6.1: Consultation and Legislation, Planning Policy and Guidance**

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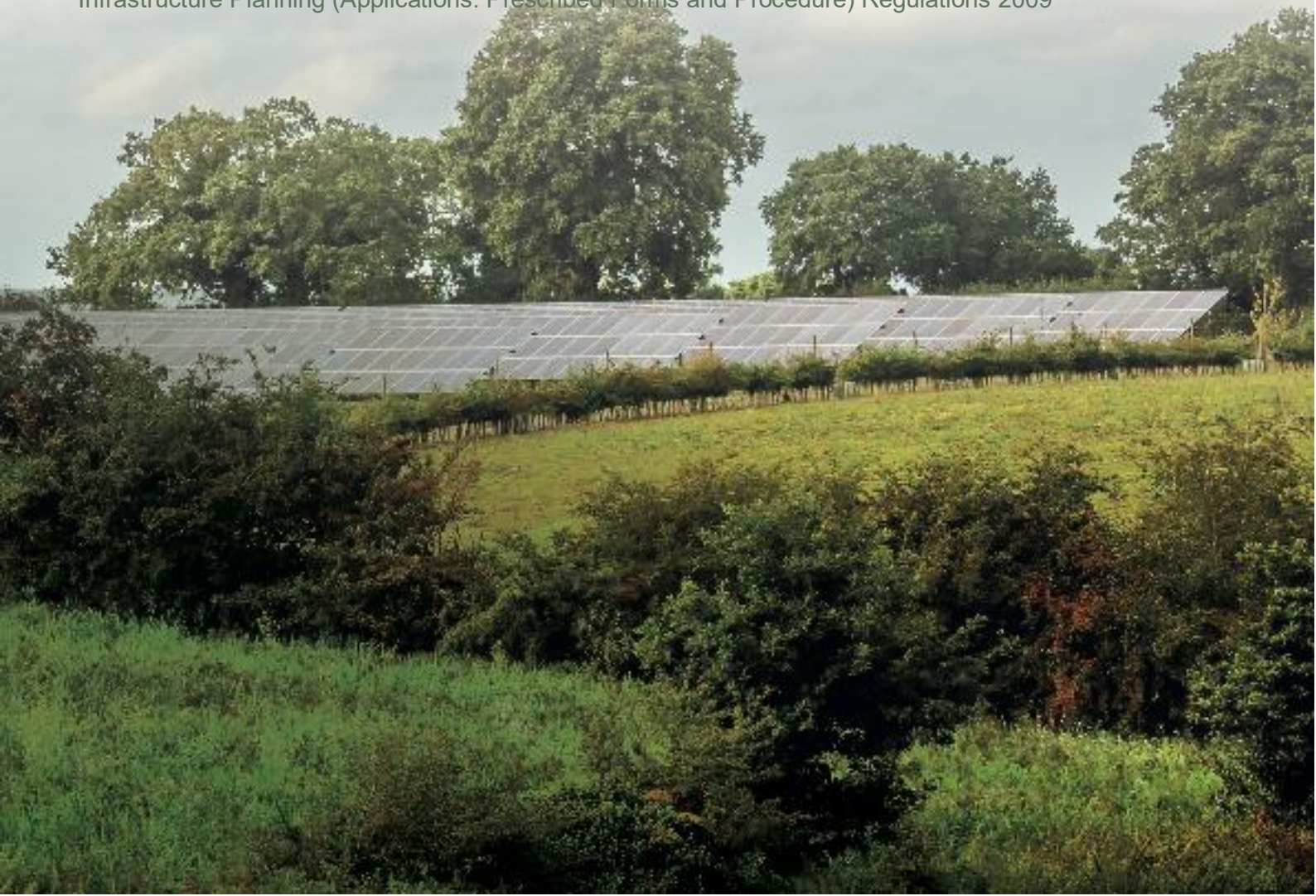
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Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009



## 1.0 Appendix 6.1 Consultation and Legislation, Planning Policy and Guidance

### Legislation

#### European legislation

The European Landscape Convention 2000 (Ref 1-1)

The European Landscape Convention 2000 promotes the need to take account of all landscapes. The European Landscape Convention defines landscape as “an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”. A Landscape and Visual Assessment considers effects on all landscapes, not just designated landscapes.

#### UK Legislation

The Environment Act 2021 (Ref 1-2)

The Environment Act 2021 provides a framework for environmental protection in the UK and requires government and public bodies to set targets for air quality, water, biodiversity, and waste reduction. Key commitments of the Act include halting species decline by 2030 and the introduction of mandatory BNG requirements for all Town and Country Planning Act (TCPA) and Nationally Significant Infrastructure Project (NSIP) developments. Commitments that would be secured through the DCO application which are relevant to the LVIA **ES Chapter 6 [APP/6.2]** include part 6 Nature and Biodiversity - Section 99: Biodiversity gain in nationally significant infrastructure projects outlines that Schedule 15 makes provision about biodiversity gain in relation to development consent for nationally significant infrastructure projects specifically. This is expected to become a legal requirement for nationally significant infrastructure projects from November 2025.

Levelling-up and Regeneration Act 2023 (LURA 2023) - Section 245 (Protected Landscapes)

This Act places a duty on relevant authorities in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or an Area of Outstanding Natural Beauty (National Landscapes) in England, ‘to seek to further the statutory purposes of the area’. The duty applies to local planning authorities and other decision makers in making planning decisions on development and infrastructure proposals, as well as to other public bodies and statutory undertakers. This legislation in effect increases the duty on relevant authorities to be more pro-active in its consideration of new development proposals to conserve and enhance the statutory purpose and function of Nationally Protected Landscapes. The new legislation also elevates the weight of these protected landscapes within any wider planning balancing exercises undertaken in preference of conserving and

enhancing national landscapes if resulting conflict arises with other material planning considerations.

## **Planning Policy**

### **National Planning Policy**

#### National Policy Statements (NPS)

The National Policy Statements (NPS) are a suite of documents issued by the SoS, setting out the government's policy for delivery of major energy infrastructure and represent the primary policy tests against which this DCO Application for the Scheme will be considered. Listed below are the details of the elements of NPS considered relevant to the landscape and visual assessment.

#### Overarching National Policy Statement (NPS) for Energy EN-1 2024 (Ref 1-3)

The Overarching National Policy Statement (NPS) for Energy EN-1 2024 sets out the Government's policy for delivery of major energy infrastructure and will be the primary basis for decision making. Section 5.10 of NPS EN-1 Landscape and Visual outlines the overarching national policy and guidance for assessment of impact on landscape character and visual amenity for major energy infrastructure projects within England.

#### Section 4.6 Environmental and Biodiversity Net Gain

Paragraph 4.6.13 states *"In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as:*

- *reductions in GHG emissions*
  - *reduced flood risk*
  - *improvements to air or water quality,*
  - *climate adaptation,*
  - *landscape enhancement*
  - *increased access to natural greenspace, or*
  - *the enhancement, expansion or provision of trees and woodlands*
- The scope of potential gains will be dependent on the type, scale, and location of specific projects. Applicants should look for a holistic approach to delivering wider environmental gains and benefits through the use of nature-based solutions and Green Infrastructure."*

#### Section 4.7 Criteria for good design for Energy Infrastructure

Paragraph 4.7.1 *"The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an*



*object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important.”*

*Paragraph 4.7.2 “Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.”*

*Paragraph 4.7.3 “Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material.”*

*Paragraph 4.7.4 “Given the benefits of good design in mitigating the adverse impacts of a project, applicants should consider how good design can be applied to a project during the early stages of the project lifecycle.”*

*Paragraph 4.7.5 “To ensure good design is embedded within the project development, a project board level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Design principles should be established from the outset of the project to guide the development from conception to operation. Applicants should consider how their design principles can be applied post-consent.”*

*Paragraph 4.7.6 “Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, land form and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area. Applicants should also, so far as is possible, seek to embed opportunities for nature inclusive design within the design process.”*

*Paragraph 4.7.7 “Applicants must demonstrate in their application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected.”*

## Section 5.10 Landscape and Visual

*Paragraph 5.10.4 “Landscape effects arise not only from the sensitivity of the landscape but also the nature and magnitude of change proposed by the development, whose specific siting and design make the assessment a case-by case judgement.”*

*Paragraph 5.10.5 “Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.” Paragraph 5.10.6 “Projects need to be*

*designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.”*

## Section 5.11 Land Use, Including Open Space, Green Infrastructure, and Green Belt

*Paragraph 5.11.1 “An energy infrastructure project will have a direct effect on the existing use of the proposed site and may have indirect effects on the use, or planned use, of land in the vicinity for other types of development. Given the likely locations of energy infrastructure projects there may be particular effects on open space including green and blue infrastructure.”*

*Paragraph 5.11.7 “Green and blue infrastructure can also enable developments to provide positive environmental, social, health and economic benefits. Green infrastructure includes green space such as parks and woodlands but also other environmental features such as street trees, hedgerows and green walls and roofs. It also includes blue infrastructure such as canals, rivers, streams, ponds, lakes and their borders. Well designed and managed green and blue infrastructure provides multiple benefits at a range of scales. It can contribute to biodiversity recovery, sequester carbon, absorb surface water, cleanse pollutants, absorb noise and reduce high temperatures. The Green Infrastructure Framework – Principles and Standards for England can be used to consider green infrastructure in development and plan for good quality and targeted creation or improvement.”*

NPS for Renewable Energy Infrastructure EN-3 2024 (Ref 1-4)

NPS EN-3 2024, sets out the Government’s policies in relation to renewable energy infrastructure and should be read in conjunction with NPS EN-1.

## Section 2.5 Consideration of good design for energy infrastructure

*Paragraph 2.5.1 “Section 4.7 of EN-1 sets out the criteria for good design that should be applied to all energy infrastructure.” Paragraph 2.5.2 “Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage”*

## Section 2.10 Solar Photovoltaic Generation

*Paragraph 2.10.42 “Applicants are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way, where possible during construction, and in particular during operation of the site.”*

*Paragraph 2.10.43 “Applicants are encouraged where possible to minimise the visual outlook from existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.”*

*Paragraph 2.10.44 “Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights of way or the*

*creation of permissive paths), taking into account, where appropriate, the views of landowners.”*

*Paragraph 2.10.94 “The approach to assessing cumulative landscape and visual impact of large-scale solar farms is likely to be the same as assessing other onshore energy infrastructure. Solar farms are likely to be in low lying areas of good exposure and as such may have a wider zone of visual influence than other types of onshore energy infrastructure.”*

*Paragraph 2.10.95 “However, whilst it may be the case that the development covers a significant surface area, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography, the area of a zone of visual influence could be appropriately minimised.”*

*Paragraph 2.10.96 “Landscape and visual impacts should be considered carefully pre application. Potential impacts on the statutory purposes of nationally designated landscapes should form a part of the pre application process.”*

*Paragraph 2.10.97 “Applicants should carry out a landscape and visual assessment and report it in the ES. Visualisations may be required to demonstrate the effects of a proposed solar farm on the setting of heritage assets and any nearby residential areas or viewpoints.”*

*Paragraph 2.10.98 “Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes.”*

*Paragraph 2.10.99 “Whilst there is an acknowledged need to ensure solar PV installations are adequately secured, required security measures such as fencing should consider the need to minimise the impact on the landscape and visual impact”*

*Paragraph 2.10.100 “The applicant should consider as part of the design, layout, construction, and future maintenance plans how to protect and retain, wherever possible, the growth of vegetation on site boundaries, as well as the growth of existing hedges, established vegetation, including mature trees within boundaries. Applicants should also consider opportunities for individual trees within the boundaries to grow on to maturity.”*

*Paragraph 2.10.101 “The impact of the proposed development on established trees and hedges should be informed by a tree survey and arboricultural/hedge assessment as appropriate.”*

*Paragraph 2.10.131 “Applicants should consider the potential to mitigate landscape and visual impacts through, for example, screening with native hedges, trees and woodlands.”*

*Paragraph 2.10.132 “Applicants should aim to minimise the use and height of security fencing. Where possible applicants should utilise existing features, such as hedges or landscaping, to assist in site security, or screen security fencing.”*

Paragraph 2.10.133 *“Applicants should minimise the use of security lighting. Any lighting should utilise a passive infra-red (PIR) technology and should be designed and installed in a manner which minimises impact.”*

- NPS EN-5 National Policy Statement for electricity networks infrastructure 2024 (Ref 1-5)

The NPS for Electricity Networks Infrastructure NPS EN-5 2024 sets out the Government’s policies for electricity networks, including overhead lines, substations, transformers and terminal towers. Paragraphs 2.9.7 to 2.9.25 set out the policies which relate to mitigating the landscape and visual impact of new infrastructure.

Paragraph 2.5.1 states that “when planning and evaluating the proposed development’s contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to: i. reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or ii. connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements.”

Paragraph 2.9.9 states that “New substations, sealing end compounds (including terminal towers), and other above-ground installations that serve as connection, switching, and voltage transformation points on the electricity network may also give rise to adverse landscape and visual impacts.”

Paragraphs 2.9.18 and 2.9.19 discuss the Horlock Rules, which were introduced by National Grid in 2009. Paragraph 2.9.19 sets out the Horlock Rules, where the applicant should:

- *“consider environmental issues from the earliest stage to balance the technical benefits and capital cost requirements for new developments against the consequential environmental effects in order to keep adverse effects to a reasonably practicable minimum.*
- *seek to avoid altogether internationally and nationally designated areas of the highest amenity, cultural or scientific value by the overall planning of the system connections.*
- *protect as far as reasonably practicable areas of local amenity value, important existing habitats and landscape features including ancient woodland, historic hedgerows, surface and ground water sources and nature conservation areas.*
- *take advantage of the screening provided by land form and existing features and the potential use of Site layout and levels to keep intrusion into surrounding areas to a reasonably practicable minimum.*

- *keep the visual, noise and other environmental effects to a reasonably practicable minimum.*
- *consider the land use effects of the proposal when planning the siting of substations or extensions.*
- *consider the options available for terminal towers, equipment, buildings and ancillary development appropriate to individual locations, seeking to keep effects to a reasonably practicable minimum.*
- *use space effectively to limit the area required for development consistent with appropriate mitigation measures and to minimise the adverse effects on existing land use and rights of way, whilst also having regard to future extension of the substation.*
- *make the design of access roads, perimeter fencing, earth-shaping, planting and ancillary development an integral part of the site layout and design, so as to fit in with the surroundings.*
- *in open landscape especially, high voltage line entries should be kept, as far as possible, visually separate from low voltage lines and other overhead lines so as to avoid a confusing appearance.*
- *study the inter-relationship between towers and substation structures and background and foreground features so as to reduce the prominence of structures from main viewpoints. Where practicable the exposure of terminal towers on prominent ridges should be minimised by siting towers against a background of trees rather than open skylines.”*

## National Planning Policy Framework (Ref 1-6)

The National Planning Policy Framework (NPPF) as revised in December 2024 sets out national planning policies that reflect priorities of the Government for operation of the planning system and the economic, social, and environmental aspects of the development and use of land. The NPPF has a strong emphasis on sustainable development, with a presumption in favour of such development. The NPPF has the potential to be considered both important and relevant to the Secretary of State’s (SoS) consideration of the Scheme. Listed below provides details of the elements of the NPPF that are relevant to this ES chapter, and how and where they are covered in the ES chapter.

The NPPF makes clear that the purpose of planning is to help achieve sustainable development (Section 2), and that making effective use of land (Section 11), well-



designed and beautiful places (Section 12), and conserving and enhancing the natural environment (Section 15) are important components of this.

Paragraph 11 sets out that in determining applications for development, this means that developments which accord with an up-to-date development plan should be approved.

Where there are no relevant development plan policies, or where the policies are out-of-date, Paragraph 11 directs that the permission should be granted unless *“any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole” (...)* or *“the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed” (...)*.

The areas or assets of particular importance, in respect of landscape and visual matters referred to within the associated footnote 7, are as follows:

- National Landscape
- National Park (or within the Broads Authority)
- Heritage Coast.

The list also includes important habitats Sites, irreplaceable habitats and / or designated as Sites of Special Scientific Interest; land designated as Green Belt or Local Green Space; designated heritage assets or heritage assets of archaeological interest; and areas at risk of flooding or coastal change.

Section 11 sets out considerations in relation to ‘Making Effective Use of Land’; noting in Paragraph 129 that, in respect of development density, the considerations should include whether a place is well-designed and *“the desirability of maintaining an area’s prevailing*

*character and setting” (...), “or of promoting regeneration and change”. Paragraph 129 also notes “the importance of securing well-designed, attractive and healthy places.”*

Paragraph 105 relating to protecting and enhancing public rights of way (PRoW) and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails;

Paragraph 130 also advises that “area-based character assessments” can be used to “help ensure that land is used efficiently while also creating beautiful and sustainable places.”

Paragraph 135 sets out that developments:

“b) are visually attractive as a result of good architecture, layout, and appropriate and effective landscaping; and

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).”

Paragraph 136 which recognises the important contribution trees make to the character and quality of the environment, that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible;

Section 12 sets out considerations in relation to ‘Achieving well-designed and beautiful places’ and indicates in Paragraph 135 that planning policies and decisions should ensure that developments:

- *“a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- *c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- *d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- *e) optimise the potential of the Site to accommodate and sustain an appropriate amount and mix of development (including green and other public space)...”*

Section 12, Paragraph 136 also advises that “Trees make an important contribution to the character and quality of the urban environment and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards)” (...) “and that existing trees are retained wherever possible”.

Footnote 52 notes that “Unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate.”

Section 15 of the NPPF ‘Conserving and enhancing the natural environment’ covers both ecological and landscape matters. Paragraph 187 requires that planning policies and decisions should contribute to and enhance the natural and local environment by:

- *“a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- *b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- *c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- *d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;*
- *e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- *f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”*

In respect of valued landscapes, Paragraph 188 notes that planning policy and decisions should “*distinguish between the hierarchy of international, national and locally designated Sites*”.

Paragraphs 189 requires that “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas”.

Footnote 67 notes that for the purposes of Paragraphs 190 and 191, “whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale

and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”

Paragraph 193 sets out “(c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.”

Paragraph 198 requires planning policies and decisions to ensure that “new development is appropriate for its location” including by limiting the “impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”

## **National Planning Practice Guidance**

### **Planning Practice Guidance for Natural Environment (Ref 1-7)**

The guidance explains the key issues in implementing policy to protect biodiversity, enhance green infrastructure and also contains a section on landscape. This section reiterates the policy set out in the NPPF, highlights the importance of identifying the special characteristics of locally valued landscapes and recommends the use of landscape character assessments.

With regards to National Parks, the Broads and National Landscapes (formerly known as AONBs), Paragraph: 039 (Reference ID: 8-039-20250129) of the guidance states that:

“Section 11A(2) of the National Parks and Access to the Countryside Act 1949, section 17A of the Norfolk and Suffolk Broads Act 1988 and section 85 of the Countryside and Rights of Way Act 2000 require that ‘in exercising or performing any functions in relation to, or so as to affect, land’ in National Parks and Areas of Outstanding Natural Beauty, relevant authorities ‘shall have regard’ to their purposes for which these areas are designated. A list of the public bodies and persons covered under ‘relevant authorities’ is found in Defra guidance on this duty, and Natural England has published good practice guidance.” Further, “this duty is particularly important to the delivery of the statutory purposes of protected areas. It applies to all local planning authorities, not just National Park authorities, and is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on their setting or protection.” (Paragraph: 039 Reference ID:8-039-20190721)

The guidance also notes under Paragraph: 040 (Reference ID: 8-040-20190721) that “Management plans for National Parks, the Broads and Areas of Outstanding Natural Beauty do not form part of the statutory development plan, but they help to set out the strategic context for development. They provide evidence of the value and special qualities of these areas, provide a basis for cross-organisational work to support the purposes of their designation and show how management activities contribute to their protection, enhancement and enjoyment. They may contain information which is relevant when preparing plan policies, or which is a material consideration when assessing planning applications.”

With regards to development within designated areas, paragraph: 041 (Reference ID: 8-041-20190721) records that “The National Planning Policy Framework makes clear that the



scale and extent of development in these areas should be limited, in view of the importance of conserving and enhancing their landscapes and scenic beauty. Its policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas. Effective joint working between planning authorities covering designated and adjoining areas, through the preparation and maintenance of statements of common ground, is particularly important in helping to identify how housing and other needs can best be accommodated. All development in National Parks, the Broads and Areas of Outstanding Beauty will need to be located and designed in a way that reflects their status as landscapes of the highest quality. Where applications for major development come forward, Paragraph 172 of the Framework sets out a number of particular considerations that should apply when deciding whether permission should be granted.”

Paragraph: 042 (Reference ID: 8-042-20190721) adds that “Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.”

The guidance also provides guidance on green infrastructure, highlighting types of green infrastructure Paragraph: 004 (Reference ID: 8-004-20190721) and the benefits which they provide Paragraph: 005 (Reference ID: 8-005-20190721), including achieving well-designed places as *“green infrastructure exists within a wider landscape context and can reinforce and enhance local landscape character, contributing to a sense of place and natural beauty”* Paragraph: 006 (Reference ID: 8-006-20190721).

Furthermore, Paragraph: 021 (Reference ID: 8-021-20240214) of the guidance refers to the principle of ‘net gain’. This is defined as *“an approach to development that leaves the natural environment in a measurably better state than it was beforehand. Net gain is an umbrella term for both biodiversity net gain and wider environmental net gain.”*

Paragraph: 021 (Reference ID: 8-021-20240214) of the guidance continues to state that:

- *“Wider environmental net gain has the aim to reduce pressure on and achieve overall improvements in natural capital, ecosystem services and the benefits they deliver. For example, habitat improvements can provide a range of benefits such as improvements to soil, water and air quality, flood risk management and opportunities for recreation.*
- *When planning strategically for the enhancement of natural capital, planning authorities can draw upon evidence on natural capital assets, the supply and demand of ecosystem services flowing from them, and existing and future risks and opportunities for these services.*
- *Natural England has developed the Environmental Benefits from Nature tool, which is designed to work alongside Biodiversity metric to provide developers, planners and*

*other interested parties with a means of enabling wider benefits for people and nature from biodiversity net gain.”*

Planning Practice Guidance for Design: process and tools (Ref 1-8)

The guidance should be read alongside the National Design Guide and sets out the characteristics of well-designed places and demonstrates what good design means in practice. Under Paragraph: 001 (Reference ID: 26-001-20191001), the guidance indicates that good design relates to 10 characteristics:

- *“context*
- *identity*
- *built form*
- *movement*
- *nature*
- *public spaces*
- *uses*
- *homes and buildings*
- *resources*
- *lifespan”*

In respect of the determining applications and the relationship between a proposal and the surrounding context, the guidance notes that: *“permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions”*

National Design Guide (Ref 1-9)

The guidance sets out characteristics of ‘beautiful, enduring and successful places’ that reflect the ‘Government’s priorities and a common overarching framework’ and provides cross references to the National Planning Policy Framework.

The guidance indicates that “context, history and the cultural characteristics of a Site, neighbourhood and region influences the location, siting and design of new developments”.

In respect of context, the guidance indicates a positive sense of place and further notes that well-designed places are:

- *“based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design;*
- *integrated into their surroundings so they relate well to them;*
- *influenced by and influence their context positively; and*

- *responsive to local history, culture and heritage”.*

The guidance indicates that identity “*or character of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together*” and that (...) “*Local character makes places distinctive.*” In respect of identity, the guidance further notes that well-designed places, buildings and spaces:

- *“have a positive and coherent identity that everyone can identify with (...);*
- *have a character that suits the context, its history, how we live today and how we are likely to live in the future; and*
- *are visually attractive”*

The guidance indicates that nature “contributes to the quality of a place, and to people’s quality of life, and it is a critical component of well-designed places.” Natural features include “natural and designed landscapes, high quality public open spaces, street trees, and other trees, grass, planting and water.”

## Local Planning Policy

The Scheme is located within the administrative areas of Norfolk County Council (NCC) and Breckland Council (BC) who are the host authorities. Local planning policies which are relevant to landscape and visual and have informed the LVIA **ES Chapter 6 [APP/6.2]** are detailed below and form part of the following planning policy documents.

- Breckland Local Plan (Adopted September 2023) (Ref 1-10)
- Swaffham Neighbourhood Plan (Adopted May 2019) (Ref 1-11)

## Breckland Local Plan (Adopted September 2023)

Breckland Council adopted planning policy documents set out the strategic context for development in the District. These include governing the decisions made on planning applications and which types of development are suitable for each area. The Breckland Local Plan was adopted on 21 September 2023. It is a key document that guides development in the Council over the next 20 years.

Policies that are considered relevant to landscape and visual matters of the Scheme within the Breckland Local Plan are as follows:

- Policy ENV 01 – Green Infrastructure
- Policy ENV 05 – Protection and Enhancement of the Landscape
- Policy ENV 06 – Trees, Hedgerows and Development
- Policy ENV 10 – Renewable Energy Development; and
- Policy COM 03 – Protection of Amenity.

Policy ENV 01 – Green Infrastructure includes policy on water bodies and strategic green infrastructure corridors. The policy states that “*New developments will be expected to exploit*

*opportunities to incorporate green infrastructure and enhance existing connectivity; recognising the intrinsic value of the green infrastructure network and ensuring that the functionality of the network is not undermined as a result of development.” It goes on to state that “Through its layout and design, new development should respond to the location of existing green infrastructure and support appropriate uses and functions. Where it is considered that the development will have a detrimental effect on the quantity or function of existing green infrastructure, compensatory provision will be required in the form of new and/or enhancements to the existing green infrastructure”.*

The policy then states that “Development proposals should also have regard to Council endorsed strategic green infrastructure strategies and made neighbourhood plans when considering opportunities on Site to provide connections and linkages with the wider network of green infrastructure”.

On linking green spaces at a more strategic scale, the policy states that “green areas in the local vicinity of a Site including designated areas of open space (in line with policy ENV 04), local green space designations, Public Rights of Way and areas protected by environmental designations should be identified to explore possible opportunities for improving connectivity between sites, where appropriate, and in the context of balancing other planning considerations for the site.”

Policy ENV 05 – Protection and Enhancement of the Landscape states that “Development proposals will be expected to contribute to and where possible enhance the local environment by recognising the intrinsic character and beauty of the countryside. Development should have particular regard to maintaining the aesthetic and biodiversity qualities of natural and man-made features within the landscape, including a consideration of individual or groups of natural features such as trees, hedges and woodland or rivers, streams or other topographical features”.

It also outlines that development should be sympathetic to the landscape character of the area as identified in the Landscape Character Assessment. It goes on to state that *“Proposals within The Brecks Landscape Character Areas will not be permitted where these would result in harm to key visual features of the landscape type, other valued components of the landscape, or where proposals would result in an unacceptable change in the landscape character”*. This needs to be considered, as much of the Scheme sits within ‘The Brecks – Heathland with Plantation’ Landscape Character Type.

Policy ENV 06 – Trees, Hedgerows and Development regards the importance of trees and significant hedgerows and shrub masses as part of the green infrastructure network. It states that *“Development requiring the loss of a protected tree or hedgerow (including preserved trees, protected hedgerows, trees in Conservation Areas, ancient trees, aged and veteran trees and trees classified as being of categories A or B in value (BS5837:2012) will only be permitted where:*

- *“it would allow for a substantially improved overall approach to the design and landscaping of the development that would outweigh the loss of any tree or hedgerow.*
- *Where the loss of such features is demonstrably unavoidable, adequate replacement provision, preferably by native species will be sought (MM130). Where the loss of a*



*tree is accepted in these circumstances, developers will be required to ensure the loss is suitably compensated for, taking into account the size and condition of the tree.”*

The policy goes on to stress the importance of protecting existing trees, hedgerows and shrubs where they are retained on a development Site.

Policy ENV 10 – Renewable Energy Development states that the Council will support for renewable energy schemes, depending on an acceptable extent of:

- *“i. adverse impacts on the local landscape, townscape or designated and non-designated heritage assets assessed in line with Policies ENV 05, ENV 07 and ENV 08 in the plan;*
- *ii. adverse effects on residential amenity by virtue of outlook / overbearing impact, traffic generation, noise, vibration, overshadowing, glare or any other associated detrimental emissions, during construction, operation and decommissioning;*
- *iii. an irreversible loss of the highest quality agricultural land;*
- *iv. cumulative impacts of renewable energy development on an area; and v. adverse impacts upon designated wildlife Sites; nature conservation interests; and biodiversity, assessed in line with Policies ENV 02 and ENV 03 in the plan.”*

The policy outlines that any benefits, including amount of usable electricity, must be demonstrated to outweigh any adverse impacts.

Regarding solar energy development, the policy states that “The effective use of land by focusing large scale solar farms on previously developed and non-agricultural land, will be encouraged provided that it is not of high environmental value. Particular factors that the Council will need to consider where a proposal involves greenfield land include:

- *the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land, where possible; and*
- *that the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays.”*

Policy COM 03 – Protection of Amenity states that “Development will not be permitted which causes unacceptable effects on the residential amenity of neighbouring occupants”, with particular regard to:

- *“Overlooking of windows of habitable rooms and private amenity space;*
- *Overbearing impact/visual dominance”;*
- *Overshadowing of private amenity space”;*
- *Loss of daylight and/or sunlight to existing windows of habitable rooms”; and*
- *Odour, noise, vibration or other forms of nuisance such as artificial light pollution.”*

## Swaffham Neighbourhood Plan (Adopted May 2019)

The Site is partially situated within ‘Swaffham Neighbourhood Plan Area’. The neighbourhood plan policies relevant to this landscape and visual chapter are as follows.

- Policy ENV4: Important public local views and vistas; and
- Policy ENV5: Dark skies.

Policy ENV4 Important public local views and vistas states that *“Development proposals within or which would affect an Important public local view and vista should ensure that they respect and take account of the view concerned has been considered”*. None of the views identified in the Neighbourhood Plan will be affected by the Scheme due to a combination of intervening vegetation and development in the Site’s context.

Policy ENV5 Dark Skies states that *“All street lighting and the lighting of residential dwellings or businesses should be environmentally efficient, sympathetic in design (for example, down lighting) and limited where adjacent to the countryside”*.

The Scheme would not be visible in any of the important public local views and vistas as outlined within the Swaffham Neighbourhood Plan. Similarly, as part of the embedded mitigation measures, the Scheme includes a relatively small number of areas that are proposed to be lit which would limit potentially significant visual impacts as a result of new lighting within the study area.

## Consultation

A request for an EIA Scoping Opinion was sought from the Secretary of State (SoS) through the Planning Inspectorate (PINS) in November 2024. PINS subsequently issued the Scoping Opinion in December 2024.

The issues raised in the Scoping Opinion relating to Landscape and Visual Impact are summarised and responded to within Table 1-1 relating to Landscape and Visual Impact demonstrates how the matters raised in the Scoping Opinion are addressed in the ES.

**Table 1-1 Relevant Scoping Opinion Comments from Statutory Bodies relating to landscape and visual.**

Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
Planning Inspectorate (on behalf of the Secretary of State) Scoping Opinion, 18 December 2024	<p>3.1.1 Lighting Impact Assessment</p> <p>The Scoping Report states that a separate Lighting Impact Assessment (LIA) has been scoped out of the Landscape and Visual Impact Assessment (LVIA).</p> <p>The Inspectorate considers that a LIA should be scoped in for further assessment as there is not sufficient information in the Scoping Report that the proposed approach to lighting is unlikely to cause any significant effects. The ES should include a LIA to support a detailed description of the Applicant's proposed approach to lighting and the</p>	<p>A Lighting Impact Assessment (LIA) remains scoped out of the ES.</p> <p>Significant landscape and visual impacts as a result of lighting would be unlikely given that the Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation, which would only include motion sensing lighting, and used only for security and maintenance purposes.</p> <p>As referred to in <b>ES Chapter 5: The Scheme [APP/6.1]</b> during construction, measures would be taken to prevent the impact on human and ecological receptors by minimising the use of light required for safe site operations, the use of directional fittings to</p>	<p>Nighttime effects and lighting have been scoped out of the LVIA (previously PEIR Table 6.2). Further detail on lighting is provided in <b>ES Chapter 5: the Scheme [APP/6.1]</b>.</p>

Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	measures taken to avoid or minimise lighting impacts on human and ecological receptors.	<p>minimise outward light spill and glare with lighting directed towards the middle of the Order limits rather than to the boundaries.</p> <p>During operation, CCTV cameras would use night-vision technology which would be monitored remotely and avoid the need for night-time lighting of the Solar PV Site. Routine maintenance would be scheduled for day light hours as far as practicable with focused task specific lighting only undertaken in the event of an emergency works or equipment failure. Motion sensing security lighting would be provided within the Customer Substation, the National Grid Substation, and within the BESS compound to maintain safe working conditions during winter months, for security</p>	



Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		<p>purposes and form maintenance activities.</p> <p>Further details of measures to control lighting are set out in the <b>outline Construction Environmental Management Plan (oCEMP) [APP/7.6]</b>.</p>	
	<p>3.1.2 Landscape Designations – National Designated Landscapes</p> <p>The Applicant proposes to scope out national designated landscape designations as none are located within or near to the site.</p> <p>The Inspectorate agrees that in the absence of any nationally designated landscapes such as National Parks or National Landscapes within the vicinity of the Proposed Development, this matter can be scoped out.</p>	<p>Noted and agreed with PINS. This has been scoped out of the ES.</p>	<p>Refer to Section 6.2 Consultation (previously PEIR Table 6.2) of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>

Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
Planning Inspectorate (on behalf of the Secretary of State) Scoping Opinion, 18 December 2024	<p>3.1.3 National Character Areas and Suffolk Regional Landscape Character Areas</p> <p>The Scoping Report states that the more detailed local Landscape Character Areas (LCAs) would form the basis of the assessment of effects on landscape character, informed by National and Regional Character Assessments where relevant. The Inspectorate agrees that National and Regional Character Areas can be scoped out on this basis.</p>	Noted and agreed with PINS. National and Regional Character Areas have been scoped out of the ES.	Refer to <b>Section 6.2: Consultation</b> (previously PEIR Table 6.2) of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .
Planning Inspectorate (on behalf of the Secretary of State) Scoping Opinion, 18 December 2024	<p>3.1.4 Table 6.9 Local Landscape Character –</p> <p>(B) Settled Tributary</p> <p>Farmland LCT; (B5) River</p>	Noted and agreed with PINS. These LCAs have been scoped out of the ES. Evidence of limited intervisibility between the Scheme and these LCAs are illustrated on <b>ES Figure 6.6 Zone of</b>	Refer to <b>Section 6.2: Consultation</b> (previously PEIR Table 6.2) of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>Wissey Tributary</p> <p>Farmland LCA</p> <p>(E) The Fens LCT; (E2)</p> <p>Saddlebow and</p> <p>Wormegay LCA</p> <p>(H) Settled Farmland with</p> <p>Plantations LCT; (H2)</p> <p>Fincham LCA</p> <p>(J) Plateau Farmland</p> <p>LCT; (J3) Great</p> <p>Massingham LCA</p> <p>The Inspectorate agrees that these LCAs can be scoped out from further assessment on the basis that evidence is provided in the ES that there is little to no visibility from these LCAs.</p>	<p><b>Theoretical Visibility (DSM)</b></p> <p><b>[APP/6.3].</b></p>	

Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
Planning Inspectorate (on behalf of the Secretary of State) Scoping Opinion, 18 December 2024	<p>3.1.5 Visual Effects – Visual Receptor Groups (VRGs) located outside of the Zone of Visual Influence (ZVI)</p> <p>The Scoping Report states that VRGs would only be defined for areas with potential visibility of the Proposed Development. The Inspectorate agrees that these VRGs can be scoped out from further assessment providing information in the ES supports the conclusion that there is no potential visibility of the Proposed Development from the VRGs located outside the ZVI.</p>	Noted and agreed with PINS. Visual receptors. VRGs located outside of the ZVI have been scoped out of the ES. <b>ES Figure 6.7: Visual Receptor Groups [APP/6.3]</b> and extensive fieldwork has confirmed that there would likely be very little to no potential visibility of the Scheme from publicly accessible areas outside of the ZVI.	Refer to <b>Section 6.2 Consultation</b> (previously PEIR Table 6.2) of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .
Planning Inspectorate (on behalf of the Secretary of State) Scoping Opinion, 18 December 2024	<p>3.1.7 Residential Visual Amenity Assessment (RVAA) –Residential properties beyond 800m distance of the Site Boundary.</p> <p>Noting that the Landscape Institute’s Technical Guidance</p>	Noted and agreed with PINS. This has been scoped out of the ES given that overbearing RVAA effects as a result of the Scheme would be unlikely to occur beyond 800m from the Order limits.	Refer to <b>Section 6.2 Consultation</b> (previously PEIR Table 6.2) of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .



Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	Note TGN 2/19: 'Residential Visual Amenity Assessment' advises that the requirement for an RVAA is generally dependent on the outcome of a LVIA, the Inspectorate agrees that residential properties beyond this distance can be scoped out from further assessment providing that the ES gives justification on why significant effects would not occur.		
Planning Inspectorate (on behalf of the Secretary of State) Scoping Opinion, 18 December 2024	<p>3.1.8 Amenity and Recreation Assessment –</p> <p>Local Public Rights of Way (PRoW) located outside of the ZVI, and those which are no longer used, accessible or identifiable on the ground.</p> <p>The Scoping Report states that local PRoW outside of the ZVI are unlikely to experience</p>	Noted and agreed with PINS. This has been scoped out of the ES. <b>ES Figure 6.6: Zone of Theoretical Visibility (DSM) [APP/6.3]</b> and <b>ES Figure 6.8: Amenity and Recreation Facilities [APP/6.3]</b> show the DSM ZTV and recreational resources within the Study Area. Extensive fieldwork and ZTV analysis has confirmed that there would likely be very little to no potential visibility of the Scheme from these areas.	Refer to <b>Section 6.2 Consultation</b> (previously PEIR Table 6.2) of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>environmental impacts which may affect overall experience of the amenity and recreational resource, due to lack of visibility, distance from the Proposed Development or lack of use.</p> <p>The Inspectorate agrees that this matter can be scoped out from further assessment on this basis providing that evidence in the ES supports this approach.</p>		
Planning Inspectorate (on behalf of the Secretary of State) Scoping Opinion, 18 December 2024	<p>3.1.9 Amenity and Recreation Assessment –</p> <p>Broadmeadow Common</p> <p>Emanuel's Common</p> <p>Newton Common</p> <p>Bradmoor Common</p> <p>The Scoping Report states that these Commons are unlikely to</p>	<p>Noted and agreed with PINS. This has been scoped out of the ES.</p> <p><b>ES Figure 6.6: Zone of Theoretical Visibility (DSM) [APP/6.3] and ES Figure 6.8: Amenity and Recreation Facilities [APP/6.3]</b> show the DSM ZTV and recreational resources within the Study Area. Extensive fieldwork and ZTV analysis has confirmed that there would likely be very little to no</p>	<p>Refer to <b>Section 6.2 Consultation</b> (previously PEIR Table 6.2) of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>

Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>experience environmental impacts which may affect overall experience of the amenity and recreational resource, due to lack of visibility and distance from the Proposed Development.</p> <p>The Inspectorate agrees that an amenity and recreation assessment of these Commons can be scoped out from further assessment on this basis.</p>	potential visibility of the Scheme from these areas.	
Planning Inspectorate (on behalf of the Secretary of State) Scoping Opinion, 18 December 2024	3.1.10 Table 3.1.10 Lighting – all phases Night-Time Effects and Lighting - all phases The Scoping Report proposes to scope out the night-time effects and lighting assessment from the LVIA. The Inspectorate considers that impacts on landscape and visual amenity resulting from the introduction of lighting during construction, operation and decommissioning which are likely to result in significant effects	With reference to the Applicant's response to 3.1.1. Lighting Impact Assessment intermittent lighting remains scoped out of the ES.	For detail on embedded mitigation measures and consultation, please refer to <b>Section 6.2 Consultation</b> (previously PEIR Table 6.2) and <b>Section 6.7 of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>should be assessed in the ES, unless it is agreed with relevant consultation bodies that this matter can be scoped out.</p> <p>The ES should ensure that intermittent lighting is assessed in relation to likely significant effects on humans and/or ecology. The ES should explain how the lighting design has been developed to minimise light spill and avoid direct intrusion into nearby properties.</p> <p>The ES should clearly explain the lighting strategy and any measures necessary to avoid or mitigate lighting effects. This should also include consideration of effects relating to intermittent lighting sources such as sensor-triggered security lighting.</p> <p>Any proposed mitigation measures should be described and secured through the DCO.</p>		

Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	The assessment should cross refer to other relevant aspect assessments and sensitive receptors (such as ecology and cultural heritage).		
Planning Inspectorate (on behalf of the Secretary of State) Scoping Opinion, 18 December 2024	<p>3.1.11 (Section 6.2, Figure 6-1, APP/6.4]) Study Area</p> <p>The Scoping Report states that the Zone of Theoretical Visibility (ZTV) is modelled on a worst-case scenario, with all other potential components of the Proposed Development having lower height parameters.</p> <p>The Inspectorate considers that the Study Area should be informed by the extent of likely effects, including from any potential elevated viewpoints. The final extent of the Study Area should be determined in consultation with the relevant local authorities to ensure it is representative, and evidence</p>	The Study Area extent was agreed with the Borough Council of King's Lynn and West Norfolk Council (KLWN), given that Breckland Council (BC) and Norfolk County Council (NCC) did not respond to the Applicant's consultation in relation to this matter.	For detail on consultation and ZTV/study are agreement please refer to <b>ES Appendix 6.1: Consultation and Legislation, Planning Policy and Guidance [APP/6.4]</b> .



Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	of this should be provided in the ES.		
Planning Inspectorate (on behalf of the Secretary of State) Scoping Opinion, 18 December 202	<p>3.1.12 Preliminary Zone of Theoretical Visibility (ZTV) and LVIA Viewpoints Visualisations and ZTV Studies.</p> <p>The decision on which viewpoints are representative should be agreed with the relevant local authorities where possible. The Applicant should demonstrate how their approach to using a ZTV complies with the Landscape Institute's guidance on establishing a ZTV for the LVIA. The Landscape Institute's ZTV approach treats the world as 'bare earth' and does not take account of potential screening by vegetation or buildings.</p> <p>The ZTV should be based on the maximum parameters of the Proposed Development.</p>	<p>Agreement on viewpoint locations has been sought with the Host Authorities but no written response was formally received.</p> <p>Clarification on how the ZTVs have been produced and on what parameters they have been modelled is provided within <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p> <p>A 'bare earth' ZTV, <b>ES Figure 6.5: Zone of Theoretical Visibility (DTM) [APP/6.3]</b> was produced for <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> illustrating an unrefined visual envelope. A detailed ZTV was also produced, <b>ES Figure 6.6: Zone of Theoretical Visibility (DSM) [APP/6.3]</b> for <b>ES Chapter</b></p>	Refer to <b>Section 6.6 Baseline Conditions</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> , <b>ES Figure 6.5: Zone of Theoretical Visibility (DTM) [APP/6.3]</b> , <b>ES Figure 6.6: Zone of Theoretical Visibility (DSM) [APP/6.3]</b> and <b>ES Appendix 6.4: Methodology for Zone of Theoretical Visibility Studies and Visualisations [APP/6.4]</b> .

Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		<p><b>6: Landscape and Visual [APP/6.2]</b> considering local obstructions.</p> <p>Both ZTVs were based on the maximum parameters of the development.</p>	
Planning Inspectorate (on behalf of the Secretary of State) Scoping Opinion, 18 December 2024	<p>3.1.13 Assessment of sensitivity – landscape and visual receptors Table 6.4 appears to duplicate the sub-heading landscape sensitivity, although visual receptors are referred to in addition to landscape receptors in paragraph 6.4.12 with respect to Table 6.4.</p> <p>The ES should clarify how susceptibility and value are to be used for the assessment for both landscape and visual receptors.</p> <p>The ES should demonstrate how relevant consultation bodies have influenced the choice of receptors</p>	<p>Comments with regards to Table 6.4 are noted and amendments have been made.</p> <p><b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> outlines how susceptibility and value relate to defining receptor sensitivity as per the Guidelines for Landscape and Visual Impact Assessment, Landscape Institute and Institute of Environment Management (IEMA), 3<sup>rd</sup> edition, 2013 <b>[Ref. 6-1]</b>.</p> <p>Agreement on landscape and visual receptors has been sought with the Host Authorities. No</p>	<p>Refer to <b>Section 6.5 Assessment Methodology</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p> <p>Refer to <b>Section 6.4 Assessment Assumptions and Limitations</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>

Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	and the level of sensitivity assigned to those receptors.	formal written response and/or note of agreement was received.	
Planning Inspectorate (on behalf of the Secretary of State) Scoping Opinion, 18 December 2024	<p>3.1.14 (Table 6.4) Landscape and visual effects assessment</p> <p>To help clearly distinguish between the assessment of landscape effects and the assessment of visual effects, the Inspectorate recommends separate criteria are presented for each assessment, in line with advice in the Guidelines for Landscape and Visual Impact Assessment (GLVIA).</p>	The assessment for landscape and visual effects are addressed separately in <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> and both parts of the assessment are clearly differentiated and referred to. The LDA Design assessment methodology by which the LVIA is undertaken is outlined in full within the ES and accompanying appendices.	Refer to <b>Section 6.5 Assessment Methodology</b> and <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .
Planning Inspectorate (on behalf of the Secretary of State) Scoping Opinion, 18 December 2024	3.1.15 Mitigation – landscape and planting The ES should cover the establishment period of any landscaping scheme and any long-term management needs. Any assumptions made with regards to the height that proposed mitigation planting would have reached by the assessment years should be clearly presented and justified for	The LVIA ( <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> ) covers potential effects for both the periods by which the planting mitigation is still establishing and also the period by which the planting is deemed to have matured and fully established. An <b>outline Landscape and Ecological</b>	Refer to <b>Section 6.7 Embedded Mitigation</b> and <b>Section 6.9 Additional Mitigation Measures of ES Chapter 6: Landscape and Visual [APP/6.2]</b> which have informed an assessment of likely effects in <b>Section 6.8 Assessment of Likely Effects</b> and the oLEMP [APP/7.11].

Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	the purposes of generating photomontages and reaching the assessment conclusions.	<b>Management Plan (oLEMP) [APP/7.11]</b> is provided for as part of the DCO Application and takes into account the long term management needs of any proposed mitigation planting.	
Planning Inspectorate (on behalf of the Secretary of State) Scoping Opinion, 18 December 2024	3.1.16 Cumulative effects The assessment of cumulative effects on visual receptors should distinguish between effect on overall landscape character and on visual impact/amenity generally, as well as any other relevant impacts such as glint and glare.	Cumulative effects are considered for both landscape character and visual amenity, within <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> . Glint and Glare effects are assessed and covered within <b>ES Chapter 16: Other Environmental Matters [APP/6.2]</b> .	Refer to <b>Section 6.11 Cumulative Effects Assessment of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .
Planning Inspectorate (on behalf of the Secretary of State) Scoping Opinion, 18 December 2024	3.1.17 Photomontages Photomontages should show all the components of the Proposed Development and demonstrate the Proposed Development before and after mitigation, in order to understand the implications of the worst-case scenario and the effectiveness of the proposed mitigation. Photomontages should	Components: All components of the Scheme (including the Grid Connection Infrastructure) have been modelled in the Type 3 illustrative Photomontages; refer to <b>ES Figure 6.14 and 6.15 of the ES Chapter 6 Landscape and Visual [APP/6.2]</b> .	Refer to <b>ES Figure 6.12 (PM6, PM8, PM12 and PM14): Parameter Based Winter Photowires</b>  <b>Figure 6.13 (PM6, PM8, PM12 and PM14): Parameter Based Summer Photowires, ES Figure 6.14 (PM8, PM12 and PM14): Winter Photomontages: Illustrative Scheme, ES Figure</b>

Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>be provided during the winter as well as in the summer to allow an assessment of maximum visibility from chosen viewpoints and to illustrate the seasonal differences in screening provided by mitigation planting, in line with the Guidelines for Landscape and Visual Impact Assessment (The Landscape Institute and Institute of Environmental Management and Assessment (IEMA), 3rd Edition, 2013)</p> <p>Photomontages should present the likely visual impact at selected locations, particularly with the effects of glint and glare without mitigation.</p> <p>The ES should clearly present any assumptions made with regards to the height that the proposed mitigation planting would have reached by the assessment years, for the purposes of generating</p>	<p>Due to the flexibility within the Scheme for extents of deviation and options associated with the Grid Connection Infrastructure, this parameter has not been modelled within the ES photowire visualisations or ZTV and instead is accounted for and assessed within the main body of the assessment in <b>ES Chapter 6 Landscape and Visual [APP/6.2]</b>.</p> <p>Winter and summer viewpoints:</p> <p>For the assessment within this ES, both winter and summer viewpoints were taken to inform the visualisations. There are two types of visualisations included. Firstly, there are Type 3 parameter based photowires, which provide a higher-level representation of proposals</p>	<p><b>6.15 (PM8, PM12 and PM14): Summer Photomontages: Illustrative Scheme [APP/6.3] and ES Appendix 6.4: Methodology for Zone of Theoretical Visibility Studies and Visualisations [APP/6.4].</b></p> <p>Refer to <b>Section 6.4 Assessment Assumptions and Limitations of ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>

Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>photomontages and reaching the assessment conclusions.</p> <p>Efforts should be made to agree the number and location of the selected viewpoints for photomontages with relevant consultation bodies including local authorities, Historic England, and Natural England (NE) and evidence of this agreement should be provided in the ES.</p> <p>The cumulative assessment should be supported by photomontages where appropriate.</p>	<p>generally showing the scale and heights of the maximum height parameters of each area of the Site, within a photographed context. These are provided for a select number of viewpoints utilising both summer and winter views, to demonstrate variations in screening</p> <p>by existing vegetation. Secondly, Type 3 illustrative photomontages have also been produced of an illustrative scheme, from two separate viewpoints, during summer and winter, both at year 1 and year 15 durations.</p> <p>Likely visual impacts:</p> <p>Photomontages present the likely visual impact at viewpoints 8, 12 and 14 with consideration given to effects of glint and glare in the images. Assumptions with regard to growth rates are presented in</p>	



Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		<p><b>ES Chapter 6: Landscape and Visual [APP/6.2].</b> Assumptions on planting heights are assumed to be the smallest height outlined within the indicative planting specification list in <b>oLEMP [APP/7.11]</b>.</p> <p>Assumptions on height of proposed mitigation planting:</p> <p>As referred to in the PEIR, assumptions with regard to growth rates are presented in <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p> <p>Agreement of number and location of viewpoints for photomontages:</p> <p>Agreement on the proposed approach and location of visualisations for the ES has been sought with the Host Authorities and Natural England. No formal written response and/or note of agreement was received. The</p>	

Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		<p>visualisation locations within this ES are the same utilised within the Preliminary Environmental Information Report (PEIR), for consistency.</p> <p>Natural England response included <i>“this proposal does not appear to be either located within, or within the setting of, any nationally designated landscape and therefore Natural England does not have remit to comment. All proposals however should complement and where possible enhance local distinctiveness and be guided by the Local Planning Authority’s (LPA) landscape character assessment where available, and the policies protecting landscape character in the relevant LPA’s local plan or development framework”</i></p> <p>The cumulative photomontages have not been produced as part of the ES given the limited number of</p>	

Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		cumulative effects identified within the assessment. Professional judgement, extensive fieldwork and use of/reference to the wide suite of visuals produced were all used to inform the cumulative assessment.	
Planning Inspectorate (on behalf of the Secretary of State) Scoping Opinion, 18 December 2024	<p>3.1.18 Cross referencing – cultural heritage</p> <p>The LVIA should cross refer to other relevant assessments and sensitive receptors, such as cultural heritage receptors. The ES should explain how the LVIA and cultural heritage assessments have been integrated with clear cross-referencing provided between the Cultural Heritage and LVIA chapters.</p>	The approach to the LVIA has been undertaken in coordination with the Applicant’s Heritage consultant, with regard to viewpoint selection and sensitive heritage receptors in the Study Area. For the ES, cross referencing between these topic chapters has been undertaken where appropriate within <b>ES Chapter 17: In-Combination Effects [APP/6.2]</b> .	Refer to <b>Section 6.6 Baseline Conditions of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
Planning Inspectorate (on behalf of the Secretary of State) Scoping Opinion, 18 December 2024	<p>3.1.19 Types of panels</p> <p>Where the potential panel solutions are widely different in their physical characteristics, the ES should give consideration to worst-case scenarios for the visual impact of the panel types.</p>	The ES has consider all proposed elements included under the Work Nos. as set out in <b>ES Chapter 5: The Scheme [APP/6.1]</b> and Works Areas as set out in the <b>Works Plan [APP/2.3]</b> . A worst-case scenario has been assessed.	Refer to <b>ES Chapter 5: The Scheme [APP/6.1]</b> and <b>Works Plan [APP/2.3]</b> .
Borough Council of King's Lynn & West Norfolk	The LPA expressed broad agreement with the representative viewpoints listed in Table 1 [of the Scoping Request Report], however the impact on both the landscape and the historic landscape are a key concern for the Borough Council and they therefore requested that the following additional viewpoints are taken: (a) Priory Road, Castle Acre (b)The high points of River Road and Petticoat Drove, within the site, (c) At the Grade II Listed temple at Narford Lane, (d)	<p>Additional views requested have been photographed during surveys and assessed as appropriate in <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p> <p>A full response to an inclusion of a LIA is included above in response to PINS comment "3.1.1 Lighting Impact Assessment".</p> <p>LIA remains scoped out of the ES with commitments made on reducing lighting impacts within the <b>Commitments Register [APP/6.5]</b> and full detail to be</p>	Refer to <b>Section 6.4 Assessment Assumptions and Limitations of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment and Scoping Opinion ID	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	Important Views listed within the Castle Acre Neighbourhood Plan.  LPA requested an LIA to be undertaken.	provided at detailed design stage, post-consent.	
Norfolk County Council And Breckland Council	Consultation letter and follow up email issued to both LPA's on 07.01.2025 respectively. No response was received.	Proceeded on the basis of agreement for the ES. Agreement was sought but no response was received and therefore the assessment was progressed on the assumption that our proposed approach was acceptable and appropriate.	Refer to <b>Section 6.2 Consultation of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Statutory consultation was held between May 21st 2025 and 9th July 2025. Relevant responses to the PEIR relating to Landscape and Visual Impact and how these have been addressed through the ES are set out in Table 1-2. Relevant responses to the PEIR relating to Landscape and Visual Impact are set out below.

**Table 1-2 Responses to the PEIR relating to Landscape and Visual**

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
Castle Acre Parish Council	<p>2 Impact on Statutory Heritage assets and their Setting</p> <p>The visual and experiential harm caused by the scale, fencing, and infrastructure of the proposed solar farm would be significant and irreversible, compromising the cultural landscape of one of Norfolk's most important heritage clusters.</p>	<p>Comments are noted.</p> <p>The landscape and visual impacts of the Scheme have been assessed, and this is reflected in <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>	Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .
	<p>4. Harm to the Character and Visual Amenity of the Historic Landscape</p> <p>The proposal would introduce visually intrusive infrastructure into an open, rural landscape that contributes to the village's</p>	<p>Comments are noted and the extensive planting and other mitigation proposals aim to limit the adverse effects upon landscape character.</p> <p>The landscape and visual impacts of the Scheme including</p>	Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .



Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	identity and attracts visitors. Peddars Way and Nar Valley Way users, residents, and tourists would experience industrialisation of a previously tranquil and historic setting.  This conflicts with NPPF Paragraphs 187 and 204 and Local Plan policies that seek to safeguard the intrinsic character and beauty of the countryside.	visual impacts on Visual Receptor Groups have been assessed in line with policies referred to in the NPPF and the Local Plan and this is reflected in <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .	
	9. Cumulative Impact and Policy Precedent  With more than 3,800 hectares of solar developments proposed across Norfolk, (including the neighbouring High Grove proposal) the cumulative impact on landscape character, biodiversity, and heritage must be assessed at a strategic level, considering the legal requirements to:	<b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> considers the cumulative landscape and visual effects of High Grove Solar Farm in addition to the Scheme. Other Schemes were considered as part of the shortlisting process but not taken forward due to no potential for cumulative effects.	Refer to <b>Section 6.11 Cumulative Effects Assessment</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<ul style="list-style-type: none"> <li>• protect designated and non-designated heritage assets and their setting.</li> <li>• conserve ecological networks and sensitive habitats.</li> <li>• avoid inappropriate development in open countryside and rural landscapes</li> </ul> <p>In conclusion, Castle Acre Parish Council considers that sixty years is a very significant period in people's lives during which the Drovers Solar Farm would seriously detract from the landscape character and visual amenity of the parish and its setting alongside what is one of the main gateway routes to North Norfolk</p>	<p>Comments are noted.</p> <p><b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has considered effects during the operational life of the Scheme when assessing the landscape and visual impacts, as well as potential effects during the construction and decommissioning phases.</p>	<p>Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>
Breckland Council	<p>1.0 Background -</p> <p>1.3 Policy ENV10 of the Local Plan supports proposals for new renewable energy and low</p>	<p>Comments are noted.</p> <p><b>ES Chapter 6: Landscape and Visual [APP/6.4]</b> has identified adverse landscape and visual</p>	<p>Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b>, <b>ES Appendix 6.7: Residential</b></p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>carbon development, subject to consideration of the impact of the development and whether this can be made acceptable, having regard to the extent to which there are:</p> <p>adverse impacts on the local landscape, townscape or designated and non-designated heritage assets assessed in line with Policies ENV 05, ENV 07 and ENV 08 in the plan;</p> <p>adverse effects on residential amenity by virtue of outlook / overbearing impact, traffic generation, noise, vibration, overshadowing, glare or any other associated detrimental emissions, during construction, operation and decommissioning;</p> <p>an irreversible loss of the highest quality agricultural land;</p>	<p>effects and these are assessed in line with policies referred to in the Local Plan.</p> <p>Effects on residential visual amenity are considered in <b>ES Appendix 6.7: Residential Visual Amenity Assessment [APP/6.4]</b> and mitigation measures considering landscape and ecological measures covered in the <b>oLEMP [APP/7.11]</b>.</p>	<p><b>Visual Amenity Assessment [APP/6.4]</b> and the <b>oLEMP [APP/7.11]</b>.</p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>cumulative impacts of renewable energy development on an area; and</p> <p>adverse impacts upon designated wildlife sites; nature conservation interests; and biodiversity, assessed in line with Policies ENV 02 and ENV 03 in the plan. The Council would consider favourably opportunities for biodiversity enhancements around arrays, the potential for complete restoration of the land and appropriate mitigation such as landscape buffers (trees and hedgerows) where compatible in the context of the Council's Landscape Character Assessment and Settlement Fringe Study.</p>		
	<p>1.0 Background - 1.4</p> <p>The Council considers that, whilst large scale ground-mounted PV solar farms</p>	<p>Noted.</p> <p><b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has assessed the impact of the development on</p>	<p>Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2], ES</b></p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	developments can have a negative impact on the rural environment, particularly in undulating landscapes, the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively.	<p>landscape and visual receptors informed by the iterative design process.</p> <p>The Scheme's design as illustrated in <b>ES Figure 5.1: Concept Masterplan [APP/6.3]</b> has been guided by an iterative design process which has sought to achieve good design and scheme outcomes through design principles as established in <b>Design Principles, Parameters and Commitments [APP/5.8]</b>. This document submitted as part of the DCO Application provides the principles and maximum parameters for the detailed design of the Scheme and the principles secured by a requirement in the <b>draft Development Consent Order (draft DCO) [APP/3.1]</b>. When the detailed design for the Scheme is submitted for approval to the relevant planning</p>	<b>Chapter 5: The Scheme [APP/6.1]</b> , and supporting <b>ES Appendix 5.1 Design Principles [APP/6.4]</b> and <b>ES Figure 5.1: Concept Masterplan [APP/6.3]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		authorities, those details must accord with the <b>Design Principles, Parameters and Commitments [APP/5.8]</b> .	
	<p>2.0 Masterplan - 2.7</p> <p>It is also considered that development has significant potential to generate cumulative landscape and visual effects with The Highgrove Solar Farm. Subsequently, significant cumulative effects are possible via extending the overall area of development, increasing the loss of agricultural land, and also through potentially increasing the extent of visibility of the two schemes by receptors. The cumulative impacts cannot be fully assessed due to the current lack of clarity in terms of key design aspects such as the location of the substations and BESS.</p>	<p>Noted.</p> <p>The ES LVIA has assessed the cumulative landscape and visual effects with High Grove Solar and this is detailed in the <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>	<p>Refer to <b>Section 6.11 Cumulative Effects Assessment of ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>



Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>2.0 Masterplan - 2.8</p> <p>A crucial aspect of this proposal is ensuring certainty about the grid connection. Given the lack of clarity, primarily regarding location, scale and associated visual and landscape impacts, Breckland Council, and all other consultees, is unable to make any detailed assessment of potential impacts of the substations and BESS upon the environment in response to the statutory consultation.</p>	<p>Comments are noted.</p> <p>The Applicant wishes to maintain a degree of flexibility with the Scheme as referred to in <b>ES Chapter 5: The Scheme T[APP/6.1]</b>, which seeks flexibility on the arrangement of the Solar PV Arrays, Conversion Units, BESS, Customer Substation and National Grid Substation and Grid Connection Infrastructure.</p> <p>Landscape and visual impact has therefore assessed an "envelope" within which works would take place informed by a suite of parameter plans. To assist with the assessment and achieve good design, scheme outcomes and Design Principles have been developed referred to in <b>Design Approach Document [APP/5.7]</b>. The <b>Design Principles, Parameters and Commitments [APP/5.8]</b></p>	<p>Refer to <b>Section 5.2 of ES Chapter 5: The Scheme [APP/6.1]</b>, supporting <b>Design Approach Document [APP/5.7]</b> and <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		document submitted as part of the DCO Application provides the principles and maximum parameters for the detailed design of the Scheme and the principles are secured by a requirement in the <b>draft DCO [APP/3.1]</b> . When the detailed design for the Scheme is submitted for approval to the relevant planning authorities, those details must accord with the <b>Design Principles, Parameters and Commitments [APP/5.8]</b> .  Design Principles have informed the landscape and visual impact assessment.	
	4.0 Arboriculture - 4.1 Policy ENV06 of the Local Plan seeks to retain and protect trees and hedgerows wherever possible. Where the loss of such features is demonstrably unavoidable, adequate replacement provision,	Noted.  Measures have been taken to protect existing trees and hedgerows with adequate replacement provision in the	Refer to <b>oLEMP [APP/7.11]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	preferably by native species would be sought.	form of new woodland belts, hedgerows and hedgerow trees.	
	<p>4.0 Arboriculture - 4.2</p> <p>The site as existing is characterised by mature hedgerows and trees, both within (scattered and woodland) and around the boundaries. It is considered that these arboricultural features make a strong contribution to landscape character.</p>	<p>Noted and agreed.</p> <p>Recognition of the existing landscape features has been considered in <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>	Refer to <b>Section 6.6 Baseline Conditions</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .
	<p>7.0 Landscape and Visual - 7.1</p> <p>Policy ENV10 of the Local Plan supports proposals for renewable and low carbon energy development, subject to any adverse impacts on the local landscape being assessed in line with Policy ENV05 of the Local Plan which seeks to protect and enhance the landscape of the borough.</p>	<p>Noted.</p> <p>The landscape and visual effects of the Scheme are assessed and presented in <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>	Refer to <b>Section 6.8 Assessment of Likely Effects</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	7.0 Landscape and Visual - 7.2 Chapter 6 of the PEIR deals with Landscape and Visual impacts, setting out that there would undoubtedly be character impacts resulting from the siting of solar panels, electrical apparatus, BESS and substations. Landscape character impacts are also said to arise from the introduction of temporary compounds, lighting, stockpiles, machinery and associated fencing topsoil stripping and temporary storage.	Noted and agreed.	Not Applicable.
	7.0 Landscape and Visual - 7.3 The Council's Landscape Consultant (Peter Richards Partnership) has assessed the proposal, commenting as follows:	Noted. Individual comments responded to below.	Not Applicable.
	7.0 Landscape and Visual - 7.4 A Landscape and Visual Appraisal (dated May 2025), prepared by LDA has been submitted in support of the application. The	Viewpoints for the Scheme were presented in <b>ES Appendix 2.1: EIA Scoping Opinion Request [APP/6.4]</b> and agreement on viewpoint locations,	Refer to <b>Section 3.2 Consultation of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	LVA viewpoints were not agreed prior to the consultation, although it is appreciated these were presented to the Council.	methodology and other LVIA matters were sought with the Host Authorities – however no response was received to the LVIA consultation letter.	
	Review Approach  7.0 Landscape and Visual - 7.5 The review has comprised a desktop review of The Drovers Solar Farm Preliminary Environmental Information Report – Volumes I & II Chapter 6: Landscape & Visual (both dated May 2025). A summary of findings of the review of the assessment methodology	Noted and confirmed.	Not Applicable.
	7.0 Landscape and Visual - 7.6 It is welcomed that the applicant recognises the relevance and appropriateness of: 1. Residential Visual Amenity Assessment (RVAA) (page 4) – Vol III App 6.9 2. Amenity and Recreation Assessment (ARA) (page 4)	Noted.	Refer to <b>ES Appendix 6.7: Residential Visual Amenity Assessment [APP/6.4]</b> and <b>ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4]</b> to <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	7.0 Landscape and Visual - 7.7 The LVIA structure and approach is clear and it is considered that, bar the points noted below, the methodology for the LVIA and the supporting studies/work is in accordance with good practice as provided for in Guidelines for Landscape & Visual Assessment, Third Edition (and subsequent Statement of Clarifications).	Noted.	Refer to <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .
	Assumptions & Limitations: Methodology identification & assessment of Local Landscape Character Areas (LLCAs)  7.0 Landscape and Visual - 7.8 There are significant reservations regarding the LVIA relying on just the District Level Landscape Character Areas - (see Table 6.1).	The LVIA focused on district level landscape character assessments which are a material consideration and have been subject to public scrutiny. Where appropriate, key characteristics identified of relevance to the Site were supplemented with further information drawn from site observations.	Refer to <b>Section 6.6 Baseline Conditions</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .



Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		In the context of the Scheme and the 3 km Study Area, the assessors agreed that the district landscape character assessments, (though dated) were still relevant noting that GLVIA para 5.13 states that <i>"justification should be provided for any departure from the findings of an existing established LCA."</i> GLVIA para 5.15 continues adding that <i>"existing assessments may need to be reviewed and interpreted to adapt them for use in LVIA - for example by drawing out more clearly the key characteristics that are most relevant to the proposal.....Completely new supplementary Landscape Character Assessment work covering the whole Study Area would only be required when there are no existing assessments or when they are available but either have serious limitations that restrict their value</i>	

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		<p><i>or do not provide information at an appropriate level of detail".</i></p> <p>For the purposes of the Scheme, the assessors do not consider that there are serious limitations with the Breckland Landscape Character Assessment, 2007 or that further detail is required.</p> <p>On the basis of these comments, any additional characteristics specific to the Site and based on site observations have been drawn out and emboldened in the text of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>	
	7.0 Landscape and Visual - 7.9 The Methodology notes at Para 6.3.22: "Paragraphs 5.13-5.15 of GLVIA, 3rd edition indicates that landscape character studies at a national or regional level are best used to "set the scene" and	<p>Noted and agreed.</p> <p>As referred to in <b>Section 6.6 Baseline Conditions of ES Chapter 6: Landscape and Visual [APP/6.2]</b>, <i>"Due to the scale of the NCA and the</i></p>	Refer to <b>Section 6.6 Baseline Conditions of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	understand the landscape context. It indicates that LPA assessments provide more detail and that these should be used to form the basis of the assessment of effects on landscape character with (appropriately justified) adaptation, Refinement and interpretation where required.	<i>presence of more detailed character areas at a local level, effects on this NCA are not assessed within this LVIA. This NCA has been scoped out from a detailed assessment as agreed with the Planning Inspectorate in the EIA Scoping Opinion"</i>	
	7.0 Landscape and Visual - 7.10 It is considered that the view that this is a disingenuous presentation of GLVIA3 as most importantly the author does not include GLVIA3 Para 5.16. This concluding paragraph on the appropriate level of information to be considered notes: "Even where there are useful and relevant existing Landscape Character Assessments and historic landscape characterisations, it is likely that it would be necessary to carry out specific and more detailed surveys of the site itself and	In accordance with GLVIA para. 5.15, the assessors did carry out specific and more detailed surveys of the Site and immediate surroundings and this is reflected in references to site observations under relevant Landscape Character Types as referred to in response to comment in paragraph 7.8 above.  Based on these comments, any additional characteristics specific to the Site and based on site observations have been drawn out and emboldened in the text of	Refer to <b>Section 6.6 Baseline Conditions</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	perhaps its immediate setting or surroundings"	<b>ES Chapter 6: Landscape and Visual [APP/6.2].</b>	
	<p>7.0 Landscape and Visual - 7.11</p> <p>A central tenet of GLVIA3 over earlier publications of GLVIA was the need for proportionality. References include but are not limited to:</p> <ul style="list-style-type: none"> <li>- Preface, page x, fourth para</li> <li>- Para 1.17 refers to "an approach that is in proportion to the scale of the project that is being assessed and the nature of its likely effects"</li> <li>- Para 1.20 "the approach and methodology adopted are appropriate to the particular circumstances"</li> <li>- Para 3.11 with respect to LVIA scoping notes, fifth bullet point: "the extent and appropriate level of detail for the baseline studies that is reasonably required to assess the landscape and visual</li> </ul>	<p>As referred to in responses to comments in paragraph 7.8 above the Breckland Landscape Character Assessment 2007 was at a suitable scale for the LVIA and as per paragraph 5.15 supplemented with site observations from fieldwork to <i>"draw out more clearly the key characteristics that are more relevant to the proposal."</i></p>	<p>Refer to <b>Section 6.6 Baseline Conditions</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2].</b></p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	effects of the proposed development”		
	<p>7.0 Landscape and Visual - 7.12</p> <p>The project is of such a scale and level of importance that it is identified as a “Nationally Significant Infrastructure Project”. Sitting at the higher end of the development scale it is considered that the assessment, to be proportionate and in accordance with landscape industry good practice and guidelines it should include the assessment of Local Landscape Character Areas.</p>	<p>Noted. However, as defined under the response to the response to comments in paragraph 7.8, the assessors considered that the current and adopted Landscape Character Assessment was suitable for the purposes for the LVIA with specific site observations where appropriate.</p>	<p>Refer to <b>Section 6.6 Baseline Conditions</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>
	<p>7.0 Landscape and Visual - 7.13</p> <p>This concern and request is reinforced when one considers:</p> <p>1. It is noted the applicant involved in the High Grove Solar farm applicant has from the outset noted their LVIA would assess Local Landscape</p>	<p>Refer to comments above in paragraph 7.8.</p> <p>In terms of references to page 14 of the LVIA's Methodology, the components of magnitude were not given equal weight with a focus on scale and judgements</p>	<p>Refer to <b>Section 6.5 Assessment Methodology</b> and <b>Section 6.8 Assessment of Likely Effects</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>Character Areas that their assessment has identified.</p> <p>2. The LVIA methodology Page 14 methodology links levels of “Magnitude of Effect” with extent of anticipated change in relation to the size of the character area (scale uses Limited, Localised, Intermediate &amp; Wide). A strict application of this approach would have the effect of downplaying magnitude of impacts given the District Level character areas are by the very fact they consider character areas across the district are much larger than LLCAs.</p> <p>Assumptions &amp; Limitations: Methodology &amp; Significance of Effects</p>	<p>on extent largely limited or localised.</p> <p>As referred to in Notes and Clarifications on aspects of the 3rd Edition Guidelines on Landscape and Visual Impact Assessment [GLVIA3] Technical Guidance Note LITGN-2024-01 Published August 2024, para 3(3) <i>"the size/scale of effect would be the most important factor, with geographical extent and duration considered as 'slight modifiers' where effects are particularly restricted or widespread; or particularly short in duration."</i></p> <p>The Technical Guidance Note goes on to state in paragraph 5(11) that <i>"GLVIA3 appears to suggest that geographical extent (and therefore magnitude) would be smaller if the change occurs within a landscape type or character area, and larger if a</i></p>	

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		<p><i>change is felt across several types or character areas – but this advice is hard to apply to individual receptors i.e. should the magnitude of effect on one LCA be greater simply because other LCAs are also affected? The Panel suggests that geographical extent should reflect the importance of the location and spread of effects, as a ‘slight modifier’ to the scale of effect so that it does not understate the magnitude of effects for extensive receptors such as large character areas or designations. What the decision maker wants to know is where the most important (or ‘significant’ in the case of EIA) effects would arise, and why and to what degree that matters.”.</i></p> <p>The LVIA has sought to follow this advice with the impacts on landscape receptors based at a district scale being largely limited</p>	



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		or localised but of a medium to large scale.	
	<p>7.0 Landscape and Visual - 7.14</p> <p>The LVIA Methodology provides a helpful Diagram of Significance in Diagram 6.1. There is concern that the author provides no supporting text on what is considered to be:</p> <ul style="list-style-type: none"> <li>- Major significance;</li> <li>- Major-Moderate significance;</li> <li>- Moderate significance;</li> <li>- Slight significance and</li> <li>- Minimal significance.</li> </ul>	<p>The LVIA methodology referred to in <b>Section 6.5 of ES Chapter 6: Landscape and Visual [APP/6.2]</b> does not provide supporting text on the level of significance. Significance is judged to be based on the consideration of the sensitivity and magnitude of change criteria and professional judgement and as such no clear terms should be defined.</p>	<p>Refer to <b>Section 6.5 Assessment Methodology of ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>
	<p>7.0 Landscape and Visual - 7.15</p> <p>There is also concern in that the supporting text in Para 6.2.13 does not clarify which of the above levels of effect is considered Significant and states, "An effect is likely to be assessed as Significant where the sensitivity of the Receptor combined with magnitude of</p>	<p>Paragraph 6.2.13 in the PEIR states what levels of effect are considered significant or potentially significant:</p> <p><i>'Effects that are Major or Major-Moderate are considered significant and "likely to influence the eventual decision" whilst those that are Slight or below are</i></p>	<p>Refer to <b>Section 6.5 Assessment Methodology of ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	change results in a degree of effect that is towards the higher end of the Moderate range (illustrated in Diagram 6.1 above) and is therefore judged more “likely to influence the eventual decision”.	<i>judged Not Significant and “of lesser concern” (GLVIA3, para 3.35). Moderate effects are considered to be potentially significant and professional judgment is used to determine whether the effect in question is Significant or Not Significant, with analysis provided to justify the rating. An effect is likely to be assessed as Significant where the sensitivity of the Receptor combined with magnitude of change results in a degree of effect that is towards the higher end of the Moderate range (illustrated in Diagram 6.1 above) and is therefore judged more “likely to influence the eventual decision”. It should be noted that whilst an effect may be assessed as Significant, it does not necessarily mean that such an impact would be unacceptable or should necessarily be regarded as an “undue consequence” (GLVIA3, para 5.40).</i>	

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>7.0 Landscape and Visual - 7.16</p> <p>The inclusion of “likely” and “towards” provides no transparent explanation of how the assessor arrives at a concluding judgement. This approach is considered far from the central tenant of GLVIA3 which states in Para 2.24, “there is a need for the judgements that are made to be reasonable and based on clear and transparent methods so that reasoning applied at different stages can be traced and examined by others”</p>	<p>Noted.</p> <p>The inclusion of the terms "likely" and "towards" are standard and typified in various publications including GLVIA Notes and Clarifications on aspects of the 3rd Edition Guidelines on Landscape and Visual Impact Assessment [GLVIA3] Technical Guidance Note LITGN-2024-01 Published August 2024.</p> <p>Further detail has been provided in the ES as to the judgement made for the assessment of landscape and visual impacts with a supporting narrative.</p>	<p>Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>
	<p>7.0 Landscape and Visual - 7.17</p> <p>The methodology, and in particular the judgement on resulting effects, is not considered transparent. It is</p>	<p>Please refer to responses to comments above relating to paragraph 7.8 to 7.16. Ongoing engagement is welcomed.</p>	<p>Refer to <b>Section 3.5 Assessment Methodology and Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	recommended the methodology be revised to remove the ambiguity in Para 6.2.13 and the methodology should provide clear and transparent text on the resulting levels of effect.		
	<p>7.0 Landscape and Visual - 7.18 Assumptions &amp; Limitations:</p> <p>Supporting Photography (1) Some of the photographs were taken at a time of day and in a direction that has resulted in photographs that do not provide clear views of the landscape as a combination of contrast and shadows effectively screen the landscape detail. Examples include</p> <ul style="list-style-type: none"> <li>- Representative Viewpoint 16 – left hand side.</li> <li>- Representative Viewpoint 13 – centre &amp; left hand side.</li> </ul>	<p>Noted.</p> <p>The winter photography has been constrained by daylight hours; however, these photographs have been lightened slightly to reduce the level of contrast / shadow and the images have been supplemented by summer photography from the same viewpoints.</p>	<p>Refer to <b>ES Figure 6.10: (PP1-16 and PPa-g): Winter Photograph Panels [APP/6.3]</b> and <b>ES Figure 6.11: (PP1-16 and PPa-g): Summer Photograph Panels [APP/6.3]</b>.</p>
	7.0 Landscape and Visual - 7.19 Assumptions & Limitations:	Noted.	Refer to <b>Section 6.2 Consultation</b> and <b>Section 6.4 Assessment Assumptions and</b>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>Supporting Photography (2)</p> <p>The LVA uses late winter photographs for the visual receptors considered. Good practice encourages the use of both winter and summer photographs. This limitation is considered acceptable in the context of the development's proximity to public viewpoints identified and their level of sensitivity.</p>	<p>Summer photography has been taken to support <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> as requested by the PINS in <b>ES Appendix 2.2: Scoping Opinion Response [APP/6.4]</b> and both the summer and winter photographs have informed the visual assessment demonstrating seasonal variations in vegetation screening. Both summer and winter photography have been used for the Scheme parameter type 3 visualisations for complete representation.</p>	<p><b>Limitations of ES Chapter 6: Landscape and Visual [APP/6.2] and ES Figure 6.11: (PP1-16 and PPa-g): Summer Photograph Panels [APP/6.3].</b></p>
	<p>7.0 Landscape and Visual - 7.20 Assumptions &amp; Limitations:</p> <p>Tree Growth Rates Para 6.2.56 notes growth rates are based on "400mm/year", and this is based on Forestry Commission growth rates. In our experience growth rates would vary considerably depending on:</p>	<p>Comments are noted.</p> <p>The growth rates proposed in the PEIR have been reviewed and revised based on consultation with the Applicant's arboriculturist. Whilst the growth rate stipulated in the PEIR is deemed reasonable and in line with other estimates locally, the</p>	<p>Refer to <b>Section 6.4 Assessment Assumptions and Limitations of ES Chapter 6: Landscape and Visual [APP/6.2].</b></p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<ul style="list-style-type: none"> <li>- Age of plant stock used and time of year planted</li> <li>- Ground/Soil conditions</li> <li>- Location</li> </ul> <p>Based on earlier work and advice from local arborists 400mm is considered optimistic. The applicant is requested to obtain local professional advice on this an adjust LVIA accordingly.</p>	<p>growth rates have been adjusted in <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> to err on the side of caution and in line with ISEP's article on Predicting Tree and Hedgerow growth [Ref 6-17]which recommends 300mm per year for Year 1 to 5 and 500mm per year for the next 10 years (adjusted down to 400mm in agreement with the Applicant's arboriculturist).</p>	
	<p>7.0 Landscape and Visual - 7.21 Assumptions &amp; Limitations: ZTV Figures 6.5a and 6.5b show the same ZTV extents. As Fig 6.5a includes buildings and vegetation some differences would be expected when comparing these drawing/findings with those shown on 6.5b – the bare earth scenario. Clarification requested.</p>	<p>The Applicant notes that there was an error in submitting Figures 6.5a and 6.5b. A "bare earth" ZTV was used to inform the selection of viewpoints alongside an obstructed (within buildings and vegetation) ZTV; however, this was not included in the final figure pack for the PEIR.</p> <p>The presentation of both ZTVs has been resolved for the ES with Figure 6.5 (DTM) illustrating the "bare earth" zone of</p>	<p>Refer to <b>ES Figure 6.5: Zone of Theoretical Visibility (DTM) [APP/6.3]</b> and <b>ES Figure 6.6: Zone of Theoretical Visibility (DSM) [APP/6.3]</b>.</p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		theoretical visibility and Figure 6.6 (DSM) showing the screening effect of existing intervening vegetation and built form.	
	<p>A summary of findings of the review of the scope of the assessment</p> <p>7.0 Landscape and Visual - 7.22 Scoped out effects:</p> <p>The LVA notes the following effects are scoped out: - Visual receptors outside the Study Area/ZTV</p>	Noted.	Not Applicable.
	<p>7.0 Landscape and Visual - 7.23 Assumptions &amp; Limitations:</p> <p>What is included within the Development Proposals</p> <p>We would suggest the LVA be amended with particular regard to: - Security Fence: Details of construction, colour, form</p>	<p>Noted.</p> <p>As described in <b>ES Chapter 5: The Scheme [APP/6.1]</b> to assist the assessment and ensure good design, scheme outcomes and Design Principles have been developed to guide (within the parameters) the size, type and</p>	Refer to <b>ES Chapter 5: The Scheme [APP/6.1]</b> and <b>Design Principles, Parameters and Commitments [APP/5.8]</b> .



Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	(important given the height is noted as being 3.4m) – no additional information provided in the LVA.	<p>colour of elements of the Scheme.</p> <p>Whilst security fencing is likely to be dark green, grey or black the final details would be approved by the relevant planning authority pursuant to the relevant requirements in the <b>draft DCO [APP/3.1]</b>.</p> <p>The maximum height of the security fencing, as detailed in <b>ES Chapter 5: The Scheme [APP/6.1]</b>, is 3m.</p>	
	<p>A summary of findings of the review of the actual assessment of effects Visual Assessment</p> <p>7.0 Landscape and Visual - 7.24</p> <p>The viewpoint assessment provided visual findings using site work and photographs undertaken at times when the trees were without leaf.</p>	<p>Noted.</p> <p>As discussed above, summer photography has also been taken to support the LVIA, and these photographs, alongside the winter viewpoints, have informed the visual assessment providing in winter photographs a "worst case scenario" and demonstrating seasonal variations for summer views.</p>	Refer to <b>Section 6.4 Assessment Assumptions and Limitations</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> and <b>ES Figure 6.11: (PP1-16 and PPa-g): Summer Photograph Panels [APP/6.3]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>7.0 Landscape and Visual - 7.25</p> <p>There is agreement with the author that this represents the worst case scenario. Given the endemic nature of Ash Die-back it is accepted that it is appropriate for the assessment to note alongside each view the likely change which might be brought about by the decline to most Ash trees within a view.</p>	<p>Noted.</p> <p>The Applicant's arboriculturist has advised that Ash is present as a minor component of some woodlands across the site, many of which are more recent plantations. Of the 165 number of individual ash trees across the site, just 25 are assessed as category U, and therefore are expected to have under 10 years remaining life expectancy. No woodlands were assessed as being dominated by ash, or featuring ash as a major component of the species mix. None appeared to be in a condition which could be expected to deteriorate significantly as a result of ash dieback.</p> <p>Consideration has been given to the likely negligible change in the view as a consequence of ash dieback and this is reflected in</p>	<p>Refer to <b>Section 6.8 of ES Chapter 6: Landscape and Visual [APP/6.2], ES Figure 6.10: (PP1-16 and PPa-g): Winter Photograph Panels [APP/6.3] and Figure 6.11: (PP1-16 and PPa-g): Summer Photograph Panels [APP/6.3].</b></p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		the future baseline and assessment.	
	7.0 Landscape and Visual - 7.26  The resulting assessment of resulting visual effects for Construction, Year 1, Year 15 and Cumulative Scenarios is considered reasoned and, other than the issues noted below there are no issues with the resulting visual effects.	Noted	Not Applicable
	7.0 Landscape and Visual - 7.27 There is largely agreement with the assessment findings bar the following:	Noted, individual comments addressed below.	Not Applicable
	7.0 Landscape and Visual - 7.28 Representative Viewpoint Group 1: Central Site area (High-Medium Sensitivity)  It is considered that the assessor does not adequately provide a reasoned judgement as to why this receptor group experiencing a Moderate adverse long-term	In terms of Visual Receptor Group 1 (not Representative Viewpoint Group 1 as in the comments) and defined in Figure 6.10 Visual Receptor Groups of the PEIR, the narrative explains that in the long term <i>"the scale of effect would lessen as new mitigation planting and</i>	Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	effect is considered not significant (Para 6.5.125). It is also noted that in close up views hedgerows allow filtered winter views and in all likelihood pedestrians in particular would be aware of the PV farms presence. In addition, the assessment should note the introduction of the hedging removes an attractive outlook for users of the rights of way. There is largely agreement with the remaining assessment but it is noted that the assessment has not recorded (provided a judgement on Operational/Short Term effects) Para 6.5.130-132.	<i>landscape management regimes provide enhanced visual screening of the Scheme, for nearby receptors". As a consequence, due to screening of new mitigation planting, effects would not be significant. Reference to a change in outlook for users of the rights of way have been noted in <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> which also recognises the offers / buffers from PRoWs to retain vistas</i>  <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has assessed operational short-term effects.	
	7.0 Landscape and Visual - 7.29 Representative Viewpoint Group 2: Castle Acre view 12 (High-Medium Sensitivity)  Largely concur with the assessment but note the assessment has not recorded	Reference is made to Visual Receptor Group 2 (not Representative Viewpoint Group 2 as in the comments) and defined in Figure 6.10 Visual Receptor Groups of the PEIR.	Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	(provided a judgement on Operational/Short Term effects) Para 6.5.122-123.	<b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has assessed operation short-term effects.	
	7.0 Landscape and Visual - 7.30 Representative Viewpoint Group 3: Nar Valley Southern Slope Edge of South Acre (High-Medium Sensitivity)  Largely concur with the assessment but note the assessment has not recorded (provided a judgement on Operational/Short Term effects) Para 6.5.126-127.	Reference is made to Visual Receptor Group 3 (not Representative Viewpoint Group 3 as in the comments) and defined in Figure 6.10 Visual Receptor Groups of the PEIR.  <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has assessed operation phase short-term effects.	Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .
	7.0 Landscape and Visual - 7.31 Representative Viewpoint Group 4: Great Palgrave (High Sensitivity)  Largely concur with the assessment but note the assessment has not recorded (provided a judgement on	Reference is made to Visual Receptor Group 4 (not Representative Viewpoint Group 4 as in the comments) and defined in Figure 6.10 Visual Receptor Groups of the PEIR.  <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has assessed	Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	Operational/Short Term effects) Para 6.5.138-139.	operation phase short-term effects.	
	<p>7.0 Landscape and Visual - 7.32 Representative Viewpoint Group 5: Castle Acre (High Sensitivity)</p> <p>It is considered that the assessor does not adequately explain why this Moderate adverse medium-long term effect is considered not significant (Para 6.5.141). Whilst we can concur that the MoC for the PV panels would be 'low' the substations could be sited where they would not have a treed backdrop and they might break the skyline – the text does not acknowledge this. The colour, prominence and possible incongruity of this change needs to be discussed. In addition, the assessment needs to note and make reference to the development being within the sightline to the attractive ruins which do/would draw the eye.</p>	<p>Reference is made to Visual Receptor Group 5 (not Representative Viewpoint Group 5 as in the comments) and defined in Figure 6.10 Visual Receptor Groups of the PEIR.</p> <p>Comments are noted with regards to the siting of the substations with reference to potentially breaking the skyline, plus likely impacts associated with colour, prominence and integrity and the relationship of the substations to a potential sightline associated with the ruins in Castle Acre. The assessment of the impacts on Visual Receptor Group 5 have taken into consideration the above points whilst also recognising that the Scheme design has been refined. The assessment has been updated</p>	Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	We largely concur with the remaining assessment but note the assessment has not recorded (provided a judgement on Operational/Short Term effects) Para 6.5.138-139.	within this ES to reflect the proposed Scheme parameters, which omits any substation development from fields within the Order limits north of Bartholomew's Hills Plantation.  <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has assessed operational short-term effects.	
	7.0 Landscape and Visual - 7.33 Representative Viewpoint Group 6: West Acre & Nar Valley Northern Slope (High-Medium Sensitivity)  Largely concur with the assessment but note the assessment has not recorded (provided a judgement on Operational/Short Term effects) Para 6.5.142-143.	Reference is made to Visual Receptor Group 6 (not Representative Viewpoint Group 6 as in the comments) and defined in Figure 6.10 Visual Receptor Groups of the PEIR.  <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has assessed operation phase short-term effects.	Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .



Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	7.0 Landscape and Visual - 7.34 Representative Viewpoint Group 7: Agricultural land immediately south and west of the Site (High-Medium Sensitivity) Largely concur with the assessment but note the assessment has not recorded (provided a judgement on Operational/Short Term effects) Para 6.5.145-146.	Reference is made to Visual Receptor Group 7 (not Representative Viewpoint Group 7 as in the comments) and defined in Figure 6.10 Visual Receptor Groups of the PEIR.  <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has assessed operation phase short-term effects.	Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .
	7.0 Landscape and Visual - 7.35 Roads & Rail: (Low Sensitivity) Largely concur with the assessment but note the assessment has not recorded (provided a judgement on Operational/Short Term effects) Para 6.5.158-159.	<b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has assessed operational short-term effects.	Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .
	7.0 Landscape and Visual - 7.36 Local Cycle Routes: (Medium Sensitivity) Largely concur with the assessment but note the assessment has not recorded	<b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has assessed operation phase short-term effects.	Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	(provided a judgement on Operational/Short Term effects) Para 6.5.149-150.		
	7.0 Landscape and Visual - 7.37 Additional Mitigation: (Paras 6.4.9-10 & 6.6) It is considered that the assessor should recognise the potential benefits of colour studies to inform the best choice of colours for the substation buildings/structures. Refer Landscape Institute Technical Information Note 04/2018. Landscape Assessment	Noted.  As described in <b>ES Chapter 5: The Scheme [APP/6.1]</b> , to assist the assessment and ensure good design, scheme outcomes and Design Principles have been developed to guide (within the parameters) the size, type and colour of elements of the Scheme.  The colour of proposed buildings and infrastructure would be approved by the relevant planning authority in pursuant to the relevant requirements in the <b>draft DCO [APP/3.1]</b> and this may include post consent the implementation of a colour study in line with Landscape Institute's recommendations in Technical	Refer to <b>ES Chapter 5: The Scheme [APP/6.1]</b> and <b>Design Principles, Parameters and Commitments [APP/5.8]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		Information Note 04/2018 [Ref 6-19].	
	<p>7.0 Landscape and Visual - 7.38</p> <p>There are significant reservations about the robustness of the assessment approach as it has not identified Local Landscape Character Areas – see earlier comments. With regards the assessment of the Six District Level Character Areas we are of the view that the findings are generally well reasoned and acceptable with the exception of:</p>	<p>Refer to above comments covered under points 7.8 to 7.13.</p> <p>The LVIA focused on district level landscape character assessments which are a material consideration and have been subject to public scrutiny. Where appropriate, key characteristics identified of relevance to the Site were supplemented with further information drawn from site observations.</p> <p>In the context of the Scheme and the 3 km Study Area, the assessors agreed that the district landscape character assessments, (though dated) were still relevant noting that GLVIA para 5.13 states that <i>"justification should be provided for any departure from the</i></p>	<p>Refer to <b>Section 6. 6 Baseline Conditions</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		<p><i>findings of an existing established LCA."</i></p> <p>The assessors considered that the current and adopted Landscape Character Assessment was suitable for the purposes for the LVIA with specific site observations where appropriate.</p>	
	7.0 Landscape and Visual - 7.39 Effects on the Site & D1: Swaffam Heath LCA: The assessment notes: The worst-case scenario for construction and decommissioning effects on this LCA, following the site, would change from a predominantly undeveloped agricultural landscape to one comprising a construction site he implementation of embedded construction and decommissioning mitigation, would be of medium magnitude,	The response to the effects during construction and decommissioning consider the impacts on the Site itself and beyond. Paragraph 6.5.13 in the PEIR explained that due to the <i>"tall and mature field boundary vegetation and woodland blocks within the Site"</i> some containment would be achieved to construction / decommissioning activity limiting the scale of effect beyond the Site. As a result construction / decommissioning effects would	Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	moderate significance and adverse in nature. Given the extensive area of the LCA compared to area of the Site, effects upon the landscape situated within the wider LCA beyond the Site would be not significant and temporary.	not be significant beyond the Site boundary.  The supporting narrative in <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has been refined to make this clearer.	
	7.0 Landscape and Visual -  7.40 Given the assessment notes in 6.5.13 the change would be large scale - total or major alteration to key elements, features, qualities or characteristics, such that post development the baseline would be fundamentally changed the view is that it is not possible to record a "Medium Magnitude" MoC. albeit we concur that the	The PEIR demonstrated a variation in effect and significance based on the impact of features within and beyond the Site; the vegetation within and edging the site providing a level of containment. A medium magnitude of effect is correct as included within the PEIR. The LVIA stated in 6.5.14 that "The scale of effect on this LCA would be large scale, over a short-term duration during construction/decommissioning and over a limited extent of the	Refer to <b>Section 6. 6 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	resulting effect is significant (Para 6.5.16).	<p>wider LCA.” Using LDA methodology, the effect would be, as stated, medium magnitude.</p> <p>This section of the LVIA has been reviewed further in the ES, following changes to the Scheme since issuing of the PEIR. The supporting narrative in <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has been refined to make this clearer.</p>	
	7.0 Landscape and Visual - 7.41 The assessment findings of significant adverse in Para 6.5.16 are not consistent with “not significant” in Para 6.5.15.	This has been reviewed and revised where appropriate in the LVIA ( <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> ) based on the revised scheme.	Refer to <b>Section 6. 6 Assessment of Likely Effects</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .
	7.0 Landscape and Visual - 7.42 Effects on the E6 North	Noted.	Refer to <b>Section 6.8 Assessment of Likely Effects</b>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	Pickenham Plateau LCA: No comment		of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .
	7.0 Landscape and Visual - 7.43 Effects on the B7 River Nar Tributary Farmland LCA: No comment	Noted.	Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .
	7.0 Landscape and Visual - 7.44 Effects on the F1 River Nar Valley LCA: No comment	Noted.	Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .
	7.0 Landscape and Visual - 7.45 Effects on the I9 Little Massingham & Castle Acre LCA: No comment	Noted.	Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .
	7.0 Landscape and Visual - 7.46 A summary of findings of the presentation of the assessment  With the exception of the LVIA Methodology the assessment is presented with clearly structured text, supporting figures, tables	Noted. Images and tables are included for the LVIA methodology. Sufficient annotation has also been provided on the viewpoint photopanel and visualisations	Not Applicable.

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	and with reference/regard to supporting computer generated images (photomontages and photos lack annotation).	without detracting from the image themselves.	
	7.0 Landscape and Visual - 7.47 The photomontages methodology appears to be in accordance with the Landscape Institute TGN 06/19.	Noted.	Refer to <b>ES Appendix 6.4: Methodology for Zone of Theoretical Visibility Studies and Visualisations [APP/6.4]</b> .
	7.0 Landscape and Visual - 7.48 The Methodology's reference to Scale, Extent, Duration (considerations) and Resulting Magnitude of Effect in Diagram 6.2 is not clear/considered transparent and the text within the assessment providing judgements does not clearly explain how these considerations come together to arrive at a balanced judgement.	Noted. The assessment of effects outlines the sensitivity of the receptor and then makes a judgement, using LDA methodology, on magnitude of effect taking into account the scale, extent and duration of the potential effect. The magnitude and sensitivity of the receptor combine to reach a judgement on significance. This is outlined in full within section 6.5 of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .	Not Applicable.



Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>7.0 Landscape and Visual - 7.49 A summary statement by the reviewer in respect of appropriateness, quality, comprehensiveness, compliance and conformity with relevant guidance and regulations</p> <p>In my professional opinion, the appraisal is well structured and the results, excluding the LVIA Methodology, insofar as the matters considered, are clearly and logically presented.</p>	Noted.	Not Applicable.
	<p>7.0 Landscape and Visual - 7.50 The LVIA Methodology:</p> <p>In my opinion the assessment should have identified Local Landscape Character Areas which have been acknowledged as relevant and appropriate by the applicant in a separate application.</p>	Noted. Refer to comments under paragraph 7.8.	Refer to <b>Section 6.6 Baseline Conditions</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	7.0 Landscape and Visual - 7.51 As noted earlier in this report the central tenant of GLVIA3 stated in Para 2.24 is, “there is a need for the judgements that are made to be reasonable and based on clear and transparent methods so that reasoning applied at different stages can be traced and examined by others”	Noted.	Not Applicable.
	7.0 Landscape and Visual - 7.52 The methodology, and in particular the judgement on resulting effects, is not considered transparent. We would recommend the methodology be revised to remove the ambiguity in Para 6.2.13 and the methodology should provide clear and transparent text on the resulting levels of effect.	Noted. The LDA methodology is very clear on the approach to judgements and is transparent on the process with regard to taking account of sensitivity and magnitude. The LDA methodology states in section 6.5 of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> <i>“The significance ratings indicate a ‘sliding scale’ of the relative importance of the effect, with Major being the most important and Minimal being the least. Effects that are Major or</i>	Not Applicable.

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		<p><i>Major-Moderate are considered significant and “likely to influence the eventual decision” whilst those that are Slight or below are judged Not Significant and “of lesser concern” (GLVIA3, para 3.35).” With regard to moderate effects the methodology states that “Moderate effects are considered to be potentially significant and professional judgment is used to determine whether the effect in question is Significant or Not Significant, with analysis provided to justify the rating.”</i></p> <p>The methodology also states that “an effect is likely to be assessed as Significant where the sensitivity of the receptor combined with magnitude of change results in a degree of effect that is towards the higher end of the Moderate range (illustrated in <b>Error! Reference source not found. of Effect</b>)</p>	

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		<i>and is therefore judged more “likely to influence the eventual decision”. It should be noted that whilst an effect may be assessed as Significant, it does not necessarily mean that such an impact would be unacceptable or should necessarily be regarded as an “undue consequence” (GLVIA3, para 5.40) [Ref. 6-1].”</i>	
	<p>7.0 Landscape and Visual - 7.53 Mitigation:</p> <p>We believe the assessor should recognise the potential benefits of colour studies to inform the best choice of colours for the substation buildings/structures. Refer Landscape Institute Technical Information Note 04/2018</p>	<p>Noted.</p> <p>As described in <b>ES Chapter 5: The Scheme [APP/6.1]</b>, to assist the assessment and ensure good design, scheme outcomes and Design Principles have been developed to guide (within the parameters) the size, type and colour of elements of the Scheme.</p> <p>The colour of proposed buildings and infrastructure would be approved by the relevant planning authority in pursuant to</p>	<p>Refer to <b>ES Chapter 5: The Scheme [APP/6.1]</b> and <b>Design Principles, Parameters and Commitments [APP/5.8]</b>.</p>

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		the relevant requirements in the <b>draft DCO [APP/3.1]</b> and this may include post consent the implementation of a colour study in line with Landscape Institute's recommendations in Technical Information Note 04/2018.	
	<p>7.0 Landscape and Visual - 7.54 Breckland Council considers further landscape and visual impact work is required to inform the ES. Recommendations for further information to be sought (if necessary):</p> <ul style="list-style-type: none"> <li>- Assessment of Operational/Short Term effects</li> <li>- Assessment of Local Landscape Character Areas</li> <li>- Assessment/Consideration of the Mitigation provided by building colours.</li> <li>- Clarification of Figures 6.5a &amp; 6.5b as to why they appear to show exactly the same ZTV findings</li> </ul>	<p>Noted.</p> <p>Responses to the points raised are covered in the above comments.</p>	Not Applicable.

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<ul style="list-style-type: none"> <li>- Better photographs where contrast is such that detail is lost within the photographs taken (e.g. Representative Viewpoint 16 – left hand side)</li> <li>- The Forestry Commission Growth Rates are considered over optimistic. A local arborist should be consulted.</li> </ul>		
	<p>7.0 Landscape and Visual - 7.55</p> <p>In addition to the above, it is noted that the PEIR assesses there to undoubtedly be a number of significant landscape and visual effects even when accounting for the proposed mitigation measures. It is considered that that further work is needed in this regard to supplement the ES if landscape and visual impacts are to be adequately addressed in the DCO submission.</p>	<p>Noted. The ES expands on the narrative of the PEIR based on a revised Scheme, supporting parameter plans, Scheme outcomes and Design Principles.</p>	<p>Refer to <b>Section 6.6 Baseline Conditions</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>

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	<p>9.0 Cumulative Effects - 9.4 Chapter 16 of the PEIR presents a summary of potential likely in-combination effects, stating that mitigation would be identified within the ES. The following significant in-combination effects are identified: Construction and Decommissioning Phase noise, vibration, and visual impact on Residential Properties and Public Rights of Way represented by Visual Receptor Groups 1, 2 and 3, as well as The Peddars Way and Norfolk Coastal Path, and Rebellion Way Cycle Route; Operational Phase noise and visual impact in the medium term on Residential Properties represented by Visual Receptor Groups 1 and 3, and Public Rights of Way represented by Visual Receptor Groups 1 and 2 Operational visual impact, cultural heritage, and socio-</p>	<p><b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> considers the cumulative landscape and visual effects of High Grove Solar in addition to the Scheme.</p> <p>Cumulative effects on shared receptors relating to other technical topics assessed in the ES have been considered in each of the topic chapters, as appropriate (<b>ES Chapters 6-16 [APP/6.2]</b>).</p>	<p>Refer to <b>Section 3.11 Cumulative Effects Assessment of ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	economic impacts the medium and long term on Castle Acre Priory and Castle Acre Castle Operational long term noise and visual impact on Public Rights of Way represented by Visual Receptor Group 2		
	9.0 Cumulative Effects - 9.6 The Council supports the comments from the Inspectorate in the Scoping Opinion that recommend considering other developments as part of the cumulative effects assessment, "In addition to the High Grove solar farm proposal, the CEA should consider including the terrestrial components of the Norfolk Vanguard Offshore Wind Farm (OWF) and Norfolk Boreas OWF developments, and other non-solar developments which may have cumulative effects with the Proposed Development". The Council's	Noted.  The recommended cumulative schemes by PINS have been included for consideration in the assessment of cumulative effects (ES Appendix 2.4: Cumulative Schemes [APP/6.4]).	Refer to Section 6.11 Cumulative Effects Assessment of ES Chapter 6: Landscape and Visual [APP/6.2].



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	Landscape Consultant is also of the view that the Vanguard & Boreas terrestrial works should be included as the development sites sit within the same Landscape Character Area. The suggestion to consult with local planning authorities and other statutory bodies on the relevant developments is also supported. It is noted and supported that the PEIR states the full assessments would be carried out in accordance with the guidance received from PINS.		
	9.0 Cumulative Effects - 9.7 At present Breckland Council has concerns regarding both the construction and operation phases, with notable intra-project effects anticipated, particularly concerning potential landscape/visual impacts and the loss of BMV agricultural land, considering that there	Noted.  Cumulative effects regarding agricultural land take and loss of BMV have been assessed in <b>ES Chapter 11: Soils and Agriculture [APP/6.2]</b> .	Refer to <b>Section 6.11 Cumulative Effects Assessment of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	needs to be further assessment of cumulative agricultural land take with other consented/pipeline projects within Breckland. It is considered that both impacts upon food production and implications for the wider farming community should be robustly assessed.		
	<p>9.0 Cumulative Effects - 9.8</p> <p>As outlined earlier in this response, Breckland Council has significant concerns regarding cumulative landscape impacts. Whilst indicative options have been provided for the zoning of the substations and BESS, the preferred layout and design of the project is unknown at the time of this statutory consultation. Similarly, the proposed detailed mitigation measures have not been finalised and presented.</p>	<p><b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> considers the cumulative landscape and visual effects of High Grove Solar, in addition to the Scheme.</p> <p>Other major energy projects (including Norfolk Vanguard and Norfolk Boreas substation) have been included for consideration in the assessment of cumulative effects (<b>ES Appendix 2.4: Cumulative Schemes [APP/6.4]</b>).</p>	<p>Refer to <b>Section 6.11 Cumulative Effects Assessment of ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	Furthermore, it is concerning that the project has reached the statutory consultation stage without a preliminary assessment of the cumulative impacts with other major energy projects (e.g. Norfolk Vanguard and Norfolk Boreas substation currently under construction at Necton and the proposed Highgrove Solar Farm along the length of the A47 towards Necton) having being undertaken.		
	9.0 Cumulative Effects - 9.9 Given the noted potential for extensive landscape impacts, it is considered that a more comprehensive assessment of both direct and cumulative effects is required. A thorough analysis must be detailed within the ES, clearly outlining the mitigation measures necessary	<b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> considers the cumulative landscape and visual effects of High Grove Solar, in addition to the Scheme.	Refer to <b>Section 6.11 Cumulative Effects Assessment of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	to address landscape sensitivities.		
	<p>11.0 Conclusion - 11.4 Given the lack of clarity regarding the siting of the BESS and the substations required to facilitate grid connection, and the lack of a preliminary cumulative impacts assessment (including both consented and pipeline schemes in the area), Breckland Council has significant concerns regarding the potential of the scheme to generate cumulative landscape or visual effects with The Highgrove Solar Farm (especially given both sites lie with the same Landscape Character Area). These concerns regard both the construction and operation phases, with notable intra-project effects anticipated. Also, the proposed detailed mitigation measures have not been</p>	<p><b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> considers the cumulative landscape and visual effects of High Grove Solar, in addition to the Scheme.</p> <p>The Cumulative Effects Assessment has been informed by the Scheme description for the ES (<b>ES Chapter 5: The Scheme [APP/6.1]</b>), <b>Works Plan [APP/2.3]</b>, <b>Design Principles, Parameters and Commitments [APP/5.8]</b>, and <b>Design Approach Document [APP/5.7]</b> which provide greater certainty to the Scheme's design.</p> <p>Mitigation measures are reflected in <b>Appendix 1 (Green Infrastructure Plan)</b> to the <b>oLEMP [APP/7.11]</b> which would be revised and finalised following</p>	<p>Refer to <b>Section 6.11 Cumulative Effects Assessment of ES Chapter 6: Landscape and Visual [APP/6.2]</b>, <b>Appendix 1 (Green Infrastructure Plan)</b> to the <b>oLEMP [APP/7.11]</b> and the <b>oLEMP [APP/7.11]</b>.</p>

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	finalised and presented. The cumulative landscape and visual effects of the developments have the potential to bring about significant negative effects, which cannot be fully assessed due to the current lack of clarity.	the DCO examination process and receipt of consent.	
	11.0 Conclusion - 11.6 The Council has significant reservations regarding the LVIA relying on just the District Level Landscape Character Areas. The methodology, and in particular the judgement on resulting effects, is not considered transparent. Additional further LVIA work, as described earlier in this report (with particular regard to methodology and mitigation of effects), is considered paramount to support the ES. Given the issues regarding the LVIA methodology, the Council	Noted.  Responses to comments made are covered in the above paragraphs.	Not Applicable.

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	is not in a position to provide full commentary at this stage.		
Natural England, July 2025	Reference is made to management plans including the LEMP, CEMP and SMP however no details have been submitted as part of this consultation.	An oLEMP [APP/7.11], oCEMP [APP/7.6], and outline Soils Management Plan (oSMP) [APP/7.13] have been prepared and submitted as part of the DCO Application.	Refer to oLEMP [APP/7.11], oCEMP [APP/7.8], and oSMP [APP/7.13].
	6.1.1. Natural England advise securing appropriate measures in the LEMP and CEMP to mitigate adverse impacts to any ancient and/or veteran trees the tree survey may identify, within or adjacent to the draft Order limits. We would advise the Applicant to refer to the standing advice <sup>7</sup> produced by Natural England and the Forestry Commission for planning authorities in relation to working around ancient woodland and ancient and veteran trees when	Specific offsets / buffers have been included in the ES for the Scheme as referred to in Table 5.1 of ES Chapter 5: The Scheme [APP/6.1]. This includes an offset/ buffer for veteran trees of at least 15 times width of tree stem diameter. This is in accordance with standing advice produced by Natural England and the Forestry Commission for development proposals that affect ancient woodland, ancient and veteran trees [Ref. 6-18]. The reference	Refer to Table 5.1 of ES Chapter 5: The Scheme [APP/6.1] and the oLEMP [APP/7.11].

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	preparing their mitigation measures.	to this offset / buffer is included in the <b>oLEMP [APP/7.11]</b> and further detail on offsetting would be provided in a detailed LEMP which would need to be approved by the relevant planning authority as secured by the relevant requirements of the <b>draft DCO [APP/3.1]</b> .	
	<p>8. Management Plans</p> <p>8.1. Several management plans have been referenced in the PEIR documents, including a Landscape Ecological Management Plan (LEMP), Construction Environmental Management Plan (CEMP) and SMP. However, no management plans, outline or otherwise, have been submitted as part of this consultation. Chapter 5 of the PEIR details a number of management plans that would be developed and submitted as</p>	<p>Noted.</p> <p>An <b>oLEMP [APP/7.11]</b>, <b>oCEMP [APP/7.6]</b>, and <b>oSMP [APP/7.13]</b> have been prepared and submitted as part of the DCO Application.</p>	Refer to <b>oLEMP [APP/7.11]</b> , <b>oCEMP [APP/7.6]</b> , and <b>oSMP [APP/13]</b> .

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	part of the DCO application. Natural England would provide comment on the relevant management plans when they are available to review.		
Forestry Commission, July 2025	<p>Mitigation:</p> <p>The concept masterplan shows indicative areas for mitigation and enhancement, although does not specify what this enhancement would consist of. It is stated at hedgerows would be strengthened between woodlands.</p>	Proposals for mitigation and enhancement are reflected in <b>Appendix 1 (Green Infrastructure Plan)</b> to the <b>oLEMP [APP/7.11]</b> and detailed further in the <b>oLEMP [APP/7.11]</b> . This includes the retention and strengthening of existing hedgerows and the creation of new hedgerows, woodland belts, copses and grasslands as well as specific areas for curlew / skylark mitigation.	Refer to <b>Appendix 1 (Green Infrastructure Plan)</b> to the <b>oLEMP [APP/7.11]</b> and <b>oLEMP [APP/7.11]</b> .
	<p>It is important that woodland creation is not just used as screening at strategic locations and ensures habitat connectivity throughout the landscape. Ideally, we would like to see</p>	<p>Comments are noted.</p> <p>The Scheme's <b>Design Approach Document [APP/5.7]</b> outlines how the Scheme seeks to improve connectivity and</p>	Refer to <b>Design Approach Document [APP/5.7]</b> , <b>Appendix 1 (Green Infrastructure Plan)</b> to the



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	woodland creation carried out in 5ha blocks, or that connecting planting with existing woodlands should create blocks of at least 5ha. Connectivity across the site could be improved and enhanced with larger blocks of woodland creation and woodland edge. There is certainly the possibility of linking several of the isolated woodlands within the site.	<p>accessibility through the Site. This is reflected on <b>Appendix 1 (Green Infrastructure Plan)</b> to the <b>oLEMP [APP/7.11]</b> which illustrates the addition of new woodland belts and proposed hedgerows as well as the strengthening of existing hedgerows by "gapping up". Two new woodland belts are proposed edging Field 27.</p> <p>Whilst the design and structure of the woodland would be developed further as part of the detailed LEMP, the <b>oLEMP [APP/7.11]</b> recognises the importance of connectivity between fragmented habitats and the need improve biodiversity value in line with Norfolk's Local Nature Recovery Strategy.</p>	<b>oLEMP [APP/7.11]</b> and <b>oLEMP [APP/7.11]</b> .
	Avoiding impacts and good landscape design:	Comments are noted.	Refer to <b>Design Approach [APP/5.7]</b> , <b>Appendix 1 (Green</b>

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	<p>To meet planning policy and Government guidance, we would recommend:</p> <ul style="list-style-type: none"> <li>- Robust adherence to the Standing Advice, especially regarding buffer zones, to rule out loss or deterioration to ancient and veteran trees.</li> <li>- Maintain and where possible improve woodland condition.</li> <li>- Utilise biodiversity gains as part of avoiding woodland and tree impacts (especially ancient/veteran) which can also maximise biodiversity benefits by embracing irreplaceable and high priority habitats – for example focussing on ecological enhancements/ creation of woodland edges.</li> <li>- Woodland creation and improvements to ecological connectivity. For example, there are potential opportunities to link</li> </ul>	<p>As discussed above, consideration has been given through the Scheme' design and Design Principles to offsets / buffer zones for veteran trees. Measures have also been taken to maintain and where appropriate improve woodland / hedgerow condition and connectivity within the Order limits and achieve biodiversity gain. These measures are reflected in the aims and opportunities of the <b>oLEMP [APP/7.11]</b> which would be revised and finalised following the DCO examination process and receipt of consent.</p>	<p><b>Infrastructure Plan)</b> to the <b>oLEMP [APP/7.11]</b> and <b>oLEMP [APP/7.11]</b>.</p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>fragmented woodland habitats across the site, which would increase habitat connectivity, making woodlands more resilient and benefitting biodiversity across the project area.</p> <ul style="list-style-type: none"> <li>- Overall increase in the tree canopy cover to contribute to the Government's target to increase tree and canopy cover to 16.5% of land area in England by 2050.</li> <li>- A UK Forestry Standard compliant woodland management plan, including deer and squirrel control, is created to ensure the long term maintenance of all new and existing woodland within the site.</li> </ul>		
Sporle with Palgrave PC	<p>4. Visual amenity and landscape</p> <p>The site area covered is characterised by an open tranquil landscape with long views, which although not</p>	<p>Comments are noted.</p> <p>Measures have been taken to protect landscape character through an iterative design process achieving good design</p>	<p>Refer to <b>Design Principles, Parameters and Commitments [APP/5.8]</b> and <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>

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	recognised as of national importance, they are to those who live there. We recognise the design of the development to restore the nature of the historic droves through the site with tree and hedge planting. However, efforts to hide all the solar arrays would only destroy the landscape character of the area.	and scheme outcomes through design principles; <b>Design Principles, Parameters and Commitments [APP/5.8]</b> . The document submitted as part of the DCO Application provides the principles and maximum parameters for the detailed design of the Scheme and the principles secured by a requirement in the <b>draft DCO [APP/3.1]</b> . When the detailed design for the Scheme is submitted for approval to the relevant planning authorities, those details must accord with the <b>Design Principles, Parameters and Commitments [APP/5.8]</b> .  These Design Principles have informed the landscape and visual impact assessment.	
	Detailed concerns and requests	Comments are noted.	Refer to <b>Section 6.11 Cumulative Effects Assessment</b> of ES Chapter 6:

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	<p>1. Cumulative impacts on landscape and views</p> <p>We are concerned by the cumulative impact of both the High Grove and the Drovers developments on the western side of the parish. To this end we have requested the removal of three fields of solar arrays from the northern edge of area C03 of the Central Area of the High Groves development. (See figure 1 below) This is an area of open sloping landscape with hedgerows and woodland areas but with long views in between, as seen in the photomontage below.</p>	<p>The removal of three fields applies to proposals for High Gove Solar which lie to the east of the A1065 and opposite the Field 21 of the Scheme.</p> <p>Consideration has been given to the cumulative landscape and visual effects of High Grove Solar in addition to the Scheme in <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>	<b>Landscape and Visual [APP/6.2]</b>
	<p>The National footpath, the Peddars Way, passes alongside both developments, it passes the old medieval village site of Great Palgrave and down Southacre Road to cross the A1065. These panel areas would impact</p>	<p>The view from Viewpoint 46 (referred to in the High Grove Solar's Scoping Report, September 2024) would not be dissimilar to The Scheme's viewpoint 8 (in terms of orientation and distance) though</p>	Refer to <b>Section 6.11 Cumulative Effects Assessment of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

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	adversely the view as shown from the path at VP46 (as shown on High Grove PEIR Figure 10.15) and VP8 (Droves representative viewpoint shown on their PEIR Figure 6.5a and their photomontage – representative viewpoint 8 in their PEIR Figure 6.8)	taken slightly further north at Great Palgrave.  <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has assessed the visual impact of the Scheme as well as the cumulative visual impacts of the Scheme in addition to High Grove Solar.	
	The PC is currently engaged in producing a Neighbourhood Plan to protect the parish's character and against adverse developments within it. As part of the plan the identification of characteristic landscape views that are important to the parish and its residents should be identified. The Peddars Way, at this point, is part of a circular walk greatly used by residents and consequently the viewpoint VP46 is shown as view 4 in the Sporle Neighbourhood Plan	Comments are noted.  As outlined above the orientation and proximity of Viewpoint 46 (referred to in the High Grove Solar's Scoping Report, September 2024) would not be dissimilar to the Scheme's viewpoint 8 (in terms of orientation and distance) though taken slightly further north at Great Palgrave. Mention of the inclusion of viewpoint 46, as View 4 in the emerging Neighbourhood Plan, is noted.	Refer to <b>ES Chapter 6: Landscape and Visual. [APP/6.2]</b> .

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	Views Assessment and included below.	Viewpoints for the Scheme were presented in <b>ES Appendix 2.1: EIA Scoping Opinion Request [APP/6.4]</b> and agreement on viewpoint locations sought with the Host Authorities but no formal written response and/or note of agreement was received.	
	The adverse cumulative impact on the landscape from both the Drovers and High Grove developments as shown by the viewpoints VP46, VP8, and L1 which show areas of panel visible from both developments at these points.	Noted. <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has undertaken a detailed assessment of the cumulative landscape and visual impacts.	Refer to <b>Section 6.11 Cumulative Effects Assessment</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .
	The viewpoints VP4 (as shown on High Grove PEIR Figure 10.15) and L2-L7 all show views across these three panel areas in the near distance and views onto the likely battery areas and	Comments are noted. <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has undertaken a visual impact assessment giving consideration	Refer to <b>Section 6.8 Assessment of Likely Effects</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> and supporting <b>ES Figure 6.12 (PM6, PM8, PM12 and PM14):</b>

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	substation on the Drovers development. In addition, they would impact views from Castle Acre castle which is shown as representative view VP6 in High Grove PEIR Figure 10.15.	to likely effects from Castle Acre reflected in representative viewpoint 14 and in <b>ES Figure 6.12 (PM6, PM8, PM12 and PM14): Parameter Based Winter Photowires</b>  <b>Figure 6.13 (PM6, PM8, PM12 and PM14): Parameter Based Summer Photowires, ES Figure 6.14 (PM8, PM12 and PM14): Winter Photomontages: Illustrative Scheme, ES Figure 6.15 (PM8, PM12 and PM14): Summer Photomontages: Illustrative Scheme [APP/6.3]</b>	<b>Parameter Based Winter Photowires</b>  <b>Figure 6.13 (PM6, PM8, PM12 and PM14): Parameter Based Summer Photowires, ES Figure 6.14 (PM8, PM12 and PM14): Winter Photomontages: Illustrative Scheme, ES Figure 6.15 (PM8, PM12 and PM14): Summer Photomontages: Illustrative Scheme [APP/6.3]</b>
	Use of footpaths with high hedges both sides reduce the enjoyment and amenity value of the paths particularly without gaps. However, even with gaps, 3.5m high solar arrays blocking your view does not improve things. The bridle way BR5 has currently several gaps along it to	In terms of the Scheme, measures have been taken to achieve good design and scheme outcomes through <b>Design Approach Document [APP/5.7]</b> including connectivity and accessibility.	Refer to <b>Table 5.1 of ES Chapter 5: The Scheme [APP/6.1]</b> , <b>Design Approach Document [APP/5.7]</b> , and <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .



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	the north and north west with wide open views towards Castleacre.	Consideration has also been given to the landscape and visual context of rights of way with a minimum offset of 15m prescribed to retain views; these are detailed in <b>Table 5.1 of ES Chapter 5: The Scheme [APP/6.1]</b> .  Comments with regards to Bridleway BR 5 are noted. However, BR 5 lies outside of the Drovers Order limits and as such no mitigation is suggested.	
	Attempted mitigation to hide the solar panels with tree shelter belts along the existing northern and western boundary dOL lines of the High Grove Development would not mitigate the adverse impacts on the views on these sloping fields towards the Drovers development	Comments are noted. Whilst these comments are directed at proposals associated with High Grove Solar, consideration has been given to the visual impacts of High Grove Solar in addition to the Scheme in the cumulative effects assessment.	Refer to <b>Section 6.11 Cumulative Effects Assessment of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

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	Removal of these areas of panels would reduce the impact on the views from Fincham Drove towards Palgrave.	Comments are noted. Whilst these comments are directed at proposals associated with High Grove Solar, consideration has been given to the visual impacts of High Grove Solar in addition to the Scheme in the cumulative effects assessment.	Refer to <b>Section 6.11 Cumulative Effects Assessment of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .
	<p>Further impacts on landscape and views</p> <p>PEIR figure 6.5a shows that there is a ZTV (Zone of Theoretical Visibility) from Newton Road and from the footpath at Hungry Hill to the west of Little Palgrave Hall.</p> <p>The currently developing Neighbourhood Plan shows a view 7 along Newton Road which shows impact on the view from the Drovers as also further viewpoints along Newton Road and Hungry Hill show as per</p>	<p>Comments are noted.</p> <p>The ZTV shows the extent of theoretical visibility and it is agreed there would be theoretical visibility from the positions shown on figure 2 in the Parish Council's response.</p> <p><b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has assessed the visual impacts of the Scheme and for views indicated on figure 2 in the Parish Council's response these would be assessed under Visual Receptor</p>	Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

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	below, (positions shown on figure 2)	Group 4: Great Palgrave and Little Palgrave.	
	<p>However, we would request that if the substations are positioned to the south of Bartholomew's Hills Plantation in fields 26 and 27, that they are positioned at the bottom of the slope as shown in photos below alongside the Byway from the A1065 and Fincham Drove.</p> <p>This would be to hide the substations as much as possible into the landscape.</p>	<p>Noted.</p> <p>The location of the National Grid and Customer Substations would be sited within Field 27 as illustrated in <b>ES Figure 5.1: Concept Masterplan [APP/6.3]</b>. The exact location would be confirmed post consent to allow flexibility in design. Mitigation measures have been introduced as presented in <b>Appendix 1 (Green Infrastructure Plan)</b> to the <b>oLEMP [APP/7.11]</b> illustrating the gapping up / strengthening of hedgerows with hedgerow trees and proposed woodland belts to provide screening.</p>	Refer to <b>ES Figure 5.1: Concept Masterplan [APP/6.3]</b> and <b>Appendix 1 (Green Infrastructure Plan)</b> to the <b>oLEMP [APP/7.11]</b> .
	We would request that a 20m wide wooded shelter belt be	A 10m wide woodland belt is proposed on either side of Field	Refer to <b>ES Figure 5.1 Concept Masterplan [APP/6.3]</b> and

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	planted to additionally hide the substations	27 to provide screening to the substations in addition to the gapping up / strengthening of hedgerows with hedgerow trees. This approach is judged to be sufficient in filtering and screening short to mid distance views of the substations from the east and west, in the long term, once established.	<b>Appendix 1 (Green Infrastructure Plan)</b> to the oLEMP [APP/7.11].
	Although current views have the pylons, we would request that there is not a doubling up or increase in the overall number of pylons when considering the connection options and thereby adversely impacting the landscape.	<p>As described in <b>ES Chapter 5: The Scheme [APP/6.1]</b>, the Scheme proposes diverting the existing dual circuit 400kV overhead line (OHL) into a newly constructed double busbar substation (the National Grid Substation).</p> <p>The Applicant however wishes to retain an element of optionality in keeping the existing line of pylons and the new diversion as presented in <b>ES Figure 5.1: Concept Masterplan [APP/6.3]</b> so that the detailed design of the</p>	Refer to <b>ES Figure 5.1: Concept Masterplan [APP/6.3]</b> , <b>ES Chapter 5: The Scheme [APP/6.1]</b> , <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> and <b>ES Figure 6.12: (PM6, PM8, PM12 and PM14): Parameter Based Winter Photowires</b> , <b>ES Figure 6.13: (PM6, PM8, PM12 and PM14): Parameter Based Summer Photowires</b> , <b>ES Figure 6.14 (PM8, PM12 and PM14): Winter Photomontages: Illustrative Scheme</b> and <b>ES Figure 6.15: (PM8, PM12 and PM14):</b>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		<p>Scheme can be informed by technical considerations, post-consent work, and take advantage of innovations in technology.</p> <p>The <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> as such considers a worst-case scenario with both the existing line of pylons and new diversion and these are presented in <b>Figures 6.14 and 6.15 (PM8, PM12 and PM14): Photomontages Illustrative Scheme [APP/6.3]</b>.</p>	<b>Summer Photomontages: Illustrative Scheme [APP/6.3].</b>
	<p>Management of panel areas</p> <p>No outline management plans have been put in place for the operation of the site. We are concerned that the length of the operational phase would mean that over time management of the site would not be as tight with resulting problems:</p>	<p>An <b>oLEMP [APP/7.11]</b> and <b>outline Operational Environmental Management Plan (oOEMP) [APP/7.8]</b> have been prepared to provide a framework for the management of the Scheme and the Site during the operation phase. Further detail on management proposals would be provided in a detailed LEMP and OEMP which</p>	Refer to <b>oLEMP [APP/7.11]</b> and <b>oOEMP [APP/7.8]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		would need to be approved by the relevant planning authority as secured by the relevant requirements of the <b>draft DCO [APP/3.1]</b> .	
	Loss of biodiversity and detrimental effects on wildlife • Poor maintenance of the species-rich grassland proposed under the solar arrays that lead to bare patches causing soil erosion and sediment build up in the drainage system • Poor maintenance of the species-rich grassland proposed under the solar arrays that lead to increased fire risk in times of drought	Reference to the management of proposed habitats is covered in the <b>oLEMP [APP/7.11]</b> and further detail would be provided in a detailed LEMP which would need to be approved by the relevant planning authority as secured by the relevant requirement of the <b>draft DCO [APP/3.1]</b> .	Refer to <b>oLEMP [APP/7.11]</b> .
	We would wish to have reassurance that the site would be managed correctly and the plans put in place.	As secured by the <b>draft DCO [APP/3.1]</b> , the Scheme would be managed by the Applicant during its operational life, apart from the National Grid Substation which would be the responsibility of	Refer to <b>oLEMP [APP/7.11]</b> and <b>oOEMP [APP/7.8]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		National Grid. This is described in the <b>oLEMP [APP/7.11]</b> and <b>oOEMP [APP/7.8]</b> and further detail would be provided in a detailed LEMP and OEMP which would need to be approved by the relevant planning authority as secured by the relevant requirement of the <b>draft DCO [APP/3.1]</b> .	
	<p>Mitigation of impact on landscape views from solar arrays to the east of Fincham Drove. (See figure 3)</p> <p>Taking into account above:</p> <ul style="list-style-type: none"> <li>• Views in the photomontages</li> <li>• Figures 1 &amp; 2</li> <li>• Description of the cumulative effects on the landscape from both the Drovers and High Groves developments in item 1</li> </ul>	<p>Comments are noted.</p> <p>The existing hedgerow edging Fields 26, 25 and 21 would be gapped up, and this alongside new woodland planting and hedgerows would provide further screening of the Solar PV Site, Customer Substation and National Grid Substation; refer to <b>Appendix 1 (Green Infrastructure Plan)</b> to the <b>oLEMP [APP/7.11]</b>.</p> <p>As discussed above further a cumulative landscape and visual</p>	<p>Refer to <b>Appendix 1 (Green Infrastructure Plan)</b> to the <b>oLEMP [APP/7.11]</b>.</p> <p>Refer to <b>Section 6.11 Cumulative Effects Assessment of ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		effects assessment has been undertaken in <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .	
	<p>Tracker panels</p> <p>The PEIR states that the design of the solar panel areas could use both fixed panels or tracker panels. The 4.5m maximum tracker panel height quoted in PEIR table 5.2 is of concern as the panels move during the sun's transit from east to west. We request that we are made aware where these would be used within the scheme so that we can ensure that sufficient hedge and tree planting can be undertaken to ensure these panels are fully hidden.</p>	<p>Comments are noted.</p> <p>To maintain flexibility in the assessment and within the DCO Application, both Single Axis Tracker and Fixed South Facing PV panels have been considered, as described in <b>ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]</b>. For the purposes of the assessment, and more specifically <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>, the Single Axis Trackers have been assessed as a worst-case scenario given their larger scale. The Single Axis Trackers have also been presented in the supporting visualisations; <b>ES Figure 6.12: (PM6, PM8, PM12 and PM14):</b></p>	<p>Refer to <b>ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]</b>, <b>Section 6.8 Assessment of Likely Effects</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>, <b>ES Figure 6.12: (PM6, PM8, PM12 and PM14): Parameter Based Photowires</b> and <b>ES Figure 6.13 PM8 and PM14): Photomontages: Illustrative Scheme [APP/6.3]</b>.</p>



Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		Parameter Based Winter Photowires, ES Figure 6.13: (PM6, PM8, PM12 and PM14): Parameter Based Summer Photowires, ES Figure 6.14: (PM8, PM12 and PM14): Winter Photomontages: Illustrative Scheme and ES Figure 6.15: (PM8, PM12 and PM14): Summer Photomontages: Illustrative Scheme [APP/6.3].	
	We note that 5m high weather masts maybe included although these were not mentioned in the PEIR. If these are used, we would want to see those positioned so they are not visible.	There are no weather masts proposed as part of the Scheme.	
Historic England	The setting impacts are discussed in more detail in Appendix 8.6: Stage 1 and 2 Setting Assessment. Whilst we are in broad agreement with these assessments at this stage, we consider that they need to be	<b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has only considered heritage assets in terms of their contribution to landscape value.	Refer to <b>ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	further refined though the Landscape and Visual Assessment and finalisation of the scheme infrastructure and layout.	The Setting Assessment has been undertaken as part of <b>ES Chapter 8: Heritage [APP/6.2]</b> .	
	Chapter 6: Landscape and Visual Figure 6.2 illustrates the locations of the designated heritage assets within the 3km LVIA Study Area. This is supported by Figures 6.5a and 6.5b which show the Zone of Theoretical Visibility and the Proposed Representative Viewpoints (1-16) and Illustrative Viewpoints (a-g).	Noted.	Refer to <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> and supporting <b>ES Figures 6.1 - 6.13 [APP/6.3]</b> .
	Historic England is broadly in agreement with the proposed viewpoints. However, we would welcome the opportunity to discuss these in more detail and any refinements necessary as further surveys are completed	Agreement on viewpoint locations has been sought with the Breckland and Kings Lynn and West Norfolk Council and Norfolk County Council following the issue of the <b>ES Appendix 2.1: Scoping Opinion Request</b>	Refer to <b>Section 6.2 Consultation</b> and <b>Section 6.6 Baseline Conditions</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	and the detailed design of the proposed development is advanced.	<p><b>[APP/6.4]</b> as referred to in <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>. No formal written response and/or note of agreement was received from Breckland council or Norfolk County Council. KLWN agreed in principal with the consultation proposals on a conference call to discuss the LVIA consultation letter and Site.</p> <p>The approach to the <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has been undertaken in coordination with the Applicant's Heritage consultant, with regard to viewpoint selection and sensitive heritage receptors in the Study Area. For the PEIR and ES, cross referencing between these chapters would be undertaken where appropriate.</p>	
	Chapter 5: Scheme Description	Comments are noted.	Refer to <b>ES Chapter 4: Reasonable Alternatives and</b>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>Chapter 5 describes the proposed infrastructure for the solar farm development.</p> <p>We understand that the proposed development may include both fixed south-facing PV arrays and single axis trackers which have heights of 3.5m and 4.5m respectively. Whilst the visual impact assessments have been based on a 'worst-case' of the taller arrays we consider that it may be worth revisiting some of the visual assessments once it has been determined which array type is being used and how they would be positioned across the site. We consider that this is particularly the case with fields 33, 34 and 35 at the northern end of the proposed development with regard to views from South Acre and Castle Acre.</p>	<p>To maintain flexibility in the assessment and within the DCO Application, both Single Axis Tracker and Fixed South Facing PV panels have been considered, as described in <b>ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]</b>. For the purposes of the assessment, and more specifically <b>ES Chapter 6 Landscape and Visual [APP/6.2]</b>, the Single Axis Trackers have been assessed as a worst-case scenario given their larger scale. The Single Axis Trackers have also been presented in the supporting visualisations; <b>ES Figure 6.12: (PM6, PM8, PM12 and PM14): Parameter Based Winter Photowires</b></p> <p><b>ES Figure 6.13 (PM6, PM8, PM12 and PM14): Parameter Based Summer Photowires</b></p>	<p><b>Design Evolution [APP/6.1], Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2], ES Figure 6.12: (PM6, PM8, PM12 and PM14): Parameter Based Photowires and ES Figure 6.13: PM8 and PM14): Photomontages: Illustrative Scheme [APP/6.3].</b></p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		<p><b>Figure 6.14 (PM8, PM12 and PM14): Winter Photomontages: Illustrative Scheme</b></p> <p><b>Figure 6.15 (PM8, PM12 and PM14): Summer Photomontages: Illustrative Scheme [APP/6.3].</b></p>	
	<p>Based on Figure 6.10 and 6.11 Viewpoints 12 and 14 the proposed substations would be visible in views of and from Castle Acre Castle and Priory. The visual impact is likely to be worse if the substations are located in the northern fields that are proposed – fields 33 and 35 for the Customer Substation and field 33 for the National Grid substation as these are located on a slightly north-facing slope. Fields 24, 26 and 27 lie to the south of Bartholomew's Hills Plantation</p>	<p>Noted.</p> <p>Based on comments received and conclusions of the PEIR the options for siting the substation have been refined with both the National Grid Substation and Customer Substation located within Field 27 and to the south of Bartholomew's Hills Plantation. The conclusions to visual impact of the Scheme are presented in <b>ES Chapter 6: Landscape and Visual [APP/6.2].</b></p>	<p>Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2].</b></p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	and are thus partly screened in views south from Castle Acre. Consequently, it is likely that the visual impact of the proposed substations on designated heritage assets in Castle Acre would be lower if they are located in fields 24, 26 or 27 rather than fields 33 and 35.		
	As the overhead line layout and pylon positions have yet to be confirmed these have not currently been fully considered as part of the visual impact of the proposed development. We recommend that visualisations and assessment of visual impacts of the proposed development are revisited once the proposed overhead line layout and pylons are known.	<p>As described in <b>ES Chapter 5: The Scheme [APP/6.1]</b> the Scheme proposes diverting the existing dual circuit 400kV OHL into a newly constructed double busbar substation (the National Grid Substation).</p> <p>The Applicant however wishes to retain an element of optionality in keeping the existing line of pylons and the new diversion as presented in <b>Figure 5.1: Concept Masterplan [APP/6.3]</b> so that the detailed design of the</p>	Refer to <b>ES Figure 5.1: Concept Masterplan [APP/6.3]</b> , <b>ES Chapter 5: The Scheme APP/6.1]</b> , <b>ES Chapter 6: Landscape and Visual APP/6.2]</b> , <b>ES Figure 6.14: (PM8 and PM14): Winter Photomontages: Illustrative Scheme</b> and <b>ES Figure 6.15: (PM8 and PM14): Summer Photomontages: Illustrative Scheme [APP/6.3]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		<p>Scheme can be informed by technical considerations, post-consent work, and take advantage of innovations in technology.</p> <p><b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> considers a worst-case scenario of both the existing line of pylons and new diversion and these are presented in <b>ES Figure 6.12: (PM6, PM8, PM12 and PM14): Parameter Based Winter Photowires</b>, <b>ES Figure 6.13: (PM6, PM8, PM12 and PM14): Parameter Based Summer Photowires</b>, <b>ES Figure 6.14: (PM8, PM12 and PM14): Winter Photomontages: Illustrative Scheme</b>, <b>ES Figure 6.15: (PM8, PM12 and PM14): Summer Photomontages: Illustrative Scheme [APP/6.3]</b>.</p>	
NGET	If a landscaping scheme is proposed as part of the	The landscaping scheme is reflected on <b>Appendix 1 (Green</b>	Refer to <b>Appendix 1 (Green Infrastructure Plan)</b> to the

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.	<p><b>Infrastructure Plan)</b> to the <b>oLEMP [APP/7.11]</b>.</p> <p>Measures would be taken to ensure that slow and low growing trees and shrubs are planted beneath and adjacent to the existing / proposed overhead line to adhere to statutory safety clearances. Reference to overhead lines has been covered in the <b>oLEMP [APP/7.11]</b> and further detail would be provided in a detailed LEMP which would need to be approved by the relevant planning authority as secured by the relevant requirement of the <b>draft DCO [APP/3.1]</b>.</p>	<b>oLEMP [APP/7.11]</b> and <b>oLEMP [APP/7.11]</b> .
Norfolk County Council	The project is considered to be broadly in line with the Government's objectives and targets on renewable energy and net zero emissions. Furthermore, the County Council's own Climate Change and Economic	(1) With regard to the the Grid Connection Infrastructure undergrounding of either the existing or the proposed 400kV line has not been explored as an option, as the Site is not within a National Landscape, and there	Refer to <b>ES Chapter 4: Alternatives and Design Evolution [APP/6.1]</b> , <b>ES Chapter 5: The Scheme [APP/6.1]</b> and <b>Section 6.8 Assessment of Likely Effects</b>



Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>Strategies are supportive of low carbon energy subject to there not being any demonstrable impacts on Norfolk's sensitive environment. Notwithstanding the above, the project at this stage raises a number of strategic concerns to the County Council, which would need to be addressed, and these include (specific to the LVIA):</p> <p>(1) The Grid connection infrastructure should be undergrounded to avoid any additional pylons in close proximity to the sensitive Nar Valley and historic environment at Castle Acre;</p> <p>(5) There are Landscape Impact concerns regarding the cumulative landscape and visual impact of the Project in combination with the proposed</p>	<p>are no significant effects arising from the proposed new OHL reported within the <b>ES [APP/ 6.1-6.5]</b>.</p> <p>(2) Noted. Cumulative landscape and visual effects have been assessed in <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>	<p>of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	adjacent High Grove Solar Farm;		
	<p>PV Panel Options</p> <p>3.6 The PEIR states that there are currently two options for the PV panels which are being considered; either fixed south facing PV Arrays that would be installed at between 15 and 35 degrees which a maximum height of 3.5 or single axis tracker arrays that would be orientated north/south and would operate between 60 degrees from the horizontal (facing east in the morning) moving toward 0 degrees (horizontal) at midday, and up to 60 degrees from the horizontal (facing west in the evening) that would have a maximum height of 4.5m. The County Council would favour the option with the least visual and landscape impact (i.e. the fixed panels). However, it is accepted</p>	<p>Comments are noted.</p> <p>To maintain flexibility in the assessment and within the DCO Application, both tracker and fixed panels have been considered, as described in <b>ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]</b>. For the purposes of the assessment, and more specifically <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>, the Single Axis Trackers have been assessed as a worst-case scenario given their larger scale. The Single Axis Trackers have also been presented in the supporting visualisations; <b>ES Figure 6.12 (PM6, PM8, PM12 and PM14): Parameter Based Winter Photowires</b></p>	<p>Refer to <b>Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]</b>, <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b>, <b>Figure 6.12 (PM6, PM8, PM12 and PM14): Parameter Based Winter Photowires</b></p> <p><b>Figure 6.13 (PM6, PM8, PM12 and PM14): Parameter Based Summer Photowires</b></p> <p><b>Figure 6.14 (PM8, PM12 and PM14): Winter Photomontages: Illustrative Scheme</b></p> <p><b>Figure 6.15 (PM8, PM12 and PM14): Summer Photomontages: Illustrative Scheme [APP/6.3].</b></p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	that through further design work and appropriate mitigation there may be opportunities for combining both fixed and tracking arrays in different parts of the 825-ha site.	<p><b>Figure 6.13 (PM6, PM8, PM12 and PM14): Parameter Based Summer Photowires</b></p> <p><b>Figure 6.14 (PM8, PM12 and PM14): Winter Photomontages: Illustrative Scheme</b></p> <p><b>Figure 6.15 (PM8, PM12 and PM14): Summer Photomontages: Illustrative Scheme [APP/6.3].</b></p>	
	<p>Landscape Impact</p> <p>3.12 The PEIR acknowledges that there would be impacts on visual amenity arising from the presence during the construction and decommissioning phases of involving vehicles moving on the Site and in and around the surrounding area and also of other associated activities. This potentially includes the presence of workers' accommodation,</p>	<p>Comments are noted.</p> <p>Mitigation measures have been put in place to screen not just the Solar PV Site but also the BESS, National Grid Substation, Customer Substation and Grid Connection Infrastructure. Mitigation measures accord with the project level design principles to achieve a good design and Scheme outcome in <b>Design Principles, Parameters and</b></p>	Refer to <b>Appendix 1 (Green Infrastructure Plan)</b> to the <b>oLEMP [APP/7.11]</b> , <b>Design Approach Document [APP/5.7]</b> and <b>oLEMP [APP/7.11]</b> for proposed mitigation measures.

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>stockpiles of materials, lighting of specific areas, the presence and operation of construction compounds, and during the operation phase of the National Grid and Customer Substations and Grid Connection Infrastructure, BESS and PV panels. As such there would need to be appropriate mitigation put in place to screen not only the solar panels but also the supporting infrastructure. At this stage the precise layout and design of the project is not known, nor the detailed mitigation measures proposed. The cumulative impacts with other projects in the area has been assessed and identifies other NSIPs, most notably the proposed High Grove Solar Farm that would be immediately adjacent to the south of The Drovers Solar Farm site to the North of Swaffham.</p>	<p><b>Commitments [APP/5.8]</b>, are presented in <b>Appendix 1 (Green Infrastructure Plan)</b> to the <b>oLEMP [APP/7.11]</b> and the <b>oLEMP [APP/7.11]</b> which sets out a framework for the planting, management and monitoring of landscaping and ecological mitigation and enhancement habitats for the Scheme.</p> <p>Cumulative landscape and visual effects have been assessed in <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>	<p>Refer to <b>Section 6.11 Cumulative Effects Assessment of ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	3.13 Given the likely visual impacts arising from this Project over an extensive area, there needs to be rigorous assessment of the impacts and cumulative impacts as well as a clear indication of the mitigation measures needed as part of the Environmental Impact Assessment (EIA). Therefore, at this stage there are significant landscape concerns with the proposed development.	<p>Noted.</p> <p>The <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has undertaken a detailed assessment of the landscape and visual impacts of the Scheme as well as cumulative landscape and visual impacts.</p> <p>As discussed above, mitigation measures are prescribed through the <b>Design Approach Document [APP/5.7]</b> and <b>Design Principles, Parameters and Commitments [APP/5.8]</b> which have been submitted as part of the DCO Application and provide the principles and maximum parameters for the detailed design of the Scheme.</p>	Refer to <b>Section 6.8 Assessment of Likely Effects</b> and <b>Section 6.11 Cumulative Effects Assessment</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> , <b>Design Approach Document [APP/5.7]</b> and <b>Design Principles, Parameters and Commitments [APP/5.8]</b> .
	Recommendations: The Director of Growth and Investment is recommended to inform the Applicant (The	Comments are noted with specific responses given above in relation to the landscape and visual impacts associated with	Refer to <b>Section 6.8 Assessment of Likely Effects</b> and <b>Section 6.11 Cumulative Effects Assessment</b> of <b>ES</b>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>Droves Solar Farm Ltd) that Norfolk County Council:</p> <ol style="list-style-type: none"> <li>1. Has strategic concerns to the Project at this stage for the reasons set out below;</li> <li>2. Has serious concerns to the potential for new overhead lines and pylons being introduced into this sensitive Nar Valley landscape as part of any grid connection infrastructure needed;</li> <li>3. Has concerns regarding the cumulative impacts of the Project on Norfolk's environment; and local communities and businesses taken together with other major infrastructure proposed in this area;</li> <li>4. Has strategic concerns regarding the loss of high-quality agricultural land;</li> <li>5. Has a number of safety concerns regarding the potential for glint and glare arising from the solar</li> </ol>	overhead lines, fixed solar panels and cumulative impacts.	<p><b>Chapter 6: Landscape and Visual [APP/6.2], ES Chapter 4: Alternatives and Design Evolution [APP/6.1], ES Chapter 5: The Scheme [APP/6.1], Design Approach Document [APP/5.7] and Design Principles, Parameters and Commitments [APP/5.8] and oLEMP [APP/7.11].</b></p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>panels in relation to highway users; aviation; and impacts on those using Public Rights of Way;</p> <p>6. Has concerns regarding the impact the Project would have on the historic assets in this area particularly on Castle Acre (the Castle and the Priory); and on the wider Nar Valley landscape;</p> <p>7. Favours fixed solar panels with a lower height (3 metres) and therefore less visual and landscape impacts than tracking panels (up to 4.5 metres);</p> <p>8. Would like to see energy generated by this project being connected into the local distribution network to enable planned housing and employment growth in the County;</p> <p>9. Would expect to see appropriate compensation for</p>		

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	those affected by the Project; 10. Would expect to see a voluntary community benefits fund being established; and 11. Has a number of detailed technical comments to the Solar Farm Project which are set out in this Report and in the accompanying Appendices 2 and 3.		
Borough Council of King's Lynn and West Norfolk	Impacts on Heritage Assets, Landscape Setting:  The most harmful element of the scheme as it relates to the historic environment of West Norfolk is the placement of the substations and the grid connection infrastructure in the fields around the Batholomew's Hill Plantation. It is clear from the information and visualisations provided that, with certain parts of the infrastructure being up to	Noted.  The location of the National Grid Substation and Customer Substation are sited within Field 27 as illustrated in <b>ES Figure 5.1: Concept Masterplan [APP/6.3]</b> . The exact location would be confirmed post consent to allow for flexibility in design.  As described in <b>ES Chapter 5: The Scheme [APP/6.1]</b> , the Scheme has proposed diverting	Refer to <b>ES Figure 5.1: Concept Masterplan [APP/6.3]</b> , <b>Appendix 1 (Green Infrastructure Plan)</b> to the oLEMP [APP/7.11], <b>ES Chapter 5: The Scheme [APP/6.1]</b> and <b>Section 6.8 Assessment of Likely Effects</b> of <b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> .



Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	13m high and with lighting, fencing and general industrial built form being required, if placed to the north of this wooded area, the views from Castle Acre Priory would be impacted, as would views from Castle Acre Castle and the Conservation Area.	<p>the existing dual circuit 400kV OHL into a newly constructed double busbar substation (the National Grid Substation). The Applicant, however, wishes to retain an element of optionality in keeping the existing line of pylons and the new diversion as presented in <b>ES Figure 5.1: Concept Masterplan [APP/6.3]</b> so that the detailed design of the Scheme can be informed by technical considerations, post-consent work, and take advantage of innovations in technology.</p> <p>As referred to on <b>ES Figure 5.1: Concept Masterplan [APP/6.3]</b>, PV panels would also be retained in Fields 33 and 34.</p> <p><b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has therefore assessed the visual impacts on visual receptors based on the siting of National Grid Substation</p>	

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		and Customer Substation behind Bartholomew's Hills Plantation alongside the presence of both options for the existing and diverted overhead lines and PV panels within Fields 33 and 34.	
	The potential temporary working area for grid connection infrastructure is also shown to the north of the plantation. The construction phase is expected to last approximately 2 years. Whilst this is a relatively short timescale, the Borough Council do not consider that this would be an appropriate use of this area of land in heritage/landscape terms considering the significance of the landscape as identified in the heritage statement.	<p>Noted. There are overhead lines to the north of Bartholomew's Hill Plantation woodland, and the working area is only to facilitate works along the existing route in the event that the existing overhead line is decommissioned. All new overhead lines are located to the south of Bartholomew's Hill Plantation woodland.</p> <p><b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has assessed the impacts of the Grid Connection Infrastructure on landscape and visual receptors.</p>	Refer to <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b> .

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
	<p>As noted throughout Chapter 6, the scale of the effect on visual receptors would reduce if larger elements of the scheme were to be situated south of Bartholomew's Hills Plantation. The Borough Council consider that any intrusion of infrastructure of any scale north of this landscape feature would lead to significant adverse impacts on the setting of Castle Acre and West Acre (and South Acre). This includes glint and glare impacts if solar arrays were proposed in these fields.</p>	<p>Noted.</p> <p>The location of the National Grid Substation and Customer Substation are sited within Field 27 as illustrated in <b>ES Figure 5.1: Concept Masterplan [APP/6.3]</b>. The exact location would be confirmed post consent to allow for flexibility in design.</p> <p>As described in <b>ES Chapter 5: The Scheme [APP/6.1]</b> the Scheme has proposed diverting the existing dual circuit 400kV OHL into a newly constructed double busbar substation (the National Grid Substation). The Applicant however wishes to retain an element of optionality in keeping the existing line of pylons and the new diversion as presented in <b>ES Figure 5.1: Concept Masterplan [APP/6.3]</b> so that the detailed design of the Scheme can be informed by technical considerations, post-</p>	<p>Refer to <b>ES Figure 5.1: Concept Masterplan [APP/6.3]</b>, <b>Appendix 1 (Green Infrastructure Plan)</b> to the oLEMP [APP/7.11], <b>ES Chapter 5: The Scheme [APP/6.1]</b> and <b>Section 6.8 Assessment of Likely Effects of ES Chapter 6: Landscape and Visual [APP/6.2]</b>.</p>

Consultee and Date	Comment	How has the comment been addressed in the ES Chapter	Location of response in Chapter
		<p>consent work, and take advantage of innovations in technology.</p> <p>As referred to on <b>ES Figure 5.1: Concept Masterplan [APP/6.3]</b> PV panels are retained in Fields 33 and 34.</p> <p><b>ES Chapter 6: Landscape and Visual [APP/6.2]</b> has therefore assessed the visual effects on visual receptors based on the siting of National Grid Substation and Customer Substation behind Bartholomew’s Hills Plantation alongside the presence of both options for the existing and diverted overhead lines and PV Panels within Fields 33 and 34.</p>	

Further engagement has been undertaken as part of stakeholder engagement specific to Landscape and Visual Impact, this is detailed below in Table 1-3.

Table 1-3 Summary of Further Engagement

Consultee and Date	Summary of Matter	Response
Natural England (Consultation letter issued and follow up email sent on 7 January 2025 and 17 January 2025 respectively)	Natural England consultation response received. Response to visualisation locations was as follows “this proposal does not appear to be either located within, or within the setting of, any nationally designated landscape and therefore Natural England does not have remit to comment. All proposals however should complement and where possible enhance local distinctiveness and be guided by the Local Planning Authority’s (LPA) landscape character assessment where available, and the policies protecting landscape character in the relevant LPA’s local plan or development framework”.	Mitigation strategies within the Scheme aim to complement and enhance local distinctiveness and existing landscape character. The approach to new planting has been guided by the published landscape character assessments and landscape policies for the Host Authorities.
Various representatives from West Norfolk District Council, Breckland District Council and Norfolk County Council  30 May 2025	Accompanied Site Visit to a number of key viewpoints and areas within the Site and Study Area with representatives from the Host Authorities.	Topics discussed with local authorities, with the use of visual aids, included landscape and visual effects amongst other environmental topics.