

The Drovers Solar Farm

Appendix 9.1: Consultation and Legislation, Planning Policy and Guidance

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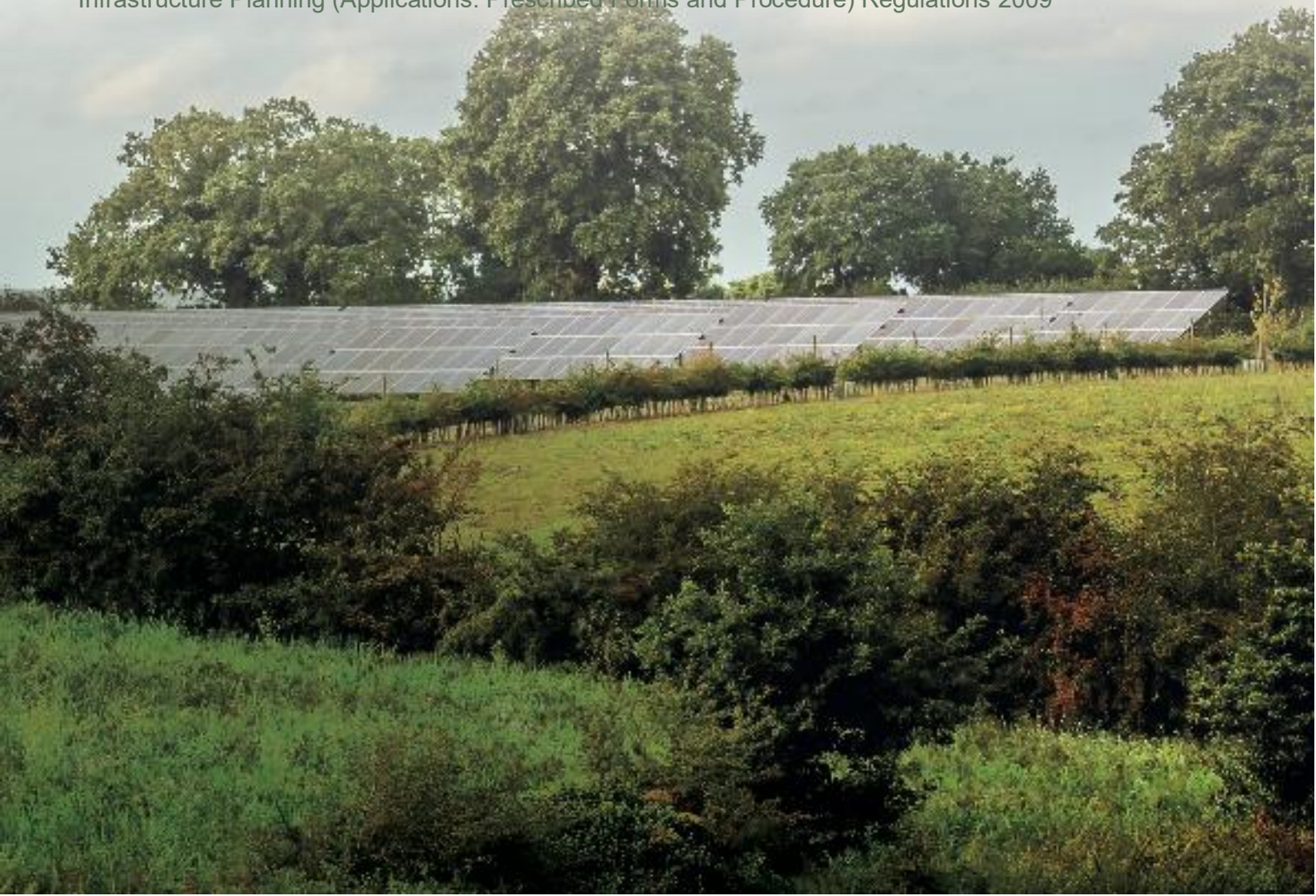
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Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009





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9 Consultation and Legislation, Planning Policy and Guidance

9.1 Consultation

Scoping Opinion

- 9.1.1 On 8 November 2024, the Applicant submitted a Scoping Opinion Request to the Planning Inspectorate (PINS) (see **ES Appendix 2.1: EIA Scoping Opinion Request [APP/6.4]**) in support of a request for a Scoping Opinion from the PINS on behalf of the Secretary of State pursuant to Regulation 10 of the EIA Regulations.
- 9.1.2 A Scoping Opinion (see **ES Appendix 2.2: Scoping Opinion [APP/6.4]**) was issued by the PINS on 18 December 2024.
- 9.1.3 The issues raised in the Scoping Opinion relating to transport and access are summarised and responded to within **Table 9-1** which demonstrates how the matters raised in the Scoping Opinion are addressed in this ES.



Table 9-1 Relevant Scoping Opinion Comments from Statutory Bodies relating to transport and access

| Consultee and Date | Comment and Scoping Opinion ID No. | How has the comment been addressed in the ES chapter | Location of response in ES Chapter |
|---|---|--|---|
| The PINS Scoping Opinion, December 2024 | ID Ref: 3.4.1 – PINS agreed that alternative modes of construction access can be scoped out on the basis that there are no viable alternative modes of transport for construction materials to site and the origin of materials to be used as well as the relevant port is not yet known. | Assessment not required as PINS agreed to scope out alternative modes of construction access. | An assessment of alternative modes of construction access is therefore not included within the ES, as agreed with PINS. |
| The PINS Scoping Opinion, December 2024 | ID Ref: 3.4.2 – PINS agreed that impacts as a result of operational traffic movements are unlikely to be significant and this matter can be scoped out of the ES. | Assessment not required as PINS agreed to scope out an assessment of operational traffic movements. | The traffic associated with scheduled replacement programs is to be managed and mitigated appropriately by way of an outline Operational Environmental Management Plan (oOEMP) [APP/7.8] , which is provided alongside the DCO Application and will be secured by way of a requirement in the DCO to ensure that there are no significant effects associated with the operational phase. |
| The PINS Scoping Opinion, December 2024 | ID Ref: 3.4.3 – PINS did not agree to scope out Transport and Access effects during decommissioning, noting that indicative traffic numbers for either the construction or decommissioning phases were not provided within the Scoping Report and no evidence was provided to support the claim that traffic numbers during | The PINS response is noted and consideration of the decommissioning phase is assessed within this chapter. | An assessment of decommissioning is inherently assessed within the assessment of construction, discussed within Section 9.8 of ES Chapter 9: Transport and Access [APP/6.2] . |



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| | decommissioning would be lower than during construction. | | |
| The PINS Scoping Opinion, December 2024 | ID Ref: 3.4.4 - PINS agreed that an assessment of impacts associated with the transport of hazardous loads can be scoped out of the ES, on the basis that the number and composition of any hazardous loads and any safety measures would be described within the ES. | Assessment not required as PINS agreed to scope out hazardous loads. | An assessment of impacts associated with the transport of hazardous loads is therefore not included within the ES, as agreed with PINS. |
| The PINS Scoping Opinion, December 2024 | ID Ref: 3.4.5 – PINS advised that the ES should confirm the final study area and key roads included in the assessment and explain how they have been identified. A plan illustrating the extent of the study area, and the expected route(s) of construction traffic, should be included in the ES. | The study area and routes of construction traffic have been discussed and agreed with Norfolk County Council (NCC) and National Highways (NH) prior to submission of the DCO Application. | The final study area and key roads included in the assessment are confirmed in Section 9.6 of ES Chapter 9: Transport and Access [APP/6.2] , along with an explanation of how they have been identified. ES Figure 9.1: Vehicle Routing and Constraints [APP/6.3] illustrates the extent of the expected route/(s) of construction traffic. |
| The PINS Scoping Opinion, December 2024 | ID Ref: 3.4.6 – PINS noted that any modelling and growth rates used in the assessment should be agreed with the local transport authority, where possible. | The growth rates and methodology for the assessment of Transport and Access have been agreed with NCC prior to submission of the DCO Application. | Engagement with NCC on the scope of the growth rates is summarised within this table. |
| The PINS Scoping Opinion, December 2024 | ID Ref: 3.4.7 – PINS advised that the ES should confirm the locations where traffic counts have been undertaken, explain why these locations were selected, and confirm the dates that the counts were undertaken. | This chapter includes the locations of the traffic surveys and a summary of the information collected. | Engagement with NCC on the scope of the traffic surveys is summarised within this table. |



Statutory Consultation and Preliminary Environmental Information Report (PEIR)

- 9.1.4 Statutory consultation was held between 21 May 2025 and 9 July 2025. Relevant responses to the PEIR relating to transport and access and how these have been addressed through the ES are set out in **Table 9-2** below.



Table 9-2 Responses to the PEIR relating to transport and access

| Consultee and Date | Comment | How has the comment been addressed in the ES chapter | Location of response in ES Chapter |
|--|---|---|--|
| Norfolk County Council (NCC), May to July 2025 Statutory Consultation period for responses to PEIR | Stating that no peak time capacity assessments, as agreed with NCC but nothing stated in the document to validate this (sic). | There has been follow up engagement by the Applicant's Transport and Access consultant with NCC to confirm that no peak hour assessments are required based on the likely impact during the AM and PM peak hours. | Peak hour assessments are not required, as agreed with NCC, so are not included within the assessment of ES Chapter 9: Transport and Access [APP/6.2] . |
| Norfolk County Council (NCC), May to July 2025 Statutory Consultation period for responses to PEIR | Peak project traffic 622 two-way movements (526LGV/96HGV) per day. This will be 1244 movements per day. | It was confirmed to NCC via email on 26 August 2025 that the peak was anticipated to be 622 two-way movements (526 two-way LGVs and 96 two-way HGVs) and not 1,244 two-way movements each day. Since the PEIR, the revised construction information for the Scheme developed by the Applicant that is assessed within this chapter identifies that the Scheme would generate a total of 628 two-way movements (532 two-way LGVs and 96 two-way HGVs), though this is not considered to be a material increase from the PEIR assessment. | Clarification provided to NCC on expected vehicle requirements which are discussed in Section 9.4 of ES Chapter 9: Transport and Access [APP/6.2] . |
| Norfolk County Council (NCC), May to July 2025 Statutory Consultation period for | There needs to be evidence that the solar panels will not adversely affect the highway network in respect to any potential glint and glare. | A standalone Glint and Glare Assessment has been undertaken by the Applicant, as reported in ES Chapter 16: Other Environmental Matters [APP/6.2] , to determine whether there are any adverse impacts to the highway | See ES Appendix 16.3: Glint and Glare Assessment [APP/6.4] . |



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| responses to PEIR | | network and is submitted as part of the DCO Application. | |
| Norfolk County Council (NCC), May to July 2025 Statutory Consultation period for responses to PEIR | There could still be off-peak restrictions depending on times that work is predicted to be carried out. | The Applicant considers that restrictions on delivery windows for construction traffic during the construction phase of the Scheme are proposed to mitigate the impacts on other users of the road network. | The restrictions on vehicle deliveries and construction operations during the construction phase of the Scheme are detailed within the outline Construction Traffic Management Plan (oCTMP) [APP/7.7] . |
| Norfolk County Council (NCC), May to July 2025 Statutory Consultation period for responses to PEIR | Cumulative traffic for other NSIPs using the A1065 have not been taken into consideration. | The assessment of Transport and Access undertaken in this ES chapter has inherently considered traffic associated with other NSIP schemes through the methodology applied and use of growth factors to capture this additional traffic. | The future baseline is discussed within Section 9.6 and the approach to cumulative assessment within Section 9.11 of ES Chapter 9: Transport and Access [APP/6.2] . |
| Norfolk County Council (NCC), May to July 2025 Statutory Consultation period for responses to PEIR | The Highway Authority would expect traffic to be using internal routes as much as possible, rather than the narrow country lanes accessing the site via A1065. | An internal routing strategy is proposed to minimise the impact to the public highway. | Further details on the proposed routing strategy in relation to the Scheme are included within ES Appendix 9.2: Transport Assessment [APP/6.4] and oCTMP [APP/7.7] , which are submitted as part of the DCO Application. |
| Norfolk County Council (NCC), May to July 2025 Statutory Consultation | Figure 9.1 construction Vehicle Routing and Constraints – No HGVs to use link 3 on drawing. | The Applicant confirms as part of the construction phase of the Scheme that HGVs will not use Link 3 (via Narford Road) to the west. | The routing for construction vehicles as part of the construction phase is secured through the oCTMP |



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| period for responses to PEIR | | | [APP/7.7] and via the DCO Application. |
| Norfolk County Council (NCC), May to July 2025 Statutory Consultation period for responses to PEIR | Figure 9.3 PRow and Cycle Route Overview – Rebellion Way and local PRow through site will need to be kept open or diverted during construction. There are concerns about the impact on the footpaths that run through the sites and especially the Peddars Way. | <p>The Applicant will ensure Public Right of Way (PRow) through the Scheme will be kept open or diverted when needed.</p> <p>The access strategy for the Scheme has been developed to provide a series of internal haul routes that minimise the need to cross the PRow network, which in turn supports the PRow around the Scheme being kept open. Where crossing a PRow is required, generally vehicles will only travel across a PRow rather than needing to go along it, which in turn reduces the impact to the PRow by as much as is practicably possible by limiting the extent of the PRow that vehicles need to cross. Traffic management and banksmen will be located in these areas to minimise disruption to the PRow users.</p> | Further detail on the measures to mitigate against the impact to PRow and permissive path users are included within the outline Public Right of Way and Permissive Path Management Plan (oPRowPPMP) [APP/7.12] . |
| National Highways, May to July 2025 Statutory Consultation period for responses to PEIR | <p>Due to the proximity of the project to, and interactions with, the A47, National Highways seeks to continue active engagement and discussions with the developer of the scheme to overcome potential issues and areas of concern that need to be resolved in advance of the DCO application being submitted.</p> <p>National Highways recommends the Study Area is extended to any SRN junctions have been identified as likely to</p> | <p>The Study Area included within this Transport and Access ES chapter has been based on the likely junctions that will be impacted by construction traffic based on the potential routes to/from the Scheme for construction vehicles.</p> <p>Through the restrictions on delivery timings for construction traffic as set out above in response to NCC Highways, there will not be any junctions during the construction phase of</p> | The Study Area for the Transport and Access assessment is shown at ES Figure 9.2: Transport and Access Study Area [APP/6.3] and further details on the restrictions on the timings of deliveries during the construction phase of the Scheme are included within the oCTMP [APP/7.7] . |



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| | <p>experience an uplift in traffic during construction in the AM and PM peaks.</p> <p>National Highways requires junction impact assessments to be undertaken on junctions experiencing an increase of 30 additional trips during the peak periods. National Highways recommends the applicant seeks to agree the scope with us of junction modelling in each of these locations.</p> | <p>the Scheme which exceed the threshold of 30 two-way vehicle trips during a peak hour.</p> <p>On this basis the extent of the Study Area as detailed within ES Chapter 9: Transport and Access [APP/6.2] is considered sufficient as the threshold of 30 two-way vehicles during a peak hour set by National Highways is not met on any of the SRN junctions along the A47.</p> | |
| National Highways, May to July 2025 Statutory Consultation period for responses to PEIR | <p>National Highways is concerned that the project could have significant implications for the SRN during construction, most notably on the A47. It is, however, considered unlikely that once The Drovers Solar Farm is complete there will be any impact upon the SRN, except for maintenance access.</p> | <p>Through the restrictions on delivery timings for construction traffic during the construction phase of the Scheme to limit vehicles during the AM peak hour and PM peak hour, outlined within the oCTMP [APP/7.7], there will not be any SRN junctions which exceed the threshold of 30 two-way vehicle trips during a peak hour. On that basis there are unlikely to be any significant impacts to the A47 as there will be no vehicles associated with the Scheme arriving during the peak hours.</p> | <p>Further details on the restrictions on the timings of deliveries are included within the oCTMP [APP/7.7].</p> |
| National Highways, May to July 2025 Statutory Consultation period for responses to PEIR | <p>It is anticipated that the outline Travel Plan will include measures to encourage construction staff to travel to and from site by sustainable modes.</p> <p>National Highways agree in principle with this method, however, National Highways will need to understand the impact that the development would have on the A47 during the construction period of the development and measures to manage and monitor the impact.</p> | <p>A standalone Travel Plan will be prepared, with the principles of the measures to be implemented summarised within the oCTMP [APP/7.7], which details the measures to mitigate against the traffic impact to the SRN that are relevant to the A47 such as the restriction on HGV deliveries to avoid the AM (08:00-09:00) and PM peak (17:00-18:00) hours.</p> | <p>Measures to be written into a Travel Plan are initially detailed within the oCTMP [APP/7.7], with a Travel Plan secured as part of the detailed CTMP in the DCO, to be provided prior to commencement of the construction phase.</p> |



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| | National Highways recommends consultation regarding the Outline Travel Plan and the proposed measures to ensure these are suitable for the A47. | | |
| Norfolk Fire and Rescue | Produce a transport strategy to minimise the impact of additional vehicle movements and prevent an increase in the potential number of traffic incidents, especially in largely rural settings. | The transport strategy as part of the design of the Scheme has been undertaken to mitigate against Transport and Access related impacts of the Scheme, which primarily take place during the construction phase and mitigation measures have been - prepared as part of the oCTMP [APP/7.7] . | The oCTMP [APP/7.7] details the measures to minimise the impact of vehicle movements and reduce accidents during the construction phase of the Scheme. |
| Mid Suffolk District Council | Mid Suffolk District Council would like to raise concerns around two matters identified within the Environmental Statement, relating to traffic routing and accommodation for the workforce. In both circumstances, concerns arise from cumulative impacts with a vast number of Nationally Significant Infrastructure Projects and major renewable projects in the region. | <p>The Transport and Access assessment undertaken in the ES for the Scheme has inherently considered traffic associated with identified NSIP schemes through the assessment methodology applied and use of growth factors to capture this additional traffic associated with the Scheme.</p> <p>Accommodation for the workforce is not considered to be a Transport and Access matter, and has been responded to in ES Chapter 14: Socio-Economics [APP/6.2].</p> | The future baseline used as part of the assessment is discussed within Section 9.6 and approach to cumulative assessment within Section 9.11 of the ES Chapter 9: Transport and Access [APP/6.2] . |
| Norfolk Constabulary | The proposed Outline Construction Traffic & Management Plan should include information on the likely AIL led resources required for the Project including haulage vehicle specifications (weight/ length/ width) - NC note that for construction phase purposes, converter station/ substation/ cable route infrastructure generate (sic) transformer & cable drum deliveries requiring HGV | An oCTMP [APP/7.7] has been prepared which details the current understanding of these requirements. As the exact requirements and specifications become understood, these will be presented in the detailed CTMP, prior to the commencement of construction works on Site. | The oCTMP [APP/7.7] will be secured by way of a requirement in the DCO and later iterations of this document will include the information requested. |



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| | specifications ranging from 75m length (transformers) to 25m+ length (cable drums). | | |
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- 9.1.5 Further engagement has been undertaken as part of stakeholder engagement specific to transport and access this, as detailed in **Table 9-3**.

Table 9-3 Summary of Further Engagement Undertaken

| Consultee and Date | Summary of Matter | Response |
|--|--|---|
| National Highways – November 2024 | Discussion on the inclusion of land at A47 / A1065 slip road in the Order limits for temporary works to facilitate abnormal load delivery. | It was agreed with National Highways that as the works proposed to be included in the Order limits were temporary to enable the abnormal load deliveries, the details of any temporary works would be agreed as part of the standalone abnormal load application by the contractor prior to construction. |
| Norfolk County Council – November 2024 | NCC reviewed the locations of the proposed automatic traffic count (ATC) surveys for the October 2024 surveys. NCC also requested additional surveys to be undertaken in the Summer and of additional locations. | The scope of the October 2024 surveys was agreed with NCC. Additional follow up surveys have been undertaken in the Summer of August 2025 as discussed in the baseline Section 9.6 of ES Chapter 9: Transport and Access [APP/6.2] for the scope requested by NCC. |
| Norfolk County Council – July 2025 | The scope of the supporting Stage 1 Road Safety Audit (RSA), access strategy, highway works was discussed with NCC. The scope of the Summer traffic surveys was also discussed. | NCC confirmed that the scope of the Stage 1 RSA which is included within ES Appendix 9.2: Transport Assessment [APP/6.4] was acceptable. |

- 9.1.6 A further round of targeted consultation was undertaken between 3 September 2025 and 1 October 2025 following changes to the development boundary area of the Scheme presented in the PEIR and during Stage Two Statutory Consultation. Further detail regarding the targeted consultation is provided in **ES Chapter 1: Introduction [APP/6.1]**.

9.2 Legislation, Planning Policy and Guidance

- 9.2.1 An overview of the legislation, planning policy and guidance against which the Scheme will be considered for the Transport and Access assessment is set out below.

Legislation and Regulations

- 9.2.2 While there is no legislation specifically relevant to the assessment of Transport and Access in relation to the Scheme, the Climate Change Act 2008 (**Ref 9-1**) sets a legally binding target for the UK to achieve a net zero carbon account by 2050.



Planning Policy

National Planning Policy

- 9.2.3 National Policy Statements (NPS) are a suite of documents issued by the Secretary of State, setting out the government's policy for delivery of major energy infrastructure and represent the primary policy tests against which the application for a DCO for the Scheme will be considered. Listed below are the details of the elements of NPS considered relevant to the Transport and Access assessment:

Overarching National Policy Statement (NPS) for Energy (EN-1) 2024 (Ref 9-2)

- 9.2.4 Paragraph 5.14.5 states:

"If a project is likely to have significant transport implications, the applicant's ES should include a transport appraisal."

- 9.2.5 Paragraph 5.14.6 states:

"Applicants should consult National Highways and Highways Authorities as appropriate on assessment and mitigation."

- 9.2.6 Paragraph 5.14.7 states:

"The applicant should prepare a travel plan including demand management and monitoring measures to mitigate transport impacts."

- 9.2.7 Paragraph 5.14.11 states that:

"Where mitigation is needed, possible demand management measures must be considered. This could include identifying opportunities to:

- Reduce the need to travel by consolidating trips*
- Locate development in areas already accessible by active travel and public transport*
- Provide opportunities for shared mobility*
- Re-mode by shifting travel to a sustainable mode that is more beneficial to the network*
- Retime travel outside of the known peak times; and*
- Reroute to use parts of the network that are less busy"*

- 9.2.8 Paragraph 5.14.13 states that:

"Regard should always be given to the needs of freight at all stages in the construction and operation of the development including the need to provide appropriate facilities for HGV drivers as appropriate."



9.2.9 Paragraph 5.14.14 states that:

“The Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic that:

- control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements*
- make sufficient provision for HGV parking, and associated high quality drive facilities either on the site or at dedicated facilities elsewhere, to support driver welfare, avoid ‘overspill’ parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions*
- ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force.”*

9.2.10 Paragraph 5.14.15 states that:

“The Secretary of State should have regard to the cost-effectiveness of demand management measures compared to new transport infrastructure, as well as the aim to secure more sustainable patterns of transport development when considering mitigation measures.”

9.2.11 Paragraph 5.14.21 states that:

“The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision.”

9.2.12 In response to NPS EN-1, **ES Appendix 9.2: Transport Assessment [APP/6.4]**, the **oCTMP [APP/7.7]**, and the **oOTMP [APP/7.9]** have been prepared to accompany the DCO Application. The **oCTMP [APP/7.7]** includes measures to manage the demand of construction traffic in accordance with the policy requirements, such as the re-timing of deliveries and consolidation to reduce the overall volume of trips.

9.2.13 National Highways (NH) and Norfolk County Council (NCC) have been consulted prior to submission as summarised in **Table 9-3**.

NPS for Renewable Energy Infrastructure (EN-3) 2024 (Ref 9-3):

9.2.14 Paragraphs 2.10.40 to 2.10.45 refers to the Transport and Access impacts of projects on the Public Rights of Way (PRoW) network, with paragraph 2.10.45 stating:

“Applicants should set out detail on how public rights of way would be managed to ensure they are safe to use in an outline Public Rights of Way Management Plan.”

9.2.15 In accordance with this policy, **outline Public Right of Way and Permissive Path Management Plan (oPRoWPPMP) [APP/7.14]** is prepared to accompany the DCO submission to set out how safe use of the PRoW and permissive path network will be managed throughout the lifetime of the Scheme.



- 9.2.16 Paragraphs 2.10.120 to 2.10.126 relate to assessing the Transport and Access impacts of renewable energy projects, notably paragraph 2.10.123 states that:

“Applicants should assess the various potential routes to the site for delivery of materials and components where the source of the materials is known at the time of the application, and select the route that is most appropriate.”

- 9.2.17 In accordance with this policy, an assessment of the routes available to access the Scheme is detailed within **ES Chapter 9: Transport and Access [APP/6.2]**.

- 9.2.18 Paragraphs 2.10.139 to 2.10.144 of EN-3 covers the impact of construction traffic, with paragraph 2.10.139 stating:

In some cases, the local highway authority may request that the Secretary of State impose controls on the number of vehicle movements to and from the solar farm site in a specified period during its construction and, possibly, on the routeing of such movements particularly by heavy vehicles.

- 9.2.19 In addition, paragraph 2.10.141 states:

Where cumulative effects on the local road network or residential amenity are predicted from multiple solar farm developments, it may be appropriate for applicants for various projects to work together to ensure that the number of abnormal loads and deliveries are minimised, and the timings of deliveries are managed and coordinated to ensure that disruption to residents and other highway users is reasonably minimised.

- 9.2.20 In accordance with this policy, the **oCTMP [APP/7.7]** allows for coordination with any cumulative schemes to ensure collaboration and that the cumulative effects on the Local Road Network (LRN) are minimised. The **oCTMP [APP/7.7]** also includes restrictions on the use of the LRN, such as prescribed routing for vehicles, a cap on the number of daily vehicles and restrictions on delivery times.

NPS for Electricity Networks Infrastructure (EN-5) 2024 (Ref 9-4):

- 9.2.21 Paragraph 2.9.19 states that Applicants should:

“...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.”

National Planning Policy Framework 2024 (NPPF) (Ref 9-5):

- 9.2.22 The National Planning Policy Framework (NPPF) as revised in December 2024 sets out national planning policies that reflect priorities of the government for the 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 important and relevant to the Secretary of State’s consideration of the Scheme. Listed below provides details of the elements of the NPPF that are relevant to this chapter, and how and where they are covered in the ES.



9.2.23 Paragraph 116 states:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

9.2.24 Paragraph 118 states:

“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.”

9.2.25 In accordance with this requirement, **ES Appendix 9.2: Transport Assessment [APP/6.4]** has been prepared. Initial measures to be written into the detailed Travel Plan are initially detailed within the **oCTMP [APP/7.7]**, with a detailed Travel Plan secured as part of the Final CTMP, which is to be secured through the DCO and provided prior to commencement of the construction phase of the Scheme.

9.2.26 The **oOTMP [APP/7.9]** is secured by way of requirement on the DCO to ensure that the operational impacts are appropriately mitigated and in accordance with the NPPF.

Local Planning Policy

9.2.27 The Scheme is located within the administrative areas of NCC and Breckland Council (BC), who are the host authorities. Local planning plan policies, which are relevant to Transport and Access and have informed the assessment, are detailed below.

NCC Local Transport Plan 4 Strategy 2021-2036 (2022) (Ref 9-6):

9.2.28 Policy 2 states:

“The priority for reducing emissions will be to support a shift to more sustainable modes and more efficient vehicles, including lower carbon technology and cleaner fuels; this includes the facilitation of necessary infrastructure.”

Breckland Council Local Plan (2023) (Ref 9-7):

9.2.29 Policy TR 01 Sustainable Transport Network states that:

“Development should:

- seek to minimise the need to travel*
- promote opportunities for sustainable transport modes*
- not adversely impact on the operation or safety of the strategic road network*
- improve accessibility to services; and support the transition to a low carbon future”*



9.2.30 Policy TR 02 states:

“Development proposals that are likely to generate a significant number of heavy goods vehicle movements will be required to demonstrate by way of a Routing Management Plan that no severe impacts will be caused to the efficient and safe operation of the road network and no material harm caused to the living conditions of residents”.

9.2.31 Policy TR 02 also states:

“Major development proposals should include an assessment of the impacts of new development on the existing transport network; and demonstrate how they will maximise connectivity within and through a development and to the surrounding areas, including the provision of high quality and safe pedestrian and cycle routes. Where potential transport impacts are identified, developers will be expected to produce Transport Assessments to assess the impacts and identify appropriate mitigation, together with Travel Plans where appropriate.”

9.2.32 In response to this policy, the submission is accompanied by **Appendix 9.2 Transport Assessment [APP/6.4]**, the **oCTMP [APP/7.7]** and the **oOTMP [APP/7.9]** to set out the mitigation strategy for the Scheme. The Travel Plan measures are initially detailed within the oCTMP, with a full version of the Travel Plan secured as part of the detailed CTMP that is to be provided prior to commencement of construction.

Other Guidance

IEMA EATM Guidance

9.2.33 The assessment methodology discussed within the **ES Chapter 9: Transport and Access [APP/6.2]** has been informed by IEMA EATM Guidance.

National Highways Strategic Road Network and the Delivery of Sustainable Development (2022) (Ref 9-8).

9.2.34 NH act as the highway authority for the Strategic Road Network (SRN) in England and for the A47 in proximity to the Scheme.

9.2.35 The circular ‘Strategic Road Network and the Delivery of Sustainable Development’ (2022) sets out the how NH govern their network and seek to help deliver sustainable development without compromising the SRN.

9.2.36 The circular states that NH:

“expects development promoters to enable a reduction in the need to travel by private car and prioritise sustainable transport opportunities ahead of capacity enhancement”.



References

- Ref 9-1 Climate Change Act 2008.
- Ref 9-2 Overarching National Policy Statement for Energy (EN-1). Department for Energy Security and Net Zero, 2024.
- Ref 9-3 National Policy Statement for Renewable Energy Infrastructure (EN-3). Department for Energy Security and Net Zero, 2024.
- Ref 9-4 National Policy Statement for Electricity Networks Infrastructure (EN 5). Department for Energy Security and Net Zero, 2024.
- Ref 9-5 Department for Levelling Up, Housing and Communities. National Planning Policy Framework (NPPF), 2024.
- Ref 9-6 Norfolk County Council (2022). Local Transport Plan 4 Strategy 2021–2036.
- Ref 9-7 Breckland Council (2023). Breckland Local Plan
- Ref 9-8 National Highways (2022). Strategic Road Network and the Delivery of Sustainable Development



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