

The Drovers Solar Farm

Appendix 14.1: Consultation and Legislation, Planning Policy and Guidance

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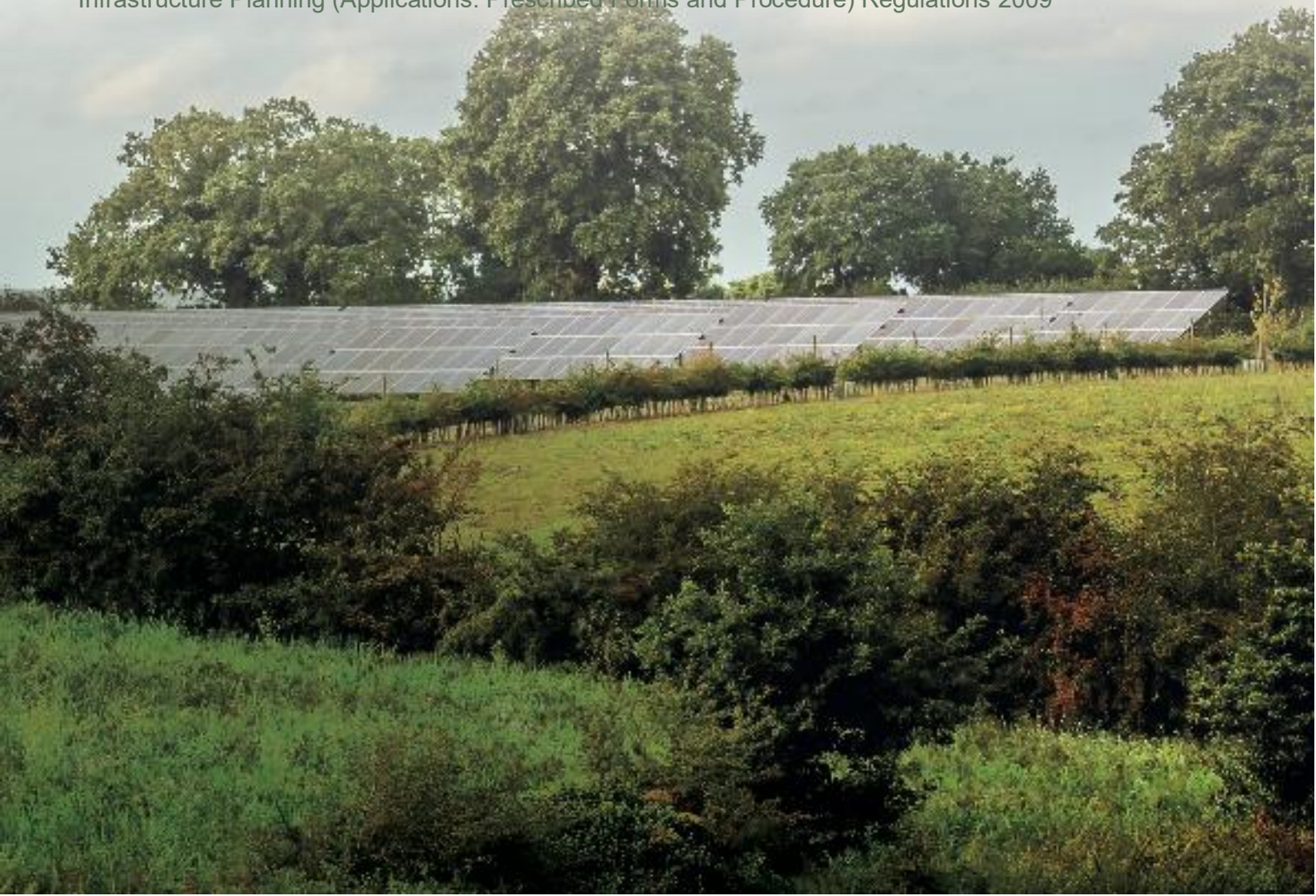
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List of Contents

<u>14</u>	<u>Consultation and Legislation, Planning Policy and Guidance Consultation.....</u>	<u>1</u>
14.1	Consultation.....	1
14.2	Legislation, Planning Policy and Guidance.....	22



List of Tables

Table 14-1 Relevant Scoping Opinion Comments from Statutory Bodies relating to socio-economics.....	2
Table 14-2 Responses to the PEIR relating to socio-economics	13



14 Consultation and Legislation, Planning Policy and Guidance Consultation

14.1 Consultation

Scoping Opinion

- 14.1.1 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.
- 14.1.2 The issues raised in the Scoping Opinion relating to human health are summarised and responded to within **Table 14-1** which demonstrates how the matters raised in the Scoping Opinion are addressed in **ES Chapter 14: Socio-Economics [APP/6.2]**.



Table 14-1 Relevant Scoping Opinion Comments from Statutory Bodies relating to socio-economics

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 Planning Inspectorate, Scoping Opinion, December 2024	ID: 3.11.1, Paragraph 16.7.6, Table 16.4 - Employment – Operation The Inspectorate agrees that Operational employment is unlikely to be significant. This matter can be scoped out of the ES.	Noted. This has been scoped out of the ES.	N/A
	ID: 3.11.2, Paragraph 16.7.7 – 16.7.9, Table 16.4 - Loss of agricultural land – All phases The Scoping Report proposes to scope this matter out on the basis that the agricultural land on site represents a small percentage of the UKs total agricultural land area. The Inspectorate notes that the total land take for the site is approximately 1133ha and an ALC Survey is currently being undertaken. As the ALC grade for the site is not currently known, it is not possible to rule out significant effects at this stage and the Inspectorate does not agree to scope this matter out. The ES should either assess the impacts from the loss of	Noted. The ALC survey results of the Order limits are set out in ES Chapter 11: Soils and Agriculture [APP/6.2] which identifies that the agricultural land within the Site represents 0.005% of the UK's utilised agricultural area. The breakdown of the survey results shows that 41% of the land is of poor quality, 54% is identified as BMV land, and the remaining 5% comprises non-agricultural land, woodland, non-surveyed areas, and roads. Given the high proportion of BMV land, this effect is scoped into the ES.	The assessment of land uses has been scoped into the assessment and is addressed throughout ES Chapter 11: Soils and Agriculture [APP/6.2] .



	agricultural land or, if the percentage of BMV land is found to be negligible, provide a statement, supported by the ALC grading of the site, explaining why the loss of agricultural land would not be significant.		
	<p>ID: 3.11.3, Paragraphs 16.7.11 – 16.7.12, Table 16.4 - Disruption to local businesses – All phases</p> <p>The Inspectorate agrees that the Proposed Development is unlikely to have a significant effect on local businesses and this matter can be scoped out of the ES.</p>	Noted. This has been scoped out of the ES.	N/A
	<p>ID: 3.11.4, Paragraphs 16.7.6, Table 16.4</p> <p>Changes in demand for temporary workers accommodation – Construction and decommissioning</p> <p>The Scoping Report proposes to scope this matter out on the basis that the supply of construction workers in the local area far exceeds the demand created by the Proposed Development and the number of specialist workers</p>	Noted. Further analysis of the supply of visitor accommodation within a 60-minute commutable distance was undertaken. To fully understand the Scheme's impact, a robust assessment is carried out to establish the number of workers requiring accommodation during the Construction Phase and to review the existing supply of visitor accommodation within a 60-minute commute. This matter is therefore scoped into the ES.	This baseline analysis can be found in Paragraph 14.6.29 and the assessment can be found in Section 14.8 of ES Chapter 14: Socio-Economics [APP/6.2] .



	<p>that are located further afield would not be significant.</p> <p>Limited information has been provided on the accommodation capacity of the local area and the Inspectorate is therefore not in a position to scope this matter out.</p>		
	<p>ID: 3.11.5, Paragraph 16.7.13, Table 16.4 - Changes in demand for health and social care – All phases</p> <p>The Inspectorate agrees that the Proposed Development is unlikely to result in significant additional demand on health and social care services and this matter can be scoped out of the ES.</p>	<p>Noted. This has been scoped out of the ES.</p>	<p>N/A</p>
	<p>ID: 3.11.6, Paragraphs 16.7.14 – 16.7.15, Table 16.4 - Access to open space and Public Rights of Way (PRoW) – All Phases</p> <p>The Scoping Report states that any PRoWs on site are located along access routes and are unlikely to be affected by the Proposed Development and that they are unlikely to see significant use. The Inspectorate notes that PRoW usage surveys have not been undertaken for the</p>	<p>PINS has requested a Public Right of Way (PRoW) usage survey to assess the frequency of use for these routes. PINS has also asked for clarification on whether any PRoW are proposed to be closed or re-routed during construction and decommissioning.</p> <p>ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4] identifies that no physical effects (i.e. permanent extinguishment or permanent diversion) to the PRoW are proposed. Temporary closures or diversions may be required for a very limited time period during construction to establish internal access tracks within the Order limits where they cross PRoW but will be limited in extent and duration (it is likely to take a few days to construct an access track across an existing PRoW). These diversions will be managed in accordance with the measures set out in the outline</p>	<p>This assessment can be found in ES Chapter 15: Human Health [APP/6.2].</p>



	<p>Proposed Development. Furthermore, it is not explicit within the report whether any PRoWS are proposed to be closed or re-directed during construction and decommissioning. As such, the Inspectorate is not in a position to scope this matter out and the ES should assess the impact on PRoWs and access to open space during construction and decommissioning phases.</p>	<p>Construction Environmental Management Plan (oCEMP) [APP/7.6] and outline Decommissioning Strategy (oDS) [APP/7.10], such as providing clear signage to recreational users and banksmen to manage plant movements and crossing where appropriate.</p> <p>It is more appropriate to assess this potential effect in relation to human health rather than socio-economics. The health assessment considers changes to both physical health and wellbeing resulting from access to these types of spaces. Therefore, socio-economic effects related to PRoW, open space, and physical activity are scoped out from further assessment in ES Chapter 14: Socio-Economics [APP/6.2] but are considered from a health perspective in ES Chapter 15: Human Health [APP/6.2].</p>	
	<p>ID 3.11.7, Paragraph 16.7.16 , Table 16.4 - Changes in crime and community safety – All Phases</p> <p>The Inspectorate agrees that the Proposed Development is unlikely to result in significant effects on crime and community safety. This matter can be scoped out of the ES. However, the Applicant's attention is drawn to the consultation response from Norfolk Constabulary (Appendix 2 of this Opinion) in relation to the layout, environmental design and the physical security of buildings.</p>	<p>Noted. This has been scoped out of the ES. The Norfolk Constabulary's response regarding layout, environmental design, and physical security has been noted and considered in the overall design of the Scheme.</p>	<p>N/A</p>



	<p>ID 3.11.8, Paragraph 16.7.17. Table 16.4, Changes in commuting patterns – All phases</p> <p>The Scoping Report proposes to scope this matter out on the basis that the site is served by roads with a good level of transport capacity and traffic generated by the Proposed Development would be mitigated by the measures outlined in the Construction Traffic Management Plan (CTMP). The Inspectorate notes that Driver Delay and other construction traffic impacts are scoped into the Transport and Access chapter (Paragraph 9.8.2). As such, the Inspectorate is not in a position to scope this matter out and the ES should assess changes in commuting patterns during construction and decommissioning of the Proposed Development. The Inspectorate agrees however that the operation of the Proposed Development is not likely to result in significant changes to commuting patterns and this matter can be scoped out of the ES.</p>	<p>Operation phase: Noted. This has been scoped out of the ES during the operation phase.</p> <p>Construction and decommissioning phase: ES Chapter 9: Transport and Access [APP/6.2] has scoped in delays and other construction impacts in its assessment.</p>	<p>The baseline analysis can be found in Paragraph 14.6.42 and the assessment can be found in Section 14.8 of ES Chapter 14: Socio-Economics [APP/6.2].</p>
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	<p>ID 3.11.9, Paragraph 16.7.27, Table 16.4 - Spending generated by workers – Operation</p> <p>The Scoping Report proposes to scope this matter out on the basis that there would not be significant amounts of staff required for the Operational Phase. On this basis, the Inspectorate agrees that there is unlikely to be significant amounts of spending generated by workers during the Operational Phase. This matter can be scoped out of the ES.</p>	<p>In the Scoping Report, it was proposed that operational worker spending would be scoped out of the assessment, and PINS agreed with this approach. This position remains unchanged. At that stage, it was also intended that construction worker spending would be scoped in.</p> <p>This position has since been reviewed. The spending associated with construction workers has also been scoped out of the assessment, as it is not expected to be significant. At its peak, the construction period would support around 740 workers, equivalent to approximately 2% of the local construction workforce, but this level would only be sustained for six months. Across the two-year construction period, the average number of workers would be lower at around 355.</p> <p>Construction workers earn between £23,000-£35,000 per year depending on experience, but because they are highly mobile and often travel to different locations for work, it is uncertain where their earnings will be spent.¹ While some spending may occur locally, most is expected to take place near their temporary accommodation. The nearest town, Swaffham (2km away), has some food and retail options, but the scale of spending is unlikely to be significant. The next major town, King's Lynn, is over 25km away, further reducing the likelihood of significant local spending.</p> <p>It is estimated that between 50% and 75% of construction workers will relocate temporarily during the construction period, spending an average of £51 per day on accommodation and food, based on Construction Industry Joint Council allowances.² This would result in total spending of between £3.9 million and £5.9 million over the construction period, based on the average number of construction workers employed (assuming 220 working days per year). This spending would be distributed across the Labour Catchment Area,</p>	<p>N/A</p>
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¹ National Careers Service, 2025. Construction labourer

² CIJC, 2024. Working Rule Agreement



	<p>which includes East Cambridgeshire, Fenland, South Holland, Breckland, Broadland, King's Lynn and West Norfolk, North Norfolk, South Norfolk, Mid Suffolk, West Suffolk, and Norwich. To illustrate the relative scale of impact, if all spending were concentrated within Breckland alone, it would represent just 0.7% of annual convenience and comparison goods spending (£902.3 million). In practice, the spending would be spread across a much wider area, making the effect even less likely to be significant.</p> <p>Given the uncertainty around exactly where spending will occur and the relatively small scale of this additional expenditure compared to the size of the local economy, this effect is unlikely to be significant and has therefore been scoped out of the assessment.</p>	
<p>ID 3.11.10, Paragraphs 16.7.29 – 16.7.31, Table 16.4 - Impact to property value – All phases</p> <p>The Scoping Report proposes to scope out an assessment of impacts to property value for all project phases on the basis that there is little evidence that property value is significantly affected by the development of solar farms. The Inspectorate agrees that significant effects are not likely in relation to property value and is content to scope these matters out.</p>	Noted. This has been scoped out of the ES.	N/A
<p>ID 3.11.11, Paragraph 16.4.1 - Guidance</p> <p>The Scoping Report states that professional judgement will be</p>	Noted. Recognised good practice methods and guidance have been applied to inform and support professional judgement, ensuring a coherent and robust assessment. An example of this is provided in the assessment of employment in the construction phase as set out	N/A



	used for the assessment, stating that there is a lack of procedural guidance. Whilst this is acceptable in principle, the ES should still point toward recognised good practice methods and guidance that have influenced the professional judgement to ensure a coherent assessment.	in paragraph 14.8.4 of ES Chapter 14: Socio-Economics [APP/6.2] .	
	<p>ID 3.11.12, N/A</p> <p>Public Rights of Way (PRoW) and Walking, Cycling and Horse Riding (WCH) receptors</p> <p>The Scoping Report states that there are numerous PRoW in proximity and within the site. Surveys should be undertaken to provide baseline data in relation to the use of the PRoWs affected by the Proposed Development. The ES should assess impacts to PRoW and on WCH receptors from the Proposed Development such as the need for temporary closures or diversions, where significant effects are likely to occur.</p>	<p>PINS has requested a Public Right of Way (PRoW) usage survey to assess the frequency of use for these routes. PINS has also asked for clarification on whether any PRoW are proposed to be closed or re-routed during construction and decommissioning.</p> <p>ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4] identifies that no physical effects (i.e. permanent extinguishment or permanent diversion) to the PRoW are proposed. Temporary closures or diversions may be required for a very limited time period during construction to establish internal access tracks within the Order limits where they cross PRoW but will be limited in extent and duration (it is likely to take a few days to construct an access track across an existing PRoW). These diversions will be managed in accordance with the measures set out in the oCEMP [APP/7.6] and oDS [APP/7.10], such as providing clear signage to recreational users and banksmen to manage plant movements and crossing where appropriate.</p> <p>It is more appropriate to assess this potential effect in relation to human health rather than socio-economics. The health assessment considers changes to both physical health and wellbeing resulting from access to these types of spaces. Therefore, socio-economic effects related to PRoW, open space, and physical activity are scoped out from further assessment in ES Chapter 14: Socio-</p>	<p>This assessment can be found in ES Chapter 15: Human Health [APP/6.2].</p>



		Economics [APP/6.2] but are considered from a health perspective in ES Chapter 15: Human Health [APP/6.2] .	
Norfolk Council, Breckland Council, Borough Council of King's Lynn and West Norfolk, March 2025	Employment and skills: Stakeholders were satisfied with the overall approach, but want to ensure that relevant partner organisations are engaged with.	<p>The Applicant will continue engagement post-application, as secured through the outline Employment, Skills and Supply Chain Strategy (oESSCS) [APP/7.15], to support the development and delivery of the detailed Employment, Skills and Supply Chain Strategy (ESSCS). This engagement will involve the following stakeholders to ensure the strategy remains aligned with local priorities and opportunities:</p> <ul style="list-style-type: none"> • Breckland, King's Lynn & West Norfolk (KLWN), Norfolk employment & skills teams; • College of West Anglia (KLWN); • City College Norwich; • East Coast College (Yarmouth); • Breckland Skills Assembly; • Boost Programmes (KLWN & Breckland); • Careers Hub (Norfolk County Council); and • Apprenticeships Norfolk. 	No response needed within ES Chapter 14: Socio-Economics [APP/6.2] , however, further details on post-application engagement commitments are set out in the oESSCS [APP/7.15] .
Norfolk Council, Breckland Council, Borough Council of King's Lynn and West Norfolk	Tourism accommodation Breckland Council was happy with the approach with respect to tourism accommodation that could be used by construction workers during the Construction Phase. No issues were raised	The assessment presents the findings of the analysis of the availability of temporary accommodation for construction workers and tests different scenarios across varying travel times. To ensure robustness, the analysis first considered the wider labour catchment area, reflecting the full geography from which workers could realistically travel. It then focused specifically on KLWN and Breckland, as these Local Authority Districts are closest to the Site and therefore, the most reasonable locations for construction	This has been considered in Paragraph 14.6.29 to Paragraph 14.6.31 in ES Chapter 14: Socio-Economics [APP/6.2] .



Norfolk, March 2025	<p>about capacity for the construction workers who may need to stay in the Labour Catchment Area during the Construction Phase.</p> <p>Officer is going to coordinate with colleagues to undertake further checks/comparisons on the data.</p>	<p>workers to seek accommodation. This narrower geographic focus provides a more conservative assessment of potential pressures on local visitor accommodation.</p>	
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Statutory Consultation and Preliminary Environmental Information Report (PEIR)

- 14.1.3 Statutory consultation was held between 21 May 2025 and 9 July 2025. Relevant responses to the PEIR relating to human health and how these have been addressed through the ES are set out in **Table 14-2** below.



Table 14-2 Responses to the PEIR relating to socio-economics

Consultee and Date	Comment	How has the comment been addressed in the ES chapter	Location of response in ES Chapter
Mid Suffolk District Council, June 2025	Mid Suffolk falls within the Labour Catchment Area and the need for temporary accommodation for the workforce [during the construction period] is of concern. This is again owing to the cumulative impacts from the need for temporary accommodation across this area to support the delivery of other Nationally Significant Infrastructure Projects and major renewable projects in the region. It needs to be clearly demonstrated that the potential cumulative impacts on accommodation, both in terms of tourism and private rentals within Mid Suffolk have been taken into account and sufficiently mitigated.	<p>The assessment of temporary accommodation presents the findings of the analysis of the availability of temporary accommodation for construction workers and tests different scenarios across varying travel times (see Paragraph 14.6.29). To ensure robustness, the analysis (see Section 14.8 of ES Chapter 14: Socio-Economics [APP/6.2]). first considered the wider labour catchment area, reflecting the full geography from which workers could realistically travel. It then focused specifically on KLWN and Breckland, as these Local Authority Districts are closest to the Site and therefore the most reasonable locations for construction workers to seek accommodation. This narrower geographic focus provides a more conservative assessment of potential pressures on local visitor accommodation.</p> <p>The Applicant also notes this comment in relation to cumulative effects. The cumulative impacts are considered and presented</p>	The assessment of temporary accommodation is set out in Section 14.8 while the assessment of cumulative impacts is presented in Section 14.11 of ES Chapter 14: Socio-Economics [APP/6.2] .



			within the cumulative effects assessment in Section 14.11 in ES Chapter 14: Socio-Economics [APP/6.2] .	
Breckland Council, June 2025		Breckland Council is supportive of the proposed enhanced public recreation opportunities, to include new and enhanced footpaths.	The Applicant makes note of this comment.	N/A
Breckland Council, June 2025		Chapter 14 of the PEIR addresses the socio-economic impacts of the proposal in terms of the likely effects on the local economy, including skills and employment. It is estimated that “the Construction Phase would support an indicative peak of approximately 740 construction jobs. In total, the Construction Phase would support approximately 1,245 construction jobs. Applying a displacement rate of 50%, it is estimated that there will be approximately 625 net direct jobs created during the Construction Phase”. When accounting for indirect and induced jobs, the PEIR estimates approximately 155-310 net direct jobs for residents in Breckland over the Construction Phase which is said to be equivalent to a 0.2%-0.5% uplift on the current baseline positions for residents in construction jobs in Breckland.	The Applicant makes note of this comment. Taking the net direct and net indirect jobs together, the Scheme is expected to support 1,145 net additional jobs during the construction phase, with between 285 and 575 of these being taken by LCA residents. When accounting for direct jobs, the Scheme is estimated to support approximately 155-310 net direct jobs per annum for residents in the LCA over the construction phase. This is equivalent to a 0.2%-0.5% uplift on the existing baseline positions for residents in construction jobs in the LCA.	N/A
Breckland Council, June 2025		A preliminary Employment and Skills Strategy has been included as part of the consultation suite. It is noted and supported that a full Outline Employment and Skills Strategy (OESS) will be submitted with the DCO Application, setting out a refined list of commitments with further detail, along with the steps required to ensure they are effectively secured and implemented. It is	The Applicant will continue engagement post-application, as secured through the oESSCS [APP/7.15] , to support the development and delivery of the ESSCS. This engagement will involve the following stakeholders to ensure the strategy remains	No response needed within ES Chapter 14: Socio-Economics [APP/6.2] , however, further details on post-application engagement commitments are set out in the b [APP/7.15] .



	considered that the potential for training to lead onto roles at Drovers Solar Farm should be investigated, considered and assessed as part of the OEES. Breckland Council is supportive of the employment and skills proposals, however, notes that long term employment benefits will be minimal given the nature of the operational requirements.	aligned with local priorities and opportunities including the potential for training initiatives: <ul style="list-style-type: none"> • Breckland, KLWN, Norfolk employment & skills teams; • College of West Anglia (King's Lynn); • City College Norwich; • East Coast College (Yarmouth); • Breckland Skills Assembly; • Boost Programmes (King's Lynn & Breckland); • Careers Hub (Norfolk County Council); and • Apprenticeships Norfolk. 	
Breckland Council, June 2025	It is considered that the ES should include an assessment of the wider socio economic benefits arising from the proposal both in isolation and cumulatively with other major energy projects in the locale. Of particular relevance is the High Grove Solar Farm scheme, given the close proximity (including area of overlap in the current iterations).	The Applicant notes this comment and concurs that in ES Chapter 14: Socio-Economics [APP/6.2] assesses the wider socio-economic impacts arising from the proposal both in isolation and cumulatively, including in relation to the High Grove Solar Farm.	The assessment of the wider socio-economic benefits arising from the Scheme both in isolation (see Section 14.8) and cumulatively (see Section 14.11) with other major energy projects in the relevant study areas have been addressed in in ES Chapter 14: Socio-Economics [APP/6.2] .
Sporle with Palgrave PC, June 2025	In addition, this industrialisation will lead to the loss of agriculturally related employment and its subsequent impact on wellbeing. (Although the suicide rate amongst farmers is well known it is double that rate amongst farm workers.) The	The overall loss of employment is expected to be negligible and, as agreed with PINS at scoping, has therefore not been included within the assessment. In addition,	This assessment can be found in ES Chapter 15: Human Health [APP/6.2] .



	main impact will be on the ancillary services such as on lorry drivers and other support businesses to agriculture.	mental health impacts relating to employment are considered as part of ES Chapter 15: Human Health [APP/6.2] .	
Sporle with Palgrave PC, June 2025	Although there may be some temporary local benefits in employment locally during the construction phase, we expect an overall a loss of employment in the area.	<p>The overall loss of employment arising from the conversion of agricultural land is expected to be negligible. An assessment by Kernon Countryside Consultants concluded that the numbers of workers on-site is somewhere in the range of 10-15 Full Time Equivalent (FTE) jobs.</p> <p>During the Operation and Maintenance phase, arable activities will likely need to cease altogether due to the introduction of solar panels. There is potential for alternative agricultural activity such as sheep grazing under and around the solar panels, and overall, the quantum of agricultural labour is not expected to change significantly due to the shift from arable production to sheep-based enterprises (if this were to occur).</p> <p>On this basis, the net effect on employment is considered to be low, and as agreed with PINS at scoping, has not been included within the assessment.</p>	N/A



Norfolk Constabulary, June 2025	The PEIR Chapter 14 - Socio-economics & Human Health (May 2025) states a total of 1,245 construction workers (740 @ monthly peak) are required on site over the construction period (2031 - 2033). 50-75% of the workforce would be located outside the 1-hour travel time 'Labour Catchment Area' & would therefore be 'non – home based' & accommodated within the private rental sector locally.	The Applicant has noted this comment.	This comment is addressed in Paragraphs 14.6.28 to 14.6.33 in ES Chapter 14: Socio-Economics [APP/6.2] .
Norfolk County Council, June 2025	The Applicant has estimated, taking the net direct and net indirect jobs together, that the Project is expected to support 1,145 net additional jobs during the Construction Phase (extending over a twenty-four-month period), with between 285 and 575 of these being taken by local residents.	The Applicant makes note of this comment. The Scheme is still expected to support approximately 1,145 net additional jobs over the twenty-four-month construction period, with 285-575 of these anticipated to be taken by local residents in the Labour Catchment Area (see ES Chapter 14: Socio-Economics [APP/6.2]).	N/A
Norfolk County Council, June 2025	A Preliminary Employment and Skills Strategy (PESS) has been prepared and outlines the initial themes and potential employment and skills initiatives that could be implemented as part of the Project. The aim of the strategy, it states is to generate local employment and skills opportunities, ensuring that local businesses and workers benefit during both the construction and operational phases, which is to be welcomed. However, once the development is operational the number of permanent jobs will be small involving limited operational employment opportunities (due to	The Applicant makes note of this comment.	No response needed within the ES.



	the nature of the development), that consist of operation and maintenance crews (including technical professions such as electrical engineers and performance managers), landscaping, and occasional repair teams.		
Norfolk County Council, June 2025	The inclusion of a Preliminary Employment and Skills Strategy (PESS) and the Applicant's early commitment to supporting local jobs, apprenticeships, education provider engagement, and green skills awareness is welcome. To ensure these commitments are meaningful, deliverable, and aligned with Norfolk's strategic ambitions for skills development and local labour market outcomes, an Outline Employment and Skills Strategy (OESS) should be submitted with the DCO Application; or be prepared as a requirement of the DCO process. Such a strategy should also refer to supply chain matters.	The Applicant makes note of this comment. An oESSCS [APP/7.15] is delivered as part of this DCO Application. Finalisation and implementation of the ESSCS will thereafter be drafted substantially in accordance with the detailed oESSCS and will be subject to approval from Breckland Council as the relevant discharging authority in consultation with the Borough Council of KLWN	No response needed within the ES.
Norfolk County Council, June 2025	The Environmental Impact Assessment (EIA) will also need to assess the wider economic benefits arising from the above development both in terms of the Project coming forward on its own and in combination with other major energy projects in the area, particularly the adjacent High Grove Solar Farm project.	The Applicant notes this comment and concurs that in ES Chapter 14: Socio-Economics [APP/6.2] , assesses the wider socio-economic impacts arising from the proposal both in isolation and cumulatively, including in relation to the High Grove Solar Farm.	The assessment of the wider socio-economic benefits arising from the Scheme both in isolation (see Section 14.8) and cumulatively (see Section 14.11) with other major energy projects in the relevant study areas have been addressed in in ES Chapter 14: Socio-Economics [APP/6.2] .



Norfolk County Council, June 2025	The Norfolk County Council Employment and Skills team welcomes the inclusion of a Preliminary Employment and Skills Strategy (PESS) and the Applicant's early commitment to supporting local jobs, apprenticeships, education provider engagement, and green skills awareness. The team particularly note the longlist of initiatives under section 14.5 of the PEIR, including potential collaborations with local programmes such as the Careers Hub, the Boost Programme, and the Breckland Skills Assembly	The Applicant makes note of this comment.	No response needed within the ES.
Norfolk County Council, June 2025	To ensure these commitments are meaningful, deliverable, and aligned with Norfolk's strategic ambitions for skills development and local labour market outcomes, the team request that the Outline Employment and Skills Strategy (OESS), to be submitted with the DCO Application, incorporates and clearly addresses the following (as set out in the rows below):	The Applicant has noted this comment. Norfolk's NSIP Employment and Skills Framework is incorporated into the oESSCS [APP/7.15] . Specific measures are set out in the oESSCS [APP/7.15] .	No response needed within the ES.
Norfolk County Council, June 2025	Alignment with Norfolk's NSIP Employment and Skills Framework The Council has developed a framework to guide expectations for Nationally Significant Infrastructure Projects (NSIPs) in Norfolk (see attached). We ask that the OESS responds directly to this Framework, which outlines tiered levels of commitment expected from developers, including: o Supplying local labour needs across construction and operational	The Applicant has noted this comment. Norfolk's NSIP Employment and Skills Framework is incorporated into the oESSCS [APP/7.15] . Specific measures are set out in the oESSCS [APP/7.15] .	No response needed within the ES.



	<p>phases.</p> <ul style="list-style-type: none"> o Apprenticeship starts and completions. o Engagement with education (site visits, curriculum input, work experience). o Employment brokerage or supply chain mapping to help connect local SMEs and jobseekers to opportunities. 		
Norfolk County Council, June 2025	<p>Collaboration with Existing Programmes</p> <p>Specific proposals should set out how the Project will collaborate with Norfolk County Council and local skills interventions:</p> <ul style="list-style-type: none"> o Careers Hub and Boost Programme to deliver employer encounters, internships, and career inspiration aligned with the Gatsby Benchmarks. o Skills Bootcamps or relevant Adult Learning offers to build local readiness for solar construction, operations, and maintenance. o Local colleges and training providers, such as the College of West Anglia, East Coast College, and City College Norwich, e.g. for delivering relevant Level 2-3 skills in solar PV installation, BESS maintenance, and land management. 	<p>The Applicant has noted this comment. Norfolk's NSIP Employment and Skills Framework is incorporated into the oESSCS [APP/7.15]. Specific measures are set out in the oESSCS [APP/7.15].</p>	No response needed within the ES.
Norfolk County Council, June 2025	<p>Securing and Monitoring Delivery</p> <p>The OESS should outline mechanisms for ensuring the delivery of commitments, including:</p> <ul style="list-style-type: none"> o Targets for local employment and 	<p>The Applicant has noted this comment. Norfolk's NSIP Employment and Skills Framework is incorporated into the oESSCS</p>	No response needed within the ES.



	<p>apprenticeships.</p> <ul style="list-style-type: none"> o A named liaison responsible for working with the County Council and local education/training providers. o Participation in a Skills and Employment Monitoring Group, reporting outcomes annually. 	[APP/7.15]. Specific measures are set out in the oESSCS [APP/7.15] .	
Norfolk County Council, June 2025	<p>Engagement with the Local Supply Chain</p> <p>As outlined in the PEIR, local procurement is a key part of the skills ecosystem. The OESS should detail:</p> <ul style="list-style-type: none"> o How local contractors and suppliers will be identified and supported to bid. o A register or portal where job openings and sub-contracting opportunities will be advertised locally 	The Applicant has noted this comment. Norfolk's NSIP Employment and Skills Framework is incorporated into the oESSCS [APP/7.15] . Specific measures are set out in the oESSCS [APP/7.15] .	No response needed within the ES.
Norfolk County Council, June 2025	Norfolk County Council would welcome further engagement with the Applicant ahead of the DCO submission to help shape a targeted and deliverable OESS that ensures Norfolk's residents and businesses benefit from the opportunities this Project presents.	The Applicant has noted this comment. Norfolk's NSIP Employment and Skills Framework is incorporated into the oESSCS [APP/7.15] . Specific measures are set out in the oESSCS [APP/7.15] .	No response needed within the ES.
Norfolk County Council, June 2025	Should you have any queries with the above comments please contact [redacted] (Employment and Skills Manager) [redacted]	The Applicant makes note of this comment.	No response needed within the ES.



- 14.1.4 Further engagement specific to socio-economics was not considered to be required following the PEIR responses above.

14.2 Legislation, Planning Policy and Guidance

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

Legislation and Regulations

Equality Act 2010 (Ref 14-1)

- 14.2.2 The Equality Act legally protects people from all discrimination in the workplace and in wider society. This was introduced to replace the previous anti-discrimination laws, via this single Act. Section 149 of the Act requires public authorities to have due regard to several equality considerations when exercising their functions. This includes eliminating discrimination and advancing equality of opportunity between persons with a protected characteristic and persons without. The act defines the following nine protected characteristics;

- Age;
- Disability and/or long-term health problems (including those with mental health problems);
- Sex;
- Gender and gender reassignment / identities;
- Marital and civil partnership status;
- Pregnancy and maternity / paternity;
- Race;
- Religion or philosophical belief; and
- Sexual orientation.

Planning Act 2008 Ref (14-2)

- 14.2.3 The Planning Act 2008 establishes the development consent process for Nationally Significant Infrastructure Projects (NSIPs). It provides the legal framework for the preparation, submission, and examination of Development Consent Order (DCO) applications. Under the Act, the Secretary of State is the decision-making authority and must have regard to relevant National Policy Statements and other important and relevant matters in determining applications.



Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Ref 14-3)

- 14.2.4 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 require that projects which might have significant effects on the environment to carry out a formal impact assessment. The Infrastructure Planning Regulations cover projects that are classified as Nationally Significant Infrastructure Projects, which are regulated under the Planning Act 2008.

Planning Policy

National Planning Policy

- 14.2.5 The 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 this Development Consent Order (DCO) Application for the Scheme have been considered. Listed below are the details of the elements of NPS considered relevant to the Socio Economics assessment.
- 14.2.6 The NPS guidance makes it easier for decision makers, applicants and the wider public to understand:
- Government policy on the need for nationally significant infrastructure projects (NSIPs)
 - How applications for energy infrastructure will be assessed; and
 - The way in which impacts and mitigations will be judged.

Overarching National Policy Statement for Energy (EN-1) (Ref 14-4)

- 14.2.7 Section 3.3 highlights the need to ensure a secure, reliable, and affordable supply of energy to support the UK's population and businesses. It recognises that energy infrastructure is critical to economic growth, productivity, and the transition to net zero, and therefore the planning system should support the timely delivery of new energy capacity;
- 14.2.8 Section 5.13 outlines the principles for assessing socio-economic impacts, stating that the assessment should consider direct, indirect, and cumulative effects on employment, skills, and local services. It also notes that decision-makers should give appropriate weight to the socio-economic benefits of proposed energy infrastructure, including job creation and wider economic opportunities;

NPS for Renewable Energy Infrastructure EN-3 (Ref 14-5)

- 14.2.9 Paragraph 2.10.69 states that applicants should set out where there may be socio-economic benefits in retaining infrastructure after the operational life, such as retaining pathways through the site. It also states that the Secretary of State should take into the account the economic (and other) benefits of the best and most versatile agricultural land and ensure the applicant puts forward appropriate mitigation measures to minimise the impacts on soils or soil resources.



- 14.2.10 Paragraph 2.6.2 states that where flexibility is sought in the consent, the likely worst-case social and economic effects of the Scheme should be assessed.

NPS for Electricity Networks Infrastructure EN-5 (Ref 14-65)

- 14.2.11 Paragraph 1.1.8 states that though decarbonisation is a priority for the government, the development of new infrastructure must minimise costs to consumers and limit community and environmental impacts where possible.

National Planning Policy Framework (NPPF) (2024) (Ref 14-7)

- 14.2.12 The NPPF 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 both important and relevant to the SoS 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.
- 14.2.13 Chapter 6 of the NPPF focuses on building a strong and competitive economy, stating that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach should allow for each area to build on its strengths, counter any weaknesses and address the challenges of the future.
- 14.2.14 Chapter 8 of the NPPF focusses on promoting healthy and safe communities, highlighting the role of the planning system in creating places that promote social interaction, are safe and accessible, and support healthy lifestyles. It encourages developments that contribute to community cohesion and well-being, including opportunities for employment, and the provision of social infrastructure.

National Planning Practice Guidance (PPG) (Ref 14-8)

- 14.2.15 The PPG section on 'Renewable and low carbon energy' highlights the role of planning in supporting the delivery of renewable infrastructure, encouraging positive consideration of schemes where impacts can be appropriately mitigated, and recognising their contribution to climate change objectives and local economic benefits.

Local Planning Policy

- 14.2.16 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 Climate Change and have informed the Climate Change assessment in **ES Chapter 14: Socio-Economics [APP/6.2]** are detailed below.



***Better Together, for Norfolk. Norfolk County Council Strategy (2021-2025)
[Ref 14-9]***

- 14.2.17 This document outlines the strategic objectives being prioritized for the 2021–2025 period. These objectives include creating a vibrant and sustainable economy, providing better opportunities for children and young people, fostering healthy, fulfilling, and independent lives, building strong, engaged, and inclusive communities, and promoting a greener, more resilient future. The NCC’s vision is for the County to be a place where everyone can start life well, live well, and age well, ensuring that no one is left behind. The aim is to cultivate a vibrant, entrepreneurial, and sustainable economy, supported by the right jobs, skills, training, and infrastructure. Additionally, communities should feel safe, healthy, empowered, and connected, with their unique characteristics respected and preserved.

Local Growth Plan: Norfolk Economic Strategy 2024-2029 (2025) (Ref 14-10)

- 14.2.18 This strategy acts as NCC’s Local Growth Plan, identifying local priorities and will provide a key role in the Government’s new Modern Industrial Strategy which seeks to ensure growth in every part of the UK. It closely aligns to the Government’s Five Missions, including Norfolk’s key role in making the UK an offshore clean energy superpower, and breaking down barriers to opportunity and kickstarting economic growth.

Breckland Local Plan (2023) (Ref 14-11)

- 14.2.19 BC’s Local Plan Policy EC 04 – Employment Development Outside General Employment Areas supports proposals for employment uses in locations beyond designated employment sites where they can demonstrate clear economic benefits and are appropriately scaled. In addition, it identifies 19 strategic objectives for all new development. The objectives relevant to the Scheme include:

- Strategic objective 4 – “To adapt and mitigate against the impacts of climate change”; and
- Strategic objective 8 – “Promote and support economic growth in sustainable and accessible locations in a flexible manner, diversifying the urban and rural economic base of the District to enable a prosperous mix where investment is encouraged, skills are developed and retained and new and existing businesses are supported”.

Breckland Corporate Plan 2024 to 2028 (Ref 14-12)

- 14.2.20 This Corporate Plan sets out the approach to deliver BC’s vision for the district. It builds on the achievements of the plan launched in 2021. It includes tackling the challenges of major cost of living pressures and constraints on public spending, whilst seeking to position BC to benefit from the opportunities of rapidly changing technology and the national economy. BC aims to achieve the three following key themes:
- Inspiring Communities: Enabling everyone to lead happy, healthy, and fulfilling lives;
 - Thriving Places: Creating opportunities for skilled jobs and economic growth; and



- Working Smarter 2035: Protecting the environment, now and for future generations; and putting customers first by delivering quality, value-for-money services that meet their needs.

Future Breckland – Thriving People and Places (2023) (Ref 14-13)

- 14.2.21 The Future Breckland programme sets out a comprehensive set of plans, co-designed with residents, businesses/public sector agencies and town council partners, to transition Breckland for the future. The anchor to the Future Breckland approach has been to focus the depth of detail on the opportunities presented within Breckland's five Market Towns, and their surrounding hinterlands. As a collectively owned community plan, Future Breckland informs future priorities and investment.

Breckland Housing and Economic Development Needs Assessment (HEDNA) (2024) (Ref 14-14)

- 14.2.22 The HEDNA provides evidence regarding the overall need for housing with assessment of the quantity and type of employment land needed. This document has analysed the economic baseline of Breckland and has identified key issues within the economy. This has been used to inform the update of the Breckland Local Plan.

Other Guidance

- 14.2.23 The assessment has been carried out in accordance with the following other guidance documents:

The Homes & Communities Agency (HCA) Additionality Guide, Fourth Edition (2014) (Ref 14-15)³

- 14.2.24 The guidance was produced by English Partnerships and provides guidelines to assess the impact of a Scheme after accounting for displacement, multiplier and leakage impacts. Additionality is defined as 'the extent to which activity takes place at all, on a larger scale, earlier or within a specific designated area or target group as a result of the intervention'. Whilst this document has now been withdrawn, it contains helpful guidance and provides the most up to date standards for assessing additionality.

The Ministry of Housing, Communities and Local Government (MHCLG) Appraisal Guide (2025) (Ref 14-16)

- 14.2.25 The MHCLG Appraisal Guide (2025) has superseded the Department for Levelling Up, Housing and Communities Additionality Guide (2023), which is has now been withdrawn. The MHCLG guide reflects the revised Green Book (2020) and Levelling Up White Paper (2022), providing additional advice on how to rigorously assess value for money and a greater focus on spatial and distributional impacts. However, in the context of additionality, the guidance is not as detailed in terms of specific assumptions around additionality.

³ HCA was replaced by Homes England and Regulator for Social Housing



Therefore, this analysis has utilised both the MHCLG guidance and the HCA Additionality Guide to assess additionality.



References

- Ref 14-1 Equality Act 2010, Government Equalities Office (2010)
- Ref 14-2 Planning Act 2008, Ministry of Housing, Communities and Local Government (2008)
- Ref 14-3 Infrastructure Planning (Environmental Impact Assessment) Regulations, Her Majesty's Stationery Office (HMSO) (2017)
- Ref 14-4 Overarching National Policy Statement for Energy (EN-1), Department for Energy Security and Net Zero (2023)
- Ref 14-5 National Policy Statement for renewable energy infrastructure (EN-3), Department for Energy Security and Net Zero (2023)
- Ref 14-6 National Policy Statement for electricity networks infrastructure (EN-5), Department for Energy Security and Net Zero (2023)
- Ref 14-7 National Planning Policy Framework, Ministry of Housing, Communities and Local Government (2024)
- Ref 14-8 Planning Practice Guidance, Ministry of Housing, Communities and Local Government (2024)
- Ref 14-9 Norfolk County Council, 2021, Better Together for Norfolk. Norfolk County Council Strategy (2021– 2025)
- Ref 14-10 Norfolk and Suffolk Economic Strategy, Norfolk and Suffolk County Councils (2022)
- Ref 14-11 Breckland District Council Local Plan, Breckland Council (2023)
- Ref 14-12 Breckland Corporate Plan 2024 to 2028, Breckland Council (2024)
- Ref 14-13 Future Breckland – Thriving People and Places, Breckland Council (2023)
- Ref 14-14 Breckland Housing and Economic Development Needs Assessment, Breckland Council (2024)
- Ref 14-15 Additionality Guide, Fourth Edition, Homes & Communities Agency (2014)
- Ref 14-16 The MHCLG Appraisal Guide, Ministry of Housing, Communities and Local Government (2025)



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