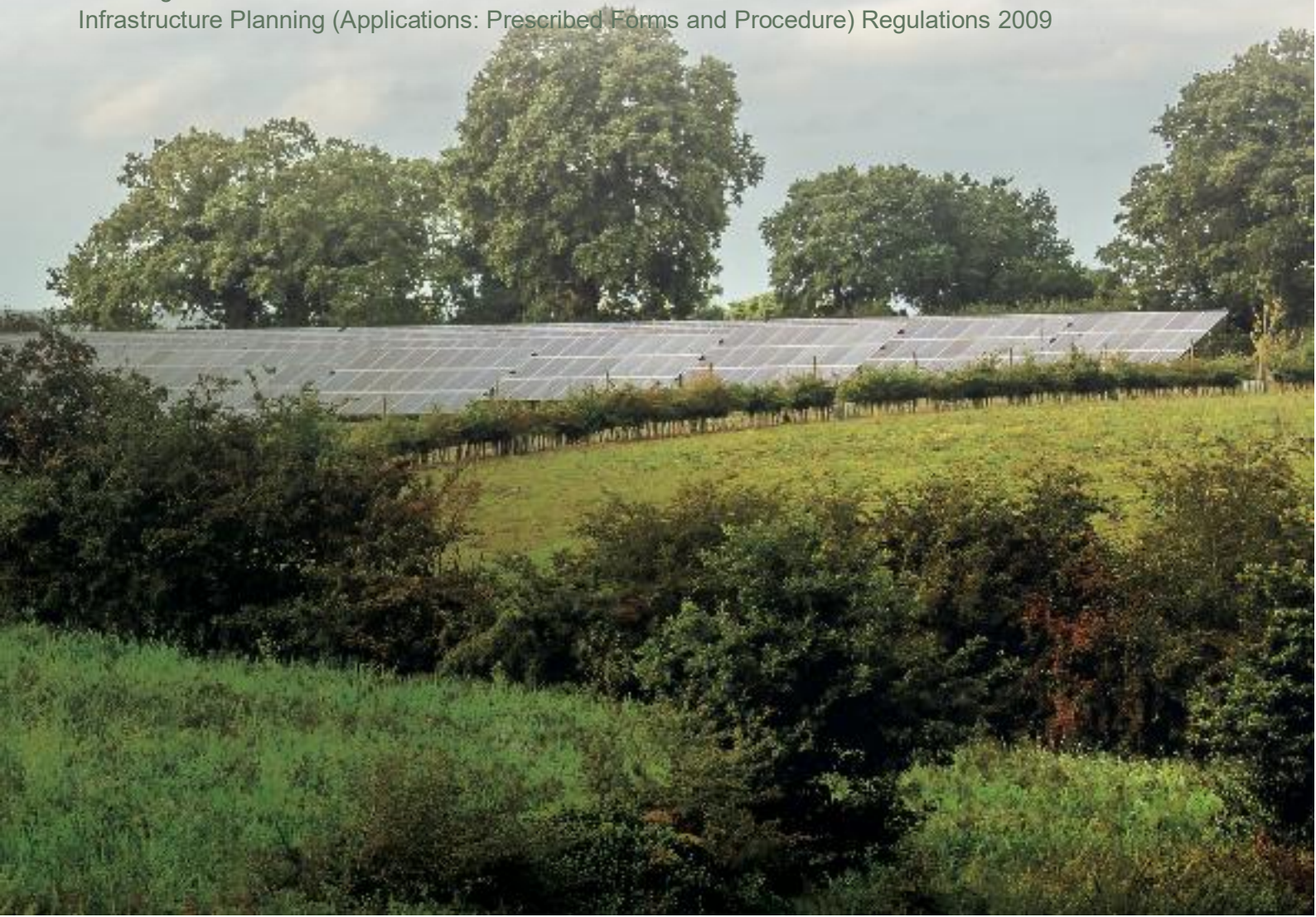
THE DROVES
SOLAR FARM

The Droves Solar Farm

Appendix 16.1: Consultation and Legislation, Planning Policy and Guidance

Prepared by: LDA Design
Date: November 2025
PINS reference: EN0110013
Document reference: APP/6.4 (Original)
APFP Regulation Reg 5(2)(a)
Planning Act 2008
Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009



List of Contents

List of Tables

List of Plates

16 Consultation, Legislation, Planning Policy and Guidance

16.1 Consultation

Scoping Opinion

16.1.1 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.

16.1.2 The issues raised in the Scoping Opinion relating to other environmental matters are summarised and responded to within Table 16-1 which demonstrates how the matters raised in the Scoping Opinion are addressed in this ES.

Table 16-1 Relevant Scoping Opinion Comments from Statutory Bodies relating to Other Environmental Matters

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
Air Quality			
The Planning Inspectorate, Scoping Opinion, December 2024	3.5.1 The release of dust and particulate matter – Construction and decommissioning: '*The Scoping Report states that dust and particulate matter produced during the construction and decommissioning of the Proposed Development would be controlled through measures outlined in the outline Construction Environmental Management Plan (oCEMP), and so significant effects would be unlikely to occur. The Inspectorate agrees that significant effects are unlikely to occur as a result of the release of dust and particulate matter during construction and decommissioning. However, insufficient information has been provided on the number of expected vehicle movements associated with the construction and decommissioning phases to confirm this. The Inspectorate is content to scope this matter out on the basis that the ES provides a statement, supported by information on expected vehicle movements and the locations of the nearest sensitive receptors, as to why effects would not be significant. The*	A Construction and Decommissioning Phase Dust Assessment has been produced to determine level of mitigation required to control dust and particulate matter emission and is appended to the **outline Construction Environmental Management Plan (oCEMP) [APP/7.6]** submitted as part of the DCO Application. Construction traffic vehicle movements associated with the construction and decommissioning phases of the Scheme have been reviewed and are below EPUK/IAQM criteria (Ref 16-10). As such, a detailed assessment is not necessary and impact from vehicle exhaust emissions has been scoped out of this ES.	A **Construction and Decommissioning Phase Dust Assessment** including receptors (Section 1.2) and list of mitigation measures (Section 1.3), is provided for as **Appendix 1** to the **oCEMP [APP/7.6]**. Details of construction vehicle movements is presented in the Air Quality Section of **ES Chapter 16: Other Environmental Matters [APP/6.2]** as well as in **ES Chapter 9: Transport and Access [APP/6.2]**.

	Applicant's attention is drawn to the consultation response received from Norfolk *County Council (Appendix 2 of this Opinion) on this matter.*'		
The Planning Inspectorate, Scoping Opinion, December 2024	3.5.2 The release of dust and particulate matter – Operation '*The Inspectorate agrees that operational activities are unlikely to give rise to significant amounts of dust and particulate matter. This matter can be scoped out of the ES.'*	Noted. The release of dust and particulate matter during the operational phase has been scoped out of the ES.	N/A
The Planning Inspectorate, Scoping Opinion, December 2024	3.5.3 Vehicle exhaust emissions – Construction and decommissioning: '*This matter is proposed to be scoped out on the basis that traffic flows during construction are considered unlikely to exceed the screening criteria for sensitive human and ecological receptors. Providing that the ES can demonstrate that the traffic flows during construction will be beneath the IAQM thresholds for further assessment, this matter can be scoped out of the ES. The Inspectorate considers that air pollution impacts on nationally and internationally designated ecological sites from construction traffic should be scoped into the assessment. The Applicant's attention is drawn to the consultation response received from*	Noted. Construction phase traffic vehicle movements have been reviewed and are below EPUK/IAQM criteria of more than 500 LDV AADY and 100 HDV AADT. The maximum construction vehicle movements on any single road link are predicted to be 368 two-way LDV AADT movements and 86 two-way HGV AADT. As such, a detailed assessment is not necessary and impact from vehicle exhaust emissions has been scoped out of this ES. Construction traffic vehicle movements have been reviewed and are below the DMRB criteria of an increase in AADT of 1000 (or 200 HDVs) on construction routes within 200m of sensitive ecological receptors, as outlined by Natural England. As such, a detailed assessment is not necessary and impact from construction	Details of construction vehicle movements are presented in Paragraph 16.4.5 of **ES Chapter 16: Other Environmental Matters [APP/6.2]**, as well as in **ES Chapter 9: Transport and Access [APP/6.2]**.

	Natural England (Appendix 2 of this Opinion) on this matter'	vehicle exhaust emissions has been scoped out of this ES.	
The Planning Inspectorate, Scoping Opinion, December 2024	3.5.4 Vehicle exhaust emissions – Operation : '*The Inspectorate agrees that operational vehicle movements are unlikely to result in significant air quality effects. This matter can be scoped out of the ES.*'	Noted. Impact to air quality from vehicle exhaust emissions during the operational phase have been scoped out of this ES, as operational traffic numbers are below EPUK/IAQM criteria.	N/A
The Planning Inspectorate, Scoping Opinion, December 2024	3.5.5 Air quality impacts to sensitive receptors as a result of Non-Road Mobile Machinery (NRMM) – Construction and decommissioning: '*This matter is proposed to be scoped out on the basis that air quality emissions from NRMM would be required to adhere to emissions standards. Providing that the ES confirms the type, quantity, use and duration of the NRMM the Inspectorate agrees that this matter can be scoped out of the ES.*'	Non-road mobile machinery (NRMM) will adhere to European regulations (EU 2016/1628) demonstrating compliance with emission limits, as detailed in the **oCEMP [APP/7.6]**.	NRMM details are located in the **oCEMP [APP/7.6]**.
The Planning Inspectorate, Scoping Opinion, December 2024	3.5.6 Air quality impacts to sensitive receptors as a result of Non-Road Mobile Machinery (NRMM) – Operation : '*The Inspectorate is content that there is unlikely to be a significant impact from NRMM during operation and therefore agrees that this matter can be scoped out of the air quality assessment.*'	Noted. Air quality impacts to sensitive receptors as a result of NRMM during the operational phase have been scoped out of the ES.	N/A

The Planning Inspectorate, Scoping Opinion, December 2024	3.5.7 Air Quality Assessment – Study Area: '*The ES should provide justification for the Study Area with reference to relevant guidance for ecological receptors and agree this where possible with relevant consultation bodies. The ES should include a plan showing the extent of the final Study Area, including proposed construction routes, the location of receptors (human and ecological) considered in the assessment.'*	Justification for the Study Area is included in **ES Chapter 16: Other Environmental Matters [APP/6.2]** with reference to the IAQM guidance for ecological receptors. A figure has been provided showing the extent of the Study Area including proposed construction routes, receptor locations (human and ecological) which have been considered in this assessment.	The Study Area for impacts during the construction phase is presented in Figure 16.2.1 of **Appendix 1** to the **oCEMP [APP/7.6]**.
The Planning Inspectorate, Scoping Opinion, December 2024	3.5.8 Strategic Mitigation: '*The air quality assessment should also take into account any strategic mitigation for air pollution.* *The Applicant's attention is drawn to the consultation response received from Natural England (Appendix 2 of this Opinion) for further information on this matter*.'	The **Construction and Decommissioning Phase Dust Assessment** submitted as part of the DCO Application considers strategic mitigation measures to be implemented to minimise air pollution from the construction and decommissioning phases, which have informed the **oCEMP [APP/7.6] and oDS [APP/7.10].**	A **Construction and Decommissioning Phase Dust Assessment**, including a list of mitigation measures (Section 1.3), is provided for as **Appendix 1** to the **oCEMP [APP/7.6]**.
Breckland Council, Scoping Opinion, December 2024	'*With regards to combustion emissions during operation the Council are concerned about the risk of fires with large combustible equipment and feel this should be properly considered before scoping this out.*'	A **Battery Plume Assessment** has been produced and appended to the **outline Battery Safety Management Plan (oBSMP) [APP/7.14]** which considers combustion emissions in the event of a battery fire.	The conclusions of the **Battery Plume Assessment** are provided for as **Appendix 1** to the **oBSMP [APP/7.14]**.

Castle Acre Parish, Scoping Opinion, December 2024	*'the safety risks associated with the storage and potential combustion of large quantities of energy should be adequately addressed. An emergency response plan should be developed in consultation with local emergency, fire and rescue services.'*	A **Battery Plume Assessment** has been produced and appended to the **oBSMP [APP/7.14]** which considers combustion emissions in the event of a battery fire.	The conclusions of the **Battery Plume Assessment** are provided for as **Appendix 1** to the **oBSMP [APP/7.14]**.
Environment Agency, Scoping Opinion, December 2024	*'Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction , demolition, and/ or operation , at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended).'*	NRMM will adhere to European regulations (EU 2016/1628) demonstrating compliance with emission limits, as detailed in the **oCEMP [APP/7.6]**.	NRMM details are located in **oCEMP [APP/7.6]**.
Environment Agency, Scoping Opinion, December 2024	In relation to Breckland SPA: '*The structure and function of the habitats that support these features may be sensitive to changes in air quality. Natural England advise air quality impacts from construction traffic are further assessed*.' In relation to Breckland Forest SSSI: '*The vascular plant assemblages and the structure and function of the habitats that support the invertebrate assemblages may be sensitive to changes in air quality. Natural England advise air quality impacts from construction traffic are further assessed.'*	Construction traffic vehicle movements have been reviewed and are below the DMRB criteria of an increase in AADT of 1000 (or 200 HDVs) on construction routes within 200m of sensitive ecological receptors, as outlined by Natural England. As such, a detailed assessment is not necessary and impact from construction vehicle exhaust emissions has been scoped out of this ES. In addition, there are no sensitive ecological receptors within 50m of the Order limits or construction routes (up to 250m from the Site entrance) that may be impacted by dust soiling.	Study area for impacts during the construction phase is presented in Figure 16.2.1 of **Appendix 1** to the **oCEMP [APP/7.6]**. Details of construction vehicle movements is presented in **ES Chapter 16: Other Environmental Matters [APP/6.2]**, as well as in **ES Chapter 9: Transport and Access [APP/6.2]**.

	In relation to River Nar SSSI: '*The notified habitats at this site may be sensitive to changes in air quality and water quality. An assessment of air quality impacts from construction traffic should be scoped into the ES*.' General comment: '*The EIA Scoping Report has scoped out the effects on air quality from further assessment. Natural England does not concur with this conclusion. Natural* *England advise that the EIA Scoping Report does not provide enough information on the expected traffic flows and extended traffic routes to reach this conclusion. Figure 9.1 currently indicates 3 proposed access routes. This includes the A1065, which runs adjacent to Breckland Forest SSSI and Breckland SPA as well as Narford, Road, Low Road and South Acre Road, which are in close proximity to the River Nar SSSI. Natural England, therefore, advises that impacts of increased air pollution from construction traffic on nationally and internationally designated sites are scoped into the EIA.* *Natural England advise that any site within 200m of a road experiencing an increase of 1000AADT (or 200AADT for HDVs) is scoped in for consideration within the ES*.'		

Glint and Glare			
The Planning Inspectorate, Scoping Opinion, December 2024	3.10.1 Glint and glare ES chapter: *"The Scoping Report states that a specific glint and glare chapter will not be required in the ES and that glint and glare effects in respect of those matters that are scoped in will be covered in Chapter 18 (Other Environmental Matters) of the ES for receptors identified in Appendix 15.1 of the Scoping Report. A technical appendix which considers glint and glare impacts will also support the assessment provided in Chapter 18 of the ES.* *The Inspectorate is content that a specific Glint and Glare chapter of the ES is scoped out on this basis."*	Noted.	Within section 16.6 of **ES Chapter 16: Other Environmental Matters [APP/6.2]**, and within **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP/6.4]**.
The Planning Inspectorate, Scoping Opinion, December 2024	3.10.2 Glint and glare effects towards receptors outside of the relevant Study Area – *"The Inspectorate is of the opinion that the study areas used should be based on potential for significant effects to occur rather than an arbitrary distance. The ES should explain how the study areas have been determined.* *Effort should be made to agree the sensitive receptors with relevant consultation bodies.*	Noted. The Study Areas for each relevant receptor are based on the potential for significant impacts to occur based on past project experience and Pager Power's Glint and Glare Guidance. Any reflections towards receptors outside of the Study Areas would be considered a low impact in the worst-case. Whilst there is no geometric limit for solar reflections, beyond these limits reflections would be of lesser intensity and are more likely to be screened by obstructions or intervening terrain.	Under the 'Study Area' subheading of section 16.6 of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. Locations of sensitive receptors are shown in **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP/6.4]**.

	The locations of the sensitive receptors should be shown on an accompanying plan."		
The Planning Inspectorate, Scoping Opinion, December 2024	3.10.3 Local road users within the study area – "*The Scoping Report states that based on the methodology set out in Appendix 15.1, technical modelling traffic densities are likely to be relatively low on local roads and any solar reflections from the Proposed Development experienced by a road user along a local road would be considered 'minor adverse' in the worst case, in accordance with the guidance and industry best practice. The Inspectorate agrees that this matter can be scoped out on this basis."*	Noted. Local roads have been scoped out of the ES.	N/A
The Planning Inspectorate, Scoping Opinion, December 2024	3.10.4 Construction and Decommissioning phases – *"The Scoping Report proposes to scope out these matters as not all of the proposed panels will be present simultaneously during the construction and decommissioning phases, and that the length and intensity of any glare will be less than or equal to the Operational Phase. The Scoping Report assumes that the worst-case scenario for glint and glare effects is therefore the Operational phase.* *The Inspectorate agrees that the worst-case scenario for glint and glare effects is likely to be during operation of the Proposed Development but considers that the ES should consider the potential for*	Consideration has been provided to the potential for significant effects during the construction and decommissioning phases in the ES, when determining relevant screening and cumulative effects.	Under the 'Construction and Decommissioning' and 'Cumulative Effects' subheadings of section 16.6 of **ES Chapter 16: Other Environmental Matters [APP/6.2]**.

	significant effects during construction and decommissioning, including cumulative effects."		
The Planning Inspectorate, Scoping Opinion, December 2024	3.10.5 Rail infrastructure – *"No rail infrastructure is identified within the relevant Study Area.* *The Inspectorate agrees that this matter can be scoped out of the assessment on this basis. Evidence should be provided in the ES which demonstrates that no significant adverse effects on railway receptors and infrastructure could occur, and no railway lines have been identified which pass through or near the Proposed Development."*	Noted. Evidence regarding the closest railway assets demonstrates that no significant adverse effects on railway receptors and infrastructure could occur, and no railway lines have been identified that pass through or near the Scheme.	Evidence has been provided in **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP/6.4].**
The Planning Inspectorate, Scoping Opinion, December 2024	3.10.6 Viewpoints – Public Rights of Way (PRoWs) and Bridleways – *"The Scoping Report states that the effect on these receptors is considered to be at most 'Minor Adverse' as the potential effects on their safety and amenity is considered to be less than that of a road user or a dwelling, but PRoWs would be considered at a high-level without detailed modelling.* *The Inspectorate agrees that PRoWs and Bridleways can be assessed without detailed modelling on this basis."*	Noted.	PRoWs and Bridleways have been assessed without detailed modelling within **ES Chapter 16: Other Environmental Matters [APP/6.2]**.
The Planning Inspectorate, Scoping Opinion,	3.10.7 Aviation infrastructure outside of the 5km and 10km Study Areas: East Winch Airfield and Great Massingham Airfield – *"The effect on these receptors*	Noted.	These airfields have been assessed without detailed modelling within **ES Chapter 16: Other Environmental Matters [APP/6.2]**.

December 2024	*will be at most 'Minor Adverse' because the effects will be no greater than 'low potential for temporary after image' on a pilot and/or will occur outside a pilots primary field of view (50 degrees either side of the direction) and no Air Traffic Control (ATC) Towers are present at these airfields, these airfields are proposed to be scoped out but will be considered at a high-level without detailed modelling.* *The Inspectorate agrees that this matter can be assessed without detailed modelling on this basis."*		
The Planning Inspectorate, Scoping Opinion, December 2024	3.10.8 Glint and Glare assessment (GGA) – cross references – *"It is noted that a Glint and Glare Assessment (GGA) will form an Appendix to Chapter 18 (Other Environmental Matters) of the ES is proposed, and glint and glare impacts relevant to the consideration of other effects, such as landscape and visual amenity effects, will be considered in that chapter. The Inspectorate is content with this approach subject to cross references being made where appropriate to the relevant ES chapters such the LVIA."*	Noted.	Glint and glare impacts relevant to the consideration of other effects have been considered in **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP/6.4]**.
Electromagnetic Fields			
The Planning Inspectorate, Scoping	3.13.1 EMF Assessment – "*The Scoping Report proposes to scope out an assessment of EMF from the ES on the*	An assessment of Electromagnetic Fields (EMF) has been scoped out of the ES.	A High-Level EMF Risk Assessment has been submitted in support of the DCO

Opinion, December 2024	*basis that any potentially significant effects can be avoided through design measures and an EMF risk assessment, setting out the routing and voltages of Low and High Voltage Cables up to 400kv, will accompany the ES in a technical appendix. The Inspectorate is content with this approach."*	Design measures for the avoidance of potential significant effects have been included in the Scheme design along with an EMF Risk Assessment which has been prepared to identify potential hazards from EMF, evaluating the risks and implementing control measures to mitigate risks.	Application as **ES Appendix 16.4: High-Level EMF Assessment [APP/6.4]**.
Major Accidents and Disasters (MA&Ds)			
The Planning Inspectorate, Scoping Opinion, December 2024	3.14.1 Major Accidents and Disasters (MA&D) – "*The Scoping Report proposes to scope out an assessment of Major Accidents and Disasters on the basis that there is no statutory basis relating to the vulnerability of the Proposed Development to MA&D and where relevant, the potential impacts from MA&D on sensitive receptors will be assessed in other technical chapters within the ES. The Inspectorate has considered the characteristics of the Proposed Development and agrees with this approach. On the basis that potential impacts from MA&D will be considered in technical aspect chapters, where relevant, this matter can be scoped out of the ES"*	MA&D has been scoped out of the ES.	Potential impacts from MA&D has been considered in topic Chapters (**ES Chapters 6-16 [APP/6.2]**), where relevant.
Telecommunications, Utilities and Television Receptors			
The Planning Inspectorate, Scoping	3.15.1 Impacts to above ground telecommunications, utilities and television infrastructure – All phases –	Impacts to above ground telecommunications, utilities and television	N/A

Opinion, December 2024	"*This matter is proposed to be scoped out on the basis that the low maximum heights associated with the Proposed Development means there would be limited potential for likely significant effects on above ground infrastructure. The Inspectorate agrees that the Proposed Development is unlikely to result in significant effects on any above ground infrastructure in proximity and this matter can be scoped out of the ES.*"	infrastructure (all phases) has been scoped out of the ES.	
The Planning Inspectorate, Scoping Opinion, December 2024	3.15.2 Impacts to below ground infrastructure – All phases – "*This matter is proposed to be scoped out on the basis that discussions and negotiations will be carried out with relevant stakeholders to establish safeguarding distances and measures for working in proximity to be incorporated into the Proposed Development parameters, prior to the submission of the DCO.* *Insufficient information has been provided on the location of potential below ground infrastructure and utilities to rule out significant effects on them. As such the Inspectorate is currently not in a position to scope this matter out entirely. The ES should either assess the impacts to below ground infrastructure or provide a statement, supported with the locations of below ground utilities and evidence of agreement with the relevant stakeholders, as to why significant effects are not likely to occur.*"	The ES demonstrates that significant effects on below ground infrastructure are not likely to occur. The impacts to underground utilities during the construction phase are associated with activities that involve breaking the ground and potentially striking the below ground utilities. Due to the nature of the Scheme, there are no below ground impacts associated with the operational phase. Therefore, no likely significant effects on underground utilities are predicted as a result of the operational phase of the Scheme. There is likely to be no significant effect to below ground utilities due to the cables being severed of operational activities during the decommissioning phase. The cables will either be left in-situ, as this avoids disturbance to overlying land and is the most environmentally acceptable	Within **ES Chapter 16: Other Environmental Matters [APP/6.2]**.

		option, or alternatively the cables can be removed opening up the ground at regular intervals and pulling the cable through to the extraction point	
Waste			
The Planning Inspectorate, Scoping Opinion, December 2024	3.16.1 *"The Scoping Report states that a separate waste chapter for the ES has been scoped out of the EIA as no likely significant effects are predicted during all phases of the Proposed Development.* *The Inspectorate agrees that a standalone chapter on waste is not required within the ES. However, the Inspectorate is not content to scope this aspect out.* *The ES should however still contain a description of the potential waste streams of construction and decommissioning, and include estimated volumes, by type and quantity, of expected residues and emissions and quantities and types of waste produced, including, and an assessment of the likely significant effects.* *If off-site disposal is required, an assessment of likely significant effects including cumulative effects should be included within the ES.* *The ES should describe any measures implemented to minimise waste and state*	Noted. Waste has been considered within Section 16.9 of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. The ES has identified potential waste streams during the construction, operational and decommissioning phases including, where possible, estimated volumes, by type and quantity, of expected residues and emissions and quantities and types of waste produced, including, and an assessment of the likely significant effects. Where off-site disposal is required such as for waste packaging materials, construction and demolition (C&D) waste, and waste electronics and electrical equipment (WEEE), the assessment of effects has included cumulative effects in Section 16.9 of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. Good practice measures have been set in place to ensure responsible processing of waste is adhered to. These are secured through a suite of outline management plans that have been submitted in support of the DCO Application. These management plans include details on appropriate monitoring measures to ensure	The assessment of Waste is undertaken within Section 16.9 of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. Embedded mitigation measures are outlined within Section 16.9 of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. These measures are secured by corresponding requirements in the **draft DCO [APP/3.1]** in relation to the respective management plans (namely, the **oCEMP [APP/7.6]**, the **oOEMP [APP/7.8]** and the **oDS [APP/7.10]**).

	whether the waste hierarchy will be utilised. *The Applicant's attention is drawn to the consultation response received from Norfolk County Council (Appendix 2 of this Opinion) on this matter".*	compliance with best practice measures as well as adherence to the waste hierarchy. Management of waste will be addressed further within the Site Waste Management Plan (SWMP) to be submitted prior to the Scheme's construction and is subject to a requirement in the **draft DCO [APP/3.1]**.	
The Planning Inspectorate, Scoping Opinion, December 2024	3.16.2 *"The ES should include an assessment of the likely impact of component replacement (e.g. batteries and panels) and outline what measures, if any, are in place to ensure that these components are able to be diverted from the waste chain. The ES should assess the likely significant effects from waste at decommissioning to the extent possible at this time.* *The ES should assess any impacts from off-site transport and disposal of waste generated during construction and decommissioning which are likely to result in significant effects. Any assumptions made, such as with regard to quantities of contaminated material, should be clearly set out and justified in the ES."*	Section 16.9 of **ES Chapter 16: Other Environmental Matters [APP/6.2]** has assessed likely significant effects from waste during all phases of development, including replacement activities of the PV panels and BESS Units, and sets out measures taken to ensure components are diverted, if feasible, from the waste chain. Impacts from disposal of waste generated during construction and decommissioning phases likely to result in significant effects have also been included in assessment. Assessment of waste transportation movements has been undertaken in **ES Chapter 9: Transport and Access [APP/6.2]**. Assumptions made, such as quantities and types of waste materials, have been set out in the assessment below.	The assessment of waste is undertaken in Section 16.9 of **ES Chapter 16: Other Environmental Matters [APP/6.2]**.
The Planning Inspectorate, Scoping Opinion,	3.16.3 *"The ES should clearly set out how decommissioning is to be assessed and any components which may remain following decommissioning.*	Section 16.9 of **ES Chapter 16: Other Environmental Matters [APP/6.2]** outlines how the decommissioning of the Scheme has been assessed, with detail any	The assessment of waste is undertaken within Section 16.9 of **ES Chapter 16: Other Environmental Matters [APP/6.2]**.

December 2024	*A Decommissioning Plan should be agreed with the local planning authority and the Inspectorate would expect to see this secured through the inclusion of an Outline Decommissioning Plan or similar with the Application."*	components to be retained during the decommissioning phase set out therein. Good practice measures are set in place to ensure responsible processing of waste is adhered to. An **oDS [APP/7.10]** has been prepared in support of the ES, which sets out the mitigation measures identified through the assessment of waste matters in Section 16.9 of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. The **oDS [APP/7.10]** is secured by a requirement in the **draft DCO [APP/3.1]**, and therefore the final wording and implementation of the full Decommissioning Strategy will be agreed with the relevant local planning authorities ahead of decommissioning activities on the Scheme commencing.	The **oDS [APP/7.11]** is secured by a requirement in the **draft DCO [APP/3.1]**.
Norfolk County Council Scoping Opinion, November 2024	8.7 Waste Management *"The Scoping Report does refer to the management of waste arising from the construction, operation and decommissioning of the proposed development.* *The application should assess the potential for impacts on waste management facilities to deal with this waste, with particular reference to the sites within Norfolk, following the proximity principle to deal with waste as close to its source, where practicable. This should be included within the outline Site Waste*	Waste is considered within Section 16.9 of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. The ES identifies potential waste streams during the construction, operational and decommissioning phases including, where possible, estimated volumes, by type and quantity, of expected residues and emissions and quantities and types of waste produced, including, and an assessment of the likely significant effects. Good practice measures are set in place to ensure responsible processing of waste is adhered to. These are secured through a suite of outline management plans submitted in support of the DCO	The assessment of waste is undertaken within Section 16.9 of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. Embedded mitigation measures are outlined within Section 16.9 of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. These measures are secured by corresponding requirements in the **draft DCO [APP/3.1]** in relation to the respective management plans (namely, the **oCEMP [APP/7.6]**, the **oOEMP [APP/7.8]** and the **oDS [APP/7.10]**).

	Management Plan (oSWMP) included in the application."	Application. These management plans include details on appropriate monitoring measures to ensure compliance with best practice measures as well as adherence to the waste hierarchy. Management of waste will be addressed further within the Site Waste Management Plan (SWMP) to be submitted prior to the Scheme's construction and is subject to a requirement in the **draft DCO [APP/3.1]**.	

Statutory Consultation and Preliminary Environmental Information Report (PEIR)

16.1.3 Statutory consultation was held between May 21st 2025 and 9th July 2025. Relevant responses to the PEIR relating to other environmental matters and how these have been addressed through the ES are set out in Table 16-2 are set out below.

Table 16-2 Responses to the PEIR relating to Other Environmental Matters

Consultee and Date	Comment and PEIR ID No.	How has the comment been addressed in the ES chapter	Location of response in ES Chapter
Air Quality			
Natural England July 2025	1.2. Breckland SPA 1.2.1. In our EIA scoping response (dated 3 December 2024, our ref: 493290), Natural England advised that air quality impacts from construction traffic on the structure and function of the habitats that support the features of Breckland SPA are further assessed.	Construction traffic vehicle movements have been reviewed and are below the DMRB criteria of an increase in AADT of 1000 (or 200 HDVs) on construction routes within 200m of sensitive ecological receptors, as outlined by Natural England. As such, a detailed assessment is not necessary and impact from construction vehicle exhaust emissions has been scoped out of this ES.	The Study Area for impacts during the construction phase is presented in Figure 16.2.1 of **Appendix 1** to the **oCEMP [APP/7.6]**. Details of construction vehicle movements is presented in **ES Chapter 16: Other Environmental Matters [APP/6.2]**, as well as in **ES Chapter 9: Transport and Access [APP/6.2]**.
Natural England July 2025	1.2.2. Chapter 7 of the PEIR (Ecology and Biodiversity) has identified that the proposed designated construction and material transit routes do not pass through or immediately adjacent to Breckland SPA and therefore consider the air quality impact on Breckland SPA as not significant. Natural England advise that should the transit routes change, the	It has been confirmed that transit routes during all phases of the Scheme do not pass immediately adjacent to Breckland SPA and therefore no further assessment of impacts to air quality at sensitive ecological receptors is required.	Construction traffic routing is shown in **ES Figure 9.1: Vehicle Routing and Constraints [APP/6.3]**.

	impact should be reassessed. We would advise using Natural England's guidance on the assessment of road traffic emissions under the Habitats Regulations1.		
Natural England July 2025	1.3. Norfolk Valley Fens SAC 1.3.1. It is noted in Chapter 7 of the PEIR that air quality impacts to Norfolk Valley Fens SAC have been determined as not significant. Potter & Scarning Fens, East Dereham SSSI is a component of Norfolk Valley Fens SAC and lies within 200m of the A47. Therefore, it could be affected by impacts to air quality from construction traffic. We note that paragraph 9.2.24 in Chapter 9: Transport and Access of the PEIR states that the worstcase scenario is 96 HGV movements per day. This figure is below the threshold of 200 heavy duty vehicles (HDV) annual average daily traffic flow (AADT) as detailed in Natural England's guidance on the assessment of road traffic emissions under the Habitats Regulations1 and concur with the conclusion that the impact is unlikely to be significant, alone.	Construction traffic vehicle movements have been reviewed and are below the DMRB criteria of an increase in AADT of 1000 (or 200 HDVs) on construction routes within 200m of sensitive ecological receptors, as outlined by Natural England. As such, a detailed assessment is not necessary and impact from construction vehicle exhaust emissions has been scoped out of this ES.	Details of construction vehicle movements is presented in Paragraph 16.4.5 of chapter, as well as in **ES Chapter 9: Transport and Access [APP/6.2]**.
Natural England July 2025	1.3.2. Natural England highlights that the assessment has not considered the impacts to air	Construction traffic vehicle movements and routing have been reviewed and are below the DMRB	Details of construction vehicle movements is presented in **ES Chapter 16: Other Environmental**

	quality from construction traffic in combination with other plans or projects. Natural England advise that this is given further consideration and refers the Applicant to the document, Natural England's guidance on the assessment of road traffic emissions under the Habitats Regulations1, for further guidance.	criteria of an increase in AADT of 1000 (or 200 HDVs) on construction routes within 200m of sensitive ecological receptors, as outlined by Natural England. As such, a detailed assessment is not necessary and impact from construction vehicle exhaust emissions has been scoped out of this ES. In addition, the potential for a cumulative impact with other plans and projects has been reviewed and given the likely timing and traffic routing of construction traffic, it is considered unlikely that the DMRB criteria would be exceeded in combination on any one route within 200m of a sensitive ecological site.	**Matters [APP/6.2]**, as well as in **ES Chapter 9: Transport and Access [APP/6.2]**.
Natural England July 2025	2.3. River Nar SSSI 2.3.1. Due to the proximity of the transit routes being less than 200m from the River Nar SSSI, Natural England concurs with the decision to scope in the assessment of impacts to air quality from construction traffic on the River Nar SSSI, as detailed in Chapter 7 of the PEIR.	Construction traffic vehicle movements have been reviewed and are below the DMRB criteria of an increase in AADT of 1000 (or 200 HDVs) on construction routes within 200m of sensitive ecological receptors, as outlined by Natural England. As such, a detailed assessment is not necessary and impact from construction vehicle exhaust emissions has been scoped out of this ES, on this basis impacts can be considered not significant.	Details of construction vehicle movements is presented in **ES Chapter 16: Other Environmental Matters [APP/6.2]**, as well as in **ES Chapter 9: Transport and Access [APP/6.2]**.

Natural England July 2025	2.3.2. We note that paragraph 9.2.24 in Chapter 9 of the PEIR states that the worst-case scenario is 96 HGV movements per day. Whilst the River Nar SSSI is not a European designated site, the advice provided in Natural England's guidance on the assessment of road traffic emissions under the Habitats Regulations1 can be used to determine if there will be a significant impact to a designated site. Taking account of this guidance and based on the information presented in the PEIR, the number of HGVs used in the construction of the proposed development will be below the threshold of 200 heavy duty vehicles (HDV) annual average daily traffic flow (AADT) when considered alone.	Construction traffic vehicle movements and routing have been reviewed and are below the DMRB criteria of an increase in AADT of 1000 (or 200 HDVs) on construction routes within 200m of sensitive ecological receptors, as outlined by Natural England. As such, a detailed assessment is not necessary and impact from construction vehicle exhaust emissions has been scoped out of this ES, on this basis impacts can be considered not significant. In addition, the potential for a cumulative impact with other plans and projects has been reviewed and given the likely timing and traffic routing of construction traffic, it is considered unlikely that the DMRB criteria would be exceeded in combination on any one route within 200m of a sensitive ecological site. As such, a detailed assessment is not necessary and cumulative impact from construction vehicle exhaust emissions has been scoped out of this ES, on this basis impacts can be considered not significant.	Details of construction vehicle movements is presented in **ES Chapter 16: Other Environmental Matters [APP/6.2]**, as well as in **ES Chapter 9: Transport and Access [APP/6.2]**.
Natural England July 2025	2.3.3. Natural England advise that should there be significant changes to the traffic plans, then impacts from road traffic emissions should be reviewed Consideration should also begiven to air quality impacts	Construction traffic vehicle movements and routing have been reviewed and are below the DMRB criteria of an increase in AADT of 1000 (or 200 HDVs) on construction routes within 200m of sensitive	Details of construction vehicle movements is presented in **ES Chapter 16: Other Environmental Matters [APP/6.2]**, as well as in **ES**

	in combination with other relevant plans or projects.	ecological receptors, as outlined by Natural England. As such, a detailed assessment is not necessary and impact from construction vehicle exhaust emissions has been scoped out of this ES, on this basis impacts can be considered not significant. In addition, the potential for a cumulative impact with other plans and projects has been reviewed and given the likely timing and traffic routing of construction traffic, it is considered unlikely that the DMRB criteria would be exceeded in combination on any one route within 200m of a sensitive ecological site. As such, a detailed assessment is not necessary and cumulative impact from construction vehicle exhaust emissions has been scoped out of this ES, on this basis impacts can be considered not significant.	**Chapter 9: Transport and Access [APP/6.2]**.
Natural England July 2025	4. Air Quality 4.1. Natural England has provided comment in section 1 and 2 of this letter on the designated sites that could potentially be affected by air quality impacts from the proposed development. Based on the traffic strategy presented in Chapter 9 of the PEIR, Natural England concurs with the conclusions that impacts from the proposed development are not considered significant. However,	Construction traffic vehicle movements and routing have been reviewed and are below the DMRB criteria of an increase in AADT of 1000 (or 200 HDVs) on construction routes within 200m of sensitive ecological receptors, as outlined by Natural England. As such, a detailed assessment is not necessary and impact from construction vehicle exhaust emissions has been scoped	Details of construction vehicle movements is presented in **ES Chapter 16: Other Environmental Matters [APP/6.2]**, as well as in **ES Chapter 9: Transport and Access [APP/6.2]**.

	we would advise that consideration is given to air quality impacts in combination with other relevant plans or projects. We would also advise reassessing the impacts should the traffic strategy change. We would advise applying the advice provided in Natural England's guidance on the assessment of road traffic emissions under the Habitats Regulations1 in this assessment.	out of this ES, on this basis impacts can be considered not significant. In addition, the potential for a cumulative impact with other plans and projects has been reviewed and given the likely timing and traffic routing of construction traffic, it is considered unlikely that the DMRB criteria would be exceeded in combination on any one route within 200m of a sensitive ecological site. As such, a detailed assessment is not necessary and cumulative impact from construction vehicle exhaust emissions has been scoped out of this ES, on this basis impacts can be considered not significant.	
Forestry Commission	These woodlands can also suffer loss or deterioration from nearby development through damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic and dust, particularly during the construction phase of a development.	Construction traffic vehicle movements have been reviewed and are below the DMRB criteria of an increase in AADT of 1000 (or 200 HDVs) on construction routes within 200m of sensitive ecological receptors, as outlined by Natural England. As such, a detailed assessment is not necessary and impact from construction vehicle exhaust emissions has been scoped out of this ES, on this basis impacts can be considered not significant.	Details of construction vehicle movements is presented in **ES Chapter 16: Other Environmental Matters [APP/6.2]**, as well as in **ES Chapter 9: Transport and Access [APP/6.2]**.
Glint and Glare			

Ministry of Defence (MOD) (July 2025)	The introduction of solar PV development, as proposed, close to RAF Marham has the potential to have an impact on aviation safety through glint and glare effects. RAF Marham has been included as a receptor within the [PEIR] report. Glare with 'potential for temporary after-image' (yellow) is predicted towards the approach path for runways 01 and 05 and potential for temporary after-image'(yellow) is also predicted to be geometrically possible towards the Air Traffic Control (ATC) tower for fixed panels. At present, the MOD has insufficient information to determine if the proposed solar PV farm will affect aircraft operating in and out of RAF Marham. The MOD therefore require the submission of an updated aviation glint and glare assessment of the proposed solar PV farm to identify any emissions that may impact upon the air traffic control tower, the air traffic approaches to runways (Rwys) 23/05 and 01/19, associated air traffic circuit patterns and other procedures used at RAF Marham. This would need to include	Noted. Further information has been requested from the MOD relating to the air traffic approaches to runways, visual circuits for runway 23, runway 05, and runway 19/01, and the locations of the vertical landing pads. Engagement is ongoing at the time of DCO Application submission.	Details of Glint and Glare are presented within **ES Chapter 16: Other Environmental Matters [APP/6.2]**and within **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP/6.4]**.

	• Rwys 23/05 being assessed for a 2.5 and 3 degree glidepath; and for Rwy 01/19 a 3 degree glidepath • Visual circuits for Rwy 23, Rwy 05 and Rwy 19 / 01 and; • the Vertical Landing (VL) Pads sited at RAF Marham will need to be taken into account. The applicant will require MOD engagement prior to updating the glint and glare assessment.		
Electromagnetic Fields			
Ministry of Defence (MOD) (July 2025)	There are indicative areas for the Solar PV site identified within the drawing titled 'Concept Masterplan, Document Volume III, PIER Appendix 5.1'. Parts of the indicative areas numbered 1, 2, 3, 6, 7 and 8 within this drawing occupy statutory technical safeguarding zones surrounding communication, surveillance and navigational equipment at RAF Marham, including the Precision Approach Radar (PAR) in which the MOD must be consulted on any development or change of land use. It has been identified that these areas of the proposed development will physically	Noted. The Applicant continues to engage with the MOD on the PAR and its operation, noting that there is already an operational solar farm within the PAR range (Burnstalk Solar farm). The MOD confirmed via email dated 16 October 2025 that they are continuing engagement with radio technical SMEs to determine the implications of the Scheme upon the operation of the PAR.	N/A

	impact upon the effective operation of the PAR installations deployed at RAF Marham. Therefore, it will be necessary for those parts of the proposed development that occupy the all development consultation zone forming part of the technical safeguarding zone for the PAR to be removed.		
Telecommunications, Utilities and Television Receptors			
No consultee comments			
Waste			
Norfolk County Council Response to Statutory Consultation and PEIR June 2025	Paragraph 4.2 The Waste Planning Authority is pleased to note at paragraph 15.1.31 of the non-technical summary that the application will contain an assessment of the waste management capacity in the vicinity of the project boundary, and that this will consider the potential impacts from the waste quantities generated by the construction and operation of the project. A Construction Environmental Management Plan will be developed based on these	Waste is considered within the Waste Section of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. The ES identifies potential waste streams during the construction, operational and decommissioning phases including, where possible, estimated volumes, by type and quantity, of expected residues and emissions and quantities and types of waste produced, including, and an assessment of the likely significant effects. Good practice measures are set in place to ensure responsible processing of waste is adhered to.	The assessment of Waste is outlined within the Waste Section of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. Embedded mitigation measures are outlined within the Waste Section of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. These measures are secured by corresponding requirements in the **draft DCO [APP/3.1]** in relation to the respective management plans (namely, the **oCEMP [APP/7.6]**, the **oOEMP [APP/7.8]** and the **oDS [APP/7.10]**).

	assessments and will be secured through the DCO. A Site Waste Management Plan will be developed as part of an Operational Environmental Plan to address waste prevention, reuse, recycling and recovery during the operational phase, an outline SWMP will be submitted with the DCO application. The Waste Planning Authority considers that these measures are appropriate at this stage and will comment on the details contained within the DCO Application at a future date.	These are secured through a suite of outline management plans submitted in support of the DCO Application. These management plans include details on appropriate monitoring measures to ensure compliance with best practice measures as well as adherence to the waste hierarchy. Management of waste will be addressed further within the Site Waste Management Plan (SWMP) to be submitted prior to the Scheme's construction and is subject to a requirement in the **draft DCO [APP/3.1]**.	
Environment Agency Response to Statutory Consultation and PEIR July 2025	During the construction phase, there will be waste from packaging materials, offcuts of materials used for mounting structures, excess concrete, and soil from earthworks. Where soils are being processed/treated a Waste Permit may be required and this will likely include mobile machinery Waste: environmental permits - GOV.UK .	The Applicant has considered likely construction waste from packaging and excess materials within the assessment of waste effects. Soil from earthworks is anticipated to be used onsite wherever practicable to reduce outward soil waste. Soil waste is anticipated only to be removed from site where required due to contamination. This is procedurally set out in the **oCEMP [APP/7.6]** and **outline Soil Management Plan** (**oSMP) [APP/7.13]**.	The assessment of waste and is outlined within the Waste Section of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. Embedded mitigation measures are outlined within the Waste Section of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. These measures are secured by corresponding requirements in the **draft DCO [APP/3.1]** in relation to the respective management plans (namely, the **oCEMP [APP/7.6]**, the **oOEMP [APP/7.8]** and the **oDS [APP/7.10]**).

	Consideration and plans need to be submitted to deal with dust mitigation, noise and traffic to and from the site in relation to any waste activities.	HGV trips associated with the removal of waste at construction, during operation, and at decommissioning have been included in the assessments of air quality (the Waste Section of **ES Chapter 16: Other Environmental Matters [APP/6.2]**), noise (**ES Chapter 10: Noise and Vibration [APP/6.2]**) and transport (**ES Chapter 9: Transport and Access [APP/6.2]**). Mitigation measures with respect to dust, noise and traffic are set out in the embedded and additional mitigation measures set out in each of the respective chapters or assessment sections.	See the Waste Section in **ES Chapter 16: Other Environmental Matters [APP/6.2]**, **ES Chapter 10: Noise and Vibration [APP/6.2]**, and **ES Chapter 9: Transport and Access [APP/6.2]**. Embedded mitigation measures are outlined within the Waste Section of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. These measures are secured by corresponding requirements in the **draft DCO [APP/3.1]** in relation to the respective management plans (namely, the **oCEMP [APP/7.6]**, the **oOEMP [APP/7.8]** and the **oDS [APP/7.10]**).
	Solar panels have a lifespan of about 25-30 years although they have quoted 40 years in this document. Once they reach the end of their life, they become waste. Solar panels contain materials such as lead, cadmium, and other heavy metals, which classify them as hazardous waste in some contexts. Currently, recycling solar panels can be expensive or not economically viable, leading to concerns about these panels ending up in landfills, potentially	The Applicant is cognisant that the end-of-life disposal of Solar PV panels must be done in accordance with the requirements for handling of inert or hazardous waste as required for the type of solar panel used. It is acknowledged that cadmium telluride or perovskite panels (if used instead of the more widely used silicon-based types) contain significant quantities of potentially hazardous substances and therefore must be decommissioned to more rigorous standards.	The assessment of waste and is outlined within the Waste Section of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. Embedded mitigation measures are outlined within the Waste Section of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. These measures are secured by corresponding requirements in the **draft DCO [APP/3.1]** in relation to the respective management plans (namely, the **oCEMP [APP/7.6]**, the

	leaking toxins into the soil or groundwater. The report states that there will be greater opportunities for PV panel recycling in the future, however the panels will still be considered waste at end of life or if broken and must be classified accordingly even if being recycled.	Acknowledging that solar PV recycling infrastructure in the UK is limited at present, the Applicant therefore commits to ensuring waste handling arrangements with the solar PV manufacturer, or a certified e-waste handler is secured prior to construction of the Scheme. This is set out in the **oCEMP [APP/7.6]** and will be detailed post-consent in the Site Waste Management Plan (SWMP) to be submitted prior to the Scheme's construction and is subject to a requirement in the **draft DCO [APP/3.1]**. Any waste handler for solar panels must treat them as e-waste as subject of the waste electronics and electrical equipment (WEEE) regulations, and sending untreated solar panels to landfill would be a breach of these regulations.	**oOEMP [APP/7.8]** and the **oDS [APP/7.10]**).
	There is also the consideration if panels are damaged across large areas of the installation, creating waste. This has been seen in Porth Wen (190 acres) during Storm Darragh recently where hundreds of solar panels were blown off their mountings and some were torn apart in the storm. How would the site deal with an incident such as this?	With respect to mitigating impacts from storm damage, **ES Chapter 13: Climate [APP/6.2]** sets out future baseline expectations for extreme weather events. The Mounting Structures and PV panels should be sourced and designed to withstand the anticipated 1 in 100-year storm conditions to reduce the likelihood of weather-related damage during the construction and operational phases.	The assessment of waste and is outlined within the Waste Section of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. Embedded mitigation measures are outlined within the Waste Section of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. These measures are secured by corresponding requirements in the **draft DCO [APP/3.1]** in relation to the respective management plans

		With respect to response to storm events, damaged infrastructure would be considered waste where it is unable to be reused and would be replaced as required. In the event of wide-scale damage event, waste procedures for damaged solar panels would be enacted as is planned for the wide-scale replacement scenario, as secured through the **oOEMP [APP/7.8]**.	(namely, the **oCEMP [APP/7.6]**, the **oOEMP [APP/7.8]** and the **oDS [APP/7.10]**).
	When a solar farm is decommissioned, not only do the panels need managing, but also other infrastructure like frames, cables, inverters, and batteries (if used for energy storage).	The Applicant confirms that the decommissioning of all onsite infrastructure is considered in the assessment of waste outcomes.	The assessment of waste and is outlined within the Waste Section of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. Embedded mitigation measures are outlined within the Waste Section of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. These measures are secured by corresponding requirements in the **draft DCO [APP/3.1]** in relation to the respective management plans (namely, the **oCEMP [APP/7.6]**, the **oOEMP [APP/7.8]** and the **oDS [APP/7.10]**).

16.1.4 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]**.

16.2 Legislation, Planning Policy and Guidance

16.2.1 An overview of the legislation, planning policy and guidance against which the Scheme will be considered for the other environmental matters assessment is set out below.

Air Quality

16.2.2 An overview of the legislation, planning policy and guidance against which the Scheme has been considered for the air quality assessment is set out below.

Legislation and Regulations

- The Environment Act 1995 (Ref 16-1) - This legislation provides the framework for the UK Government to implement an Air Quality Strategy (AQS) including objectives for ambient air quality that are not to be exceeded. It also sets out the requirement that local authorities review current and future air quality within their area of jurisdiction allowing designation of an Air Quality Management area (AQMA). The declaration of an AQMA influences the screening criteria used for trip generation and to inform the methodology an air quality assessment
- The Environment Act 2021 (Ref 16-2) - In relation to air quality, this legislation set the requirement for the UK Government to set targets for $PM_{2.5}$
- The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (Ref 16-3) - The Air Quality Strategy provides the policy framework for local air quality management and assessment in the UK. It sets out air quality standards and objectives for key air pollutants designed to protect human health and the environment
- The Air Quality (England) Regulations 2000 (Ref 16-4) set national air quality objectives for NO_2, PM_{10} and $PM_{2.5}$ under the Environment Act 1995. The Air Quality Standards Regulations 2010 (Ref 16-5) implemented European Union directives into legalisation, introducing legally binding limit values and target values.
- The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 (Ref 16-6) - This legislation set out the $PM_{2.5}$ targets required by the Environment Act 2021 and when they are to be achieved by.
- The Clean Air Strategy (CAS) (Ref 16-7), published in 2019 sets out the Government's proposals aimed at delivering cleaner air in England, and indicates how devolved administrations intend to make emissions reductions. It sets out the comprehensive action that is required from across all parts of government and society to deliver clean air.

- Requirements relating to gaseous and particulate pollutant emission limits and type-approval for internal combustion engines for non-road mobile machinery (EU 2016/1628) (Ref 16-8) – Sets emission standards for NRMM; and
- The Non-Road Mobile Machinery (Type-Approval and Emission of Gaseous and Particulate Pollutants) Regulations 2018 (Ref 16-9) - Brings the emissions standards for NRMM outlined in European Regulations (EU 2016/1628) into UK law.

Planning Policy

National Planning Policy

16.2.3 The Energy National Policy Statements (NPS) are a suite of documents issued by the Secretary of State for Energy Security and Net Zero, 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 EN-1 considered relevant to the air quality assessment:

- Section 5.2 Air Quality and Emissions – This section requires the assessment on impacts to air quality at both human and ecological receptors. It sets out the method of air quality assessment required and the factors that are considered relevant for the SoSs decision making, including:

  5.2.13 "…whether mitigation measures are needed for both operational and construction emissions over and above any which form part of the project application"

  5.2.14 "…where a project would lead to a deterioration in air quality. This could for example, include where an area breaches any national air quality limits or statutory air quality objectives. However, air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches of statutory limits, objectives or targets."

  5.2.15 "…where a project is proposed near a sensitive receptor site, such as an education or healthcare facility, residential use or a sensitive or protected habitat."

16.2.4 As there are no anticipated significant impacts to air quality, a full air quality ES chapter has not been provided and as such, the proposed methodology has not been followed exactly. However, all factors relevant to decision making have been considered in determining the potential for significant impacts and impacted the decision to scope out impacts to air quality; and

- NPS EN-1 – Section 5.7 Dust, Odour, Artificial Light, Smoke, Steam and Insect Infection – This section requires consideration of loss of amenity from dust during the construction phase, which has been addressed in the **Construction and Decommissioning Phase Dust Assessment included in Appendix 1** of the **oCEMP [APP/7.7].**

16.2.5 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 both important and relevant to the SoSs consideration of the Scheme. Listed below are details of the paragraphs of the NPPF that are relevant to this chapter, and how and where they are covered in the ES:

- Paragraph 187 – "Planning policies and decisions should contribute to and enhance the natural and local environment by: […]

  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. […] ";

- Paragraph 199 – "Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan."

16.2.6 The above paragraphs have been considered throughout the determining the likelihood of potential significant impacts to air quality.

16.2.7 The National Planning Practice Guidance section on air quality (Paragraph Reference ID: 32-001-20191101 to 32-008-20191101) provides a framework for implementing the requirements of the NPPF. It requires consideration of the impact of new development on air quality, how local policy should support improvements in air quality, where information on air quality can be sourced, air quality assessment requirements and the requirements for mitigation to be proportionate and location specific. This guidance has been considered throughout determining the likelihood of potential significant impacts to air quality and the appropriateness of the inherent mitigation for construction dust emission, as provided for as **Appendix 1** to the **oCEMP [APP/7.6]**.

Local Planning Policy

16.2.8 The Scheme is located within the administrative areas of Norfolk County Council (NCC) and Breckland Council (BC), who are the host authorities. Local planning plan policies which are relevant to air quality and have informed the air quality assessment are detailed below:

- Norfolk County Council – Environmental Policy – supports initiatives that lead to clean air
- Breckland Council Local Plan – Policy COM 01 (Design) – requires any new development to be designed in a way as to reduce impact on local air quality

Other Guidance

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

- Institute of Air Quality Management (IAQM) Guidance on the Assessment of Dust from Demolition and Construction V2.2 (Ref 16-10) - The guidance provides a methodology to determine the dust emission magnitude and provides a series of matrices to determine the risk magnitude of potential dust sources associated with construction activities. In addition, mitigation measure appropriate to the level of risk of dust emission are provided. This methodology has been followed in undertaking the construction dust risk assessment and determining appropriate construction dust mitigation as provided for as **Appendix 1** to the **oCEMP [APP/7.6]**
- Environmental Protection UK (EPUK), and IAQM Land-Use Planning & Development Control: Planning for Air Quality (Ref 16-11) - This guidance provides a methodology for the consideration of impacts to air quality for planning purposes. Requirement criteria for an air quality assessment based on the likelihood of impacts to air quality from a proposed development are provided, which have influenced the decision to scope out air quality impacts from this DCO Application
- Defra Local Air Quality Management Technical Guidance (LAQM.TG(22)) (Ref 16-12) – This document was published for use by local authorities in their LAQM review and assessment work. The document provides key guidance in aspects or air quality assessment, including screening, use of monitoring data and use of background data that are applicable to all air quality assessments. The sensitivity of receptors in relation to Air Quality Objectives was used in determining the potential for impacts to air quality at sensitive receptors and the decision to scope out air quality impacts
- Design Manual for Roads and Bridges (DMRB) guidance (Ref 16-13) - This guidance document provides criteria for the number of vehicle movements that may impact ecologically sensitive areas and the habitats of protected species. This has been used to determine that given the level of construction traffic proposed, there are unlikely to be impacts to any ecological receptors and no further assessment is required
- Defra PM2.5 Targets: Interim Planning Guidance - In 2024, Defra released an interim planning guidance on the consideration of the Environmental Act PM2.5 targets. The interim planning guidance outlines the environmental targets (Fine Particulate Matter) (England) Regulations 2023
- IAQM A guide to the assessment of air quality impacts on designated nature conservation sites (Ref 16-14) - This provides a methodology for ensuring that ecologically sensitive areas and the habitats of protected species are not harmed by air pollution in their vicinity. This has been used to determine that given the level of

construction traffic proposed, there are unlikely to be impacts to any ecological receptors and no further assessment is required

Arboriculture

16.2.10 The Arboricultural Impact assessment (AIS) (**ES Appendix 16.4: Arboricultural Impact Assessment [APP/6.4]**) sets out the legislation, planning policy and relevant industry guidance that the assessment has taken into account.

Glint and Glare

16.2.11 The Glint and Glare Assessment (**ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP/6.4]**) sets out the legislation, planning policy and relevant industry guidance that the assessment has taken into account.

Electromagnetic Fields (EMF)

16.2.12 The Electromagnetic Field Assessment (**ES Appendix 16.3: High-Level EMF Assessment [APP/6.4]**) sets out that legislation, planning policy and relevant industry guidance that the assessment has taken into account.

Telecommunications, Utilities and Television Receptors

16.2.13 Effects related to existing infrastructure are not considered environmental effects and do not require assessment under the EIA Regulations. However, due to the nature of solar farm developments, there is potential to impact existing utility infrastructure both above and below ground. This is addressed through the measures outlined in the corresponding section below. There is no other legislation, policy or guidance specifically related to telecommunications, utilities and television receptors relevant to this assessment.

Waste

Legislation and Regulations

16.2.14 The Environmental Protection Act 1990 (Ref 16-15) is the primary legislation which controls and regulates the safeguarding of resources, environmental pollution and protecting public health. It puts measures in place to manage waste, addressing issues relating to air quality, land contamination, reducing pollution and water pollution

16.2.15 The Environment Act 2021 (Ref 16-16) is legislation that makes provisions for environmental protection and also outlines the priority for waste reduction and resource efficiency. The Act promotes circular economy by encouraging recycling and reducing waste

16.2.16 The Environmental Permitting (England and Wales) Regulations 2016 (Ref 16-17) aims to streamline and consolidate the permitting system for activities that could harm human health or the environment. A set of regulations introduced to set out laws of environmental protection to manage activities that have the potential to cause harm to the environment

16.2.17 The Waste (England and Wales) Regulations 2011 (Ref 16-18) transposes the Waste Framework Directive into national law via the Waste (Miscellaneous Amendments) (EU Exit) Regulations 2019

16.2.18 The Hazardous Waste Regulations (England and Wales) 2005 (amended 2006) (Ref 16-19) establishes a comprehensive framework for managing hazardous waste. A set of regulations to control hazardous waste, ensuring its safe handling from all stages including production, transportation and the disposal of hazardous waste

16.2.19 The Waste Electrical and Electronic Equipment Regulations 2013 (Ref 16-20) aims to reduce the amount of electrical and electronic waste going to landfill and improve the recovery and recycling rates of these products. These regulations are part of the broader effort to promote a circular economy by ensuring that valuable materials are recovered and reused, reducing the environmental impact of electronic waste. The waste hierarchy will be applied throughout the lifetime of the Scheme during construction, operation (and maintenance) and decommissioning; and

16.2.20 The Waste Batteries and Accumulators Regulations 2009 (Ref 16-21) aims to ensure that environmental protection against contamination from the disposal of batteries (including 'industrial' scale battery energy storage units) are underpinned in legislation. This includes compulsory implementation of collection, retrieval and recycling of batteries and accumulators by their producer or distributor, and the prevention of batteries and accumulators from being incinerated or sent to landfill.

Planning Policy

National Planning Policy

- National Policy Statements (NPS) are a suite of documents issued by the Secretary of State for Energy Security and Net Zero, setting out the government's policy for delivery of major energy infrastructure and represent the primary policy tests against which DCO Application for the Scheme will be considered. Listed below are the details of the elements of NPS considered relevant to the Waste assessment:
  - National Policy Statement (NPS) for Energy (EN-1) – Overarching NPS EN-1 (Ref. 16-22) sets out in Section 5.15 Resource and Waste Management the strategy that should be taken regarding reducing the amount of waste being produced where possible and by trying to use it as a resource
  - Paragraph 5.15.1 states that: "Government policy on hazardous and non hazardous waste is intended to protect human health and the environment by producing less waste and by using it as a resource wherever possible. Where this is not possible and disposal is required as a last resort, waste management regulation ensures that waste is disposed of in a way that is least damaging to the environment and to human health."
  - It is acknowledged that Paragraph 5.15.2 states: "Sustainable waste management is implemented through the waste hierarchy, which sets out the priorities that must be applied when managing waste. These are (in order and as shown on Plate 16-1):

- *Prevention;*
- *Preparing for reuse;*
- *Recycling;*
- *Other recovery, including energy recovery; and*
- *Disposal."*

16.2.21 Paragraphs 5.15.6 to 5.15.13 outline the considerations for an applicant's assessment, and paragraphs 5.15.14 to 5.15.19 outline the considerations for SoS decision making

- Paragraph 5.15.15 states that the SoS should be satisfied that:

  "Any such waste will be properly managed, both on-site and off-site.

  The waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area.

  Adequate steps have been taken to minimise the volume of waste arisings, and of the volume of waste arisings sent for recovery or disposal, except where that is the best overall environmental outcome."

- It goes on to further state that applicants should seek to minimise the volume of waste produced and the volume of waste sent to disposal. Good practice construction management should be followed in relation to storing of materials in an adequate and protected place on site to prevent waste generation.

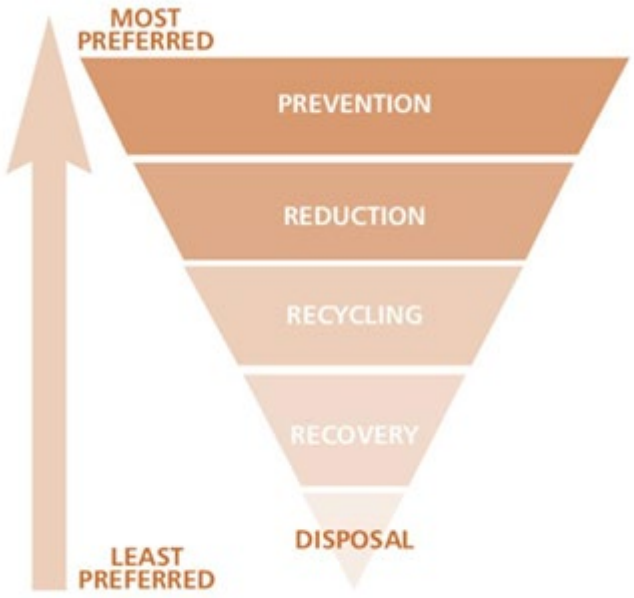


Plate 16-1 Waste Hierarchy

16.2.22 The NPPF (Ref 16-23) 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 both important and relevant to the SoSs consideration of the Scheme. Listed below are details of the elements of the NPPF that are relevant to this chapter, and how and where they are covered in the ES:

- The NPPF sets out national planning guidance in England, with a strong emphasis on sustainable development. Key focus areas include:
  - Supporting a strong economy
  - Promoting healthy and safe communities
  - Improving transport and communications
  - Encouraging good design
  - Protecting the Green Belt
  - Tackling climate change
  - Conserving the natural and historic environment
- Although the NPPF does not directly cover waste in a dedicated section, the NPPF does support sustainable waste management through several policies:
  - Making effective use of land
  - Meeting the challenge of climate change, flooding and coastal change

- Facilitating the sustainable use of minerals
- Plan-making

16.2.23 Additional national policy relevant to the Scheme waste assessment includes:

- The National Planning Policy for Waste (NPPW) 2014 (Ref 16-24) – The NPPW, published in 2014, outlines the UK government's approach to waste management planning. The waste management framework in England guides on how to reduce and minimise the environmental impact via sustainable waste management facilities.
- Environmental Improvement Plan 2023 (Ref 16-25) – The Environmental Improvement Plan is the first revision of the 25 Year Environment Plan, mandated by the Environment Act 2021. It outlines specific targets, commitments, and actions to achieve the 10 goals set out in the 25 Year Environment Plan, reinforcing the long-term vision for environmental health and sustainability.
- The Waste Management Plan for England 2021 (Ref 16-26) – The Waste Management Plan for England provides an overview of the current waste management in England. The plan aligned with the requirements of the Waste (England and Wales) Regulations 2011 consolidating existing waste management policies into a single national plan without introducing new policies.
  - A Green Future: Our 25 Year Plan to Improve the Environment 2018 (Ref 16-27) – A Green Future: Our 25 Year Plan to Improve the Environment (2018) outlines the UK government's long-term strategy to enhance the natural environment within a generation. The plan includes several goals including 'minimising waste' which includes:
  - Working towards our ambition of zero avoidable waste by 2050
  - Working to a target of eliminating avoidable plastic waste by end of 2042
  - Meeting all existing waste targets – including those on landfill, reuse and recycling – and developing ambitious new future targets and milestones
  - Seeking to eliminate waste crime and illegal waste sites over the lifetime of this Plan, prioritising those of highest risk. Delivering a substantial reduction in litter and littering behaviour
  - Significantly reducing and where possible preventing all kinds of marine plastic pollution – in particular material that came originally from land.
- Our Waste, Our Resources, A Strategy for England 2018 (Ref 16-28) – Our Waste, Our Resources, A Strategy for England outlines the UK government's approach to managing waste and resources sustainably. The strategy aims to minimise waste, promote resource efficiency, and transition towards a circular economy. Chapter 3 focuses on 'resource recovery and waste management' which addresses the following:
  - Improve recycling rates by ensuring a consistent set of dry recyclable materials is collected from all households and businesses

- Improve working arrangements between and better support performance of local authorities
- Address barriers to the use of recycled materials
- Encourage waste producers and managers to implement the waste hierarchy in respect of hazardous waste.

16.2.24 The strategy aligns with the broader goals of the 25 Year Environment Plan.

- The Waste Prevention Programme for England: Maximising Resources, Minimising Waste 2023 (Ref 16-29) – The Waste Prevention Programme for England outlines the government's strategy to manage resources and reduce waste, aiming to transition towards a circular economy. The waste prevention programme outlines the approach to achieving the second strategic principle of the Resources and Waste Strategy: preventing waste from occurring initially and managing it more effectively when it does highlighting the following key themes:
  - Designing out waste: Including ecodesign and consumer information requirements, and Extended Producer Responsibility schemes
  - Systems and services: Including collection and take-back services, encouraging reuse, repair, leasing businesses and facilities
  - Data and information: including materials databases, product passports (sets of data, unique to the specific product that can be accessed online and give detailed information on, for example, contained materials, components and history, to support improved outcomes such as higher quality recycling) and voluntary corporate reporting.

Local Planning Policy

16.2.25 The Scheme is located within the administrative areas of NCC and BC who are the host authorities. Local planning policies which are relevant to waste and have informed the Waste assessment are detailed below:

- The Norfolk Minerals and Waste Local Plan (NM&WLP) (Ref 16-30) was adopted in May 2025. This sets out how NCC manages mineral extraction and waste disposal across the County. It guides where these activities can take place and ensures they are carried out in a way that protects Norfolk's environment and communities.

16.2.26 The NM&WLP covers the period to the end of 2038. The NM&WLP replaces and consolidates the following Minerals and Waste Development Plan Documents with one Local Plan:

- The Norfolk Core Strategy and Minerals and Waste Development Management Policies Development Plan Document (DPD) (the 'Core Strategy) (adopted in 2011)
- The Norfolk Waste Site Specific Allocations DPD (adopted in 2013); and

- The Norfolk Minerals Site Specific Allocations DPD (adopted in 2013). The Minerals Site Specific Allocations DPD was subsequently amended by the adoption of the Single Issue Silica Sand Review in December 2017.

16.2.27 The NM&WLP outlines strategic objectives for waste management under Section 4.2, including:

- WSO1. Support the prevention and minimisation of waste generation in line with the Waste Hierarchy, and where waste cannot be avoided, maximise the recovery value from waste
- WSO2. To support an increase in the proportion and the quantity of waste that is re-used, recycled and recovered within Norfolk.

16.2.28 The plan recognises that waste is an inevitable by-product of economic and social activity, but also highlights its potential value as a resource, either as a material input or through energy recovery. The plan acknowledges the economic role of the waste sector in Norfolk, both as an employer and as a service essential to business productivity and environmental protection

16.2.29 To support a plan-led approach to waste management, the NM&WLP includes several policies, notably:

- Policy WP1: Sustainable waste management – The policy supports the strategy for waste management in Norfolk in ensuring there is enough capacity to manage the expected amounts of Local Authority Collected Waste (LACW), commercial and industrial (C&I) waste, and inert waste. It also includes appropriate provision for handling, transferring, and managing hazardous waste, while recognising that due to the relatively small quantities involved, it may not be practical for Norfolk to host a full range of hazardous waste facilities. However, Norfolk may accommodate certain specialist facilities that also serve other areas.
- The NM&WLP highlights that Norfolk has facilities for handling hazardous waste, including that which is WEEE, that also caters for inbound hazardous waste from elsewhere in the UK. Whilst this identifies waste handling capabilities within the host authority area, it is also noted that Norfolk does not have any hazardous waste landfill capacity. This therefore requires all hazardous waste to be fully treated, or transported outside the County if it is to be sent to landfill.

Other Guidance

16.2.30 The assessment has been carried out in accordance with the following other guidance documents.

16.2.31 The Institute of Sustainability and Environment Professionals (ISEP) (formally the Institute of Environmental Management and Assessment (IEMA)) guide to: Materials and Waste in Environmental Impact Assessment – Guidance for a proportionate approach (2020) (Ref 16-31) provides a clear framework for determining the methodology for assessing waste impacts. This includes defining the area of influence subject to study, applying sensitivity

criteria, and defining how to assess the magnitude of impacts. As a result, this guidance has been incorporated into the assessment in the rest of this chapter.

16.2.32 Waste Duty of Care Code of Practice (Ref 16-32) provides practical guidance on how to meet waste duty of care requirements in England. It applies to anyone who produces, carries, keeps, treats, disposes of, or has control of waste. The main goal is to ensure waste is managed safely and responsibly and only handled by authorised businesses.

16.2.33 The Waste Hierarchy (produced under Reg 15(1) of the Waste (E&W) Regulations 2011) (Ref 16-33) ranks waste management options based on their environmental impact. It prioritises preventing waste first, followed by preparing for reuse, recycling, recovery, and lastly, disposal (e.g., landfill). This hierarchy is designed to minimize waste and its environmental footprint.

References

Ref 16-1 The Stationery Office (1995) The Environment Act 1995 (Part IV), London

Ref 16-2 The Stationery Office (2021) The Environment Act 2021, London

Ref 16-3 Defra (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland – [online]

Ref 16-4 The Stationery Office (2000) Statutory Instrument 2000, No 928, The Air Quality (England) Regulations 2000, London

Ref 16-5 The Stationery Office (2010) Statutory Instrument 2010, No 1001, The Air Quality Standards Regulations 2010, London

Ref 16-6 Environmental Protection (2023) The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 – [online]

Ref 16-7 Defra (2019) The Clean Air Strategy – [online]

Ref 16-8 European Parliament and Council. (2016). Regulation (EU) 2016/1628 of 14 September 2016 on requirements relating to gaseous and particulate pollutant emission limits and type-approval for internal combustion engines for non-road mobile machinery

Ref 16-9 Department for Transport (2018) Non-Road Mobile Machinery (Type-Approval and Emission of Gaseous and Particulate Pollutants) Regulations 2018

Ref 16-10 Institute of Air Quality Management (2024) Guidance on the assessment of dust from demolition and construction v2.2 – [online]

Ref 16-11 Environmental Protection UK and Institute of Air Quality Management (2017), Land-Use Planning & Development Control: Planning For Air Quality v1.2 – [online]

Ref 16-12 Defra (2022) Local Air Quality Management Technical Guidance (TG22) – [online]

Ref 16-13 Design Manual for Roads and Bridges (2024) LA 105 Air quality (vertical barriers)

Ref 16-14 Institute of Air Quality Management, (2020) A guide to the assessment of air quality impacts on designated nature conservation sites

Ref 16-15 Environmental Protection Act 1990, 1990 c.43. (as amended)

Ref 16-16 Environment Act 2021, 2021 c.30. (as amended)

Ref 16-17 The Environmental Permitting (England and Wales) Regulations 2016, 2016 c.1154. (as amended)

Ref 16-18 The Waste (England and Wales) Regulations 2011, 2011 c.988. (as amended)

Ref 16-19 The Hazardous Waste (England and Wales) Regulations 2005, 2005 c.894 (as amended)

Ref 16-20 The Waste Electrical and Electronic Equipment (WEEE) Regulations 2013, 2013 c.3113. (as amended)

Ref 16-21 The Waste Batteries and Accumulators Regulations 2009, 2009 c.890. (as amended)

Ref 16-22 Department for Energy Security and Net Zero (2024). Overarching National Policy Statement for Energy (EN-1). London: The Stationery Office.

Ref 16-23 Ministry of Housing, Communities and Local Government (2025). National Planning Policy Framework. London: The Stationery Office.

Ref 16-24 Department for Communities and Local Government (2014). National Planning Policy for Waste. London: DCLG.

Ref 16-25 Department for Environment, Food & Rural Affairs (2023). Environmental Improvement Plan 2023. London: DEFRA.

Ref 16-26 Department for Environment, Food & Rural Affairs (2021). Waste Management Plan for England. London: DEFRA.

Ref 16-27 HM Government, Department for Environment, Food & Rural Affairs (2018). A Green Future: Our 25 Year Plan to Improve the Environment. London: DEFRA.

Ref 16-28 HM Government, Department for Environment, Food & Rural Affairs (2018). Our Waste, Our Resources: A Strategy for England. London: DEFRA.

Ref 16-29 Department for Environment, Food & Rural Affairs (2023). Waste Prevention Programme for England: Maximising Resources, Minimising Waste. London: DEFRA.

Ref 16-30 Norfolk County Council (2025). Norfolk Minerals and Waste Local Plan 2023–2038. Norwich: Norfolk County Council.

Ref 16-31 Institute of Environmental Management and Assessment (2020) Materials and Waste in Environmental Impact Assessment: Guidance for a Proportionate Approach. Lincoln: IEMA.

Ref 16-32 Department for Environment, Food & Rural Affairs, Environment Agency, Llywodraeth Cymru Welsh Government (2018). Waste Duty of Care Code of Practice.

Ref 16-33 Department for Environment, Food & Rural Affairs (2011). Guidance on applying the Waste Hierarchy. London: DEFRA.

THE DROVES
SOLAR FARM