

Droves Solar Farm (EN0110013)

Local Impact Report (Planning Act 2008, Section 60(3))

Breckland District Council (2nd June 2026)

1.0 Terms of Reference

Introduction

- 1.1 Breckland District Council (“the Council”) welcomes the opportunity to submit a Local Impact Report (LIR) on the Development Consent Order (DCO) application (Ref: EN0110013) for The Droves Solar Farm (“the Scheme”), promoted by The Droves Solar Farm Limited (part of Island Green Power Limited (IGP)).
- 1.2 An LIR is defined under Section 60(3) of the Planning Act 2008 as “*a report in writing giving details of the likely impact of the proposed development on a local authority area (or any part of that area)*”. The content of the LIR is a matter for the local authority concerned as long as it falls within this statutory definition. This provides a means for Local Planning Authorities to present knowledge and evidence of local issues in a full and robust report to the Examining Authority (ExA). This report is based on the existing local knowledge of Council Officers and Elected Members.
- 1.3 This is an LIR relating to the submitted Development Consent Order application for the Droves Solar Farm. The Council has had regard to the purpose of LIRs as set out in s60(3) of the Planning Act 2008 (as amended), the Planning Inspectorate’s Advice Note One, Local Impact Reports (Version 2, April 2012), and the Planning Inspectorate’s Nationally Significant Infrastructure Projects: Advice for Local Authorities (August 2024 – last updated December 2024) in preparing this LIR.

Scope

- 1.4 The LIR relates only to the impacts of the proposed development as it affects the administrative area of the district of Breckland. The Council is a statutory consultee for this Nationally Significant Infrastructure Project (NSIP) as it is the Local Authority within whose administrative area the Order Limits are situated. All solar developments over 100MW capacity are currently considered by the Secretary of State for Energy (SoS) under the Planning Act 2008, with the Council acting as a statutory consultee.
- 1.5 Specifically, this LIR describes the impact of Works 1 to 11 (as described in the Development Consent Order (DCO)), namely;
 - Work No. 1 comprising the solar photovoltaic generating station contained within the Solar PV Site comprising an area of approximately 608ha to include the Conversion Units / 33kV Sub-distribution Switch Rooms and the cabling between these elements and the Customer Substation. The Solar PV Site is also expected to include Ancillary Buildings, which could include containers

for storage of materials, as well as operational monitoring and maintenance equipment;

- Work No. 2 comprising the energy storage facility comprising the BESS contained within Fields 24 and 27, including access and temporary construction compounds;
- Work No. 3 comprising the works in connection with the Customer Substation located within Field 27, including access and temporary construction compounds, and cabling between Work No. 3 and Work No. 4;
- Work No. 4 comprising the works in connection with the new National Grid Substation located within Field 27, including access from the A1065, temporary construction compounds and associated mitigation planting;
- Work No. 5 comprising the Grid Connection Infrastructure, including a diversion and decommissioning of the existing 400kV overhead line, removal of old pylons and installation of new pylons, including works to lay electrical cables, access, and temporary construction laydown areas for electrical cables;
- Work No. 6 comprising the works associated with the Solar PV Site, including boundary treatment; security and monitoring equipment; landscaping and biodiversity mitigation and enhancement measures; internal access tracks and improvement, maintenance and use of existing private tracks; access arrangements; footpaths, and roads; temporary footpath diversions; signage and information boards; earthworks; drainage and irrigation infrastructure and improvements to existing drainage and irrigation systems; electricity and telecommunications connections; and the potential undergrounding of the existing 11kV overhead line in Fields 20, 21, 25 and 26;
- Work No. 7 comprising the temporary construction and decommissioning compounds within the Solar PV Site and works associated with these comprising areas of hardstanding; car parking; site and welfare offices and workshops; security infrastructure, including cameras, perimeter fencing and lighting; area to store materials and equipment; site drainage and waste management infrastructure (including sewerage); and electricity, water, wastewater and telecommunications connections;
- Work No. 8 comprising the works to facilitate both temporary construction access and permanent access to the Order limits;
- Work No. 9 comprising the works to create and maintain habitat management areas;
- Work No. 10 comprising the creation of permissive paths; and
- Work No. 11 comprising the mitigation areas specifically for Skylark and Curlew, to allow continued agricultural use and associated access.

1.6 The LIR does not describe the proposed development any further, relying on the applicant's description as set out in Chapter 5 of the Environmental Statement (ES) (APP/6.1).

- 1.7 Only a brief description of the development area is provided below to highlight particular features. The applicant's ES otherwise provides a sufficient description.
- 1.8 There is no relevant planning history to be described, with the Order Limits primarily encompassing greenfield land in the form of agricultural fields, other than where it encompasses the public highway.

Purpose and structure of the LIR

- 1.9 The national guidance for LIRs states that, when the ExA decides to accept an application, it will invite relevant local authorities to submit a LIR. It is the responsibility of local authorities to prioritise preparation of the LIR irrespective of whether the local authority considers the development would have a positive or negative impact on their area.
- 1.10 The LIR's primary purpose is therefore to identify the likely impacts of the proposed development on the local authority area, having regard to local policy, evidence and local knowledge. A number of topics are suggested within the guidance which may be of assistance in the LIR. The topics considered relevant by the Council are included in this report, reinforced by local knowledge and evidence for the benefit of the ExA. This is done under topic-based headings (following the form of the Overarching National Policy Statement (NPS) for Energy (EN-1)) reflecting the likely nature of impacts. The key issues for the Council and the local community are then identified, followed by commentary on the extent to which the applicant addresses these issues by reference to the application documentation, including the DCO articles, requirements and obligations, as relevant.
- 1.11 While a number of the points made in the LIR are repeated from the Council's Statutory Consultation and Relevant Representations (Section 56) consultation responses, the importance afforded to the LIR in the Planning Act 2008 is such that they are reconfirmed here so that the ExA and the SoS are in no doubt as to the Council's views. The LIR has sought not to duplicate material that will be addressed through Statements of Common Ground where appropriate, and reference is made to these where relevant.
- 1.12 The LIR may also comment on DCO obligations and their impact on the local authority's area. The advice is however clear that in producing an LIR the local authority is not required to carry out its own consultation with the community. It is understood that parish councils, organisations and members of the public are able to make representations directly to the Planning Inspectorate as "*interested parties*" so that their comments about the scheme will be considered by the ExA. As such the views of local interest groups have not been sought specifically for the purposes of this report.
- 1.13 This LIR has been written to incorporate the relevant topics and guidance in the Advice Note specifically arising from the DCO application. This LIR should be read alongside the Council's Relevant Representations, Written Representations, Statement of Common Ground, and oral submissions.

2.0 Description of the Area

Breckland District

- 2.1 Spanning over 500 square miles Breckland is a geographically large rural District located in the heart of Norfolk. The District is characterised by a dispersed settlement pattern of market towns, villages and hamlets. There are five market towns, a network of local service centres, and numerous small villages and hamlets. Approximately half the current population live in one of the five market towns of Attleborough, Dereham, Swaffham, Thetford and Watton with the remaining population dispersed across the District. The area is represented through 112 town and parish councils and the District Council.
- 2.2 Two trunk road routes run across the District and Breckland's strategic position is emphasised by good road communications offered by the A47 and A11. The A47 links Dereham and Swaffham with Norwich in the east and King's Lynn in the west and further afield to Peterborough and the A1(M), while the A11 links Attleborough and Thetford with Norwich and the Norwich Research Park to the north-east and Newmarket, Cambridge and the M11 in the south-west. The remaining parts of Breckland are served by a network of non-trunk "A" category, secondary and minor roads.

Development Site

Location and Context

- 2.3 The Order Limits comprise approximately 840 hectares of predominantly agricultural land located wholly within the administrative area of Breckland Council, with Norfolk County Council as the highway and county authority. The Site lies to the north of Swaffham, with South Acre immediately adjacent to the northern boundary, Castle Acre approximately 1.2 km to the north, and West Acre approximately 1.7 km to the northwest.
- 2.4 The surrounding area is characterised by a dispersed rural settlement pattern, including small villages, isolated dwellings and farmsteads, reflecting the agricultural character of this part of Breckland.

Existing Land Use and Landscape Character

- 2.5 The Site is currently in active agricultural use, comprising a mix of arable cultivation and livestock farming across large fields divided by hedgerows, tree belts, agricultural tracks and drainage ditches. Several former marl pits and areas of semi natural vegetation are present within the Order Limits.
- 2.6 The topography of the Site is gently undulating, with part occupying relatively elevated ground within the local landscape, contributing to longer range views. The Site's high point is close to Round Covert at circa 80m AOD, with the land falling as it extends north towards the Nar Valley.
- 2.7 In landscape character terms, the Site lies primarily within the The Brecks – Heathland with Plantation and Breckland Plateau Farmland Landscape Types, including parts of the Swaffham Heath and North Pickenham Plateau Landscape Character Areas, with a small area within the River Nar Tributary Farmland. These landscapes are characterised by large scale arable fields, open skylines, variable hedgerow structure and a strong relationship between

land use and visual experience. There are no statutory landscape designations covering the Site.

Transport Network, Access and Public Rights of Way

- 2.8 The A1065 runs north/south along and across parts of the eastern edge of the Site and is the primary route linking Swaffham with settlements to the north. A network of rural roads, including South Acre Road, Low Road, River Road, Narford Lane, Narford Road and West Acre Road, define and traverse the Site.
- 2.9 The Site contains a notable density of Public Rights of Way, including restricted byways and footpaths that often follow historic droveways such as Fincham Drove, Petticoat Drove and Washpit Drove. These routes are actively used for recreation and provide close range and, in places, open views across the Site.

Existing Built Form and Infrastructure

- 2.10 Built development within the Site is limited and largely associated with agricultural buildings. Isolated residential properties are located near the Site boundaries, with Keepers Cottage situated within the wider Site area but excluded from the Order Limits.
- 2.11 A key existing feature is the 400 kV overhead electricity transmission line and pylons, which run broadly east/west through the northern and central parts of the Site. This infrastructure is already a visually prominent element of the local landscape.

Heritage and Sensitive Receptors

- 2.12 There are no designated heritage assets within the Order Limits. However, the Site lies in close proximity to a concentration of designated heritage assets, including South Acre Conservation Area immediately to the north, Castle Acre Conservation Area, Castle Acre Priory and Castle Acre Castle Scheduled Monuments, and the Registered Park and Garden at Narford Hall. The significance of many of these assets derives in part from their rural setting and relationship with the surrounding agricultural landscape.

Relationship of the Proposed Development to its Context

- 2.13 The Proposed Development would introduce a large-scale solar farm and associated energy infrastructure across a substantial proportion of the Site for a long term temporary operational period of up to 60 years. Solar PV arrays would be distributed across multiple field parcels, with the most visually prominent elements, including the BESS, Customer Substation and National Grid Substation, concentrated primarily within Fields 24, 27 and adjacent land.
- 2.14 The scale and extent of the Scheme mean that it would interact with multiple landscape character areas, the rural road network, and a large number of public rights of way. The development would result in a fundamental change in land use and landscape character, introducing engineered structures, fencing and access infrastructure into areas currently experienced as open agricultural land.
- 2.15 While existing vegetation and proposed mitigation planting would provide some localised screening, the openness and scale of the Breckland Plateau

mean that parts of the Scheme would remain perceptible in both close and longer range views, particularly from elevated ground and along public rights of way. Similarly, some long range views would be lost with the introduction of the Scheme.

- 2.16 The Scheme would also contribute to the concentration of large-scale energy infrastructure in this part of Breckland, interacting with the existing 400kV overhead line and the cumulative presence of other nearby nationally significant energy projects.
- 2.17 Given the density of PRoW within the Order Limits, the Scheme would be encountered at close proximity by walkers, equestrians and cyclists using droveways and field edge paths. During operation, users would experience the development not only through views of solar arrays and associated infrastructure, but also through the changed character of the land they pass through, including perimeter fencing, access tracks and managed grassland beneath panels.
- 2.18 The Applicant proposes permissive paths and enhancements to the access network. While these measures provide public benefit, they do not alter the fact that the Scheme would materially change the experience of moving through this part of the Breckland landscape.
- 2.19 Although the Scheme avoids direct physical impacts on designated heritage assets, its relationship with the settings of nearby conservation areas, scheduled monuments and listed buildings is an important aspect of the Site context. In particular, the proximity of the northern parts of the Site to South Acre, Castle Acre and associated assets means that changes to land use, landscape structure and views have the potential to affect how these heritage assets are experienced, especially where open agricultural land currently forms part of their wider setting.
- 2.20 In summary, the Site comprises an extensive area of attractive and intrinsically rural Breckland farmland characterised by its scale, openness, recreational use and proximity to heritage assets. The Scheme would interact with this context across a wide area and through multiple receptors, resulting in changes to landscape character, views, rural land use and the experiential qualities of the area for a prolonged temporary period.

Energy Infrastructure Context in Norfolk

- 2.21 Norfolk has experienced an extraordinary recent increase in large scale energy infrastructure proposals, particularly solar generation and associated grid development. This reflects wider national policy objectives to increase renewable energy capacity and reinforce the electricity transmission network.
- 2.22 The District, **and the wider county**, are therefore increasingly hosting a range of NSIPs and other large-scale renewable energy schemes.
- 2.23 At the time of preparing this LIR, a number of solar NSIP scale projects are at different stages of the Planning Act 2008 regime within Norfolk and the surrounding area. These include:
 - High Grove Solar Farm (1,400 ha);
 - East Pye Solar Farm (1,110 ha); and

- Tasway Solar Farm (1,100 ha).
- 2.24 These projects are typically characterised by:
- Large site areas (often several hundred hectares);
 - Long operational timeframes; and
 - Associated infrastructure including substations, battery energy storage systems and grid connections.
- 2.25 Taken together, these schemes indicate an emerging pattern of spatial concentration of large scale solar and energy infrastructure within Norfolk, including areas of Breckland District.
- 2.26 This pattern reflects:
- The availability of suitable land with grid connectivity;
 - The presence of existing and proposed National Grid infrastructure corridors; and
 - The relatively sparse settlement pattern and rural character of parts of the county.
- 2.27 In addition to NSIP scale schemes, the Council considers that Norfolk is extremely attractive to solar farms of all scales, the following being notable examples within Breckland:
- Jafa Solar Farm, Little Dunham (Ref: 3PL/2022/1215/F); and
 - Old Buckenham Solar Farm, Land off Attleborough Road (Ref: 3PL/2021/0236/F)
- 2.28 Further notable proposed schemes currently under determination:
- PL/2025/0998/FMAJ - Proposed construction of ground mounted solar panel arrays and associated infrastructure - Land at Dykewood Farm, Beeston
 - PL/2025/0904/FMAJ - Construction and operation of a Solar Farm and Battery Energy Storage System, together with related infrastructure, access, drainage, landscaping and other associated works - Land at Park Farm, Birds Corner, Shipdham
- 2.29 It is considered that the approved schemes listed in paragraph 2.27 demonstrate that the Council is supportive of appropriately located solar farms.
- 2.30 Furthermore, it is considered that schemes below the NSIP thresholds also contribute to the urbanisation and landscape issues identified within this LIR and should be given appropriate consideration by the ExA in the assessment of cumulative effects.
- 2.31 The implications of this pattern of development, including any cumulative effects on landscape character, visual amenity and other receptors, are considered in the relevant topic sections of this LIR.

3.0 National and Local Planning Policy Context

Statutory Development Plan

- 3.1 Section 38(3)(b) of the Planning and Compulsory Purchase Act 2004 (as amended) describes the development plan as the relevant documents which have been adopted or approved in relation to that area.
- 3.2 The Order Limits lie wholly within the administrative area of Breckland District Council, with Norfolk County Council acting as Highway Authority, Lead Local Flood Authority and Minerals Authority.
- 3.3 The statutory development plan comprises the Breckland Local Plan (Adopted September 2023). Where made, neighbourhood plans also form part of the development plan for relevant areas.
- 3.4 For the purposes of Section 104 of the Planning Act 2008, the statutory development plan is a material consideration insofar as it provides an understanding of local policy priorities, sensitivities and evidence relevant to the assessment of local impacts, but it does not determine whether development consent should be granted.

National Policy Statements (Local Relevance)

- 3.5 The principal National Policy Statements of relevance are:
 - EN 1 (Overarching Energy Policy Statement)
 - EN 3 (Renewable Energy Infrastructure)
 - EN 5 (Electricity Networks Infrastructure)
- 3.6 These statements confirm the national need for renewable energy generation and associated infrastructure, while requiring careful consideration of impacts on landscape character, agricultural land, heritage assets, residential amenity and cumulative effects.
- 3.7 The LIR focuses on how the Scheme interacts with local circumstances in Breckland, rather than rehearsing overall conformity with national policy.

Spatial Strategy and Settlement Context

- 3.8 Policy GEN 03 (Settlement Hierarchy) establishes a dispersed rural settlement pattern, with growth directed primarily to:
 - Key Settlements: Attleborough and Thetford
 - Market Towns: Dereham, Swaffham and Watton
 - Local Service Centres and villages with defined boundaries
- 3.9 The wider countryside is recognised as a valued rural environment, with development beyond settlement boundaries generally restricted (Policy GEN 05).
- 3.10 The Site lies in predominantly open countryside, outside defined settlement boundaries (as generally required for a development of this nature), and is therefore subject to policy considerations that seek to protect landscape character, rural amenity and the agricultural resource (set out in the relevant sections of this LIR).

Renewable Energy Policy

- 3.11 The Council recognises the national need for renewable energy infrastructure and aligns with the Government's Net Zero trajectory, having declared a climate emergency on 19th September 2019. Since then, the Council has committed to reducing the level of greenhouse gases within the district and is striving to achieve net zero as an organisation by 2035. This is also supported within the Breckland Sustainability Policy Statement 2021–2035. Policy GEN 01 of the Breckland Local Plan (Adopted 2023) states that development should aim to mitigate and adapt to climate change. However, this does not bind the Council to unconditional support for renewable energy development, Policy ENV10 of the Local Plan outlining support for new renewable energy and low carbon development, subject to consideration of the impact of the development and whether this can be made acceptable. The policy requires particular regard to:
- Landscape character and visual amenity, including cumulative effects;
 - Impacts on designated and non-designated heritage assets and their settings;
 - The loss of Best and Most Versatile agricultural land, particularly where long term or irreversible;
 - Effects on biodiversity, ecological networks and green infrastructure; and
 - Amenity impacts such as noise, glint and glare.
- 3.12 Policy ENV 10 therefore establishes local policy support for renewable energy but does so within a framework that places considerable weight on local environmental sensitivity and cumulative impacts.
- 3.13 This identifies the crux of the matter in this case from the point of view of the Council. It cannot be disputed that Norfolk should accommodate the creation of solar farms in principle and the benefits of renewable energy are supported for Breckland. However, the District enjoys a special and unique landscape character, and this development proposal would have a significant impact on the character of the countryside and the visual amenity of those within it. Local Planning Authorities must ensure that protecting the local environment is properly considered alongside the broader issues of protecting the global environment.

Landscape Policy and Evidence Base

- 3.14 Also relevant is Section 15 of the NPPF regarding conserving and enhancing the natural environment. In line with this part of the framework, the Council seeks to protect and enhance the natural environment of the district and recognises the intrinsic character and beauty of the countryside. The countryside includes not just designated landscapes but also the wider countryside. Policy ENV 05 (Protection and Enhancement of the Landscape) seeks to protect Breckland's varied landscapes, requiring development to:
- Reflect the distinctive character of the local landscape;
 - Avoid significant adverse visual effects, particularly in open or elevated landscapes; and

- Be informed by relevant landscape character evidence.
- 3.15 The principal evidence base is the Breckland Landscape Character Assessment (2007). This is supplemented by the Breckland Landscape and Settlement Character Assessment (2022) which provides additional evidence base material with the focus on a number of settlements within the District. The LCA identifies the Site as lying predominantly within:
- The Brecks – Heathland with Plantation and Plateau Farmland Landscape Types, specifically the Swaffham Heath and North Pickenham Plateau a Landscape Character Areas; with
 - Chalk Rivers and Settled Tributary Farmland Character Types to the north and north-east, specifically River Nar Landscape Character Areas.
- 3.16 These landscapes are characterised by large scale arable fields, open skylines, limited vertical features and long-range views, with sensitivity to large scale, engineered development. The Assessment also highlights the sparsely populated settlement patterns, remote character, historic lanes and paths as well as its wider historic context.
- 3.17 Local policy requires that high protection will be given to the landscape, reflecting its role as a regionally significant green infrastructure asset. The Council expects all the development within the District to be of the highest design quality in terms of both architecture and landscape. It should have regard to good practice in urban design and fully consider the context within which it sits. It should embrace opportunities to enhance the character and appearance of an area and contribute to create a sense of local distinctiveness.

Heritage Policy Context

- 3.18 Policies ENV 07 (Designated Heritage Assets) and ENV 08 (Non-Designated Heritage Assets) require development to conserve, and where possible enhance, heritage assets and their settings.
- 3.19 Although there are no designated heritage assets within the Order Limits, the Site lies in proximity to a notable cluster of heritage assets, including:
- South Acre Conservation Area;
 - Castle Acre Conservation Area;
 - Castle Acre Priory and Castle Acre Castle Scheduled Monuments; and
 - Narford Hall Registered Park and Garden.
- 3.20 The Local Plan recognises that the significance of many heritage assets derives in part from their rural setting, reinforcing the importance of assessing indirect and cumulative effects.

Agricultural Land and Rural Character

- 3.21 The Local Plan places importance on the protection of the rural environment and agricultural land through Policies ENV 05 and ENV 10, recognising the economic and landscape value of farming in Breckland.

- 3.22 Large areas of the District are in productive agricultural use, and the loss of such land, particularly Best and Most Versatile land, is a relevant local consideration even where development is temporary in nature.

Conclusion

- 3.23 Taken together, the adopted Local Plan and its supporting evidence base provide an important framework for understanding:
- The sensitivity of Breckland's landscapes to large scale change;
 - The policy balance between renewable energy support and environmental protection; and
 - The significance of cumulative effects in an area already hosting major energy infrastructure.
- 3.24 The LIR therefore utilises the development plan not as a determinative test, but as a means of articulating how nationally significant infrastructure would be experienced locally, and how local policy considerations inform the assessment of impact.

Assessment of Local Impacts

4.0 Introduction

- 4.1 The following sections identify the relevant policies within the development plan and other local policy, together with the key issues arising from the Proposed Development. They also consider the extent to which these matters have been addressed by the Applicant, and the degree of compliance with local policy.
- 4.2 As noted above, for ease of reference, the section headings broadly align with those used in Part 5 of the Overarching National Policy Statement for Energy (EN-1).

5.0 Principle of Development

National Need and Renewable Energy Context

- 5.1 The Applicant's case is that the Proposed Development would make a meaningful contribution to national renewable energy generation, supporting the decarbonisation of the electricity system and assisting in meeting legally binding climate change targets.
- 5.2 The Council recognises that national policy establishes a clear need for renewable energy infrastructure, including large-scale solar generation and associated grid infrastructure. In this context, the principle of solar development is supported at a strategic level.
- 5.3 The Proposed Development comprises a large-scale solar generating station with associated infrastructure, including solar photovoltaic arrays, battery energy storage systems (BESS), substations, and related works, to operate over a long-term temporary period of up to 60 years before decommissioning.

Local Policy Position

- 5.4 At a local level, Policy ENV10 of the Breckland Local Plan (2023) supports renewable energy development in principle, subject to consideration of the impact of the development and whether this can be made acceptable.
- 5.5 The policy requires particular regard to:
- Effects on landscape character and visual amenity;
 - Impacts on heritage assets and their settings;
 - The loss of agricultural land;
 - Cumulative impacts arising from multiple schemes; and
 - Effects on biodiversity and local amenity.
- 5.6 The Local Plan therefore establishes a policy position of qualified support, whereby renewable energy proposals are acceptable only where their impacts are appropriately avoided, minimised or mitigated.

Breckland Council Position on the Principle of Development

- 5.7 In its Relevant Representations, the Council acknowledged that the principle of renewable energy development is broadly supported, consistent with both national and local policy.
- 5.8 However, the Council's position is that:

- The acceptability of the Proposed Development turns on the scale, siting and extent of the Scheme, and
 - The extent to which its local environmental and cumulative impacts can be satisfactorily addressed.
- 5.9 In particular, the Council identified a number of key areas requiring careful examination, including:
- The scale of land take and resulting change in landscape character and visual amenity;
 - The relationship of the Scheme to the rural settlement pattern and public rights of way network;
 - The potential cumulative impact arising from other large scale energy schemes in the area; and
 - The effects on agricultural land and the rural economy.

Applicant's Case and Approach

- 5.10 The Applicant's Planning Statement and ES set out a case that:
- The Site has been selected having regard to grid connectivity, land availability and environmental constraints;
 - Potential adverse effects have been avoided or reduced through design iteration, including the distribution of panels, retention of vegetation and provision of mitigation planting; and
 - The Scheme would deliver environmental enhancements, including biodiversity gains, alongside its energy generation benefits.
- 5.11 The ES assesses the likely environmental effects of the Proposed Development across a range of topic areas, including landscape and visual impact, ecology, heritage, transport and land use.

Approach of this Local Impact Report

- 5.12 The Local Impact Report does not seek to dispute the national need or broad principle of renewable energy development, nor the national need case.
- 5.13 Instead, it focuses on:
- Whether the local impacts of the Proposed Development are acceptable in planning terms, having regard to the characteristics of Breckland; and
 - Whether the Applicant has provided sufficient and robust evidence to support its conclusions, and whether the proposed mitigation is likely to be effective.
- 5.14 The following sections therefore consider, by topic, the magnitude and significance of impacts at a local level, and the adequacy of the Applicant's response, drawing on the Council's knowledge of the area and its policy framework.

6.0 Air Quality and Emissions

Introduction

- 6.1 This section considers the likely effects of the Proposed Development on air quality within Breckland, together with an assessment of the adequacy of the Applicant's assessment and proposed mitigation.
- 6.2 Policy COM01 of the Breckland Local Plan (2023) states, "*development should be designed to reduce the impact on local air quality, particularly from road traffic, especially in those areas in or likely to impact on, areas identified as 'at risk' of exceeding air quality objectives*".
- 6.3 Policy COM02 states, "*New development will be expected to take appropriate steps to avoid/mitigate potential negative effects on the health of the population and facilitate enhanced health and well-being through the provision of conditions supportive of good physical and mental health.*"
- 6.4 Policy COM03 requires development to have regard to potential air pollution impacts.
- 6.5 Air quality has been addressed within ES Chapter 16 (Other Environmental Matters) on the basis that likely significant effects are not anticipated, and a proportionate, high-level assessment is therefore appropriate.

Scope and Approach of the ES

- 6.6 The Applicant proposed to scope out detailed air quality assessment, which was agreed by the Planning Inspectorate, subject to the provision of supporting information demonstrating that effects would not be significant.
- 6.7 This includes:
- Confirmation that construction traffic flows are below relevant thresholds (EPUK/IAQM);
 - Identification of sensitive receptors and justification of the study area; and
 - Demonstration that appropriate mitigation measures are embedded.
- 6.8 The Council considers this to be a proportionate approach, consistent with the limited potential for significant effects.

Baseline Conditions

- 6.9 The Site is located within a predominantly rural area, with generally good baseline air quality and a dispersed pattern of sensitive receptors.
- 6.10 Sensitive receptors are limited to:
- Individual residential properties and farmsteads;
 - Users of the local road network; and
 - Nearby ecological sites (including designated sites within the wider area).
- 6.11 No Air Quality Management Areas are identified within the immediate vicinity.

Likely Effects

Construction Phase

- 6.12 The ES identifies that potential effects are limited to:

- Dust emissions arising from construction activities; and
- Vehicle emissions associated with construction traffic and plant.

6.13 The assessment concludes:

- Dust effects would be controlled through mitigation secured via the Outline CEMP and would not be significant.
- Construction traffic flows are predicted to remain below EPUK/IAQM screening thresholds for detailed assessment (i.e. below 500 LDVs and 100 HDVs on any link).
- Effects on ecological receptors are also below DMRB thresholds requiring further assessment.
- Emissions from non-road mobile machinery (NRMM) would be controlled through compliance with emissions standards.

6.14 Overall, no likely significant effects are identified during the construction phase.

Operational Phase

6.15 The ES assesses that the Proposed Development would not give rise to material operational emissions, and therefore no significant effects on air quality are anticipated during operation.

Decommissioning Phase

6.16 Effects during decommissioning are considered comparable to (and no greater than) the construction phase and are therefore also assessed as not significant.

Applicant's Mitigation

6.17 Mitigation is proposed to be secured through the Outline CEMP and Outline CTMP, and includes:

- Preparation of a Dust Management Plan;
- On-site monitoring and complaint procedures;
- Dust suppression measures (e.g. water damping, screening, stockpile management);
- Controls on vehicle movements and routing; and
- Measures to minimise emissions from plant and vehicles.

6.18 These measures reflect standard good practice in accordance with IAQM guidance.

Council Assessment of Adequacy

6.19 The Council's Relevant Representations did not identify air quality as a principal concern.

6.20 Having reviewed the ES, the Council considers that:

- The scoping approach is appropriate, given the absence of significant emission sources;
- The Applicant has provided sufficient justification to demonstrate that construction traffic and emissions fall below recognised thresholds;

- The identification of impact pathways (dust and traffic emissions) is proportionate; and
- The proposed mitigation, secured through the CEMP and CTMP, is standard, comprehensive and likely to be effective.

6.21 The Council is therefore satisfied that the Applicant has:

- Adequately assessed the likely effects, and
- Provided a robust and proportionate mitigation strategy.

Conclusion

6.22 The Council concludes that:

- Effects on air quality would be limited to the construction and decommissioning phases and would be temporary;
- No significant operational effects are anticipated; and
- The Applicant's assessment and mitigation proposals are adequate and consistent with best practice.

6.23 Air quality is therefore not considered to constrain the Proposed Development, subject to the implementation of mitigation secured through the Development Consent Order.

7.0 Biodiversity and Geological Conservation

Introduction

7.1 This section considers the likely effects of the Proposed Development on biodiversity and geological conservation, together with an assessment of the adequacy of the Applicant's assessment and proposed mitigation.

7.2 Policy ENV02 of the Breckland Local Plan (adopted 2023) seeks to protect biodiversity, requiring all development with the potential to affect biodiversity to demonstrate how such effects have been considered, by firstly demonstrating how effects have been avoided, and then how effects that cannot be avoided have been minimised. Residual harm, after all measures to prevent and adequately mitigate have been applied, must be adequately compensated for.

7.3 Policy ENV03 of the Local Plan requires a Habitats Regulations Assessment is undertaken on all proposals for development that are likely to have a significant effect on The Breckland Special Protection Area (SPA). Development will only be permitted where it can be demonstrated that the proposal will not adversely affect the integrity of the SPA or the SAC.

Applicant's Assessment

7.4 The Applicant has assessed ecological effects within the Environmental Statement, supported by a range of technical surveys and assessments.

7.5 The Proposed Development includes embedded mitigation and enhancement measures, including habitat retention, buffer zones, ecological management and proposals for biodiversity enhancement, which are intended to avoid or reduce adverse effects and deliver biodiversity benefits.

7.6 The ES concludes that, subject to these measures, no unacceptable significant residual effects on ecological receptors would arise.

Breckland Council Position – Biodiversity

7.7 In its Relevant Representations, Breckland Council did not identify biodiversity as a principal area of concern but noted that specialist ecological matters fall primarily within the remit of Natural England and other relevant consultees.

7.8 The Council recognises that:

- Natural England is the principal statutory consultee in respect of designated sites and protected species; and
- Detailed ecological matters, including survey adequacy, impact assessment and mitigation design, are appropriately considered through those expert bodies.

7.9 On that basis, the Council:

- Defers to the advice of Natural England and other relevant consultees on the technical adequacy of the ecological assessment; and
- Considers that appropriate weight should be given to any Statements of Common Ground, agreements or outstanding concerns arising during the Examination process.

7.10 Notwithstanding the above, the Council notes that biodiversity is a key component of Policy ENV10 (Renewable Energy Development) of the Breckland Local Plan (2023), which requires that impacts are appropriately avoided, minimised or mitigated.

7.11 The Council therefore relies on the following to ensure that the requirements of local policy are met:

- The conclusions of the statutory consultees; and
- The securing of mitigation, management and enhancement measures through the Development Consent Order (including the OLEMP and related documents)

Adequacy of Assessment

7.12 Having regard to the information submitted, and in the absence of any substantive concerns raised in its Relevant Representations, the Council considers that:

- The scope of the ecological assessment appears proportionate to the scale and nature of the Proposed Development; and
- The identification of mitigation and enhancement measures is consistent with established practice for solar NSIPs.

7.13 The Council does not raise any specific objections in relation to biodiversity, subject to the conclusions of Natural England and the appropriate securing of mitigation measures.

Geological Conservation

7.14 The ES considers geological receptors within the “Other Environmental Matters” chapter and concludes that no likely significant effects are anticipated.

- 7.15 In its Relevant Representations, the Council confirmed that matters relating to geology and soils fall within the expertise of the Minerals Planning Authority (Norfolk County Council).
- 7.16 The Council therefore:
- Defers to Norfolk County Council in its capacity as Minerals Planning Authority on matters of geological conservation; and
 - Raises no additional comments on this topic.

Conclusion

- 7.17 In respect of biodiversity, the Council:
- Defers to the advice of Natural England and other relevant consultees on technical matters; and
 - Relies on the implementation of mitigation and enhancement measures secured through the Order.
- 7.18 With regard to geological conservation, the Council defers to Norfolk County Council as Minerals Planning Authority.
- 7.19 On this basis, no objection is raised by the Council in principle in respect of this topic.

8.0 Arboricultural Considerations

Introduction

- 8.1 This section considers the potential effects of the Proposed Development on trees and hedgerows, including impacts on arboricultural features within and adjacent to the Site.
- 8.2 Policy ENV06 of the Breckland Local Plan (2023) seeks to ensure that trees and hedgerows are protected from development impacts. The Policy states that trees and significant hedge and shrub masses form part of the green infrastructure network and should be retained as an integral part of the design of development except where their long-term survival would be compromised by their age or physical condition, or there are exceptional and overriding benefits in accepting their loss. The Policy goes on to say that development requiring the loss of a protected tree (including preserved trees and trees classified as being of categories A or B in value) will only be permitted where it would allow for a substantially improved overall approach to the design and landscaping of the development that would outweigh the loss of any tree or hedgerow.
- 8.3 The policy also states, "*Where a proposed development retains existing trees and hedgerows on-site, or where development occurs within a tree root protection area, provision must be made for their care and protection throughout the duration of the development with mitigation measures being put in place to ensure that development works do not have a harmful impact on existing trees. To ensure that tree cover and habitat is retained, it is important that both the short term and long term impacts that a development may have on trees is evaluated at the earliest opportunity.*"

Applicant's Assessment

- 8.4 The Applicant has assessed arboricultural impacts within the Environmental Statement and supporting documentation.
- 8.5 The assessment considers:
- The presence of trees, hedgerows and other vegetation within the Site;
 - Potential impacts arising from:
 - construction activities;
 - access arrangements;
 - the layout of infrastructure; and
 - Measures to retain, protect and enhance existing vegetation, including through mitigation planting.
- 8.6 The Applicant concludes that, with appropriate mitigation, effects on arboricultural features can be appropriately managed.

Breckland Council Position

- 8.7 In its Relevant Representations, Breckland Council identified the importance of existing trees and hedgerows in contributing to:
- local landscape character;
 - visual screening; and
 - the wider rural environment
- 8.8 The Council notes:
- Trees and hedgerows form an important component of the landscape framework of the Site; and
 - These features are integral to:
 - the character of the rural landscape, and
 - the mitigation of visual effects identified elsewhere in this Report.
- 8.9 The Council considers:
- The retention of existing arboricultural features, where possible, is an important aspect of the Scheme; and
 - Loss or damage to such features should be minimised through design and construction practices.
- 8.10 The Council also notes the detailed comments of its Tree and Countryside Officer as set out in the Relevant Representations. In particular, these identify:
- Concerns regarding the proposed removal of a Category A tree (T206), which is considered to represent a significant arboricultural constraint (noted the applicant now proposes to retain this tree within the draft Statement of Common Ground); and
 - The need to minimise and, where possible, avoid encroachment into root protection areas (RPAs) associated with high and moderate value tree groups through refinement of layout and access arrangements.

- 8.11 The Council considers that these matters are capable of resolution through:
- Design refinement, including review of panel layout and haul road alignment; and
 - The securing of appropriate arboricultural protection and management measures, including through an Arboricultural Method Statement and related requirements within the DCO.

Controls and Mitigation

- 8.12 The Council expects that, if development consent is granted, appropriate measures would be secured through the DCO to ensure:
- The protection of retained trees and hedgerows during construction, including root protection and exclusion zones;
 - The implementation of suitable construction management measures, including within a Construction Environmental Management Plan (CEMP);
 - The delivery of replacement planting and landscape mitigation, where removal of vegetation is necessary, to be secure via a final Landscape and Ecological Management Plan that appropriately reflects site conditions and arboricultural constraints; and
 - Matters such as establishment, hedgerow management and lighting are addressed in accordance with relevant best practice guidance.
- 8.13 The Council considers that these measures are necessary to:
- Maintain the integrity of the landscape structure; and
 - Support the effectiveness of mitigation proposed in relation to landscape, visual and ecological effects.

Conclusion

- 8.14 The Council Recognises the importance of trees and hedgerows in the context of the Proposed Development and considers that impacts on arboricultural features can be appropriately managed, subject to the implementation of suitable mitigation and controls.
- 8.15 The Council expects that the retention, protection and enhancement of arboricultural features will be given appropriate weight through the detailed design and construction of the Scheme.

9.0 Civil and Military Aviation and Defence Interests

Introduction

- 9.1 This section considers the potential effects of the Proposed Development on civil and military aviation and defence interests, together with the adequacy of the Applicant's assessment.

Applicant's Assessment

- 9.2 The Applicant has assessed aviation, and defence matters within the Environmental Statement, including effects relating to:
- Precision approach radar at RAF Marham; and
 - Glint and glare effects on aviation receptors.

9.3 The ES concludes that, subject to mitigation, no likely significant effects are anticipated. However, engagement with the Ministry of Defence (MoD) remains ongoing.

Breckland Council Position – Deferment

9.4 In its Relevant Representations, Breckland Council confirmed that it defers to the advice of relevant statutory consultees, including:

- Ministry of Defence (through the Defence Infrastructure Organisation);
- Civil Aviation Authority; and
- Other relevant aviation bodies such as the relevant highway authorities in regard to more general glint and glare issues.

9.5 These organisations are best placed to assess aviation safety, operational impacts, general glint and glare concerns, and the Council relies on their expert advice in this regard.

Emerging Mitigation and Uncertainty

9.6 Notwithstanding the above, the Council notes from the Issue Specific Hearing 1 (Agenda Item 3.4) that:

- The MoD has identified potential impacts on precision approach radar and aviation receptors;
- The Applicant is undertaking further analysis and ongoing discussions with the MoD to resolve these matters; and
- At the time of the hearing, no agreed mitigation solution had been identified.

9.7 The Council further notes that potential mitigation measures discussed include technical or operational solutions, but also physical mitigation measures, including the potential use of earthen bunds or shielding structures to screen solar arrays from radar line of sight. The Council notes that the form of any required mitigation remains under discussion, and that different mitigation approaches may have differing implications for environmental effects, including landscape, landform and construction related impacts.

Implications for Breckland Council

9.8 The Council considers that this raises a number of important planning considerations:

EIA and Design Certainty

- The nature, scale and location of any such mitigation measures are currently undefined;
- As a result, the likely environmental effects of this mitigation are not clearly assessed within the ES; and
- This gives rise to a degree of uncertainty as to whether the Scheme, as assessed, represents a reasonable worst-case scenario.

Landscape and Visual Effects

- Physical mitigation measures, such as bunding, could introduce substantial and irreversible changes to the landform;

- The potential for such measures to affect landscape character and visual amenity must be acknowledged within the Examination; and
- These impacts may be material in the context of the open rural character of the Site.

Interaction with Other Environmental Topics

- Such mitigation could also have implications for:
 - biodiversity,
 - land use, and
 - the overall design of the Scheme.

Control through the Development Consent Order

- The Council considers it important that any mitigation required is:
 - clearly defined;
 - appropriately assessed; and
 - secured through the Development Consent Order in a manner that ensures its impacts are fully understood.

Conclusion

9.9 The Council continues to defer to the relevant statutory consultees in respect of aviation safety and defence matters. However, the Council highlights:

- The potential requirement for additional mitigation, including physical measures such as bunding, introduces uncertainty into the assessment; and
- The implications of such mitigation, particularly for landscape and visual impact, should be fully considered and appropriately addressed.
- The Council would be concerned if these matters were to be wholly dealt with post-decision as the issues raised are considered to potentially be significant.

10.0 Flood Risk

Introduction

10.1 This section considers the potential effects of the Proposed Development in relation to flood risk and the water environment, together with an assessment of the adequacy of the Applicant's assessment.

10.2 Policy ENV09 of the Breckland Local Plan (2023) seeks to minimise the risk of flooding and requires that all development incorporates appropriate surface water drainage mitigation measures. Policy ENV 09 also requires appropriate sustainable surface water attenuation measures are provided, and where possible included as part of landscaping schemes.

Applicant's Assessment

10.3 The Applicant has assessed flood risk and water environment matters within the Environmental Statement and supporting Flood Risk Assessment (FRA).

10.4 The assessment considers:

- Fluvial, surface water and groundwater flooding;

- Drainage strategy and runoff management; and
 - The potential for effects during construction, operation and decommissioning.
- 10.5 The Applicant concludes that, subject to the implementation of embedded mitigation and appropriate drainage measures, the Proposed Development would:
- Not increase flood risk on or off site; and
 - Not give rise to significant adverse effects.

Breckland Council Position – Deferment

- 10.6 In its Relevant Representations, Breckland Council confirmed that it defers to the advice of the relevant statutory consultees, including:
- The Environment Agency; and
 - The Lead Local Flood Authority (Norfolk County Council).
- 10.7 These bodies are responsible for assessing:
- The adequacy of the Flood Risk Assessment;
 - Compliance with national policy and guidance; and
 - The acceptability of drainage proposals.
- 10.8 The Council considers that appropriate weight should be given to their technical advice and any agreed positions secured through the Examination.

Policy Context and Local Considerations

- 10.9 Flood risk is a key consideration under both:
- The National Policy Statement for Energy (EN-1); and
 - National planning policy and guidance relating to flood risk and drainage.
- 10.10 At a local level, Policy ENV09 of the Breckland Local Plan (2023) requires that development:
- Avoids increasing flood risk; and
 - Incorporates appropriate mitigation and sustainable drainage measures.
- 10.11 The Council has not identified any site-specific flood risk concerns beyond those addressed within the Applicant’s assessment and the representations of the relevant statutory consultees.

Adequacy of Assessment

- 10.12 Based on the information available, and in the absence of any substantive concerns raised in its Relevant Representations, the Council considers that:
- The scope of assessment appears proportionate to the nature of the Proposed Development; and
 - The approach to mitigation, including drainage management and construction controls, is consistent with standard practice for large scale solar development.

10.13 The Council therefore relies on the conclusions of the Environment Agency and Lead Local Flood Authority as to the adequacy of the assessment and proposed mitigation.

Conclusion

10.14 The Council defers to the advice of the relevant statutory consultees in respect of flood risk and the water environment.

10.15 The Council does not raise an objection in principle in relation to this topic subject to:

- The agreement of an appropriate drainage strategy, and
- The securing of mitigation measures through the DCO, in the event the application is approved.

11.0 Historic Environment

Introduction

11.1 This section considers the potential effects of the Proposed Development on the historic environment, including designated and non-designated heritage assets, together with an assessment of the adequacy of the Applicant's assessment and proposed mitigation.

11.2 Section 16 of the NPPF and Policy ENV07 of the Breckland Local Plan (2023) require the significance of designated heritage assets to be conserved, while Policy ENV08 requires development to conserve, or wherever possible enhance the historic character, appearance and setting of non-designated historic assets. This is also recognised in Policy COM01 of the Local Plan (2023).

Applicant's Assessment

11.3 The Applicant has assessed effects on cultural heritage and archaeology within the Environmental Statement.

11.4 The assessment considers:

- Direct effects on archaeological remains within the Site; and
- Indirect effects on the significance of designated heritage assets through changes to their setting.

11.5 A total of 15 designated heritage assets have been identified as potentially sensitive to the Scheme, including:

- Castle Acre Castle and Priory (Scheduled Monuments);
- A number of Grade I listed churches;
- Conservation Areas at Castle Acre and South Acre.

11.6 The ES concludes that:

- Effects on designated heritage assets are generally negligible to minor adverse and not significant; and
- Effects on archaeological remains within the Site may be significant prior to mitigation but can be reduced to neutral following mitigation.

Breckland Council Position

11.7 In its Relevant Representations, the Council recognised that:

- The Site lies within a sensitive historic landscape, including the Nar Valley and the setting of Castle Acre; and
- The principal heritage considerations arise from:
 - Impacts on the setting of designated heritage assets, and
 - Effects on below ground archaeology.

11.8 The Council also notes that a number of the most sensitive designated heritage assets are located within the administrative area of King's Lynn and West Norfolk Borough Council (KLWN), including:

- Castle Acre Castle and Priory (Scheduled Monuments); and
- Elements of the historic landscape associated with Castle Acre.

11.9 In this respect, Breckland Council:

- Supports and aligns with the Relevant Representations made by KLWN in relation to impacts on these assets and their settings; and
- Considers that KLWN is the primary local authority in respect of effects on those assets, with appropriate weight to be given to its position alongside that of Historic England.

11.10 The Council considers that the Applicant has undertaken a comprehensive baseline assessment, including desk-based assessment, geophysical survey and trial trenching.

Designated Heritage Assets and Setting

11.11 The Council notes that the ES identifies limited intervisibility between the Site and key high-value heritage assets, particularly:

- Castle Acre Castle and Priory;
- South Acre and Castle Acre Conservation Areas.

11.12 The Applicant concludes that:

- The Scheme would result in minor or negligible adverse effects on setting, primarily due to:
 - limited visibility, and
 - embedded mitigation (e.g. layout changes and planting).

11.13 However, Historic England raises a number of important concerns:

- The contribution of setting to significance is under-assessed, particularly for Castle Acre assets;
- The significance of the Conservation Area is undervalued; and
- The ES does not provide an explicit assessment of the level of harm, which is necessary to apply the planning balance under EN-1.

Council's Position

11.14 The Council:

- Defers to Historic England in respect of the assessment of impacts on highly designated heritage assets;
- Notes that further work may be required to:
 - clearly define the level of harm, and
 - ensure that impacts are properly assessed in line with EN-1 paragraph 5.9.33 (weighing harm against public benefits); and
- Considers that these matters must be appropriately addressed through the ongoing Examination and Statements of Common Ground process.

11.15 The Council further emphasises that, where heritage assets fall within neighbouring administrative areas, potential impacts on their significance and setting should be considered in the context of the views of the relevant host authority. In this case, the Council fully supports the position of King's Lynn and West Norfolk Borough Council in respect of the assessment of impacts on assets at Castle Acre and their wider setting.

Archaeology

11.16 The ES identifies:

- The Site contains archaeological remains of predominantly low (local) sensitivity, including Iron Age and Romano-British features;
- Some areas (e.g. substation locations) would result in permanent loss of archaeological remains; and
- Prior to mitigation, there may be moderate adverse (significant) effects.

11.17 Mitigation is proposed through an Outline Archaeological Mitigation Strategy, including:

- Further investigation and trenching;
- Excavation and recording; and
- Preservation in situ where appropriate.

Council's Position

11.18 The Council:

- Defers to Norfolk County Council Historic Environment Service and Historic England on archaeological matters;
- Notes that the proposed mitigation strategy is appropriate in principle, but full details are not yet available, due to design uncertainty; and
- Considers it essential that mitigation is:
 - proportionate to significance, and
 - secured through the DCO.

11.19 This is consistent with Historic England's position that further detail is required to ensure mitigation is appropriate and sufficiently defined.

Grid Connection Infrastructure

11.20 The ES assesses two scenarios:

- Scenario A: new overhead line alongside existing (worst case);
- Scenario B: new line with removal of existing.

11.21 Historic England has indicated:

- A preference for Scenario B, as it would reduce harm to the historic environment.

Council's Position

11.22 The Council notes the potential for greater harm under Scenario A, particularly in relation to:

- skyline intrusion; and
- setting of key heritage assets

11.23 The Council considers that the Examination should give appropriate weight to the selection of the least harmful option, informed by statutory consultees' advice.

Adequacy of Assessment

11.24 The Council considers that the ES provides a robust evidential baseline and proportionate assessment. However, there are areas of residual uncertainty, including:

- the precise level of harm to designated assets;
- the final form of mitigation; and
- the detailed archaeological mitigation strategy

11.25 It is considered that these matters must be appropriately addressed through:

- Ongoing consultation with Historic England;
- Further submissions during Examination; and
- Securing sufficient mitigation through the DCO.

Conclusion

11.26 The Council:

- Does not raise an objection in principle to the Proposed Development in respect of the historic environment;
- Defers to Historic England and Norfolk County Council on technical matters relating to designated heritage assets and archaeology.

11.27 However, the Council highlights that further clarification is required regarding the assessment of harm to designated assets, and the detail and securing of mitigation measure to ensure that the requirements of national policy (including EN-1) and local policy are fully satisfied.

12.0 Landscape and Visual Effects

Introduction

12.1 This section considers the potential effects of the Proposed Development on landscape character and visual amenity, together with an assessment of the adequacy of the Applicant's assessment and proposed mitigation.

- 12.2 Policy ENV05 of the Breckland Local Plan (2023) seeks new development to contribute to and where possible enhance the local environment by recognising the intrinsic character and beauty of the countryside. It states:

The landscape of the District is valued for, its benefit to the rural character and in the interests of biodiversity, geodiversity and historic conservation. Development proposals will be expected to contribute to and where possible enhance the local environment by recognising the intrinsic character and beauty of the countryside. Development should have particular regard to maintaining the aesthetic and biodiversity qualities of natural and man-made features within the landscape, including a consideration of individual or groups of natural features such as trees, hedges and woodland or rivers, streams or other topographical features.

Development proposals will have regard to the findings of the Council's Landscape Character Assessment (LCA) and Settlement Fringe Landscape Assessment. Development should also be designed to be sympathetic to landscape character.

High protection will be given to The Brecks landscape, reflecting its role as a regionally significant green infrastructure asset. Proposals within The Brecks Landscape Character Areas will not be permitted where these would result in harm to key visual features of the landscape type, other valued components of the landscape, or where proposals would result in an unacceptable change in the landscape character.

High protection will also be given to the river valleys and chalk rivers in Breckland as identified in the Landscape Character Assessment, recognising their defining natural features, rich biodiversity and the undeveloped character of their shallow valleys.

- 12.3 Policy ENV01 of the Local Plan recognises the value of all green space, not just protected landscapes, requiring all green infrastructure, requiring new development to:

“exploit opportunities to incorporate green infrastructure and enhance existing connectivity; recognising the intrinsic value of the green infrastructure network and ensuring that the functionality of the network is not undermined as a result of development.”

- 12.4 Policy COM01(f) of the Local Plan requires that new development:

“Ensures that high quality hard and soft landscaping is integral to layout and design, and opportunities to introduce green urban design solutions are optimised. Specifically, development proposals should respond to: i) landform; ii) levels, slopes and the fall from the ground; iii) trees on and close to the site; iv) natural boundary features; v) the biodiversity of the site and its context; and vi) maximise the use of permeable surfaces”

- 12.5 Development proposals must have regard to the Council's Landscape Character Assessment (LCA) and Settlement Fringe Landscape Character

Assessment (SFLCA) and be designed to be sympathetic to landscape character.

Applicant's Assessment

12.6 The Applicant has assessed landscape and visual effects within the Environmental Statement, supported by a Landscape and Visual Impact Assessment (LVIA).

12.7 The assessment considers:

- Effects on landscape character at site and wider levels based on the District's published character assessments. It does not contain a more detailed analysis of the character of the site itself;
- Effects on visual receptors, including those within nearby settlements, Public Rights of Way, local roads and visiting heritage assets; and
- Cumulative effects with the adjacent proposed High Grove large-scale solar scheme (DCO application currently forecast to be submitted in October 2026).

12.8 The Applicant concludes:

- Landscape and visual effects are generally localised and limited in extent;
- Effects can be mitigated through embedded design measures, including layout, setbacks and planting; and
- Residual effects are predominantly not significant in EIA terms, with some localised adverse effects.

Breckland Council Position – Strategic Context

Landscape context

12.9 The Council notes that the Site is located within a predominantly rural, agricultural landscape, forming part of the wider Breckland Landscape.

12.10 The Council's Landscape Character Assessment (May 2007) identifies the site as being washed over by two landscape character areas, D1: The Brecks – Heathland with Plantation – Swaffham Heath and E6: Plateau Farmland – North Pickenham Plateau.

12.11 Key Characteristics guidelines for LCA D1, which are typical of the site and the immediate area are listed as follows:

- *Ancient, contorted scots pine shelterbelts and screening belts of trees provide shelter to the easily eroded brown soils and are a prominent landscape feature.*
- *The large scale arable fields are delineated by hedgerows in variable condition from occasional species rich intact hedgerows with trees, thorn hedges and pine lines.*
- *A large scale landscape, with an open, windswept character, quiet and seemingly remote in places.*
- *Sparsely populated – the settlement pattern is characterised by scattered Halls, farm buildings and a small number of nucleated villages and hamlets. Churches are often isolated.*

12.12 Key Characteristics guidelines for LCA E6, which are typical of the site and the immediate area are listed as follows:

- *Geometric/rectilinear field pattern, of large scale, defined by low, flailed hedges, with more extensively treed hedge to the network of lanes traversing the area.*
- *Remote character with little evidence of settlement, other than isolated farms and network of semi enclosed and enclosed rural roads and lanes.*
- *The character of the area is defined by muted colour and is strongly rural. The landscape of the character area is relatively remote and peaceful, with little movement.*
- *The historic way marked route of Peddars Way bisects the character of the area in the east, together with other waymarked routes such as Procession Lane, there is a network of footpaths and bridleways across the character area.*

12.13 The council contends that the site and the surrounding area exhibit a strong rural character, with minimal industrial/urbanising elements and that the introduction of the scheme over such a large area would give rise to significant long term changes to the character of the landscape between Swaffham and the settlements along the River Nar to the north. Contrary to the applicant's assessment the Council does not accept these significant effects stop at the site boundary.

Cumulative landscape context

12.14 In its Relevant Representations, the Council highlighted the increasing concentration of large-scale solar and energy infrastructure within Norfolk and Breckland. The introduction of numerous such schemes has the potential to give rise to significant landscape and visual effects and notably change the characteristics of the landscape of Norfolk from that of a rural landscape to one that is increasingly industrialised.

12.15 In particular, the Council highlighted the potential for:

- A progressive and cumulative change in landscape character and sequential impacts, arising from multiple large scale solar developments and energy infrastructure; and
- The perception of a gradual industrialisation of the countryside, where individually acceptable schemes may cumulatively result in a materially different landscape context.

12.16 The Council maintains this position and considers that the Proposed Development should be assessed in the context of this wider pattern of change, rather than in isolation.

12.17 The Council considers:

- The Proposed Development must be assessed strategically in the context of existing and proposed solar and energy infrastructure schemes, including NSIP scale projects Norfolk wide.
- There is potential for a cumulative transformation of landscape character, particularly where multiple schemes are located within the same broad landscape;

- There is the potential for sequential impacts to be experienced by those travelling through the landscape as they are afforded views of multiple schemes; and
- This raises concerns regarding the capacity of the local landscape to accommodate further large-scale solar development.

12.18 The Council considers that this is a matter of significant material importance, particularly in relation to:

- Landscape character;
- Visual amenity; and
- The overall perception of the rural environment.

12.19 The Council considers that this issue goes to the capacity of the local landscape to accommodate further large-scale solar development and is therefore a matter of particular relevance and significance to the overall planning balance.

12.20 In this regard the Landscape Institute Technical Guidance Note LITGN-2024-01 Published August 2024 'Notes and Clarifications of Aspects of Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3), states at para 7(2):

Nationally Significant Infrastructure Projects Advice Note Seventeen: cumulative effects assessment relevant to nationally significant projects refers to three 'tiers' of development certainty where Tier 1 includes permitted or submitted planning applications, Tier 2 refers to projects where a scoping report has been submitted and Tier 3 relates to sites where a scoping report has not been submitted but may be identified in a plan or programme.

12.21 The Council asks that the inspector considers a full range of renewable energy projects both committed and coming forward to assist in a fuller understanding of these cumulative effects.

Effects on Landscape Character

12.22 The LVIA concludes that effects on landscape character are generally limited and localised.

12.23 The Council notes:

- The Site covers a large area (circa 608 Ha) and forms part of a coherent and intrinsically rural landscape, which contributes to the wider character of the area;
- The introduction of extensive solar arrays, associated infrastructure and grid connection works represents a substantial change in land use and character at a local level, while also contributing to cumulative effects on the character of the wider area; and
- Whilst such effects may be spatially contained, they nevertheless represent a notable alteration to the character of the Site and its immediate surroundings.

12.24 The Council considers:

- The Applicant's assessment, while acknowledging significant effects on the site itself, has not undertaken a sufficiently detailed study of the character of the site itself and the likely effects of the proposal on the site. Particular concern is raised concerning the assessment of:
 - the droveways,
 - ground modelling,
 - the introduction of the supporting infrastructure, sub station and the associated ground modelling, power line connections and associated mitigation etc.
 - The wider cumulative landscape effects, particularly at a strategic scale across Breckland and Norfolk, require careful consideration.

Visual Effects

12.25 The LVIA identifies a range of visual receptors, including:

- Nearby settlements;
- Users of the local road networks;
- Users of Public Rights of Way; and
- Visitors to Heritage assets, including Castle Acre.

12.26 The Council notes:

- Visibility of the entire Scheme from the wider area is, to varying degrees, broken by topography and vegetation, with only elements being visible from any, one, location. Nonetheless, there are localised views, including from elevated locations, which would endure into the long term;
- There are extended viewing opportunities from some of the roads and PRow within and in close proximity to the site;

12.27 The Council accepts effects are unlikely to be widespread; however, for affected receptors, the introduction of solar infrastructure represents a notable change in visual amenity, particularly in views which are currently rural in character.

12.28 The Council considers that some of the effects have been underplayed. While the introduction of new planting may help to screen the development, it does not negate the permanent loss of the open views which characterise this landscape.

Relationship with Heritage Assets

12.29 The Council notes:

- Landscape and visual effects are closely linked to the setting of heritage assets, particularly at Castle Acre;
- Whilst the ES concludes that effects are limited, Historic England has raised concerns regarding:
 - the assessment of setting, and
 - the extent to which harm has been clearly identified

12.30 The Council:

- Supports and aligns with the position of King's Lynn and West Norfolk Borough Council, as the host authority for key heritage assets; and
- Considers that landscape effects should be assessed in the context of their contribution to heritage setting and significance.

Grid Connection Infrastructure

12.31 In terms of landscape and visual impact the Council's position is as outlined in the Heritage section of this report.

Emerging Mitigation and Design Uncertainty

12.32 The Council further draws attention to the issues identified in Section 9 (Civil and Military Aviation and Defence Interests) regarding the potential requirement for additional mitigation measures, including bunding or other physical screening to ensure there is no interference with the radar systems at RAF Markham.

12.33 The Council considers that the need, scale, design and location of such mitigation is currently uncertain. These mitigation solutions have the potential to generate adverse impacts. The introduction of bunding, in particular, has the potential to create notable landscape and visual impacts (both construction and long term), which would not be reversible. These effects are not assessed within the ES at this stage.

Chapter 6 of the ES notes that a number of embedded mitigation elements would be decided at the detailed design stage (para 6.7.2), including proposed buildings and infrastructure, fencing, gates, façade structures and colour. Further clarity is sought in order to fully understand the likely effects and adequacy of the mitigation measure.

12.34 The Council therefore considers that there is a significant degree of uncertainty regarding the final landscape impacts of the Scheme, pending the resolution of these matters.

Adequacy of Assessment

12.35 The Council considers:

- The LVIA is broadly comprehensive and proportionate, queries have been raised in relation to the methodology in the Statement of Common Ground which are currently under discussion;
- The identification of localised effects is broadly robust, however the Council judges that some of the effects have been underestimated, particularly in relation to:
 - The Local Landscape, as per GLVIA3 Paras 5.12 to 5.16 (Guidance to landscape professionals) the assessment has not identified and considered effects on Local Landscape Character Areas (a significant omission that runs contrary to early work submitted by the High Grove applicant);
 - the sequential experience of those travelling through this landscape; and;

- the permanent loss of open views which characterise this area (the introduction of planting to help contain views of the development, would not mitigate these losses).

12.36 The Council identifies the following areas where further consideration is considered to be required:

- The cumulative and sequential effects of large-scale solar and energy infrastructure development within the Norfolk wide area;
- The identification and assessment of Local Landscape Character Areas
- Additional views to help illustrate the sequential effects of the Scheme;
- The interaction between landscape impacts and heritage setting; and
- The potential for additional, currently undefined mitigation measures to alter landscape effects.

12.37 The council has concerns about the use of ‘future baseline’ with regard to the recently undertaken planting within and around the site.

12.38 The ES states (LVIA para 6.4.111) that the recently planted hedgerows and areas of gapping up around the site’s field boundary, are considered as ‘future baseline’ and their anticipated growth is taken into account when considering predicted effects.

12.39 GLVIA3 (para 5.33) reads:

The aim should be to describe the landscape as it is at the time but also to consider what it may be like in the future in the absence of the proposal. This means projecting forward and any trends in change and considering how they may affect the landscape over time, accepting that this involves a degree of speculation and uncertainty.

12.40 Given the above, the recently introduced planting is judged to form part of the mitigation proposals, albeit coming forward in advance, and should not be included as ‘future baseline’, as it would not come forward in isolation of the proposals.

Conclusion

12.41 The Council:

- Recognises that landscape and visual effects are largely localised in spatial extent; and
- considers that the Scheme represents a material change to the character of the Site and its immediate surroundings and would not be in accordance with Policy ENV05 Protection and Enhancement of the Landscape.

12.42 The Council further highlights:

- Cumulative landscape effects arising from multiple solar/energy infrastructure developments within Breckland and the wider Norfolk area are an important consideration, including whether the landscape has the capacity to accommodate further large-scale solar development without material change in character;

- A number of elements, particularly in relation to the details of the sub-stations and the mitigation measures in relation of RAF Marham, are yet to be fully resolved and assessed; and
- The potential requirement for additional mitigation, including bunding, introduces a degree of uncertainty into the assessment of landscape effects.

12.43 The Council therefore considers that these matters should be given appropriate weight during the Examination, alongside the advice of relevant consultees and neighbouring authorities.

13.0 Land Use, Including Open Space, Green Infrastructure and Green Belt

Introduction

- 13.1 This section considers the potential effects of the Proposed Development on land use, primarily the use of agricultural land, together with an assessment of the adequacy of the Applicant's conclusions.
- 13.2 Policy ENV10 of the Breckland Local Plan (adopted 2023) supports proposals for new renewable energy and low carbon development, subject to consideration of the impact of the development and whether this can be made acceptable. Proposals will be considered having regard to the extent to which there is an irreversible loss of the highest quality agricultural land.

Applicant's Assessment

- 13.3 The Applicant has assessed land use effects within the Environmental Statement and supporting documentation.
- 13.4 The Proposed Development would involve:
- The use of land currently in predominantly agricultural use for solar photovoltaic infrastructure and associated development;
 - A long-term temporary change in land use (of 60 years) for the operational lifetime of the Scheme; and
 - The potential continuation of limited agricultural activities within the Site, such as grazing.
- 13.5 The Applicant concludes:
- The use of the land for solar generation would be reversible at the end of the operational period; and
 - The Scheme would not result in a permanent loss of land use.

Breckland Council Position

Agricultural land and land use change

- 13.6 In its Relevant Representations, Breckland Council identified that the Site comprises valuable agricultural land forming part of the rural resource of the district.
- 13.7 The Council notes:
- The Proposed Development would result in a substantial area of agricultural land being taken out of conventional agricultural production;

- Whilst some level of dual use may be possible, the character and function of the Site would change from productive agricultural land to energy generation infrastructure; and
- This represents a material change in land use, even where elements of agricultural use may continue in a limited capacity.

13.8 The Council also notes that the operational life of the Scheme represents a long-term use of 60 years, rather than a short term or transitional change.

Best and Most Versatile (BMV) land

13.9 The Council recognises that national and local policy (ENV10) seeks to:

- Protect the best and most versatile agricultural land (Grades 1, 2 and 3a); and
- Direct development where possible to areas of lower agricultural value.

13.10 The Council considers that the presence and extent of BMV land within the Site is an important consideration and should be given appropriate weight in the overall planning balance.

Cumulative agricultural land context

13.11 The Council's Relevant Representations raised concerns regarding the increasing demand for land for large scale solar and energy infrastructure within Breckland and the wider Norfolk area.

13.12 The Council considers:

- The Proposed Development should be assessed in the context of multiple existing and proposed solar schemes across the area;
- Individually acceptable schemes may cumulatively result in a notable reduction in land available for agricultural production; and
- There is potential for a gradual and cumulative shift in land use across the district, particularly within areas of concentrated solar development.

13.13 The Council maintains that this cumulative change is a material consideration, particularly in a district characterised by its productive agricultural landscape and rural economy.

Policy Context

13.14 Land use and agricultural land are addressed through:

- National policy, which seeks to safeguard agricultural land quality, particularly BMV land; and
- Local planning policy, which supports the protection and sustainable use of the rural environment and land-based resources.

13.15 The Council considers that proposals should demonstrate that:

- The use of agricultural land is justified, particularly where higher quality land may be affected; and
- Opportunities to minimise impacts on higher grade agricultural land have been considered.

Adequacy of Assessment

13.16 The Council considers that the Applicant has:

- Identified and described the existing land use baseline; and
- Set out the broad implications of the proposed use of the Site for solar generation.

13.17 However, the Council considers:

- The assessment of land use change should be considered in the context of the long-term temporary nature of the development, and
- Greater weight should be given to the cumulative effects of multiple solar developments on agricultural land across the district and wider Norfolk area.

Conclusion

13.18 The Council recognises that the Proposed Development would result in a reversible change in land use. However, it is considered that the Scheme would nonetheless represent a substantial and long-term change in the use of agricultural land at the Site.

13.19 The Council further highlights:

- The potential presence and extent of best and most versatile agricultural land is an important consideration; and
- The cumulative effect of solar development on agricultural land availability within Breckland and the wider Norfolk area should be taken into account.

13.20 Breckland Council defers to the advice of Natural England in regard to the technical details of the potential impacts upon agricultural land and soils.

13.21 These matters should be given appropriate weight in the overall planning balance.

14.0 Noise and Vibration

Introduction

14.1 This section considers the potential effects of the Proposed Development in relation to noise and vibration, together with an assessment of the adequacy of the Applicant's assessment and conclusions.

14.2 Policy COM03 of the Breckland Local Plan (2023) seeks to protect residential amenity, requiring developments to have due regard to forms of nuisance, including noise.

Applicant's Assessment

14.3 The Applicant has assessed potential noise and vibration effects within the Environmental Statement.

14.4 The assessment considers:

- Construction phase effects, including:
 - site preparation, plant movement and installation activities; and
- Operational phase effects, including:
 - noise associated with solar infrastructure such as inverters, transformers, substations and battery storage systems.

14.5 The Applicant concludes:

- Construction noise effects would be temporary and managed through standard mitigation measures; and
- Operational noise can be controlled to acceptable levels at nearby receptors, such that effects would not be significant.

Breckland Council Position

General approach

14.6 In its Relevant Representations, the Council noted that noise and vibration effects are primarily associated with:

- Construction activity, which has the potential to affect nearby receptors in the short term; and
- Operational plant and equipment, which may give rise to ongoing noise emissions.

14.7 The Council recognises that the Site is located within a predominantly rural area, where existing background noise levels are likely to be relatively low and the environment generally tranquil in character.

Construction impacts

14.8 The Council notes that construction activities associated with the Proposed Development have the potential to result in:

- Temporary increases in noise levels, particularly from plant, machinery and vehicle movements; and
- Disturbance to nearby receptors, including residential properties and users of the local area.

14.9 The Council considers that such impacts are typically short term and reversible, however, require appropriate management and control measures.

Operational impacts

14.10 The Council notes that the operational phase of the Proposed Development would introduce fixed sources of noise, including plant associated with substations and energy storage infrastructure.

14.11 The Council considers that the acceptability of operational noise will depend on:

- achieving appropriate site-specific noise limits at sensitive receptors; and
- ensuring that the development does not give rise to unacceptable impacts in a rural context, where background noise levels are low.

Role of Environmental Health and Controls

14.12 The Council's Relevant Representations incorporate the advice of its Environmental Health Officers, who have reviewed the Applicant's noise and vibration assessment.

14.13 The Council notes:

- Environmental Health has considered the methodology, predicted impacts and proposed mitigation measures; and

- No substantive concerns have been raised, subject to the implementation of appropriate controls.
- 14.14 The Council expects that, if development consent is granted, appropriate mitigation and controls would be secured through the DCO, including:
- A Construction Environmental Management Plan (CEMP), to control and manage construction noise and vibration; and
 - The imposition of appropriate operational noise limits and any necessary monitoring requirements, to ensure that noise levels at sensitive receptors remain acceptable.
- 14.15 The Council considers that these measures are necessary to ensure:
- Construction impacts remain temporary and appropriately managed; and
 - Operational noise does not give rise to unacceptable impacts, particularly having regard to the rural character and sensitivity of the surrounding area.

Adequacy of Assessment

- 14.16 Based on the information available, and in the absence of any substantive concerns raised in its Relevant Representations, the Council considers that:
- The scope of the Applicant's assessment is appropriate to the scale and nature of the Proposed Development;
 - The distinction between construction and operational impacts is clearly set out; and
 - The reliance on standard mitigation and control measures is consistent with similar forms of development.
- 14.17 However, the Council emphasises:
- The effectiveness of mitigation will depend on the detailed design and implementation of control measures; and
 - Particular regard should be had to the rural character of the area, where receptors may be more sensitive to changes in noise environment.
- 14.18 The Council also notes that the assessment identifies the potential for cumulative operational noise effects at certain receptors, which requires further consideration through the Examination and appropriate controls.

Conclusion

- 14.19 The Council Recognises that noise and vibration effects are likely to be localised and manageable, subject to appropriate controls, and does not raise an objection in principle in respect of this topic.
- 14.20 The Council takes into account the advice of its internal Environmental Health Officers in relation to:
- The adequacy of the assessment; and
 - The acceptability of predicted impacts.
- 14.21 Subject to the agreement and implementation of appropriate construction and operational controls, the Council considers that the Proposed Development

would not give rise to unacceptable noise and vibration impacts, including having regard to the rural character and sensitivity of the surrounding area.

15.0 Socio-Economic Effects

Introduction

15.1 This section considers the potential socio-economic effects of the Proposed Development, including employment, economic activity and effects on the local area.

Applicant's Assessment

15.2 The Applicant has assessed socio-economic effects within the Environmental Statement and supporting documentation.

15.3 The assessment considers:

- Employment generation, including construction and operational phases;
- Economic activity associated with the development, including investment and supply chain opportunities; and
- Wider effects on the local and regional economy.

15.4 The Applicant concludes:

- The Proposed Development would generate economic benefits, particularly during the construction phase; and
- Operational employment and economic activity would be more limited but would provide some ongoing benefit.

Council Position

Economic benefits

15.5 In its Relevant Representations, the Council recognised that the Proposed Development has the potential to deliver:

- Short-term employment opportunities during the construction phase; and
- Some level of ongoing economic activity associated with the operation and maintenance of the Scheme.

15.6 The Council acknowledges that:

- Such benefits are typical of large-scale infrastructure projects; and
- They may contribute to the local and regional economy, including through supply chains and expenditure.

Nature and distribution of benefits

15.7 The Council notes:

- Construction employment is temporary in nature; and
- Operational employment associated with solar development is typically limited in scale

15.8 The Council therefore considers that whilst the Scheme would deliver economic benefits, these are likely to be modest at a local level, particularly over the longer term.

Local context

- 15.9 The Council further notes that the Site is located within a predominantly rural area, where land is currently used for agricultural purposes and the rural economy is shaped by agriculture and the character of the wider landscape.
- 15.10 The Council considers that the Proposed Development represents a change in land use, and that the implications of this change should be considered alongside the wider planning issues identified elsewhere in this Report.

Cumulative context

- 15.11 Consistent with the Council's Relevant Representations, the Council highlights:
- The Proposed Development forms part of a wider pattern of large scale solar and energy infrastructure development across Breckland and the wider Norfolk area; and
 - The cumulative effects of such development may give rise to broader changes in the rural environment and economy.
- 15.12 The Council considers that socio-economic effects should therefore be understood in the context of this wider pattern of development, rather than assessed solely on a scheme-by-scheme basis.

Adequacy of Assessment

- 15.13 The Council considers:
- The Applicant has appropriately identified the main economic effects of the Proposed Development, including employment and investment; and
 - The distinction between construction and operational effects is clearly set out.
- 15.14 However, the Council notes:
- The local economic benefits are likely to be limited in scale and duration, particularly during the operational phase; and
 - The assessment should be considered alongside the wider land use and cumulative issues identified elsewhere in this Report.

Community Benefits and Commitments

- 15.15 In its Relevant Representations, the Council made requests in relation to a community benefit fund and the inclusion of such measures within a Commitments Register.
- 15.16 Community benefit funds and similar measures may provide local benefits to communities affected by the Proposed Development; however, the Council recognises that such measures are not material planning considerations and must not influence the determination of the application.
- 15.17 Notwithstanding this, the Council considers:
- Community benefit provisions are of local interest and importance, reflecting the scale of the Proposed Development and its relationship with nearby communities; and

- The inclusion of such measures within a Commitments Register would provide transparency as to the Applicant's intentions, albeit outside the planning balance.

Conclusion

- 15.18 The Council acknowledges that the Proposed Development would deliver economic benefits, particularly during construction, however, considers that these benefits are likely to be temporary and relatively limited at the local level, particularly in the longer term.
- 15.19 The Council further considers that socio-economic effects should be considered in the context of the change in land use and the cumulative pattern of solar development across Breckland and the wider Norfolk area.
- 15.20 These matters should be taken into account in the overall planning balance.

16.0 Traffic and Transport

Introduction

- 16.1 This section considers the potential effects of the Proposed Development in relation to traffic and transport, together with an assessment of the adequacy of the Applicant's assessment and conclusions.
- 16.2 Policies TR01 and TR02 of the Breckland Local Plan (2023) seek to promote sustainable transport. Policy TR01 requires development to minimise the need to travel; promote opportunities for sustainable transport modes; not adversely impact on the operation or safety of the strategic road network; improve accessibility to services; and support the transition to a low carbon future. Policy TR02 requires development to integrate into existing transport networks; mitigate highways impacts; protect and enhance access to public rights of way; provide safe, suitable and convenient access for all users, including appropriate parking; and avoid inappropriate traffic generation and do not compromise highway safety. Major development proposals should include an assessment of the impacts of new development on the existing transport network.
- 16.3 Policy GEN02 seeks amongst other things, to maximise connectivity within and through a development and to the surrounding areas, including the provision of high quality and safe pedestrian and cycle routes.

Applicant's Assessment

- 16.4 The Applicant has assessed traffic and transport effects within the Environmental Statement and supporting Transport Assessment.
- 16.5 The assessment considers:
- Construction phase traffic, including:
 - staff movements
 - delivery vehicles
 - abnormal loads
 - Access arrangements to the Site; and
 - Effects on the local and strategic highway network.
- 16.6 The Applicant concludes:

- Traffic effects would be temporary and primarily associated with the construction phase; and
- The local and strategic highway network would be able to accommodate the proposed development, subject to appropriate mitigation and management measures.

Breckland Council Position

General approach

16.7 In its Relevant Representations, the Council confirmed that it defers to the advice of the relevant highway authorities, namely:

- Norfolk County Council (Local Highway Authority);
- National Highways, in respect of the Strategic Road Network; and
- Norfolk County Council Public Rights of Way (PRoW) team, in respect of impacts on the Public Rights of Way network.

16.8 These bodies are responsible for assessing:

- The adequacy of the Transport Assessment;
- The suitability of the proposed access arrangements;
- Impacts on the local and strategic highway network; and
- Effects on the Public Rights of Way network, including any required diversions, closures or mitigation.

Construction traffic impacts

16.9 The Council notes:

- Traffic impacts are primarily associated with the construction phase; inclusive of increases in:
 - Heavy Goods Vehicle (HGV) movements; and
 - staff and contractor traffic.

16.10 The Council recognises that such impacts are temporary in nature but may give rise to localised effects particularly on rural road, nearby settlements and the wider highway network.

Access and routing

16.11 The Council notes that the Applicant has identified proposed access routes and measures to manage construction traffic.

16.12 The Council considers that the acceptability of these arrangements is a matter for:

- The Local Highway Authority, and
- National Highways, where the Strategic Road Network is affected.

Public Rights of Way

16.13 The Council notes that the Site is crossed by, or located in proximity to, elements of the Public Rights of Way network, which are important for:

- Recreational use; and

- Appreciation of the rural landscape.

16.14 The Council considers:

- Construction activities may give rise to temporary disruption, including closures or diversions; and
- The acceptability of such impacts, and the need for any mitigation, is a matter for the NCC Public Rights of Way team.

Role of Highway Authorities and Controls

16.15 The Council confirms that it defers to the advice of Norfolk County Council, including both the Local Highway Authority and Public Rights of Way teams, and National Highways in respect of:

- The adequacy of the Transport Assessment;
- The acceptability of traffic impacts;
- Impacts on the Public Rights of Way network; and
- The need for any mitigation measures.

16.16 The Council expects that, if development consent is granted, appropriate controls would be secured through the DCO, including:

- A Construction Traffic Management Plan (CTMP), to manage:
 - routing of traffic
 - timing of deliveries
 - traffic impacts on local roads
- Measures to manage impacts on Public Rights of Way, including:
 - temporary closures or diversions;
 - maintenance of safe access where possible; and
 - restoration of routes following construction.
- Measures to ensure the safe and efficient operation of the highway network during construction.

16.17 The Council considers that these measures are necessary to ensure:

- The safe and efficient operation of the highway network; and
- The protection of the amenity and usability of the Public Rights of Way network.

Adequacy of Assessment

16.18 Based on the information available, and in the absence of any unresolved concerns raised in its Relevant Representations, the Council considers:

- The scope of the Applicant's traffic and transport assessment is proportionate to the nature and scale of the Proposed Development; and
- The assessment appropriately focuses on the construction phase, where impacts are most likely to arise.

16.19 The Council considers that the adequacy and acceptability of the assessment are matters that should be:

- Determined having regard to the technical advice of the relevant highway authorities; and
- Confirmed through the Examination process.

Conclusion

16.20 The Council recognises that traffic and transport impacts are likely to be temporary and primarily associated with the construction phase and does not raise an objection in principle in respect of this topic.

16.21 The Council defers to the advice of the following highway authorities in respect of the assessment of impacts and the identification of any necessary mitigation measures:

- Norfolk County Council (Local Highway Authority and Public Rights of Way Team); and
- National Highways,

16.22 Subject to the agreement and implementation of appropriate traffic management measures, including a Construction Traffic Management Plan, the Council considers that the Proposed Development would not give rise to unacceptable traffic and transport impacts.

17.0 Resource and Waste Management

Introduction

17.1 This section considers the potential effects of the Proposed Development in relation to resource use and waste management, including the management of construction materials and waste material.

Applicant's Assessment

17.2 The Applicant has assessed resource and waste management within the Environmental Statement.

17.3 The assessment considers:

- The generation and management of construction waste;
- The use of materials during construction; and
- The implementation of measures to promote efficient resource use and waste minimisation.

17.4 The Applicant concludes that effects can be appropriately managed through standard construction practices and mitigation measures.

Breckland Council Position

17.5 In its Relevant Representations, the Council did not identify any substantive concerns in relation to resource use or waste management.

17.6 The Council notes:

- Effects are largely confined to the construction phase; and

- Such effects are typically temporary and capable of being effectively managed through established construction practices.

Role of Statutory Consultees and Controls

- 17.7 The Council notes that resource use and waste management are matters on which advice is provided by relevant bodies, including:
- The Environment Agency, in respect of waste management and environmental protection; and
 - Norfolk County Council, in its role as the Waste Planning Authority.
- 17.8 The Council expects that appropriate controls would be secured through the DCO, if granted, including:
- A Construction Environmental Management Plan (CEMP); and
 - Measures to ensure the appropriate handling, storage, reuse and disposal of materials and waste.
- 17.9 The Council considers that, subject to such controls, impacts relating to resource use and waste can be adequately mitigated.

Conclusion

- 17.10 The Council has no objection in principle in respect of resource use and waste management; and considers that effects are localised, temporary and manageable, subject to appropriate controls secured through the DCO.
- 17.11 Appropriate weight should be given to the advice of the Environment Agency, Norfolk County Council and any other relevant consultees in determining this matter.

18.0 Water Quality and Water Resources

Introduction

- 18.1 This section considers the potential effects of the Proposed Development on water quality and water resources, including the protection of surface water and groundwater.
- 18.2 Policy ENV 09 of the Breckland Local Plan (adopted 2023) requires proposed development to, wherever practicable, have a positive impact on the risk of surface water flooding and to address the potential impact of infiltration upon groundwater Source Protection Zones and/or Critical Drainage Catchments.

Applicant's Assessment

- 18.3 The Applicant has assessed water quality and water resources within the Environmental Statement. The assessment considers:
- Potential effects on surface water and groundwater during construction and operation;
 - Risks associated with pollution or runoff; and
 - Mitigation measures to prevent adverse effects on the water environment.
- 18.4 The Applicant concludes that, subject to mitigation, effects would not be significant.

Breckland Council Position

18.5 The Council notes that potential effects arise primarily during the construction phase, including risks associated with:

- Surface water runoff; and
- Accidental pollution incidents.

18.6 The Council further notes that these matters are closely related to those addressed within the Flood Risk section (Section 10) of this Report.

Role of Statutory Consultees and Controls

18.7 The Council confirms that it relies on the advice of the Environment Agency and other relevant consultees in respect of:

- The adequacy of the assessment; and
- The acceptability of impacts on water quality and resources.

18.8 The Council expects that appropriate mitigation would be secured through:

- A Construction Environmental Management Plan (CEMP); and
- Measures to prevent pollution and protect surface water and groundwater.

Conclusion

18.9 The Council does not raise an objection in principle in respect of water quality and water resources; and considers that effects can be appropriately managed, subject to the implementation of suitable mitigation and controls.

18.10 Appropriate weight should be given to the advice of the Environment Agency and any other relevant consultees in determining this matter.

19.0 Cumulative Effects

Introduction

19.1 This section considers the potential cumulative effects of the Proposed Development in combination with other existing, consented and proposed developments within the wider area.

Applicant's Approach

19.2 The Applicant has assessed cumulative effects within the Environmental Statement, including consideration of other developments within the study area.

19.3 The assessment identifies that potential cumulative effects may arise in relation to:

- landscape and visual character;
- heritage settings;
- and other environmental receptors;

19.4 With mitigation, such effects are assessed by the Applicant as being generally limited and not significant.

Breckland Council Position

- 19.5 In its Relevant Representations, the Council highlighted that the Proposed Development forms part of a wider pattern of large scale solar and energy infrastructure development across Breckland and the wider Norfolk area.
- 19.6 The Council considers:
- Cumulative effects should be understood not only in terms of individual receptor impacts, but also in relation to broader spatial and strategic change; and
 - The combined effect of multiple large-scale schemes has the potential to result in a progressive change in the character of the rural environment across Breckland and the wider Norfolk area.
- 19.7 The Council further notes that one of the developments contributing to the cumulative context, High Grove Solar Farm, is at an early stage in the development process and not yet subject to detailed or fixed design.
- 19.8 The Council considers:
- This creates a significant degree of uncertainty in the assessment of cumulative effects, as the precise layout, scale and configuration of such schemes is not yet known; and
 - As a result, the ability to fully understand the combined effects of multiple large-scale solar developments across the area is inherently constrained at this stage.

Key Cumulative Issues

- 19.9 Drawing together the matters addressed in the preceding sections of this Report, the Council identifies the following key areas of cumulative consideration:
- *Landscape and visual character:*
The potential for the incremental introduction of solar development to give rise to a cumulative change in landscape character, particularly within a predominantly rural and agricultural context and the sequential impact on those travelling through the landscape
 - *Land use and agricultural land:*
The potential for a combined reduction in land available for agricultural production, and a longer-term shift in land use across the district and the wider Norfolk area.
 - *Heritage setting:*
The extent to which cumulative development may affect the wider setting of heritage assets, including those located within neighbouring authority areas.
 - *Overall rural character:*
The potential for a perception of increasing industrialisation of the countryside, arising from the concentration of large-scale infrastructure.
- 19.10 The Council considers that, whilst each scheme may be acceptable in isolation, the combined effect of multiple developments may give rise to a materially different environmental context.

Conclusion

- 19.11 The Council recognises that the applicant has undertaken a cumulative effects assessment. However, it is considered that the wider pattern and concentration of solar development within Breckland and the wider Norfolk area is a matter of particular importance.
- 19.12 The Council also considers that the evolving and uncertain nature of other major solar proposals within the area, including High Grove Solar Farm, means that cumulative effects are not fully fixed at this stage, and this uncertainty should be taken into account in the overall planning balance.
- 19.13 The Council therefore considers that cumulative effects represent a significant material consideration, particularly in relation to:
- landscape character;
 - land use; and
 - the overall rural environment.
- 19.14 These effects should be given appropriate weight in the overall planning balance, having regard to the scale and distribution of solar development across the area.

20.0 Design

Introduction

- 20.1 This section considers the approach to the design of the Proposed Development, including how design has influenced the form, layout and mitigation of the Scheme.
- 20.2 Policy GEN 02 of the Breckland Local Plan (2023) requires high quality design in all development within the district that:
- *respects and is sensitive to the character of the surrounding area and makes a positive architectural and urban design contribution to its context and location*
 - *contributes positively to the public realm and public spaces, protecting the high levels of amenity and quality of life making Breckland an attractive, successful and vibrant place for residents, workers and visitors;*
 - *creates high quality, safe and sustainably designed buildings, places and streets; and*
 - *maximises connectivity within and through a development and to the surrounding areas, including the provision of high quality and safe pedestrian and cycle routes.*
- 20.3 Policy COM01 of the Breckland Local Plan (2023) also requires new development to be designed to the highest possible standards. All new development must achieve a specification of high architectural, urban and landscape design quality and contribute to the distinctive character and amenity of the local area. The Council will promote high quality design in the District by requiring that the design of new development meets specific criteria. Amongst other things, new development must, integrate to a high degree of compatibility with the surrounding area in terms of: layout, form, style, massing, scale, density, orientation, materials, and design, in order to reinforce the positive and

distinctive local character and amenity. In addition, it must respond appropriately to, and be completely integrated with, the existing layout of buildings, surrounding streets, open spaces and patterns of development. The layout of new development should create direct, recognisable, through routes that improve legibility and movement through places, and positively contribute to street frontages.

- 20.4 Furthermore, Policy ENV01 of the Local Plan sets out a requirement to safeguard, retain and, where opportunities arise, enhance green infrastructure. In addition, *“New developments will be expected to exploit opportunities to incorporate green infrastructure and enhance existing connectivity; recognising the intrinsic value of the green infrastructure network and ensuring that the functionality of the network is not undermined as a result of development”*.
- 20.5 Breckland Council has adopted supplementary planning documents (SPD’s), with the help of its residents and other stakeholders, the Breckland Design Guide and the Breckland Landscape and Settlement Character Assessment. The aim of these SPD’s is to raise the bar in the design of new development across the Breckland District by providing developers and their agents with guidance on what is expected from the design of their schemes.

Applicant’s Approach

- 20.6 The Applicant has described the Proposed Development as a parameter based scheme, with detailed design to be finalised following consent, within the bounds established by the draft DCO.
- 20.7 The design approach includes:
- The siting and layout of solar arrays and associated infrastructure;
 - The retention of landscape features and provision of landscape mitigation planting; and
 - Measures embedded within the Scheme to reduce potential impacts on:
 - landscape character
 - visual amenity
 - and the historic environment.
- 20.8 The Applicant identifies that the design has evolved through the pre-application process in response to consultee feedback, including amendments to the layout and reduction of potential impacts in sensitive areas. However, whilst mitigation planting may screen the solar panels, the Council maintains strong concerns that the scheme would still result in the loss of the long and open views from some locations.

Breckland Council Position

- 20.9 The Council recognises:
- The design of the Proposed Development is influenced by its functional and technical requirements, including the need to accommodate solar infrastructure and grid connection;
 - The use of a parameter-based (Rochdale Envelope) approach is common for NSIPs; and

- Design has an important role in mitigating environmental effects.

20.10 The Council considers:

- The overall layout and design approach represent an appropriate starting point; however
- There remains scope for further clarifications and refinement through detailed design, particularly in relation to the matters identified within this Report.

Key Design Considerations

Substation design and parameter flexibility

20.11 The Council notes that key elements of the Proposed Development, including the Customer Substation, National Grid Substation and associated infrastructure, are not yet defined in detailed design terms and are instead controlled through maximum design parameters within the draft DCO.

20.12 The Council recognises that final design will be influenced by technical and operational requirements. However, the use of this approach introduces a degree of uncertainty in the scale, form and appearance of these elements at this stage.

20.13 The Council considers:

- The detailed design of these elements will be an important factor in determining the extent of landscape, visual and heritage impacts; and
- It is therefore essential that:
 - appropriate design principles and controls are secured through the DCO; and
 - sufficient flexibility is retained to enable refinement of siting, layout and screening to minimise impacts.

Relationship with landscape and heritage

20.14 The Council considers that design plays a key role in mitigating the effects identified in relation to:

- Landscape character and visual amenity; and
- The setting of heritage assets, including those within neighbouring authority areas.

20.15 In particular, the Council notes:

- Layout, setbacks and screening are important in reducing the visibility of infrastructure; and
- Further refinement of the design could assist in minimising impacts on sensitive viewpoints and heritage receptors.

Arboricultural constraints and layout

20.16 The Council's Relevant Representations, including the advice of its Tree and Countryside Officer, identify specific arboricultural considerations relevant to the design of the Scheme.

20.17 These include:

- The importance of retaining existing trees and hedgerows as part of the site's landscape framework; and
- The need to minimise encroachment into root protection areas (RPAs) through appropriate layout and alignment of infrastructure and access tracks.

20.18 The Council considers that these matters:

- Represent design constraints which should inform the layout of development; and
- Are capable of being addressed through design refinement, including adjustments to array layout and access arrangements.

Construction and mitigation design

20.19 The Council notes that elements of the Scheme design may also influence the overall environmental effects of the development, including:

- Construction access routes;
- Temporary works; and
- Mitigation measures such as planting and bunding (where/if required),

20.20 The Council considers:

- The final form and extent of mitigation measures will be an important factor in determining the effectiveness of the Scheme in reducing impacts; and
- These measures should be capable of being refined through detailed design and secured through the DCO.

Design evolution through the Examination

20.21 Given the parameter-based nature of the Scheme, the Council considers:

- There is potential for further design evolution during the Examination and post consent stages; and
- This should be directed toward:
 - reducing impacts on landscape and heritage;
 - maximising the retention of existing natural features; and
 - ensuring that the Scheme responds appropriately to the local context.

Conclusion

20.22 The Council recognises that the design of the Proposed Development has evolved through the application process and incorporates a number of embedded mitigation measures. However, it is considered that there remains scope for further refinement, particularly in relation to:

- the detailed design of substations and associated infrastructure; and
- the interaction between layout and environmental constraints, including arboriculture and landscape features.

20.23 The Council therefore considers:

- The detailed design of the Scheme will be an important factor in determining the extent of its impacts; and
- Appropriate controls and flexibility should be secured through the DCO to ensure that the final design represents an appropriate response to the existing landscape and local area.

21.0 Summary and Overall Conclusions

Introduction

21.1 This section summarises the Council's assessment of the Proposed Development, drawing together the key issues identified in this LIR.

Overview of Assessment

21.2 The Council has reviewed the Proposed Development having regard to:

- The Environmental Statement and supporting documentation;
- Its Relevant Representations; and
- The advice of internal officers and relevant consultees.

21.3 The Council's assessment has focused on those matters considered to be of greatest relevance to the local area, including:

- Landscape and visual effects;
- Land use and agricultural land;
- Historic environment; and
- The cumulative effects of development.

21.4 The Council has relied on the advice of relevant statutory consultees and internal specialist officers in respect of a number of technical matters, and identifies no objection in principle subject to appropriate controls:

- Flood risk;
- Noise and vibration;
- Traffic and transport; and
- Water quality and resources.

Key Issues

Landscape and rural character

21.5 The Council considers that the Proposed Development would result in a material change in the character of the Site and its surroundings, through the introduction of large-scale solar infrastructure within a predominantly rural and agricultural landscape.

21.6 Whilst such effects are likely to be focused on the site and the surrounding landscape in spatial extent, they are of particular importance in a district characterised by its rural landscape and settlement pattern.

Agricultural land and land use

- 21.7 The Council notes that the Proposed Development would involve a substantial area of agricultural land being taken out of conventional agricultural production over the operational life of the Scheme.
- 21.8 Whilst the use is described as reversible, the Council considers that this represents a long-term change in land use, and that the presence and extent of best and most versatile agricultural land is an important consideration, along with the cumulative loss of agricultural land across Norfolk.

Historic environment

- 21.9 The Council has identified that potential effects on the setting of heritage assets, including those located within neighbouring authority areas, are a key consideration.
- 21.10 The Council supports and aligns with the position of King's Lynn and West Norfolk Borough Council and the advice of Historic England, considering that the assessment of harm, and the application of the planning balance in accordance with national policy, are matters requiring careful consideration during Examination.

Cumulative effects

- 21.11 A central theme of the Council's assessment is the cumulative context of solar development within Breckland and the wider Norfolk area.
- 21.12 The Council further notes that many of the schemes contributing to this cumulative context, including High Grove Solar Farm, are not yet subject to finalised design or consent. As such, there remains a degree of uncertainty as to their ultimate form and impacts.
- 21.13 The Council considers that this limits the extent to which cumulative effects can be fully and definitively assessed at this stage and is therefore a relevant consideration for the ExA in determining the weight to be given to the cumulative assessment presented. This in itself is not a criticism of the assessment methodology but reflects the practical difficulty of assessing cumulative effects where vital details of cumulative schemes remain uncertain.
- 21.14 The Council considers:
- The Proposed Development forms part of a wider pattern of large-scale solar and energy infrastructure; and
 - Whilst individual schemes may be acceptable in isolation, their combined effect may result in a progressive and material change to the rural environment across Breckland and the wider Norfolk area.
- 21.15 This is a matter of particular importance in relation to:
- Landscape character and visual amenity;
 - Land use; and
 - The overall perception of the countryside.

Design certainty and grid connection infrastructure

- 21.16 The Council has identified that a degree of uncertainty remains in relation to the layout and form of key elements of the Proposed Development, including grid connection infrastructure, the associated substations and the assessment of

cumulative effects across the wider area. The Council also notes that uncertainty remains in relation to the form of mitigation required to address aviation and glint and glare impacts, and that this may have implications for the assessment of environmental effects.

21.17 The Council notes:

- The Scheme is presented on a parameter based (Rochdale Envelope) basis, with detailed design to be confirmed post consent; and
- The precise siting and configuration of certain infrastructure remains subject to ongoing discussion with National Grid Electricity Transmission.

21.18 The Council considers:

- This introduces a significant degree of uncertainty as to the final form of the development; and
- Has implications for the assessment of environmental effects, including landscape and visual, heritage and land use impacts, which have been assessed on the basis of the parameters currently defined.

21.19 The Council therefore considers that the adequacy of the Environmental Statement in assessing a reasonable worst-case scenario, and the extent to which the Scheme is sufficiently defined to support robust decision making, are matters requiring careful consideration through the Examination. As such, the Council reserves the right to make additional representations should the scheme be amended as a result.

Other matters

21.20 The Council acknowledges:

- The Proposed Development would deliver economic benefits, particularly during construction, although these are likely to be limited in scale and duration at the local level; and
- Matters such as noise, traffic, flood risk and environmental protection can be appropriately managed through established controls, informed by consultee advice.

21.21 The Council also draws attention to its Relative Representations in relation to community benefits and commitments, which, whilst not material to the determination, are of local interest.

21.22 The Council has reviewed the draft DCO and associated provisions. The Council's detailed comments are set out within its Relevant Representations and are being actively progressed through the Examination, including via Statements of Common Ground where appropriate. The Council will continue to engage with the Applicant to ensure that appropriate controls and mitigation are secured through the DCO.

Overall Position

21.23 The Council considers:

- The Scheme would result in a material change to the character and use of land within the local area; and

- The cumulative effects of solar development across Breckland and the wider Norfolk area are a matter of significant relevance to the overall planning balance.

21.24 In particular, the interaction between these matters and the scale and distribution of solar development across the area is central to the overall planning balance.

21.25 The Council therefore considers that these matters should be given appropriate weight by the Examining Authority and the Secretary of State, alongside the benefits of the Scheme and the advice of relevant consultees.

Final Remarks

21.26 The Council welcomes continued engagement with the following parties to address outstanding matters through the Examination, including through the development of Statements of Common Ground where appropriate:

- The Applicant;
- Statutory consultees; and
- Neighbouring authorities.