

The Borough Council of Kings Lynn and West Norfolk

Local Impact Report – The Drovers Solar Farm- EN0110013

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1. Introduction

1.1. Purpose and Structure of this report

- 1.1.1. This report constitutes the Local Impact Report (LIR) for the purposes of section 60 of the Planning Act 2008 for the Borough Council of Kings Lynn and West Norfolk, herein referred to as “the Council”.
- 1.1.2. The Order limits comprise a total area of approximately 840 hectares of land located entirely within the administrative boundaries of Breckland District Council and Norfolk County Council who are host authorities for the development. The Scheme lies adjacent to the administrative boundary of the Borough Council of Kings Lynn and West Norfolk.
- 1.1.3. Norfolk County Council is the upper-tier local authority for the county of Norfolk as a whole, its functions include acting as local highway authority, waste planning authority, minerals planning authority, lead local flood authority, fire authority (including public safety), public health authority, education authority, and social services authority. NCC also holds responsibility for maintaining the Definitive Map and the Historic Environment Record. This report does not seek to consider matters within the remit of NCC.
- 1.1.4. The Council have liaised with Norfolk County Council and Breckland District Council since pre-application stage. Each council are providing their own separate Local Impact Reports focusing on key issues for their administrative areas.
- 1.1.5. In preparing this LIR, the Councils have had regard to the purpose of LIRs as set out in s60(3) of the Planning Act 2008 (as amended), Ministry for Housing Communities and Local Government guidance for the examination of applications for development consent, and the Planning Inspectorate’s (PINS) Advice Note One: Local Impact Reports.
- 1.1.6. The main content of this report is a description of the impacts of the proposed development on the administrative area of the Council.
- 1.1.7. The proposed Drovers Solar Farm would comprise solar photovoltaic panel arrays, battery energy storage system (BESS) and grid connection infrastructure, as follows:
 - Solar PV Panels, approximately 608 ha
 - Customer Substation and BESS, approximately 14.5 ha
 - National Grid Substation and Grid Connection Infrastructure, approximately 42 ha
 - Mitigation and Enhancement Areas (excluding mitigation for skylark/curlew), approximately 105 ha
 - Skylark Mitigation, approximately 81ha; and

– Curlew Mitigation, approximately 9ha.

1.1.8. This report does not seek to replicate information set out within the DCO submission and as such does not seek to describe the proposed development itself. Instead, the report provides a description of the area in and around the Order Limits to allow the expected impacts to be conceptualized. The report also comments on the mitigation measures proposed by the Applicant, and as and where appropriate, sets out proposals by the Councils for alternative or additional measures to reduce the impact of the scheme.

1.1.9. Section 60 (3) of the 2008 Planning Act defines the purpose of Local Impact Reports as: “a report in writing giving details of the likely impact of the proposed development on the authority’s area.” This report describes these impacts under headings by topic. Under each heading the key issues for the Councils and the local community are identified, and commentary is provided 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.

1.2. Description of the Area

Natural and Built Environment

1.2.1. The natural and built environment of the area around the proposed development has unique characteristics which draw from the combination of the landscape, cultural heritage, and ecology.

1.2.2. The immediate surroundings are agricultural in character, in use for a combination of arable and livestock farming. Agricultural Land Classification gradings are provided in Chapter 11 of the Environmental Statement - Soils and Agriculture [APP-060].

1.2.3. The Land is characterised by fields with parcels separated by hedgerows, tree belts and agricultural tracks. Fincham Drove, Petticoat Drove and Washpit Drove (former livestock driving routes) extend through the Order limits.

1.2.4. The Land is within the National Character Area (NCA) defined by Natural England as: NCA Profile: 85 The Brecks (NCA85), and within Landscape Character Types LCT(D) The Brecks – Heathland and Plantation and LCT(E) Plateau Farmland within the Breckland Landscape Character Assessment (2007).

1.2.5. The landscape character types are broken down further into more area-specific Landscape Character Areas (LCA), to which the Order limits are largely situated within parts of both LCA(D1) Swaffham Heath and LCA(E6) North Pickenham Plateau. A very small part of the northeastern site area is situated within the LCA (B7) River Nar Tributary Farmland.

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- 1.2.6. The Character of Castle Acre is described similarly within the Council’s Landscape Character Assessment, notably describing the area as having a strong sense of tranquillity and isolation and setting out various inherent landscape sensitivities including: the mature landscape structure including tree belts, woodland and patches of intact hedgerow, the strong sense of openness with open views over farmland, and the mature corridor of the River Nar.
- 1.2.7. No nationally or internationally designated sites are located within the Order limits. In depth information on protected sites is provided within ES Chapter 7: Ecology and Biodiversity [APP-056]. Breckland SPA is located approximately 2.6km southwest of the Order limits. The Norfolk Valley Fens Special Area of Conservation is approximately 3.7km northwest of the Site. The River Nar Site of Special Scientific Interest (SSSI) and Castle Acre Common SSSI are located approximately 322 m and 495 m north of the Site, respectively. Narborough Railway Embankment and Breckland Forest SSSI are located beyond the A47 to the south of the Site.
- 1.2.8. In terms of cultural heritage and historic designations, whilst no designated heritage assets are located within the Order limits, the landscape forms part of the Nar Valley and adjoins both the South Acre and Castle Acre Conservation Areas and there is a large number of Listed Buildings and Scheduled Monuments within the immediate vicinity. The landscape within the order limits plays a key part in the understanding and significance of these designated heritage assets by being a part of their setting. A full list of designated heritage assets is provided within the DCO submission at ES Chapter 8 [APP-057]. In particular:

Within the Council’s Area:

- Castle Acre Priory Scheduled Monument (Ref: 1015870), approximately 750m north of the Site
- Castle Acre Castle, Town Defences and Bailey Gate Scheduled Monument (Ref: 1017909) is located approximately 1.2km north-east of the site.
- Church of St James (Ref 3423861 – Grade I Listed)
- Castle Acre Conservation Area, approx. 450m north

Within Breckland District Council’s Area:

- Double moated site of Old Hall, 250m west of Church Farm Scheduled Monument (Ref: 1015269), some 570m north of the Site
- Great Palgrave Scheduled Monument (Ref: 1002894), some 640m southeast.
- Narford Hall (NHLE 1000337), a Registered Park and Garden some 380m west of the Site.
- South Acre Conservation Area, adjacent to the north boundary of the site
- Swaffham Conservation Area, some 650m south

- 1.2.9. Royal Air Force (RAF) Marham is located approximately 8km southwest of the Site, located primarily within the Council’s administrative area.

Socio-economics

- 1.2.10. Chapter 14 of the Environmental Statement sets out baseline conditions in regard to Socio-Economics. It is evident that there is a clear relationship between residents of our Borough and the services and facilities provided within the Breckland District Council Area, and vice versa.
- 1.2.11. Our Borough in general has a strong foundational economy, including significant employment in manufacturing, engineering, and health and care, which is expected to increase to support our ageing population (36% aged 65+ and declining proportion ages 25-39) and our population's health needs (56% of households have 1+ dimension of deprivation) in the years to come.
- 1.2.12. The challenges the Borough faces are exacerbated by the rurality of the area and dispersion of the population, however the rurality of the area and sense of remoteness also contributes as a strength in terms of tourism draw, which makes up a significant portion of the economy, with a total tourism value of £565m.
- 1.2.13. The Borough Council's Economic Vision and Strategy dated November 2024 and adopted in January 2025 sets out the baseline position and the Council's strategy to support economic growth going forwards.
- 1.2.14. The Council's Local Plan sets out in particular the economic contribution that RAF Marham makes to our borough from an employment perspective, being the largest single employment site in the Borough, supporting over 4,000 jobs as well as its strategic position as one of the largest air bases in the UK.

Transport

- 1.2.15. The site is readily accessible via several existing agricultural accesses onto the core highway network. Access routes to/from the site rely primarily on the A47 and the A1065 which runs along the east boundary of the Order limits, and via Narford Road, Low Road and South Acre Road.
- 1.2.16. Other than the strategic routes, the site is in a rural area served by minor roads. River Road bisects the site to the southwest of the order limits. Washpit Drove, Petticoat Drove and Fincham Drove form part of the extensive public walking routes in the locality and largely align with the historic droves across the site. The Peddars Way and Norfolk Coast Path National Trail route beside the proposed mitigation land along South Acre Road to the northeast of the order limits, north of Bartholomew's Hill Plantation.

1.3. National Policy and Principle of Development

- 1.3.1. National policy is supportive of the principle of renewable development. The Clean Power 2035 target sets out the strategy to fully decarbonize the electricity system by 2035, phasing out the use of fossil fuels and relying on zero carbon energy sources, including solar power.
- 1.3.2. The Climate Change Act 2008 sets a legally binding target for the UK to reduce greenhouse gas emissions from 1990 levels. The 2019 amendment to this act sets the target at 100% reduction by 2050. The Paris Agreement under the United Nations Framework Convention on Climate Change provides a framework to prevent global warming.
- 1.3.3. National Policy Statements set out Government policy on national infrastructure projects. The Council considers that NSP EN-1, EN-3 and EN-5 are relevant to this application. The key elements of each policy as they relate to the Council's concerns are outlined below.
- 1.3.4. NPS Policy EN-1 makes clear within its scope that there is an urgent need for clean energy infrastructure such as solar PV equipment and that substantial weight should be given to this need. It also recognises the strategic importance of solar generation in particular as part of the UK's energy generation mix and its general contribution to net zero targets as well as to security of the country's energy supply.
- 1.3.5. Paragraphs 5.9.22-5.9.36 of EN-1 (2023) set out the Secretary of State's responsibilities when considering development proposals impacting heritage assets. The 2025 version does not substantially alter any wording of these key policies. Historic England guidance also refers to an asset's "level of significance" which in this usage has the same meaning as importance.
- 1.3.6. EN-1, para 5.10.6 refers to minimising landscape harm. stating that projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate
- 1.3.7. EN-3, para 2.5.2 'Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage.'
- 1.3.8. EN-3 Para 2.10.46-48 discusses security lighting, with the paragraphs noting that Applicants should assess the visual impact of security measures, as well as the impacts on local residents and should consider the need to minimise the impact on the landscape.

1.3.9. EN-5 covers transmission systems and associated infrastructure including substations and converter stations. The policy includes additional considerations for, amongst other things, site selection and design, biodiversity, landscape and visual and noise and vibration.

1.4. Statutory Development Plans

1.5. KLWN Local Plan (2021-2040)

1.5.1. The Borough Council's Local Plan (March 2024) is supportive of renewable energy infrastructure and development to mitigate climate change. Policy LP06 of the Local Plan (2021-2040) states that development shall recognise and contribute to the importance of, and future proofing against, the challenges of climate change and to support the transition towards meeting the Net Zero target.

1.5.2. Policy LP18 of the Local Plan states the Council will support and encourage the generation of energy from renewable sources. These will be permitted unless there are unacceptable locational or other impacts that could not be outweighed by wider environmental, social, economic and other benefits.

1.5.3. Policy LP24 of the Local Plan generally supports proposals for renewable energy and associated infrastructure, subject to consideration of impacts upon ecology, landscape, heritage, amenity, contamination, public safety, tourism and other economic activity and the loss of agricultural land. These considerations are expanded upon within Policies LP06, LP18, LP19, LP20 and LP21 of the Local Plan. The policy goes on to state that development may be permitted where adverse impacts can be satisfactorily mitigated against, and where that mitigation can be appropriately secured.

1.6. Castle Acre Neighbourhood Plan

1.6.1. Castle Acre Neighbourhood Plan sets out various policies which are intended to protect the sensitive landscape setting and character of the village. Of particular relevance to this proposal, Policy HE1 sets out that proposals for new development, irrespective of scale, that could either directly or indirectly affect the historic significance of any of Castle Acre's designated or non-designated historic assets will not be supported, unless the tests set out in national guidance can be met and clear and convincing justification can be given.

1.6.2. Policy HE2 of the Neighbourhood Plan sets out a requirement for protection and reinforcement of the Conservation Area.

- 1.6.3. Policy HE4 sets out important views, including views south from the top of the valley, views from Grade I Listed Church of St James and views to/from the Castle and Priory.
- 1.6.4. Policy NE1 sets out protection of the landscape setting, stating that *‘The visual scenic value of the landscape and countryside in the Neighbourhood Area outside the defined settlement boundary will be protected from development that may adversely affect its visual appearance or harm sensitive features typical of the Rolling Open Farmland Character Area. Developments which adversely impact the historic landscape setting of Castle Acre and of the River Nar Valley including views over the Water Meadows will not be supported.’*
- 1.6.5. Other policies set out requirements for Dark Skies and External Lighting (NE4), Design (HD3),

1.7. Other Relevant Local Policy

- Castle Acre Conservation Area Character Statement (as amended in 2009)
- Kings Lynn and West Norfolk Economic Strategy

IMPACTS BY ISSUE

2. Cultural Heritage and Landscape Context

2.1. Summary

- 2.1.1. The proposal area is rich in designated sites such as Listed Buildings and Scheduled Monuments. Designated heritage assets are concentrated within the settlements, in particular Castle Acre, South Acre and West Acre, with many of the buildings being within designated Conservation Areas. These historic sites together denote multiple periods of human occupation and conflict. Development in their wider setting and the industrialisation of this key landscape will result in harm to the significance of the assets.
- 2.1.2. The Council disagree with the assessment and level of harm that has been attributed to the development within Chapter 8.
- 2.1.3. The Borough Council will rely on the views of Norfolk County Council in regard to below ground archaeology.

2.2. Policy Context

- 2.2.1. The applicable legislation, planning policy and other guidance documents against which the Scheme will be considered in regard to Cultural Heritage is set out in ES Appendix 8.1: Consultation and Legislation, Planning Policy and Guidance [APP-151].
- 2.2.2. Paragraphs 5.9.22-5.9.36 of EN-1 (2023) set out the Secretary of State’s responsibilities when considering development proposals impacting heritage assets. The 2025 version does not substantially alter any wording of these key policies. Historic England guidance also refers to an asset’s “level of significance” which in this usage has the same meaning as importance.
- 2.2.3. With regard for ‘substantial harm’ and ‘less than substantial harm’, Paragraph 5.9.27 of NPS EN-1 states that “when considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset’s conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance”. Paragraph 212 of the NPPF aligns with Paragraph 5.9.27 of NPS EN-1.
- 2.2.4. Section 8.6 of ES Chapter 8: Cultural Heritage and Archaeology [APP.057] outlines the baseline conditions of heritage assets. The section outlines the fifteen designated and other non-designated heritage assets that have, as part of the PEIR, been scoped in as receptors/matters for assessment with the derivation of a heritage asset’s significance in mind, as outlined in Paragraph 5.9.3 of NPS EN-1. The receptors/matters assessed include changes to the setting of Listed Buildings, Conservation Areas, Scheduled Monuments, a Registered Park and Garden, and non-designated heritage buildings, direct physical impacts to designated heritage assets, changes to the setting of non-designated heritage assets and direct physical impacts to non-designated heritage assets.
- 2.2.5. The Council considers that it is important the scheme demonstrates compliance with the requirements of NPS EN-3, on the following matters:
- Paragraph 2.5.2 in regard to demonstrating good design, particularly in respect of landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage.
 - Paragraph 2.10.107 onwards in regard to the impacts of solar PV developments on the historic environment.

2.3. Implications

- 2.3.1. The order limits lie to the north of Swaffham and to the south of the historic towns of South Acre, West Acre and Castle Acre. Although the site lies outside of the Borough of Kings Lynn and West Norfolk, it plays a crucial part in the setting of the Designated Heritage Assets listed in section 1.2.8 above and the order limits form part of a sensitive and impressive historic landscape.
- 2.3.2. Castle Acre is an impressive settlement set within a river valley. The topography of the Nar Valley is rare for Norfolk. The village of Castle Acre sits on the north side of the valley and has commanding views over the river and the opposite valley side as well as the surrounding landscape. Bartholemew's Hill Plantation, which the proposed substation would be set behind is a key part of this view and the plantation is visible from both the castle and the castle bailey.
- 2.3.3. The intended purpose of a castle was to ensure that it was able to defend itself and its lands from invasion during turbulent times. The Castle, as a result of its elevated position and far reaching views across the valley, would have been able to defend its people, protect its source of water and farm the surrounding land. This is the purpose of it being in this location. Although the upstanding remains and the underground archaeology are its reason for scheduling, the building cannot be read in isolation, its purpose and place in the landscape add to the significance of the upstanding and underground structures and places it in context. The agricultural character of this landscape is unchanged and while the hedgerows and field sizes may have changed, the nature of the land use has not. The Castle can still be appreciated across the valley as one nestled in amongst an agricultural, rural landscape over which it had control.
- 2.3.4. The Conservation Area at Castle Acre is one of the jewels in the crown of West Norfolk. It is a collection of heritage assets, both designated and non-designated, that as a whole have a harmonious and coherent story to tell. The red pantiles of the streets as they rise up the valley side from the River Nar are atmospheric and glimpsed views of the rural landscape beyond as well as the ever dominant castle, are possible. It is indeed often the streets of rising pan tiled buildings that guide the eye up towards the civic buildings in the longer view, a visual interpretation of the hierarchy of power of the day.
- 2.3.5. The proposed solar development has the potential to impact the setting of these heritage assets by dramatically changing the character of the landscape, the rural qualities of which are key to the understanding and context of these important buildings and places.

Pylons

- 2.3.6. The movement of the existing pylon line to behind Batholemew’s Hill Plantation would, if able to be achieved, have a positive impact upon the character and setting of the heritage assets inside Castle Acre however, the new line of pylons has not been shown on the visualisations, and it is unclear where in the landscape these would actually be placed. While the Council support the decommissioning and repositioning of the pylons in principle, additional information is required to ensure that they are placed in positions that would not be more prominent within this sensitive landscape.

Fencing

- 2.3.7. The fencing around the scheme also requires some further consideration. Large high fencing along the road and between fields of solar panels, at this scale would turn this landscape into one of industrialisation rather than rural agricultural and changes the context of the castle and castle acre. This has also not been shown on any of the visualisations and could be key when considering the impact of the proposal from, for example Little Palgrave Hall.

Bunds

- 2.3.8. Bunds have also been proposed around the substation and potentially are required around RAF Marham. The scale of these bunds, expected to be around 4m in height, would result in large areas of earth which could block out the views of the sky over the crest of the valley. This needs some further understanding before comments can be given but, has the potential to be impactful upon the character of the landscape and therefore the context of Castle Acre. It is also unclear whether fencing would be required on top of the bund. If so, this would raise the visibility of these features further.

SuDS features

- 2.3.9. The impact of the SuDS scheme on the landscape could also be harmful if standard drainage basins are proposed. The SuDS should work with the existing landscape to provide a harmonious transition between the existing agricultural landscape and the designed landscape that inevitably comes with this sort of proposal.

Mitigation land

2.3.10. At present the land to the north of Bartholemew’s Plantation is proposed to be skylark mitigation. No real indication has been provided as to what this land would look like and whether any infrastructure such as fencing or other paraphernalia is required to manage this. The ecological requirement for mitigation land is noted, however the change the character of the land from farmland to something else could itself have a negative impact on the setting of the area if not properly managed

Summary

2.3.11. Overall, the proposal would introduce industrialisation into this intensely rural and special part of landscape. Industrialisation and the paraphernalia that this brings with it, would change the character of the land and be impactful upon the setting, which forms a part of the significance of the designated heritage assets identified. The topography of the landscape, being on the valley side, means that the infrastructure and panels have the potential to be visible from further away.

2.3.12. The Council maintain that as an integral part of the significance of the Castle and Conservation Area at Castle Acre, this change in land use would result in less than substantial harm, moderate in scale, to the significance of the castle at castle acre and a moderate level of less than sibstantial harm to the setting of Castle Acre Conservation Area.

2.4. Requirements and Obligations/DCO and Work Plans

2.4.1. The success of the mitigation for heritage impacts will depend upon the detail of the scheme which is not currently available to the Council. Section 9 below details the Council’s request for consultation when key details of the scheme are being discharged post-consent.

2.4.2. Part of the mitigation’s success will rely upon existing landscape features – including in particular Bartholomew’s Hill Plantation being appropriately retained and managed throughout the construction, operation and post-decommissioning period, particularly given the intention for the substation to be retained in perpetuity.

- 2.4.3. The Council has concerns that the scope of allowances for loss/removal of trees as written in Article 40 of the dDCO will not sufficiently protect these tree belts, woodland and hedgerows that have been specifically removed from the Order limit. The Council requests that the wording is amended to remove ambiguity given inclusion of the word ‘near to any part of the authorised development’ and suggest the wording is revised to that which reflects that of the Springwell DCO granted in April 2026 and protects the key landscape features, for example Bartholomew’s Hill from damage given that these mature tree belts and woodland plantations provide crucial screening of the infrastructure as proposed.

3. Ecology and Biodiversity

3.1. Summary

- 3.1.1. The Development Site is close to a number of sites designated nationally or internationally for their nature conservation importance at international, national, or local level, including:

- Breckland SPA/SAC
- Norfolk Valley Fens SAC
- River Nar SSSI
- Castle Acre Common SSSI
- Narborough Railway Embankment SSSI
- East Walton & Adcock’s Common SSSI

- 3.1.2. A full list of ecological designations in proximity to the Order limits is provided in Appendix 7.2 [APP-148].

- 3.1.3. The baseline survey work appears to be thorough and the Council in general has limited concerns from an ecology perspective in regard to the impacts upon our Borough, subject to compliance with the construction management plan and clarification in regard to Biodiversity Net Gain and proposed monitoring of the created habitat.

3.2. Policy Context

- 3.2.1. NPS EN1, Para 5.4.42 sets out a general principle that development should in line with the mitigation hierarchy aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives. The policy goes on to state that where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought.

- 3.2.2. On protected habitats and species, NPS EN-1 states that it should be ensured these “are protected from the adverse effects of development by using requirements or planning obligations” and that substantial weight should be given “to any such harm to the detriment of biodiversity features of national or regional importance which it considers may result from a proposed development” (para 5.4.55).
- 3.2.3. The Council considers that it is important the scheme demonstrates compliance with the requirements of NPS EN-3, on the following matters:
- Paragraph 2.5.2 in regard to demonstrating good design, the design of the project to mitigate impacts including effects on ecology
 - Paragraph 2.10.128-130 in regard to biodiversity and ecological conservation/mitigation

3.3. Impacts on Species and Habitats

Foraging and roosting bats

- 3.3.1. The submission relies on the lack of impact to potential roosting features within trees on site to rule out impacts upon on roosting bats. The retention of the proposed buffers throughout construction activities is therefore vital, given the lack of detailed survey work to confirm the nature, species and status of any individual roosts. Consideration will also need to be given to commuting corridors throughout construction, operation and decommissioning which also have not been specifically mapped. Measures with regard to preventing lighting impacts are also welcomed.
- 3.3.2. Fragmentation of habitat connection could occur through severance of hedgerows, impacting upon foraging bats. One of the largest bat roosts in the country is recorded to the north of the site within the Stags Inn pub (soprano and common pipistrelles) and the bats within this roost may be reliant on habitats within the red line boundary. The retention of key features and the implementation of exclusion buffers is likely suitable to prevent loss of important navigational features, commuting routes or foraging areas. The lighting design within the substation/BESS compounds should take into account light spill and other potential impacts on bats, particularly given the records of barbastelle bats in this area.

Badgers

- 3.3.3. Badger setts have been identified within the red line, and the detailed design will need to accommodate them as per standard guidance, and a licence obtained where necessary. Fencing may prevent connectivity of foraging areas for badgers, however on the basis of fencing retaining key wildlife corridors in the field margins, no significant adverse impact has been identified.

Birds

- 3.3.4. Construction activities will result in the direct loss of arable habitat and therefore the loss of breeding and foraging habitat for various bird species. The assemblage of breeding birds on the site includes priority species and the loss of active nests or other disturbance during construction activity could have adverse impacts on local populations. Measures set out within the proposed mitigation include timing of clearance works and nesting bird checks in order to safeguard nesting birds of any species and to avoid an offence under the Wildlife and Countryside Act 1981 (as amended).
- 3.3.5. Potential effects on wintering birds during the construction phase relate to a direct loss of foraging habitat and/or potential disturbance. Birds are highly mobile during this season, and as such will be able to disperse away from any habitat clearance or construction works, meaning the magnitude of impact on bird populations would therefore be negligible
- 3.3.6. The majority of bird species on site are generalist species that make use of a wide variety of habitat and food sources and will likely therefore continue to use the field boundaries and buffers with any disturbance therefore unlikely to cause significant impacts. However, Skylark and Eurasian Curlews are priority species on the red list and have been identified within the site. The use of fields for solar PV will result in the loss of land currently used by these birds for ground nesting. Compensation measures are proposed as discussed below. These mitigation measures would also benefit Lapwing during the winter months.

Skylark Mitigation

- 3.3.7. The Skylark mitigation strategy uses an input figure of 50% to calculate required area of land to offset impacts and justifies this based on other consented solar farms (Cottam, Lincolnshire). There are however examples of solar projects delivering mitigation on a 2:1 basis (Wickham Hall Solar Farm, Uttlesford delivered 26 plots for impacts to 13 breeding pairs). The calculation provided within the Skylark mitigation strategy outputs an area requirement of 77.2ha. 77.2 ha could support 32 skylark territories ($0.56-0.15=0.41 \times 77.2=31.65$). This would only equate to around 36% of the skylark territories impacted being mitigated.
- 3.3.8. Accounting for the territories that could be absorbed into adjacent land (21), could use the curlew mitigation area (6) or were recorded with Field 32 (now removed from order limits) (4) this leaves 90 territories to be mitigated for. Territories that could be displaced onto curlew mitigation land is calculated as 6 however the Council's Ecologist calculates it as 4 ($0.56-0.15=0.41 \times 8\text{ha}=3.3$). It is also not clear if the 4 territories which are discounted due to the removal of Field 32 are counted again under the 21 being excluded due to proximity to the order limits. The Breeding Bird Survey Results - North (Plan 6806/ECO7a-f) within the PEA suggest that 2 territories might fall into both categories.

Curlew Mitigation

- 3.3.9. It appears, given the contents of the Ecology Report that the mitigation land proposed is for the Eurasian Curlew population which has been identified on site. One stone curlew was identified during winter bird surveys, however this finding has not been mapped or expanded upon further. Local residents have suggested there may be at least one breeding pair of Stone Curlew within the Order limits which has not been accounted for within the DCO submission (likely due to the date of surveys in 2024). If a breeding pair of Stone Curlew are present, it is likely that the breeding pair rotate between fields which suggests that other habitat is available in the local area. The Council note the presence of Stone Curlew and extent of surveys is queried within Q3.0.1 of the ExQ1 and await the views of Natural England in regard to survey adequacy and functionally linked land.
- 3.3.10. The presence electricity pylons and overheads lines within the proposed mitigation area could impact the suitability for the species, as raised by the Norfolk Wildlife Trust and Natural England, who note a requirement for predator-exclusion measures within the curlew mitigation grassland. The mitigation should be confirmed as appropriate prior to reliance on it.

Habitats

- 3.3.11. The Preliminary Ecological Assessment (PEA) outlines habitats of Principal Importance including lowland deciduous woodland, tree lines and veteran trees, most of which will be retained and protected.
- 3.3.12. Veteran trees are an irreplaceable habitat under the Environment Act. A substantial number of veteran trees are present on site. The Biodiversity Net Gain Report states that 37 veteran trees are present whereas 39 have been identified by the Arboricultural Impact Assessment (see 5.2.2 of that document [APP-178]). It is of note that the way arboriculturists categorise veteran and the Environment Act categorise veterans differs, with the Environment Act having a lower threshold for veteran. If not already done so, the number of veterans on site should be confirmed by the Ecologist.
- 3.3.13. Game cover crops that are under countryside stewardship schemes are also present on site as are two Schedule 9 species (of which it is offence to cause such species to grow in the wild). These species need to be carefully managed during construction to avoid an offense.

3.4. Impacts on Protected Sites

- 3.4.1. Breckland Special Protection Area is located approximately 2.6km southwest of the order limits. At in excess of 2.5km from the site, no direct effects are anticipated in relation to potential impact pathways from the proposal scheme. Following survey results, no significant effects on Breckland SPA are anticipated in relation to functionally linked land.
- 3.4.2. The key potential impact pathway identified is air quality on Breckland SPA and Norfolk Valley Fens SAC. Impacts alone and in combination are screened out of further assessment based on the provision of a routing strategy, with an initial feasibility exercise indicating three key routes to the Site via local and strategic road networks which avoid passing through or immediately adjacent to the protected sites. No significant effects in regard to air quality are expected.
- 3.4.3. Breckland SAC is well distanced from the scheme (some 8km south) such that no effects are anticipated.
- 3.4.4. The River Nar Site of Scientific Interest is in relatively close proximity to the north of the site, outside of the order limits. The proposed vehicle routing strategy is sufficient to rule out air quality effects on this nationally significant site. This SSSI is a key habitat corridor within the landscape and any direct impacts during construction and operation should be avoided i.e. contamination from run off, lighting, noise and pollution.
- 3.4.5. No significant adverse effects on Castle Acre Common SSSI, Narborough Railway Embankment SSSI, and East Walton & Adcock's Common SSSI in relation to direct or indirect pathways are anticipated as a result of the construction phase of the Scheme.
- 3.4.6. In general, subject to compliance with the outline Construction Traffic Management Plan and outline Construction Environmental Management Plan, the Council raises no objection in regard to impacts on Protected Sites.

3.5. Biodiversity Net Gain

- 3.5.1. Notwithstanding that Biodiversity Net Gain is not yet a statutory requirement for DCO applications, given the general requirement for biodiversity enhancements enshrined within planning policy at a local and national level, the Council note that the information submitted for biodiversity net gain is not detailed enough to make any final assessment.

3.5.2. Ultimately, the Metric and the condition assessments should be submitted in Excel format rather than provided as screenshots (as per the Biodiversity Net Gain Report). The Metric User needs to be a person not a company to enable assessment of the validity of the inputs. The Metric will also need to be updated to reflect October publication of LNRS – this is noted in the BNG report. The LNRS will affect the trees recorded in the baseline and the other neutral grassland being created post development. It is understood from discussions that the Applicant intends to clarify via submission of amended details at Deadline 1.

3.5.3. Habitat monitoring should continue for the full lifespan of the project, to effectively demonstrate the success of the mitigation/compensation and achievement of a Biodiversity Net Gain. The final detailed LEMP should reflect the ongoing requirement of regular monitoring, as noted in Para 7.5.11 of the Outline LEMP [APP-191].

3.6. Requirements and Obligations/DCO and Work Plans

3.6.1. The information currently submitted suggests that the BNG will be delivered onsite and will be considered as significant. Typically, a Habitat Monitoring and Management Plan, completed in accordance with the Government's standard format, would be provided alongside the Biodiversity Gain Plan to allow clear assessment against BNG requirements at discharge stage. The Council recommend a similar approach is taken to this scheme, notwithstanding the Outline LEMP which has been submitted

3.6.2. Schedule 2 of the dDCO sets out that no part of the authorised development may commence until the Biodiversity Net Gain strategy has been submitted to and approved by the relevant planning authority. The proposed permitted preliminary work (to be excluded from the definition of commencement) allow site clearance which will impact upon the BNG baseline. It is therefore imperative that the baseline is agreed as accurate prior to consent being granted.

3.6.3. Subject to finer details being aligned throughout the submission, the BNG plans for the site are likely to be considered acceptable. For example, the Hedgerow Removal Works outlined in Schedule 12 of the Draft DCO must align with the detail on the LEMP and within the Biodiversity Net Gain Baseline and ultimately a HMMP or equivalent to ensure accurate results in regard to enhanced hedgerows versus replacement hedgerows.

4. Noise, Dust, Lighting and Residential Amenity

4.1. Summary

4.1.1. The nature, size and duration of the construction phase of this development is likely to cause adverse effect on nearby sensitive receptors. This is primarily the remit of Breckland District Council given that the core impacts will be on their residents as closest dwellings.

- 4.1.2. If the development is consented, it must be ensured that impacts have not been underestimated, that there are robust procedures to monitor those impacts and that where there are impacts, the mitigation reduces as much as reasonably practicable the impact on those affected.
- 4.1.3. The section below deals with construction impacts in the first instance, followed by operational disturbance and then mechanisms to prevent disturbance. Air quality impacts are discussed separately later in this report.

4.2. Policy Context

- 4.2.1. The overarching national policy statement for energy (EN-1), includes consideration of impacts of noise and vibration, plus the national policy statement for renewable energy infrastructure (EN-3), particularly section 2.10 includes matters relating to traffic and transport, and noise and vibration. Particularly regarding noise and vibration, a key consideration is the effects (including cumulatively) on residential receptors and whether proposed mitigation is adequate and can be secured to ensure appropriate protection of amenity.

4.3. Construction Phase

- 4.3.1. Potential impacts during construction would be noise and vibration impacts from vehicle movements, including HGV deliveries as well as disturbance impact from construction itself - vibrations (noted as significant in PEIR documentation) - particularly for piled foundations planned for the photovoltaic panels - and construction site operational site lighting. These impacts would persist throughout the construction period, as well as during decommissioning.

4.4. Operational Phase

- 4.4.1. Potential noise sources at operational phase will include the noise from vehicle movements, plant and machinery (the BESS and Substations etc.) and any permanent lighting. These effects will primarily be restricted to within Breckland District Councils boundary.
- 4.4.2. The highest potential sources of operational noise are the Transformers and PCS Inverters associated with the BESS. Paragraph 8.3.2.42 of the Planning Statement [APP-043], relating to Chapter 5: The Scheme, refers to the creation of an earth bund alongside the BESS to create a noise buffer, however no detail of this bund has been provided, and no reference to the bund is made within the outline Landscape Ecological Management Plan [APP-191]. As such, it is not known where within the BESS compound this bund would be placed, or specifically what level of noise mitigation it would achieve.

- 4.4.3. The Baseline Noise Survey (BNS) undertaken in November 2024 demonstrated that in the daytime, background levels of 25 to 35 dB LA90, 15min could be typically experienced at properties neighbouring the Solar PV Site, with higher noise levels of 53-54 dB LA90,15min for locations exposed to traffic noise from the A47, and locations to the north of the Solar PV Site experienced a quieter environment during the daytime. During quiet evening periods noise levels at the two fixed positions decreased to 20 to 34 dB LA90,15min and were regularly below 30 dB LA90,15min at night-time.
- 4.4.4. Plant types and specifications, and precise locations have not yet been confirmed. The applicant should be providing confident data that the significance of operational noise impacts are accurately modelled and are sufficiently low that they will remain negligible under all weather conditions (for example temperature inversions, positive downwind scenarios etc.) and throughout the life of the project, and will not impact those properties which might experience lower background noise levels at night than those reported in the Baseline Noise Survey.
- 4.4.5. The details contained within the oCEMP are acceptable with respect to the options for dust monitoring and these should be moved forward to the final CEMP, following discussion and agreement. Agreements will be sought on the most appropriate measures considering sensitive human receptors when considering the location and timing of construction activities; the requirement being to consider dust mitigation controls and/or monitoring requirements dynamically and with regular opportunity for review. The CEMP should be reviewed and amended as necessary prior to the decommissioning phase.
- 4.4.6. Operational lighting is not expected to result in neighbour amenity concerns on residents of our Borough.

4.5. Requirements and Obligations/DCO and Work Plans

- 4.5.1. The Council will ultimately defer to the views of Breckland District Council in terms of the impact on their residents, however, note that the proper management of the construction and operational phases is an important consideration for residents of both areas.
- 4.5.2. The intensive construction works of the scheme have the potential to impact upon the rural noise climate if not appropriately managed however the majority of these impacts will fall within the remit of Breckland District Council in their consideration as host authority and the Council will therefore defer to the host authority to comment in detail.
- 4.5.3. Ultimately, various measures are proposed to manage the effects of noise and vibration during construction. This will include good practice measures as proposed within the Outline Construction Environmental Management Plan [APP-186]:

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- Deliveries and construction activities being limited to the hours 07:00 to 18:00 Monday to Friday and Saturday 08:00 to 13:30, with additional precautions during certain piling works
- Direct liaison with local residents and the wider community to notify them when particular activities causing elevated noise or vibration levels will occur and how long they will last, and
- Contractors employing Best Practicable Means (BPM) to reduce noise from plant, machinery, and construction activities.

4.5.4. These measures, and general compliance with the Outline Construction Environmental Management Plan (oCEMP) will be secured as final documents by a requirement of the DCO. The Council raises no objection on noise or residential amenity grounds on that basis.

4.5.5. An outline Operational Environmental Management Plan (oOEMP) has also been submitted with the application, including measures to monitor & maintain equipment, and noise levels, and a complaints procedure for members of the public to report noise disturbance at residential properties – again a final version will be secured as a requirement of the DCO.

5. Contamination – Land and Air Quality

5.1. Summary

5.1.1. The site is a greenfield site and is outside the borough council boundary, therefore the potential for unacceptable risks from land contamination in the borough is limited. No cross-boundary risks from contaminated land are reported in the information submitted.

5.1.2. The Council would agree therefore, that the construction traffic levels in this council's area are less than the IAQM screen for further air quality assessment. Therefore, as long as the CTMP is implemented as set out we would have no objection, as the road links in BCKLWN area not anticipated to be used for construction.

5.2. Policy Context

5.2.1. Policy 5.11.15 of EN-1 states that 'Developments should contribute to and enhance the natural and local environment by preventing new and existing developments from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.'

5.3. Land Contamination

- 5.3.1. The Council are not aware of significant sources of land contamination in our area in the vicinity of the proposed development and note that the draft DCO contains protective provisions for Exolum Pipeline System Ltd. An abandoned MOD fuel pipeline runs north south through the site, and this is accounted for within the submission documents.
- 5.3.2. The Draft DCO includes documents and plans to be certified including the Environmental Statement, Outline Construction Environmental Management Plan, and Outline Soil Management Plan.
- 5.3.3. The Council welcome the submission of the Construction Environmental Management Plan and Soil Management Plan which should help to manage any potential impacts from contaminated land and should contribute the sustainable use of soils.

5.4. Air Quality

- 5.4.1. Air quality was covered within the ES under Chapter 16 'Other Environmental Matters' (ES, Nov 2025; APP-065), which the Council considered already within the relevant representation. Dusts were however assessed separately as set out within Appendix 1 of the Outline Construction Environmental Management Plan (oCEMP; APP-186).
- 5.4.2. In terms of impacts the Dust Assessment submitted as Appendix 1 within the oCEMP [APP-186] identified the potential risk of construction dusts based on IAQM's guidance (IAQM, 2024). This highlighted that the track out of dusts to be of the largest magnitude category (assessed as Large), followed by earthworks (Medium) and actual construction as having a small risk category due to the modular type of build out being proposed.
- 5.4.3. As explained within the relevant representation response, potential sensitive receptors are those within 250m of these activities, but for those nearest there should be actual air quality monitoring to be considered within the CEMP. According to the IAQM in its latest (2024) guidance this is highly recommended for all risk categories.
- 5.4.4. In terms of sensitive receptors, the Dust Assessment describes the sensitivity of the area as low based on the predicted background concentration of PM10 (less than 24 µg/m³) in conjunction with the limited number of sensitive receptors located near to the source of these dusty activities. However, the Dust Assessment (Table 1.9) only lists the potential receptors, without plotting them spatially or providing grid references. The likelihood is that air quality monitoring (dusts / PM10) may not be required for receptors in BCKLWN area, but this should be based on agreement between the local authorities when presented with information in a suitable map (shape file) based format.

- 5.4.5. Tables 16.1 and 16.2 within Chapter 16 [APP-065] set out that air quality monitoring is still to be agreed, which could be secured through the CEMP under Requirement 13 of the draft DCO.
- 5.4.6. In terms of construction vehicle emissions, the Council has previously stated that this could be scoped out for further and more detailed air quality assessment based on IAQM screening criteria, as long as sufficient information was provided on vehicle movements (24-hr AADT) during the construction and decommissioning phases.
- 5.4.7. Transport Assessment (TA; Appendix 9.2) explained that the routing for HGVs will be secured by way of a requirement in the DCO through a detailed CTMP (Requirement 15). The routing strategy is for HGVs to primarily arrive from the A47 to the south of the site within Breckland Council area, and with access via the A1065, which forms the preferred Route A of this CTMP as set out in the ES Figure 9.25. It adds that subject to the sourcing of the relevant materials, there may also be a nominal level of HGVs arriving from the north via the A1065 (still within Breckland). The TA added that it is not proposed for any HGVs to access the Scheme via Route C (Narford Lane route). Part of Route C in is BCKLWN area.
- 5.4.8. As confirmed within our relevant representation [RR-010] the Council had calculated change in HGV within the affected road network as presented with the TA which confirmed up to 87 HGV to access the site via Route A in Breckland DC area. The road link 9 (off from Route C) within the Council's area was consistent with the outline CMTP with no construction traffic shown via this route.
- 5.4.9. The Council would agree therefore, that the construction traffic levels in this council's area are less than the IAQM screen for further air quality assessment. Therefore, as long as the CTMP is implemented as set out the Council would have no objection, as the road links in BCKLWN area not anticipated to be used for construction purposes. Once operational, PV panels and batteries will need to be replaced, but traffic levels will be much reduced when compared to construction period.

6. Other Material Considerations

6.1. Electro Magnetic Fields

- 6.1.1. The Environmental Statement on Electromagnetic Fields (EMF) considers EMF Risk Assessment and well-being concerns (ES Appendix 16.4) . The Council note the conclusion that there is no potential for significant effects as a result of the Scheme in respect of EMF.

6.2. Impacts on RAF Marham

6.2.1. *Policy LP10 of the Council's Local Plan acknowledges the importance of RAF Marham as a key economic contributor to the Borough 4.38* The RAF base (and associated facilities) at Marham is the largest single employment site in the Borough, supporting over 4,000 jobs, with a wide range of roles, and in particular a strong emphasis on high-end engineering skills. The estimated annual value to the local economy is in excess of £150 million. The base also hosts the whole of the RAF strategic strike capability, and this pre-eminence will continue into the future. Any impacts upon the RAF base, for example from impacts upon the precision radar or from glint and glare would be at odds with this Local Plan policy and would not be supported by the Council. Any physical mitigation measures could have additional impacts which would need careful consideration given the landscape and heritage considerations above.

6.3. Grid Connection

6.3.1. BCKLWN have previously discussed the lack of Gate 2 Grid Connection Offer with the Applicant. This Local Impact Report and our engagement is based upon the plans and supporting information *as submitted*. The lack of a formal connection offer raises concerns from the Borough Council's perspective as to the uncertain details of the proposal.

6.3.2. Ultimately, it is a matter for the Examining Authority to consider whether or not the proposal has been suitably detailed to allow assessment of the significant effects on the environment and to comply with the relevant regulations.

6.3.3. As noted during pre-application discussions, the position of key infrastructure is a key concern for BCKLWN, and any change to the grid connection would likely result in knock on impacts, for example on the incredibly sensitive historic setting or the surrounding landscape and this may alter the Borough Council's stance to the development as a whole.

7. Cumulative Impacts

7.1. BMV Land

7.1.1. Para 5.11.12 of EN-1 sets out that 'Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).'

7.1.2. The project would result in the loss of BMV land. The Agricultural Land Classification (Appendix 11.2, [APP-168]) sets out the grading of a total of 829.4ha of land (the Application Cover Letter, Appendix 1.1 states the total order limit is 838.77ha). 17.5ha is graded as Grade 1, 276.4ha as Grade 2, 160.9ha as Grade 3a. This results in approximately 55% of the site falling within the definition of Best and Most Versatile (BMV) agricultural land. Whilst the 60 year decommissioning timeframe set out by Requirement 20 is noted, the loss of BMV, particularly in combination with other schemes across Norfolk as a whole is a concern for the Borough Council.

7.2. In-combination effects with other schemes

7.2.1. The Borough Council support the concerns of Norfolk County Council and Breckland District Council raised at Relevant Representations stage in regard to the in-combination effects of solar developments across Norfolk as a whole.

7.2.2. Particular attention is drawn to the potential implications of High Grove Solar Farm to the east of the site which also adjoins Swaffham and the potential in-combination effects on adjoining settlements, in particular in relation to the landscape and heritage assets as discussed above.

8. Specific comments on DCO and Discharge Requirements

8.1. Draft Development Consent Order wording

8.1.1. The Council have reviewed the Draft DCO [APP-021] and has commented on it on a topic by topic basis above, where relevant. At the time of writing, the Council are working alongside Norfolk County Council and Breckland District Council to review and assess the implications of the wording. As it stands, The Council's current views include the following.

8.1.2. The definition of 'Permitted Preliminary Works' in the context of the draft DCO has the opportunity to allow significant works, for example to pylon lines or site clearance before the detail of works or management plans have been confirmed. The Council request that the implications of this definition are carefully considered and suggest that where permitted preliminary works have the potential to impact upon available or appropriate mitigation, the definition of Commencement within each requirement is qualified appropriately. For example, a sub-paragraph could be added to Requirements 7, 9, 10, stating that 'For the purposes of sub-paragraph (1), "commence" includes any permitted preliminary works.'

8.1.3. The Council also suggest that any advanced planting to allow for an earlier establishment of protective screening is specifically included as a 'permitted preliminary work' to allow for beneficial soft landscaping to be put in place at the earliest stage (subject to details being agreed) and to allow its early maturation.

- 8.1.4. For the avoidance of doubt, the Council also suggest that the definition of Maintain is amended, to state ‘inspect, repair, adjust, alter, remove, refurbish, reconstruct, replace and improve any part of, but not remove, reconstruct or replace the whole of, the authorised development and “maintenance” and “maintaining” are to be construed accordingly;’.
- 8.1.5. In Regard to Schedule 1, Part 6, Article 40, the Council has serious concerns with the flexibility provided by the current wording in regard to felling or lopping of trees and removal of hedgerows. The Council requests that the wording is amended to remove ambiguity and scope of allowances of the phrase ‘near to any part of the authorised development’ and suggest the wording is revised to that which reflects that of the Springwell DCO granted in April 2026, or similar.
- 8.1.6. It is essential that the DCO wording protects the key landscape features, in particular Bartholomew’s Hill Plantation, from damage for the duration of the construction, operation, and decommissioning periods, given that the mature tree belts and woodland plantations which adjoining the order limits in various locations provide crucial mature screening of the infrastructure as proposed.
- 8.1.7. In relation to Schedule 2, Requirement 5 and whilst the requirements of the Landscape and Ecological Management Plan controlled by Requirement 7 are noted, the Council suggest that given the importance of landscape screening, that this provision should be reworded to include specific details of soft landscaping. It is assumed that any bunds required would be fully detailed as part of para 5.c.

8.2. Discharge Requirements – Request for Consultation

- 8.2.1. Given the potential cross boundary implications of the scheme, the Council request to be included as a named consultee in the discharge of the following requirements within Schedule 2 of the draft DCO where the requirements impact upon the Borough, its heritage and its landscape setting and its residents.

- Requirement 5 - Detailed Design Approval
- Requirement 7 – Landscape and Ecological Management Plan
- Requirement 8 – Operational Management Plan
- Requirement 9 – Biodiversity Net Gain
- Requirement 10 – Fencing and other means of enclosure
- Requirement 13 – Construction Environmental Management Plan

- Requirement 14 – Operational Environmental Management Plan
- Requirement 15 – Construction Traffic Management Plan
- Requirement 18 – Skills, Supply Chain and Employment
- Requirement 20 – Decommissioning and Restoration

9. Conclusion

- 9.1.1. This Local Impact Report has considered the potential impacts of The Drovers NSIP proposals at a local level in respect of the Borough Council of Kings Lynn and West Norfolk’s administrative area, which the Order limits immediately adjoin. Within this LIR, the Council has considered positive, negative, and neutral impacts within the context of its knowledge and understanding of the area and against the proposals as currently submitted.
- 9.1.2. Whilst the benefits of renewable energy and the Government’s targets in this regard are noted, and the policy support for such development is clearly acknowledged, this support is subject to compliance with a number of other policy considerations in relation to the impacts of the proposed development.
- 9.1.3. The ExA will need to be satisfied that the residual impacts arising from the proposed development are capable of being outweighed by public benefits of the proposal.
- 9.1.4. Of the matters that fall within the Council’s jurisdiction, we have identified the following potentially **positive** impacts which can be summarised as follows:
- Contribution to the production of clean energy and energy security
 - Ecological benefits and biodiversity benefits arising from the development (subject to ongoing consideration of BNG and detail required within the outline LEMP).
- 9.1.5. Of the matters that fall within the Council’s jurisdiction, we have identified the following potentially **negative** impacts which can be summarised as follows:
- The scale and significance of the impact on the landscape setting, in particular the identified harm to the landscape setting of designated heritage assets, and the visual amenity of the area more generally

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- The potential adverse impacts upon RAF Marham and the current lack of known mitigation/resolution to the concerns raised by the Defence Infrastructure Organisation
- The in combination effects of the scale of the solar development and loss of BMV land across Norfolk as a whole, albeit noting that the loss of BMV land would be temporary in nature given the 60 year decommissioning period.
- The implications of the lack of certainty over Grid Connection, and the knock on implications on the assessment of the above matters.

9.1.6. Of the matters that fall within the Council’s jurisdiction, we have identified the following **neutral** impacts, subject to appropriate mitigation, as follows:

- Construction period benefits to the workforce spending, employment and supply chain effects
- The impacts arising from noise and vibration, glint and glare (save for any impacts on RAF Marham), and air quality