

The Drovers Solar Farm

Chapter 4: Reasonable Alternatives and Design Evolution (Clean)

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4 Reasonable Alternatives and Design Evolution

4.1 Introduction

- 4.1.0 This chapter of the Environmental Statement (ES) provides a summary of the reasonable alternative options that the Applicant has considered for the Scheme, including the initial selection of the Site and throughout the development of the design.
- 4.1.1 This chapter also details how the assessment of sites and design alternatives has been undertaken, detailing the factors that have been considered and the main reasons for discounting alternative design options. Further details can be found in the **Design Approach Document [APP/5.7]** and **Design Principles, Parameters and Commitments [APP/5.8]**.
- 4.1.2 The **Statement of Need [APP/5.4]** and **Planning Statement [APP/5.5]**, both submitted in support of the Development Consent Order (DCO) Application, set out a detailed and compelling case as to why the Scheme is urgently required and at the proposed scale. This assessment of alternatives is set in the context of the clear and urgent need for the Scheme.
- 4.1.3 This document has been updated at Deadline 3 to include information on the consideration of alternative technologies as requested by the Examining Authority. The document references have not been updated from the original submission. Please refer to the **Guide to the Application [APP/1.3.4]** for the list of current versions of documents.

4.2 Legislation, Policy, and Advice Notes

- 4.2.0 National Policy Statement (NPS) EN-1 (Ref.4-1) paragraph 4.3.9 confirms that, from a policy perspective, there is no general requirement to consider alternatives or to establish whether a development represents the best option. Although there are specific requirements in relation to compulsory acquisition and habitats sites, the NPS does not change these requirements.
- 4.2.1 However, paragraphs 4.3.15 to 4.3.17 of NPS EN-1 go on to set out the circumstances where there is a requirement to consider alternatives, as noted:
- Applicants are obliged in their ES to include information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the Applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility
 - In some circumstances, the NPSs may impose a policy requirement to consider alternatives; and
 - Where there is a policy or legal requirement to consider alternatives, the Applicant should describe the alternatives considered in compliance with these requirements.



4.2.2 Although there is no general planning policy requirement to consider alternatives and show the proposals represent the best option, the requirement to include information on alternatives is imposed by other legislation and in specific circumstances, as set out in NPS EN-1. In particular:

- Regulation 2 of the Environmental Impact Assessment (EIA) Regulations (Ref.4-2) requires an ES to include *“a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment”*
- Paragraph 2 of Schedule 4 of the Environmental Impact Assessment (EIA) Regulations (Ref.4-2) requires *“A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects”*
- There is a requirement under the Habitats Directive, as transposed into UK law by the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) (Ref.4-3) to consider alternative solutions where a derogation is required under stage 3 of a Habitats Regulations Assessment (HRA) for projects where the Habitats Regulations apply
- NPS EN-1 includes specific requirements to consider alternatives in relation to biodiversity and geological interests, flood risk and development within nationally designated landscapes, which are set out in Sections 5.4, 5.8, and 5.10 of NPS EN-1; and
- NPS EN-1 Paragraph 4.3.17 provides that where there is a policy or legal requirement to consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements.

4.2.3 A full description of the alternatives has been provided within this Chapter of the ES.

4.2.4 NPS EN-3 (Ref.4-4) paragraphs 2.10.18-2.10.48 set out the key considerations involved in the siting of a solar farm and factors influencing site design, including:

- Irradiance and site topography
- Network connection
- Proximity of a site to dwellings
- Agriculture land classification and land type
- Accessibility
- Public rights of ways; and
- Security and lighting.



4.2.5 NPS EN-5 (Ref.4-5) set out, in paragraphs 2.2.7 to 2.2.9, which factors influence site selection and design for electricity network infrastructure:

- *“The connection between the initiating and terminating points of a proposed new electricity line will often not be via the most direct route. Siting constraints, such as engineering, environmental or community considerations will be important in determining a feasible route”* (paragraph 2.2.7); and
- *There will usually be a degree of flexibility in the location of the development’s associated substations, and applicants should consider carefully their location, as well as their design”* (paragraph 2.2.8).

4.2.6 The Planning Inspectorate’s Advice Note Seven (Ref.4-6) sets out that a good ES is one that, amongst numerous things, *“explains the reasonable alternatives considered and the reasons for the chosen option taking into account the effects of the Proposed Development on the environment”*

4.2.7 All relevant policies included in the NPS EN-1, NPS EN-3, NPS EN-5, NPPF, National Guidance and local planning policy have been taken into account in the assessment, which are listed in ES **Appendix 4.1: Planning Policy for Reasonable Alternatives [APP/6.4]**.

4.3 Alternative Technologies

4.3.0 The Applicant is a solar PV and energy storage developer, and on that basis alternative types of low-carbon forms of electricity generation have not been considered by the Applicant. However, notwithstanding this, it is not considered that the Site would be suitable for other forms of low carbon generation at the same scale as the Scheme, as described below. Further details on various alternative low-carbon generation technologies, and the role they play in the UK’s wider energy portfolio, is contained within Chapter 5 of the **Statement of Need [APP-042]**.

4.3.1 Tidal power and offshore wind have not been considered as alternative technologies, as any new tidal or offshore developments would not make use of the Site as the Site is located away from the coast.

4.3.2 Hydroelectric storage has also not been considered because the local area is not suitable for this technology, as there are no opportunities to source hydroelectric power from rivers at a similar order of magnitude as the Scheme. The closest river is the River Nar, which is designated as a SSSI and is therefore unsuitable.

4.3.3 Nuclear power was also not considered as an alternative technology because of the high cost of electricity and the lengthy planning and development timeframe (as explained in Section 5.6 of the **Statement of Need [APP-042]**), that such a project would involve. The Scheme, as a solar farm, will be able to start generating electricity much more quickly. Section 6.6 of the **Statement of Need [APP-042]** provides further information on this matter. The same is true for hydrogen or abated generation from natural gas, as described in Sections 5.7 and 5.8 of the **Statement of Need [APP-042]**.



- 4.3.4 Onshore wind development is a potential alternative source of power generation to the Scheme. Section 5.5 of the **Statement of Need [APP-042]** explains that the effective moratorium on onshore wind development in England, in place since 2015, was lifted in July 2024 and that onshore wind re-entered the NSIP process when the Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025 took effect on 31 December 2025. Onshore wind development pipelines are currently restarting; however, the Applicant's view is that the development timelines for this technology are unlikely to be sufficiently quick for an onshore wind scheme of a similar capacity to the Scheme to come forward in comparable timeframes.
- 4.3.5 Further, the Site itself is not considered to be well-suited to onshore wind generation. The nature of the area means that such development would likely give rise to greater visual impacts due to the height of turbines, and their impact on sensitive receptors located along the Nar Valley. In addition, a turbine's proximity to residential dwellings, public rights of way and roads within the Site may result in adverse effects associated with shadow flicker and wind turbine noise.

4.4 Approach to Assessment

- 4.4.0 Taking into consideration the policy and legal requirements as well as the iterative approach to the design, the following alternatives have been considered for the Scheme and are discussed in this chapter:
- Site Evaluation
 - Alternative design/layouts, including solar PV development, Battery Energy Storage System (BESS), National Grid Substation and Customer Substation.
- 4.4.1 A 'no development' scenario as an alternative to the Scheme has not been considered further in line with EN-1 paragraph 4.3.23. This is because 'no development' is not considered to be a reasonable alternative to the Scheme as it would have no prospect, realistic or otherwise, of delivering the additional electricity generation and energy storage proposed. A smaller development in terms of energy-generating capacity has not been considered further as an alternative to the Scheme, in the context of both EN-1 paragraph 4.3.23 and 4.3.27.
- 4.4.2 The overarching need for the Scheme is set out in brief in **ES Chapter 1: Introduction [APP/6.1]**. The DCO Application includes a **Statement of Need [APP/5.4]** addressing the need for large-scale solar assets.

Site Evaluation

- 4.4.3 There is no standard methodology for selecting sites for solar energy generating stations. However, as NPS EN-3 (Ref.4-3) paragraphs 2.10.21- 2.10.26 recognise, a viable grid connection is an essential material consideration for proceeding with development and is instrumental in defining the search area.



- 4.4.4 During ongoing engagement, the Applicant and National Grid came to an agreement for a connection offer for 500MW into the existing section of overhead line between Walpole and Necton. At the same time as National Grid's offer for a 500MW connection, a land agent indicated to the Applicant that the landowner was willing to put forward the Site for a solar farm development.
- 4.4.5 A review of planning constraints along and near the overhead line identified the land where the Scheme is proposed to be located as particularly good from a desktop planning constraints review, notably appearing to be a small area of predominantly grade 4 land surrounded by the more typical higher-grade land in the area. The Applicant then engaged with the landowner to agree on the most appropriate land within their estate on which to propose the development.
- 4.4.6 The Site fits the factors explored by the Applicant and as set out in NPS EN-3 (Ref.4-3), being without many constraints and with the benefit of a potential viable connection point to be included in the Site. The Applicant considers factors including, but not limited to, a large enough site area, topography, access and the lack of designations. Having experience and understanding of the surrounding area and requirements for utility-scale solar, it was clear to the Applicant that the Site met their environmental site selection criteria. The Applicant, therefore, had identified a suitable site and concluded their site evaluation process.
- 4.4.7 A Site Evaluation Report has been submitted as part of the DCO Application. Appendix 1 of the **Planning Statement [APP/5.5]** provides an overview of the site evaluation process, which the Applicant has undertaken, for both the siting of the proposed National Grid Substation and the evaluation of land available for solar development, resulting in the land that is subject to the Scheme being brought forward. The Site's suitability for National Grid Substation and solar development is due to the lack of landscape and environmental statutory designations, limited residential receptors, the absence of BMV on the published "provisional" ALC maps, and the Likelihood of BMV maps and accessibility from a major highway network.
- 4.4.8 Furthermore, undergrounding of either the existing or the proposed 400kV line has not been explored as an option, as the Site is not within a National Landscape, and there are no significant effects arising from the proposed new OHL reported within the **ES [APP/ 6.1-6.5]**.
- 4.4.9 Section 2.10 of NPS EN-3 (Ref.4-3) relates specifically to Solar Photovoltaic generation, and paragraphs 2.10.19 to 2.10.48 list factors influencing site selection. The Site's initial evaluation was in accordance with these key site selection factors outlined in section 2.10 of NPS EN-3. The site evaluation involved a balance of these factors, including:
- Irradiance and site topography – Preference for south-facing aspect and/or flatter topography
 - Network connection – Proximity to existing electricity transmission infrastructure'
 - Proximity of site to dwellings – Avoidance of close proximity to residential dwellings or where it would not be possible to mitigate visual amenity, glint and glare appropriately



- Environmental considerations – Avoidance of environmental constraints, such as those containing Site of Special Scientific Interest (SSSIs), Nature Reserves, Ramsar Sites, Special Area of Conservation (SAC), and Special Protection Areas (SPA)
- Agricultural land classification and land type – Minimise the impact on the best and most versatile agricultural land; and
- Accessibility – Suitability of the access routes both during construction and operation.

Irradiance and Site Topography

- 4.4.10 Paragraph 2.10.19 of NPS EN-3 (Ref.4-3) notes that site topography and irradiance levels are a key input to the site selection process.
- 4.4.11 Norfolk represents a good location within the UK to construct a solar farm as the area benefits from higher levels of photovoltaic power and irradiance compared to other parts of the UK. Further details can be found in Section 7.4 of the **Statement of Need [APP/5.4]**.
- 4.4.12 Flat or gently south-facing slopes are most suitable and beneficial for solar. Topography, which is generally flat or gently undulating, is most suitable for solar energy from both a constructability and operational perspective, ensuring that the Site can produce a large amount of electricity.
- 4.4.13 Therefore, this factor has influenced the focus on the Norfolk area as the preferred location of the Scheme. The general topography surrounding the Site is flat or has limited gradients, making it particularly suitable for solar energy.
- 4.4.14 In addition, Norfolk benefits from large areas of land characterised by a generally sparse settlement pattern. Such characteristics provide the opportunity for utility-scale solar development, which can contribute to delivering net zero.

Network Connection

- 4.4.15 The availability of a grid connection point with capacity is recognised as being an important consideration in terms of project viability and site selection in paragraphs 2.10.21 – 2.10.26 of NPS EN-3 (Ref.4-3), which are assessed as part of the **Planning Statement [APP/5.5]** and **Policy Compliance Document [APP/5.6]**.
- 4.4.16 One high-voltage transmission circuit crosses Norfolk from the Midlands towards Norwich and from there turns towards demand centres in the south. This circuit is important for the reliable distribution of electricity to users in the county while also having the capacity to connect new large-scale generation facilities and transmit their output for national benefit. However, the number of existing points of connection to that circuit, and the available connection capacity at those points, is limited.
- 4.4.17 During discussions with National Grid in 2022, the Applicant discussed National Electricity Transmission System (NETS) capacity within the East Anglia region. Due to the availability of transmission capacity within the existing overhead line between Walpole and Necton but no existing and available substation, a new Point of Connection (PoC) was considered,



requiring a new National Grid Substation. The potential for a connection into the overhead lines (OHL) enabled the Applicant to identify the least constrained land along the line for the potential development opportunity. The Applicant made a grid connection application to National Grid (now NESO), who made an offer for a 500MW connection between Necton and Walpole as set out within the **Grid Connection Statement [APP/7.1]**, and the Applicant had already started engagement with a local landowner.

- 4.4.18 As part of the grid connection offer from National Grid, the Applicant is required to obtain land and consent for a new National Grid Substation within their Development Consent Order. This is detailed in the **Grid Connection Statement [APP/7.1]**, which explains that the National Grid Substation is to be sited and designed to connect the Scheme to the 400kV transmission network between the existing substations at Necton and Walpole.
- 4.4.19 The Site is located immediately adjacent to and underneath the existing overhead line between Walpole and Necton. Further details can be found in the **Grid Connection Statement [APP/7.1]**.

Proximity of the Site to dwellings

- 4.4.20 NPS EN-3 (Ref.4-3), paragraph 2.10.27, sets out the need for the Applicant to consider the proximity of a site to dwellings. The two main impact issues that determine the necessary distances to sensitive receptors are, therefore, likely to be visual amenity and glint and glare. In line with this, consideration was given to the proximity of nearby sensitive human receptors, including residential dwellings and workplaces, to assess potential impacts. This ensures that any adverse effects, such as visual intrusion or safety concerns related to glint and glare, are appropriately mitigated to protect these sensitive receptors.
- 4.4.21 The immediate surroundings are characterised by a settlement pattern of rural villages and scattered properties linked by rural lanes. The village of South Acre is adjacent to the north. The village of Castle Acre is 1.2km north, and the village of West Acre is 1.7km northwest. The larger town of Swaffham is to the south and is separated from the Site by the A47.
- 4.4.22 There are limited individual dwellings near the Site. Residential dwellings of Finger Hill Cabin, twin dwellings along South Acre Road, along Narford Lane, and Hall Farm and Nar Valley Farm are located (at the closest dwelling) approximately 120m from the Site. The visual impact on residential receptors will be considered throughout the design evolution. For example, strategic setbacks from receptors to the above-ground infrastructure are being proposed to limit visual impacts and the impact of glint and glare on residential receptors.
- 4.4.23 The Applicant considered that there was sufficient land available to provide offsets to residential receptors through a combination of setbacks, natural screening, and existing and proposed landscape improvements. For example, Keepers Cottage within the site has a bespoke design response around the property's curtilage.



Environmental Considerations

- 4.4.24 A key principle in selecting a site is to avoid areas of particular environmental and landscape sensitivity to minimise potential impacts. This is true from a natural and built environment perspective, including ecology and biodiversity, landscape, water resources, and cultural heritage.
- 4.4.25 Once the Site was identified, a desktop site evaluation considered the following environmental factors, which are also illustrated in Part 2 of the DCO Application, **ES Figures 2. to 2.10 [APP/2.7 – APP/2.10 and Appendix 12.2: Flood Risk Assessment (FRA) Annexe E [APP/6.4]:**
- Designated international and national ecological and geological sites – To avoid direct impacts on these sites, any international and nationally designated sites
 - Nationally Designated Landscapes – To avoid any nationally designated landscapes
 - Flooding – The location of Flood Zones in the area was also considered, and
 - Heritage - Any historic designations, such as listed buildings and scheduled monuments.
- 4.4.26 The Site performed well against these criteria, as detailed within the **Planning Statement, Appendix 1: Site Evaluation Report [APP/5.5] and Policy Compliance Document [APP/5.6].**

Agricultural Land Classification (ALC) and Land Type

- 4.4.27 NPS EN-3 (Ref.4-3) indicates that Agricultural Land Classification (ALC) should not be a:
- “predominating factor in determining the suitability of the site location” (Paragraph 2.10.29). However, paragraph 2.10.29 of NPS also states that where “the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of “Best and Most Versatile” agricultural land where possible.”*
- 4.4.28 ALC was therefore an important factor for the Applicant when evaluating the Site.
- 4.4.29 Consistent with national policy, the Applicant considered the best and most versatile land based on the available data at the time of the initial Site evaluation, which was the Natural England Agricultural Land Classification (ALC) maps. These maps help identify the predicted agricultural land classification category and include the best and most versatile land: ALC grades 1, 2, and 3a. The Natural England ALC maps do not differentiate between grades 3a and 3b.
- 4.4.30 The Site was considered favourable because it was predominantly a mixture of Grade 3 and 4 agricultural land according to the provisional ALC mapping (DEFRA and Natural England). It avoided the larger swathe of Grade 2 identified to the east of the Site.



- 4.4.31 Based on the published “provisional” ALC maps and the Likelihood of BMV maps, which represent all the available ALC information without field survey, the location for the Scheme was identified as likely to be some of the lowest quality land in the wider area. This is illustrated in **ES Chapter 11: Soils and Agriculture [APP/6.2]**.
- 4.4.32 The Applicant has now undertaken a soil classification survey, and subsequent detailed ALC survey and soil survey have identified the soils and land quality of the Order limits (excluding Work No. 5). This has identified areas of Grade 1 and Grade 2, contrary to the expectations of the published information. The Order limits have been revised to remove the fields comprising entirely of a combination of Grades 1 and 2 from the Scheme in the north, as discussed in the **Design Approach Document [APP/5.7]** and **ES Figure 5.1: Concept Masterplan [APP/6.3]**.
- 4.4.33 The ALC has identified a large range in the ALC grades found across the Site, from two modest areas of Grade 1 to wider areas of Grade 4. The ALC Survey results are in **ES Appendix 11.2 ALC Survey [APP/6.4]**, and assessment details are in **ES Chapter 11: Soils and Agriculture [APP/6.2]**. The results show that, in broad terms, the eastern and western areas of the Site are generally moderate or poor-quality land. In contrast, the central areas, where the soils are more loamy and hold more water, are generally good or very good quality.
- 4.4.34 NPS EN-3 (Ref.4-3) states that previously developed, brownfield, contaminated, and industrial land should be preferred for solar projects. Where agricultural land is necessary, poorer quality land should be preferred, avoiding the use of the best and most versatile land where possible.
- 4.4.35 The use of previously developed (brownfield) land was considered. The Applicant conducted a review of the brownfield registers maintained by the Borough Council of King’s Lynn and West Norfolk Council and Breckland Council. The brownfield land identified was less than 2-4 acres in size, or was already allocated within the emerging local plan, or had been granted planning permission for residential development at the time of the search. Therefore, it was determined that the available brownfield sites within the initial search were not of sufficient size for the Scheme and would compete with, or be in conflict with, local planning policy seeking to deliver housing and traditional employment uses on these sites to meet local need.
- 4.4.36 It was determined that no brownfield sites were therefore taken forward for further consideration from both registers, as no brownfield land meets the provision of the 2 - 4 acres per MW, as stated within NPS EN-3 (Ref.4-3) at paragraph 2.10.17, for a 500MW utility-scale solar farm in proximity of the Site.
- 4.4.37 The use of commercial rooftops was not considered as an alternative to the scheme. A very large number of commercial rooftops would be required to deliver a utility-scale solar farm. This would require multiple land ownerships, and the legal complexities involved in combining multiple sites of this nature would be prohibitive. The government recognises rooftop solar as being clearly desirable, both on residential and commercial premises. However, rooftop solar energy is not considered an alternative to the Scheme because rooftop solar alone will not be able to meet the scale and pace required of new capacity growth to meet the UK’s needs. Therefore, utility-scale ground-mounted solar schemes are also needed, and as



described in NPS EN-1 (Ref.4-1) at paragraph 3.3.12, roof-mounted solar panels should be deployed in addition to utility-scale solar farms rather than instead of them. Furthermore, the benefits of utility-scale solar farms in relation to enabling the bulk transfer of power for national consumption, as opposed to on-site consumption of rooftop solar, are explained in the Section 6.3 of the **Statement of Need [APP/5.4]**.

- 4.4.38 There is a clear urgent and enduring need for further renewable energy capacity. While this will likely include more generation connecting across the electricity distribution network, the Scheme presents a single, large-scale generating asset connected to the electricity transmission network. This addresses the project aims of delivering clean and secure electricity to consumers nationally as well as locally whilst making a significant contribution to the fulfilment of the UK's legally binding climate change commitments. More, smaller-scale solar PV developments will also be required in order to achieve these commitments, however they do not represent a realistic alternative to the development and are required in addition to large scale solar projects. The bulk generation potential of large-scale schemes and their connection to the electricity transmission network enables their significant benefits to be felt more widely than those achieved by smaller scale projects.
- 4.4.39 The Applicant regularly engages with land agents regarding potentially willing landowners for solar developments. The availability of willing landowners is an important consideration because it is preferable that land is leased rather than permanently acquired due to solar farms consisting of temporary structures (therefore, land ownership is preserved for original use post-decommissioning). Without willing landowners, acquiring land through compulsory acquisition powers would be necessary, which the Applicant has sought to avoid as far as practicable while still delivering a suitable site. Compiling a site with as few land ownerships as possible is desirable to minimise project complexities (including engineering, design, and mitigation measures), all of which were considered in evaluating the Site.
- 4.4.40 The Applicant had a willing landowner come forward at the same time as a grid connection offer was made by National Grid to the Applicant. The Site is under the ownership of two estates, but under the ultimate control of a single landowner, who remains the beneficiary; therefore, it satisfies this criterion. Additionally, the Site includes land needed temporarily during the construction phase for the grid connection works, which is under the control of an adjoining landowner.

Accessibility

- 4.4.41 The Site is directly accessible from the A1065, which is an important factor when considering the siting of solar farms in rural areas. The close proximity to the A1065 and the A46 will help to minimise potential effects on rural communities and villages during construction. The A Roads, when compared with B Roads and rural roads, also provide better suitability to accommodate HGVs and potential Abnormal Indivisible Loads (AILs), minimising the need for and extent of highway improvements. Being directly adjacent to the A1065 also provides direct access to the Site, avoiding the need for onsite access rights across tracks of land to provide access to the Solar PV Arrays. Further details can be found in **ES Chapter 9: Traffic and Transport [APP/6.4]**.



4.5 The Development Area and Alternative Layouts

Introduction

- 4.5.0 The design and layout, and extent, of the Scheme has been subject to an iterative process involving the developer, the design team and Design Principles, as set out in the **Design Principles, Parameters and Commitments [APP/5.8]**, the environmental consultant team and is informed by feedback from statutory consultees, host authorities and local communities through the scoping and consultation process. The Scheme layout is shown in the **Works Plan [APP/2.4]**. Preliminary layouts were produced to inform the early surveys and data collection, the scoping of environmental topics and receptors.
- 4.5.1 Parameters such as offset distances were informed by the technical consultant team based on their professional judgement and experience of solar developments as well as feedback from consultation. Once applied, the remaining site area was designated the ‘developable area’ for the Solar PV Arrays, Conversion Units, Customer Substation, National Grid Substation, the BESS and Access Tracks. Security fencing was able to be placed along the perimeter boundary. Areas between the fencing and the development site boundary were made available for ecology and landscape mitigation or enhancement.
- 4.5.2 The stages of iteration that have been carried out are outlined in the sections below. The continuous analysis, both contextual and on-site, has directly informed the design and layout.
- 4.5.3 The stages of iteration that have been carried out are set out in Table 4-1 below. A summary of the design changes made following non-statutory consultation, statutory consultation and targeted consultation are set out below in Table 4-1. Further information on the design stages is set out within the **Design Approach Document [APP/5.7]**.

Table 4-1 Overview of the Scheme Design Iterations

Stage	Key Design Considerations	Summary of Consultation Events and Activities
Stage 1 – Project Team Inception to Non statutory consultation workshops and EIA Scoping appraisal, reporting and the PINS EIA Scoping Opinion (May to	Outline of the site area	Workshops with stakeholder groups including political representatives, local community groups and technical specialists. Each workshop included an introductory presentation followed by a question-and answer session and an interactive masterplanning session to inform the first environmental masterplan and layout. PINS consultation in accordance with EIA regulations. Receipt of Scoping Opinion (December 2024).



Stage	Key Design Considerations	Summary of Consultation Events and Activities
September 2024)		
Stage 2 – Post Non-Statutory Consultation to Statutory consultation (Oct - May 2025)	Confirmation of the developable areas for the preliminary scheme with solar panels and associated development, potential locations for substations, potential mitigation and enhancement opportunities. Presentation of the indicative masterplan for statutory consultation.	Public and statutory consultee consultation events across May to July 2024.
Stage 3 - Post Statutory Consultation up to DCO submission (July 2025 to October 2025)	Design concept parameters are to be fixed for the Scheme. Mitigation measures supported by information gathered from the completion of environmental surveys. Design responding to feedback received from the statutory consultation period. Grid Connection Infrastructure and Skylark and Curlew mitigation refined.	Ongoing engagement with stakeholders including PINs, Ministry of Defence.
Stage 4 - Targeted Consultation (September 2025)	Localised changes to the Scheme boundary which made up the Site extents, now the Order limits.	A targeted consultation was carried out to inform affected landowners and nearby residents to potential increases to the scheme boundary as presented during the statutory consultation process.

Alterations to the Site Extents

4.5.4 The key considerations made between site layout iterations have been shown in Table 4-2 and Table 4-3 below. See **ES Figure 3.3: Field Numbering Plan [APP/6.3]** for the exact locations for fields referenced in the tables below.



EIA Scoping – 2024

- 4.5.5 At this stage, the outline design of the Scheme published at non-statutory consultation was presented alongside desk-based and initial field assessments of the proposed Scheme. The initial layout developed was based on limited data obtained from early desk-based research and preliminary survey information. See **ES Figure 4.1: Site boundary and layout submitted at Co:Design [APP/6.3]**.
- 4.5.6 These findings were then presented to the Planning Inspectorate (PINS) and the notified statutory bodies to comment on the scope of assessment required for the proposals through the submission of the EIA Scoping Request.
- 4.5.7 Following feedback from the Planning Inspectorate and statutory consultees during the EIA Scoping stage, the design of the Scheme evolved in tandem with further desk-based and field assessments. See **ES Figure 4.2: Site boundary and layout submitted at PEIR [APP/6.3]**. This included further engagement (Design Principle 5.3) with the landowners and National Grid which culminated in alterations to the Scheme extents of:
- The area of potential mitigation and enhancement being removed within the northern extents of the Site. Whilst this area had been identified for potential mitigation and enhancement measures at the Co:Design (non-statutory consultation) and EIA Scoping Stage, discussions ongoing at the time with the landowners regarding the availability of the land had not been finalised
 - An additional 26.3 ha of land being added to the Site extents to provide optionality at this stage in the process for the Grid Connection Infrastructure options (Design Principle 4.2). Further detail on the potential Grid Connection Infrastructure can be found in **ES Chapter 5: The Scheme [APP/6.1]**; and
 - The A34 / A1066 Junction being included within the Site extents to allow for the provision of localised road improvements (widening) to facilitate the movement of abnormal indivisible loads.

Targeted Consultation – 2025

- 4.5.8 Following Statutory Consultation and a result of further technical design iteration and engagement with the landowner, further alterations to the Scheme extents, now the Order limits were undertaken, which are summarised below, see **ES Figure 4.3: Additional land for grid connection infrastructure and mitigation [APP/6.3]**:
- Inclusion of Petitcoat Drove, Washpit Drove and the Washpit Drove / Low Road junction to allow for a temporary residential access during the construction phase
 - Inclusion of the existing 400kV overhead lines to the east of Field 33 to allow for the potential restringing of the transmission lines; and
 - Inclusion of approximately 80 hectares north and south of the existing 400kV overhead line for the provision of Skylark and Curlew mitigation.



Alterations of Scheme Design

Design Stage 2: Changes following Non-Statutory Consultation

4.5.9 The location for the National Grid Substation, Customer Substation and BESS had not been defined at the Co:Design (non-statutory Consultation) nor EIA Scoping Stage. Following further design and environmental considerations, drawing upon those set out within National Grid's Horlock Rules (Ref. 4-3) Fields 27 and 33 were identified as potential locations for the National Grid Substation. These fields were identified as potential locations considering the combination of the following factors:

- Land – the potential to use land within the control of the Applicant and reduce any reliance on compulsory purchase powers
- Size – the potential to accommodate the footprint of the substation, avoiding the removal of existing vegetation, and allow for the potential for screening of views by mounding or planting
- Proximity to the existing overhead line – the potential to reduce the need for additional electrical infrastructure to connect into and / or divert the existing overhead lines
- Proximity to the A1065 – the potential to avoid the use of rural roads and minimise the length of new access roads required to construct and operate the substation
- Environmental Constraints – the potential to avoid and minimise direct impacts to environmental and cultural designations and flood risk zones
- Topography – the potential to construct a level development platform whilst reducing the need for cut and fill
- Residential Receptors – the potential to minimise visual and noise effects on residential receptors; and
- Agricultural Land Classification – the potential to minimise loss of BMV.

4.5.10 The combination of these considerations has led to the selection of Fields 27 and 33 as preferred locations for the National Grid Substation.

4.5.11 Flexibility is sought on the location of the Customer Substation and BESS albeit the intention was to co-locate these elements with the National Grid Substation as far as practicable. Co-location of these elements has the benefit of minimising electrical losses between the on-site equipment and the national grid, maximising efficiency of power flows onto and from the network. It also co-locates the taller electrical infrastructure elements of the Scheme with the existing overhead lines and minimizes the spatial distribution of these taller elements across the Site.

4.5.12 The positioning and size of the National Grid Substation and Customer Substation required for the Scheme is primarily driven by electrical design. The design evolution and parameters have been informed by results of the environmental assessments, technical considerations and responses from consultation. Most of these considerations were adopted as parameters across the Site to ensure consistency of approach, however site-specific requirements – led



by the substation size – were also included. Parameters such as offset distances were informed by the technical consultant team based on their professional judgement and previous experiences.

4.5.13 Table 4-2 below summarises the main infrastructure layout iterations for the Scheme following Non-Statutory Consultation.



Table 4-2 Summary of changes made following non-statutory consultation

Land Parcels/ Field No.	Topic/Discipline	Project Level Design Principle	Stage of Design	Key Design Considerations and Iterations
36	Agricultural Land	P5.3	Pre-Statutory Consultation	Summary of Design Change/Commitment: Removal of Field 36 from accommodating PV panels, BESS and/or Customer or National Grid Substations. Explanation: As a result of further ongoing engagement with the Landowner, field 36 was removed at the landowner's request so that it could be retained in agricultural use to support the ongoing commercial farming enterprise.
32	Agricultural Land	P2.10	Pre-Statutory Consultation	Summary of Design Change/Commitment: Removal of Field 32 from accommodating PV panels, BESS and/or National Grid Substation and Customer Substation. Explanation: Field 32 consists entirely of Grade 1 & Grade 2 agricultural land and was therefore removed.
Field 21 and 26	Transport	P2.2; P2.8; P2.9; P5.9	Pre-Statutory Consultation	Summary of Design Change/Commitment: Two potential points of access into the Site have been identified from the A1065. Explanation: The potential points of access from the A1065 have been chosen to avoid resurfacing and routing traffic along Fincham Drove into the Site. Early swept path analysis identified that vegetation clearance would have been required at the junction of Fincham Drove, South Acre Road and A1065 to facilitate AILs. By accessing the Site from the A1065, impacts arising from routing traffic along Fincham Drove, River Road, Narford Lane, and through local villages has been avoided, along with minimal vegetation clearance.



Land Parcels/ Field No.	Topic/Discipline	Project Level Design Principle	Stage of Design	Key Design Considerations and Iterations
Field 33 and 27	Engineering	P1.1; P2.2; P4.2; P6.1; P7.1	Pre-Statutory Consultation	Summary of Design Change/Commitment: The Concept Masterplan for the purposes of the PEIR includes two potential locations for the National Grid Substation and Customer Substation. Explanation: The Applicant is continually engaging with NGET regarding the preferred location of the National Grid Substation. The proximity of the two potential locations to the existing National Grid infrastructure has been a key consideration and will allow for co-location of electrical infrastructure which aids the integration of the Scheme into its context. Flexibility on its location is retained at this stage to allow further consideration and evaluation of engineering and environmental matters. As a result of the flexibility of the National Grid Substation and Customer Substation, the Applicant has retained flexibility for the location of the BESS, as shown on the Works Plan [APP/2.3]. This is to allow for the BESS to be designed around the final layout of the National Grid and Customer Substation. The potential locations for the BESS are within close proximity to the Customer Substation to minimize the amount of materials, carbon emissions as well ground and hedgerow disturbance required to connect the BESS with the Customer Substation.
Eastern parcels	Amenity Recreation &	P2.3; P5.4; P5.8; P5.11	Pre-Statutory Consultation	Summary of Design Change/Commitment: Inclusion of potential permissive paths within the Site. Explanation: Following feedback from the non-statutory consultation and a review of the Norfolk Green Infrastructure Strategy, the concept masterplan illustrates potential permissive routes through the Site, which would deliver improved connectivity between Swaffham and the Nar Valley. The potential routes provide connectivity between West Acre Road and Fincham Drove. The Applicant has also collaborated with the promoter of the High Grove Solar Farm to provide a potential route to the south through the High Grove Solar Scheme that connects into Footpath 'Swaffham FP13'.



Land Parcels/ Field No.	Topic/Discipline	Project Level Design Principle	Stage of Design	Key Design Considerations and Iterations
All fields	Ecology, Landscape and Heritage	P2.1; P2.2; P2.3; P3.1; P3.2, P3.4	Pre-Statutory Consultation	Summary of Design Change/Commitment: Development of a hedgerow management and enhancement strategy. Explanation: A hedgerow strategy has been developed to retain and enhance the existing hedgerow network within the Site to aid the integration of the Scheme into its context and respond to the Breckland LCA. Minimum buffers to all existing and/or proposed hedgerows, woodland, ponds, Marl pits have been incorporated into the Scheme and are set out in Table 5.1 of ES Chapter 5: The Scheme. Hedgerows between woodland blocks will be strengthened with hedgerow trees to provide greater ecological connectivity. The Applicant has considered the experience of users of PROWs and the landscape character of the Site to identify appropriate places to plant new hedgerows throughout the Site. Through the analysis of historic maps, the Applicant has identified opportunities to reinstate historic field boundaries between Fields 14 and 31 and Fields 18 and 19.
Field 11	Heritage and Archaeology	P2.6	Pre-Statutory Consultation	Summary of Design Change/Commitment: Provision of buffer to heritage asset. Explanation: A WWII bunker/decoy post to the south of Keepers Cottage has been incorporated into the hedgerow buffer in order to avoid potential direct impacts on this asset.
Fincham Drove	Heritage and Archaeology, Transport & Amenity and Recreation	P2.1, P2.2, P2.5, P2.6; P2.9; P5.10	Pre-Statutory Consultation	Summary of Design Change/Commitment: Identification of internal access routes. Explanation: Recognising the local importance of Fincham Drove and the user experience along it, the Applicant has avoided routing construction and decommissioning traffic along that Drove and sought to minimise vehicular



Land Parcels/F ield No.	Topic/Discipline	Project Level Design Principle	Stage of Design	Key Design Considerations and Iterations
				crossings over that Drove to locations where there are existing gaps or agricultural access points.
All fields	Ecology; Amenity & Recreation, Waste & Materials	P1.1; P2.2; P3.1; P5.10; P7.1; P7.2	Pre-Statutory Consultation	Summary of Design Change/Commitment: Identification of internal fencing strategy. Explanation: The Applicant has developed a proposed fencing strategy that seeks to balance sustainable resource management by reducing the amount of fencing infrastructure whilst allowing for unimpeded ecological and PRow movement through the Site. The fencing strategy allows at least 2 points of access to the woodland block which allow for continued ecological movement between these habitats. The proposed fencing strategy has also sought to align with offsite hedgerows and woodland to ensure there is continued connectivity through and across the Site, to minimise the funnelling of larger mammals along the local roads. Marl Pits and/or ponds that are located in close proximity to the existing hedgerows have been integrated into green infrastructure corridors to support the ecological connectivity throughout the Site.
Field 11	Residential Amenity	; P2.2; P2.7	Pre-Statutory Consultation	Summary of Design Change/Commitment: Removal of Solar PV Arrays in close proximity to a residential property. Explanation: Following Site visits, the Applicant has reduced the extent of Solar PV Arrays in Field 11 to minimise any residential amenity impacts on the residential property that is located in the north of the field. A new hedgerow will be planted along the northern extents of the Solar PV Arrays in Field 11 to integrate the Scheme into its context. The hedge alignment has been designed to reflect the existing field and hedgerow pattern within the Site's landscape character.



Land Parcels/ Field No.	Topic/Discipline	Project Level Design Principle	Stage of Design	Key Design Considerations and Iterations
Field 4	Heritage, Landscape, Amenity recreation and	P2.1; P2.5; P2.6; P2.9; P3.4; P5.4; P5.10.	Pre-Statutory Consultation	Summary of Design Change/Commitment: Inclusion of a potential area for publicly accessible amenity space. Explanation: An area for potential publicly accessible amenity space has been identified in Field 4, resulting from the retention of the PRoW on its existing alignment. The area is located approximately halfway along the Castle Arce circular walk, providing an opportunity for users of this PRoW to pause and appreciate the landscape and heritage setting of the Nar Valley to the north of the Site. The setting back of Solar PV Arrays from River Road, where the landscape character starts to transition from plateau into the valley, responds to the Site landscape character and aids the Scheme's integration into its context.



Design Stage 3: Changes following Statutory Consultation

- 4.5.14 The concept masterplan produced along with the Preliminary Environmental Information Report following feedback at the Scoping stage was presented to the public and statutory consultees for statutory consultation in May to July 2025.
- 4.5.15 This stage of the design process has taken into account the feedback received during the statutory consultation, including feedback from members of the public, statutory consultees and final design requirements from landowners. The development of the EIA has also had a reciprocal impact on the design, as mitigation requirements for hydrology, landscape, ecology and other environmental topics were fed back into the overall Scheme design. The main changes are set out in the table below. The development of the design has culminated in the design masterplan included in the DCO Application.
- 4.5.16 Table 4-3 below summarises the main infrastructure layout iterations for the Scheme following Statutory Consultation.



Table 4-3: Summary of changes made following statutory consultation.

Land Parcels / Field No.	Topic/ Discipline	Project Level Design Principle	Stage of Design	Key Design Considerations and Iterations
Field 32	Soils	P2.1, P2.10	P2.9, Post-Statutory Consultation	Summary of Design Change/Commitment: Field 32 has been removed from the Order Limits. Key Design Outcomes: Field 32, which consists entirely of Grade 1 and 2 agricultural land, has been removed from the Order Limits, as sufficient land had been identified for the provision of Skylark and Curlew mitigation and therefore was no longer required for mitigation. The field's removal retain views across the field to the Nar valley landscape from Public Footpath South Acre RB2.
Woodland Blocks	Socio-economics	P7.2	Post-Statutory Consultation	Summary of Design Change/Commitment: The majority of the woodland blocks have been removed from the Order Limits as they are not required to deliver the Scheme and / or ecological mitigation. Key Design Outcomes: The removal of the woodland blocks allows the existing landowner to continue to manage these woodlands as part of their existing agricultural enterprise.
Existing Farm Buildings	Socio-economics	P5.2	Post-Statutory Consultation	Summary of Design Change/Commitment: A cluster of agricultural buildings have been removed from the Order Limits as they are not required to deliver the Scheme and / or ecological mitigation. Key Design Outcomes:



Land Parcels / Field No.	Topic/ Discipline	Project Level Design Principle	Stage of Design	Key Design Considerations and Iterations
				The removal of the agricultural buildings allows the existing landowner to continue to use these buildings as part of their existing agricultural enterprise and support the local economy.
A1065	Transport	P2.8 and P5.9	Post-Statutory Consultation	Summary of Design Change/Commitment: Inclusion of a temporary access from the A1065 into Field 39, the field east of the A1065, to enable construction. Key Design Outcomes: The inclusion of this temporary access avoids the use of South Acre Road / Peddars Way, reducing the impact of users of this long distance walking route and routing of traffic towards Great Palgrave.
Existing agricultural access tracks	Access	P3.1 and P5.2	Post-Statutory Consultation	Summary of Design Change/Commitment: The fencing strategy was refined to avoid crossing any existing farm access tracks. Key Design Outcomes: This allows the landowner to be able to use the existing farm access tracks to support the management of the woodlands and wider agricultural enterprise. It also allows the existing access tracks to be used in case of emergency during all phases of the project.
Field 26, 27, 33, and 35	Heritage, Landscape and Noise	P2.1, P2.5, P2.7 and P2.8	Post-Statutory Consultation	Summary of Design Change/Commitment: The siting zones for the National Grid Substation and Customer Substation were removed from fields to the north of Batholomew's Hills Plantation and located to the south of the plantation. The siting zones for the National Grid Substation and Customer Substation were restricted to Field 27 only.



Land Parcels / Field No.	Topic/ Discipline	Project Level Design Principle	Stage of Design	Key Design Considerations and Iterations
				Key Design Outcomes: This approach enabled the extent of substation infrastructure at the edge of the plateau and valley slopes to be limited. Removing the Customer Substation infrastructure from Field 26 also reduced effects on users of the A1065 and receptors further east.
Field 26, 27, 33, and 35	Heritage, Landscape and Noise	P2.1, P2.5, P2.8 and P5.3	Post-Statutory Consultation	Summary of Design Change/Commitment: The siting zones for BESS were removed from fields to the north of Batholomew's Hills Plantation and located to the south of the plantation. The siting zone for BESS is now restricted to part of Field 27 and part of Field 24. Key Design Outcomes: This approach enabled the extent of BESS infrastructure at the edge of the plateau and valley slopes to be limited, reducing noise effects on users of Peddars Way. Removing BESS infrastructure from Field 26 also reduced noise effects on receptors further east.
Field 33, and 35	Heritage and Landscape	P2.5 and P3.4	Post-Statutory Consultation	Summary of Design Change/Commitment: PV panels were removed from Field 35. PV panels were reduced within Field 33, set further back from South Acre. Key Design Outcomes: This set PV panels further back from South Acre to reduce effects on heritage assets and the sense of proximity to a solar farm for residents of the village.



Land Parcels / Field No.	Topic/ Discipline	Project Level Design Principle	Stage of Design	Key Design Considerations and Iterations
				The removal and reduction of PV panels in these fields reduced the extent of development at the edge of the plateau, retaining the character of the arable landscape where its transitions to the valley slopes of the River Nar.
Field 27	Recreation and Amenity	P2.9	Post-Statutory Consultation	Summary of Design Change/Commitment: PV panels (and the National Grid and Customer Substation and BESS infrastructure) were reduced within Field 27, set back from the northern edge of Field 27 and Fincham Drive. Key Design Outcomes: The set back along the northern boundary of Field 27 from Fincham Drive was to address potential impacts on users of the Public Right of Way and allow for an area of green infrastructure to accommodate drainage and planting to help filter / screen views towards the National Grid Substation and Customer Substation from Fincham Drive.
Field 33, 35, 36, 37, and 38	Ecology	P2.5, P3.1, P3.2, and P3.4	Post-Statutory Consultation	Summary of Design Change/Commitment: The provision for approximately 88ha of land for Skylark and Curlew mitigation has been included within the Order limits. Key Design Outcomes: In the event that the provision of Skylark mitigation within arable land outside of the Order limits, secured via legal agreement with the landowner falls through, the Applicant has sought for the inclusion of these areas within the Order limits which allows the Scheme to deliver areas of mitigation for Skylark. See ES Figure 5.1: Concept Masterplan [APP6.3]. The area of land selected for the provision of Curlew mitigation is non-BMV land, whilst the land identified for Skylark mitigation still allows for agricultural use.



Land Parcels / Field No.	Topic/ Discipline	Project Level Design Principle	Stage of Design	Key Design Considerations and Iterations
				The proposed approach is set out within ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP/6.4] and details of creation and management of specific grassland areas for ground nesting birds are identified within the oLEMP [APP/7.11] .
Washpit Drove and Petticoat Drove	Access	P5.5.	Post-Statutory Consultation	Summary of Design Change/Commitment: Inclusion of access tracks between Low Road and Finger Hill Cottage, including additional land either side of the junction of Washpit Drove and Low Road to accommodate potential hedgerow removal, should this be required to ensure safe visibility for residents using the alternative route during temporary closures. Key Design Outcomes: This land has been included to provide a safe alternative access to the property if temporary closure to public rights of way and residential access along Petticoat Drove are required during construction phase.
Fincham Drove and Petticoat Drove	Landscape, Heritage and Ecology	P2.2, P2.3, P2.6, P2.9, P3.1, P3.4 and P3.5	Post-Statutory Consultation	Summary of Design Change/Commitment: Environmental offsets associated with Fincham Drove and Petticoat Drove (and respective Public Rights of Way South Acre RB6 and RB1) were increased from a total of approximately 30m to 50m. Key Design Outcomes: By increasing the offset of these key routes, the Scheme amplifies their role as key green infrastructure corridors running through the Site.
Field 27	Landscape and Heritage	P2.1, P2.2 and P2.9	Post-Statutory	Summary of Design Change/Commitment:



Land Parcels / Field No.	Topic/ Discipline	Project Level Design Principle	Stage of Design	Key Design Considerations and Iterations
			Consultation	Additional areas of permanent woodland belt planting included along the western and eastern boundaries of Field 27. Key Design Outcomes: These woodland belts have been included to limit the wider visual influence on the National Grid Substation and Customer Substation and filter/screen views from the Fincham Drove.
Field 27	Noise	P2.9	Post-Statutory Consultation	Summary of Design Change/Commitment: Inclusion of acoustic barrier along the western boundary of Fields 24 and 27. Key Design Outcomes: AA reduction in the noise impacts on users of Fincham Drove.
Field 12 and 13	Access	P5.9	Post-Statutory Consultation	Summary of Design Change/Commitment: An additional access crossing over Petticoat Drove has been included between Fields 12 – 13. Key Design Outcomes: The provision of a second access crossing allows for greater resilience during all phases of the Scheme and avoids the potential use of local roads in the event that the single crossing is blocked.
Keepers Cottage	Noise	P2.7	Post-Statutory Consultation	Summary of Design Change/Commitment: A commitment has been included to locate Standalone Conversion Units and/or Integrated Conversion Units to be minimum 250m from Keepers Cottage.



Land Parcels / Field No.	Topic/ Discipline	Project Level Design Principle	Stage of Design	Key Design Considerations and Iterations
				Key Design Outcomes: A reduction in the noise impacts on residential receptors.
Public Rights of Way	Noise	P2.9	Post-Statutory Consultation	Summary of Design Change/Commitment: A commitment has been included to locate Standalone Conversion Units and/or Integrated Conversion Units to be minimum 15m from Public Rights of Way. Key Design Outcomes: A reduction in the noise impacts on residential receptors.
Field 29	Water resources	P4.3	Post-Statutory Consultation	Summary of Design Change/Commitment: A commitment has been included to locate Standalone Conversion Units and/or Integrated Conversion Units to outside of surface water flooding within Field 29. Key Design Outcomes: This will avoid any impacts on surface water flooding within the Site.
A1065 and Field 27	Landscape and Glint and Glare	P2.2 and P2.8	Post-Statutory Consultation	Summary of Design Change/Commitment: Provision of advance planting along the A1065 where there are gaps in the roadside hedgerow and around the boundaries of Field 27. Key Design Outcomes: By undertaking advanced planting over Winter 2025 / 2026, this allows for the establishment of hedgerow within the existing gaps along the A1065 reducing the potential need for temporary hoarding during the construction and/or early years of operation of the Scheme in order to avoid potential Glint and Glare impacts on users



Land Parcels / Field No.	Topic/ Discipline	Project Level Design Principle	Stage of Design	Key Design Considerations and Iterations
				of the A1065. The advanced planting along the A1065 and around the boundaries of Field 27 will also reduce visual effects on close quarter views.
River Road	Ecology and Landscape	P2.2 and P2.8	Post-Statutory Consultation	Summary of Design Change/Commitment: The crossing over River Road has been relocated further north. Key Design Outcomes: The relocation of the crossing will reduce the total length of hedgerow removal required for the crossing and associated visibility splays.



Design Stage 4: Changes following Targeted Consultation

- 4.5.17 Following targeted consultation, no further changes or commitments have been made to the Scheme.

4.6 Green Infrastructure

- 4.6.0 The design evolution and consideration of green infrastructure has been an iterative process taking into account the baseline conditions, consultation responses and the requirement of environmental mitigation identified throughout the EIA.
- 4.6.1 The Scheme has opportunities to deliver biodiversity net gain, flood risk improvements and tree enhancement of existing hedgerows, in line with local conservation priorities and national targets.
- 4.6.2 The landscape design has approached the design through the mitigation hierarchy through, where practicable, excluding areas of greater landscape and ecological value from accommodating infrastructure. The Scheme has sought to avoid and reduce effects on such elements through adherence to minimum offsets and seeks to enhance these where practicable. These offsets have been determined through baseline ecological and landscape assessments and are secured through the **Works Plan [APP/2.4]**, **Design Principles, Parameters and Commitments [APP/5.8]**, and the **outline Landscape and Environmental Management Plan [APP/7.13]**.

4.7 Summary and Conclusions

- 4.7.0 In summary, the Applicant has considered alternatives in line with the requirements of the EIA Regulations and the specific provisions of NPS EN-1, NPS EN-3 and NPS EN-5. The Applicant has also demonstrated through the information set out in this chapter and in the **Design Principles, Parameters and Commitments [APP/5.8]** how ‘good design’ is being delivered throughout the course of the Scheme and how IGP’s Design Principles and the Draft Project Level Design Principles have informed the design evolution of the Scheme.
- 4.7.1 This chapter of ES has described the consideration of reasonable alternatives and design evolution in relation to the Scheme. The site evaluation process has been considered, followed by a Stage 1 Design Appraisal and feedback from stakeholders received during the Statutory Consultation, Targeted Consultation, Non-Statutory Consultation (Co:Design) and the EIA Scoping exercise as set out above.



References

- Ref 4-1 Overarching National Policy Statement (NPS) EN-1, Department for Energy Security and Net Zero, (2023)
- Ref 4-2 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017
- Ref 4-3 Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations): Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents>
- Ref 4-4 National Policy Statement (NPS) for Renewable Energy Infrastructure (EN-3), Department for Energy Security and Net Zero, (2023)
- Ref 4-5 National Policy Statement (NPS) for Electricity Networks Infrastructure (EN-5), Department for Energy Security and Net Zero, (2023)
- Ref 4-6 Nationally Significant Infrastructure Projects - Advice Note Seven: Environmental Impact Assessment: process, preliminary environmental information and environmental statements
- Ref 4-7 The Horlock Rules, National Grid, (2009)



THE DROVES
SOLAR FARM

