THE DROVES
SOLAR FARM

The Droves Solar Farm

Planning Statement (Clean)

Prepared by: DWD
Date: October 2026
PINS reference: EN0110013
Document reference: APP/5.5.3 (Revision 3)
APFP Regulation Reg 5(2)(q)
Planning Act 2008
Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009



Contents

1 Introduction 1
1.1 Background 1
1.2 The Applicant 3
1.3 Legislative Context Review 3
1.4 Pre-Application Consultation 4
1.5 Supporting Documents 5
1.6 Purpose and Structure of the Planning Statement 6
2 Design Approach 8
3 Site Context 11
3.1 Introduction 11
3.2 Site Description 11
3.3 Site Location 12
3.4 Environmental Designations Within and Surrounding the Order Limits 13
3.5 Relevant Planning History 17
4 The Scheme 19
4.1 Introduction 19
4.2 Definition of the Scheme in the DCO 19
4.3 Components of the Scheme 19
4.4 Flexibility and Development 20
4.5 Lifetime of the Development 21
4.6 Construction, Operation and Decommissioning 21
5 The Need for and Benefits of the Scheme 24
5.1 Introduction 24
5.2 The Need for the Scheme 24

5.3 The Benefits of the Scheme 28
5.4 Community Liaison Group 31
5.5 Community Benefit Fund 33
6 Legislation and Policy Framework 34
6.1 Introduction 34
6.2 Legislative Context and Policy 34
6.3 Relevant National Policy Statements 35
6.4 Local Impact Reports 38
6.5 Prescribed Matters 38
6.6 Other Important and Relevant Matters 39
6.7 Other Policy and Legislation 43
6.8 Additional Consents 47
7 Ongoing Engagement 48
8 Planning Appraisal 49
8.1 Introduction 49
8.2 Assessment Principles 50
8.3 Generic Impacts 68
9 Decision-Making and Planning Balance 124
9.1 Introduction 124
9.2 Section 104(2) of the PA 2008 124
9.3 Section 104(3) of the PA 2008 124
9.4 Planning Balance 125
9.5 CNP Infrastructure 130
9.6 Summary 133
10 Conclusion 134
11 References 135

List of Tables

Table 1.1 Planning History 18

Table 1.2 ALC Survey Result of the Site 101

List of Images

Image 1 Location Plan 1

Image 2 Location Plan 10

Image 3 Provisional ALC Map for the Site and Surrounding Area 100

Image 4 ALC Survey Results of the Site 101

List of Appendices

Appendix 1 Site Evaluation Report.....139

Glossary

Applicant: The Droves Solar Farm Limited.

Associated Development: Development associated with the Scheme including but not limited to the BESS, Customer Substation, National Grid Substation, Grid Connection Infrastructure and Ancillary Infrastructure, and any other works integral to the construction, operation, maintenance and decommissioning of the Scheme.

Battery Energy Storage System (BESS): Electrical infrastructure forming part of the Scheme which stores electricity generated by the solar arrays for release during periods of higher demand.

Biodiversity Net Gain (BNG): An approach to development which seeks to leave biodiversity in a measurably better state than before development, expressed as a percentage increase in habitat value following mitigation and enhancement.

Development Consent Order (DCO): Development consent is required pursuant to the Planning Act 2008 for Nationally Significant Infrastructure Projects. A development consent order is a statutory instrument containing powers that enable the applicant to carry out the construction, operation, maintenance and decommissioning of the Nationally Significant Infrastructure Project. Applications for DCOs are made to, and decided by, the relevant Secretary of State.

DCO Application: The application submitted to the Secretary of State under the Planning Act 2008 seeking a Development Consent Order for the Scheme.

Environmental Impact Assessment (EIA): The process undertaken in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 to identify, assess, and report the likely significant environmental effects of the Scheme.

Environmental Statement (ES): The suite of documents reporting the findings of the Environmental Impact Assessment, submitted in support of the DCO Application.

Examining Authority (ExA): The body appointed by the Secretary of State to examine the DCO Application and make recommendations.

Grid Connection: The physical and contractual connection between the Scheme and the National Electricity Transmission System, via a new National Grid Substation.

National Energy System Operator (NESO): The organisation responsible for operating the national electricity transmission system and agreeing grid connections.

NETS: The National Electricity Transmission System which is made up of high-voltage network of lines, cables and substations that transport electricity across Great Britain from generators to major substations and distribution systems.

National Grid Substation: A new electricity substation forming part of the Scheme, enabling connection to the National Electricity Transmission System.

National Policy Statements (NPSs): Statements designated by the Government under the Planning Act 2008 which set out national policy for the development of nationally significant infrastructure.

Nationally Significant Infrastructure Project (NSIP): A NSIP is a large-scale development (as defined in sections 14 - 30A of the Planning Act 2008) such as certain new harbours, power generating stations (including wind farms and solar farms), highways developments and electricity transmission lines, which require a type of consent known as 'development consent' which is governed by the Planning Act 2008.

Order limits: The land shown on the **Works Plan [APP-009]** within which the Scheme can be carried out.

Outline Construction Environmental Management Plan (oCEMP): A secured document setting out proposed environmental management measures to be implemented during the construction phase of the Scheme.

Outline Construction Traffic Management Plan (oCTMP): A secured document setting out proposed measures to manage traffic and transport impacts during the construction phase of the Scheme.

Outline Decommissioning Strategy (oDS): A secured document setting out the proposed approach to the decommissioning of the Scheme at the end of its operational life.

Outline Landscape and Ecological Management Plan (oLEMP): A secured document setting out the principles for managing landscape and ecological features during the construction and operational phases of the Scheme.

Permissive Paths: Routes provided as part of the Scheme which allow public access, but do not constitute public rights of way.

Planning Act 2008 (PA 2008): The legislation establishing the consenting regime for Nationally Significant Infrastructure Projects and requiring a Development Consent Order.

Planning Inspectorate (PINS): The executive agency of the Department for Levelling Up, Housing and Communities responsible for administering the DCO process.

Project Level Principles: Project level design principles are used to guide decision making throughout the design evolution process in order to deliver the intended outcomes of the Scheme.

Scheme: A Nationally Significant Infrastructure Project (NSIP) comprising a ground mounted solar photovoltaic generating station with a gross electrical capacity of over 50

megawatts, with Associated Development which would allow the generation, storage and export of electricity. The Scheme is known as “The Droves Solar Farm”.

Secretary of State (SoS): The Secretary of State with responsibility for determining the DCO Application under the Planning Act 2008.

Site Evaluation: The process undertaken by the Applicant to identify, assess, and compare potential land and substation locations for the Scheme, having regard to factors including grid connection opportunities, site area, topography, environmental constraints, access, planning designations, and deliverability, and through which the Order limits for the Scheme were determined.

Siting Zone: An area identified through the Site Evaluation process within which development of specific components of the Scheme, including the National Grid Substation and associated infrastructure, is considered potentially suitable, having regard to constraints such as proximity to grid infrastructure, environmental and planning designations, access, and land availability.

Solar PV Arrays: Rows or groups of PhotoVoltaic (PV) Tables that are connected to one another to form a Solar PV Array.

Solar PV Site: A term used to describe the land that accommodates the Solar PV Arrays, Conversion Units and 33kV Sub-distribution switch rooms.

Statutory Nuisance: Nuisance as defined under section 79 of the Environmental Protection Act 1990, including noise and other disturbances.

Statutory Consultation: Consultation undertaken in accordance with sections 42, 47 and 48 of the Planning Act 2008 prior to submission of the DCO Application.

Executive Summary

This Planning Statement has been prepared by The Droves Solar Farm Limited (the Applicant) in relation to an application for a Development Consent Order (DCO Application) for The Droves Solar Farm (the Scheme).

It provides an assessment of the Scheme against the relevant policy and legislative framework. It draws upon the conclusions of the Environmental Statement (ES) and other reports forming part of the DCO Application to assess whether the Scheme complies with planning policy.

Section 5 sets out the needs and benefits of the Scheme. The government has confirmed that there is a critical national priority (CNP) for nationally significant low-carbon infrastructure, such as the Scheme. Government policy supports the development of large-scale solar projects to meet its targets for decarbonisation, security of supply, and affordability to end-users. The Scheme will significantly contribute to the government meeting these aims through the provision of low-carbon and affordable electricity and, in doing so, it would be a critical part of the national portfolio of renewable energy generation. The Scheme will also deliver more localised economic and environmental benefits. These include employment generation, the creation of approximately 3785 linear metres of permissive path within the Order limits and approximately 1203 linear metres of permissive paths outside of the Order limits and ecological and landscape enhancements.

The DCO Application will be determined in accordance with section 104(2) of the Planning Act 2008, which provides that in deciding the application, the Secretary of State must have regard to *"any national policy statement which has effect in relation to development of the description to which the application relates (a "relevant national policy statement")"* together with any local impact reports, any prescribed matters and any other matters which the Secretary of State thinks are important and relevant to the decision.

The relevant National Policy Statements (NPS) in relation to the Scheme are the Overarching National Policy Statement for Energy (NPS EN-1), the National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) and the National Policy Statement for Electricity Networks Infrastructure (NPS EN-5). This Planning Statement demonstrates the Scheme's compliance with national policy.

Breckland Council and Norfolk County Council are the host local authorities for the Scheme and will have the opportunity to prepare local impact reports following submission of the DCO Application. This Planning Statement also considers local planning policy.

Prescribed matters that are relevant to the DCO Application are set out in the Infrastructure Planning (Decisions) Regulations 2010 (as amended) (the Decisions Regulations) and include Regulation 3 (regard to preserving listed buildings, conservation areas and scheduled monuments) and Regulation 7 (regard to the United Nations Environmental Programme Convention on Biological Diversity of 1992). This Planning Statement demonstrates the Scheme's compliance with the relevant prescribed matters.

Other national and local policies considered relevant are explained in **Section 6** of this Planning Statement, including relevant local plans, and the Scheme's compliance with them is appraised in **Section 8.**

Section 9 of this Planning Statement applies the planning balance in relation to the beneficial and adverse effects of the Scheme. It concludes that adverse effects have been appropriately managed and that the residual adverse effects are outweighed by the benefits. **Section 9** also considers the CNP presumption and concludes that, given the Applicant has demonstrated the Scheme is in accordance with national policy, the mitigation hierarchy has been applied and compliance with other legal and regulatory requirements has been demonstrated, the CNP presumption applies to the Scheme. Accordingly, it should be taken into account in decision-making.

Given the urgent need for large-scale solar development and the substantial benefits of the Scheme, there is a clear and compelling case for the DCO to be made.

1 Introduction

1.1 Background

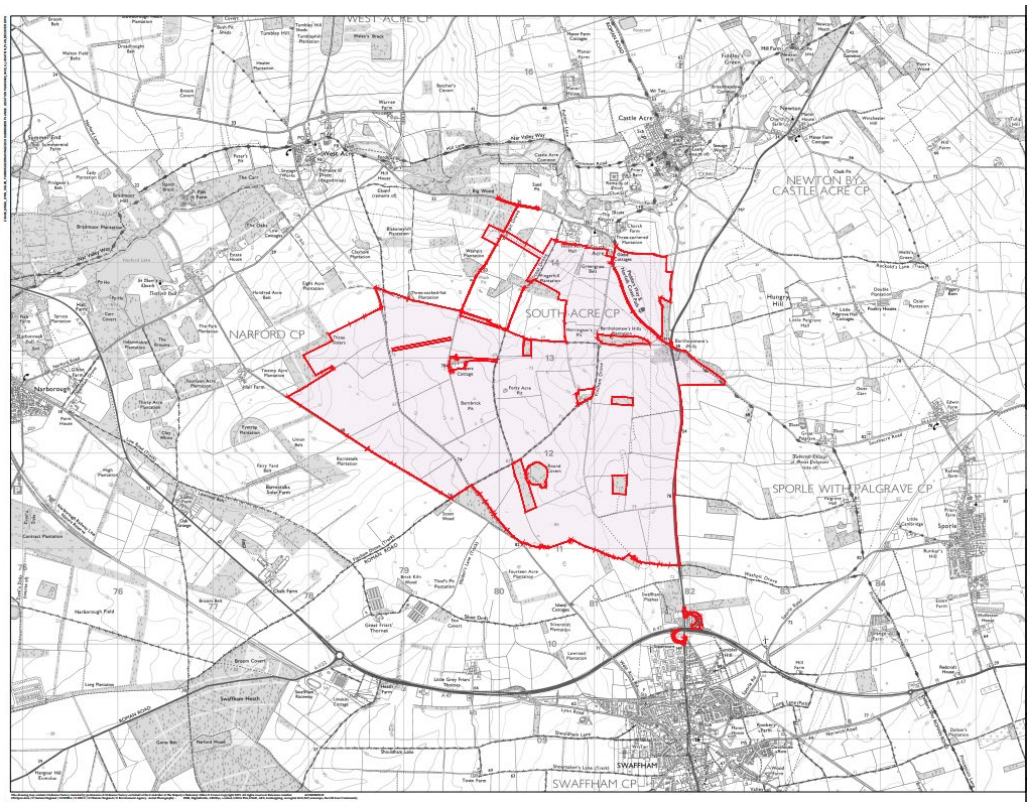
1.1.1 This Planning Statement has been prepared on behalf of The Droves Solar Farm Limited (the Applicant) in relation to an application for a Development Consent Order (DCO) (the DCO Application) to be made to the Secretary of State (SoS) to construct, operate and maintain, and decommission The Droves Solar Farm (the 'Scheme'), pursuant to the Planning Act 2008 (PA 2008) **[Ref. 1]**.

1.1.2 This document has been updated at Deadline 6 to consider the Longmarsh Green Energy project, for which the EIA Scoping Report was submitted to PINS in October 2026, in relation to the cumulative assessment of the Scheme. This demonstrates the proactive and robust nature of the Applicant's cumulative assessment, even though the information for the Longmarsh Green Energy project has been received at a late stage of the Examination. The document has also been updated to correct an inconsistency with the conclusions of the **ES Chapter 16: Other Environmental Matters [APP/6.2.2]**. The document references have not been updated from the original submission. Please refer to the **Guide to the Application [APP/1.3.8]** for the list of current versions of documents.

1.1.3 The Scheme is a Nationally Significant Infrastructure Project (NSIP) for the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station and associated development comprising a Battery Energy Storage System (BESS), a Customer Substation and Grid Connection Infrastructure, including a new National Grid Substation. The Scheme would allow for the generation and export of over 50 megawatts (MW) Alternating Current (AC) of renewable energy, connecting into the National Electricity Transmission System (NETS) overhead line that passes through the Site.

1.1.4 The **Location Plan [APP/2.1]** shows the Order Limits for the Scheme, which is approximately 840 hectares (ha) of land within Norfolk (the 'Order limits').

Image 1 – Location Plan



1.1.5 The location of the Scheme is shown in **ES Figure 3.1: Scheme Location [APP/6.3]**. The Scheme would be located within the Order limits. The land within the Order limits and its surroundings are described in **ES Chapter 3: Order limits and Context [APP/6.1]**.

1.1.6 The Applicant has secured a 500MW import and export connection at a new National Grid Substation. The actual amount of electricity generated by the Scheme will depend on the final design, layout and technology adopted in the detailed design stage, but capacity is expected to be approximately 500MW. The Applicant does not propose a limit on the generating capacity of the Scheme in the DCO Application. This is because the environmental effects associated with the Scheme are determined by the relevant design parameters, rather than by generating capacity. This is set out further in the **Grid Connection Statement [APP/7.1].**

1.1.7 The Order limits are located entirely within the administrative boundaries of Breckland Council (BC) and Norfolk County Council (NCC).

1.1.8 The Scheme would generate large amounts of electricity from a renewable source and so it would assist the Government in meeting its targets to decarbonise our electricity supply and reduce overall carbon emissions.

1.1.9 The Government expects large scale solar generation to make an important contribution to achieving its objectives for the UK's power system which are to ensure the supply of energy always remains secure, reliable, affordable, and enables the UK to meet its carbon

emission reduction commitments. These include the achievement of net zero carbon emissions by 2050 and delivery of carbon budgets in the intervening years. Further details are set out in the **Statement of Need [APP/5.4]**.

1.2 The Applicant

1.2.1 The Scheme is being developed by The Droves Solar Farm Limited (the Applicant). The Applicant is part of Island Green Power Limited (IGP), which was established in 2013.

1.2.2 IGP have delivered nearly 40 solar projects worldwide that have generated more than 3GW of energy capacity. This includes 21 solar projects in the UK. These range in size from below 5MW to Nationally Significant Infrastructure Projects (NSIPs) such as Cottam, currently the UK's largest consented solar project. Cottam will generate 600MW of clean, renewable and secure electricity and includes 600MW of Battery Storage that will store and then release energy as needed. Further information on the Applicant can be found in the **Funding Statement [APP/4.2]**.

1.2.3 IGP has a proven track record with the DCO application process. IGP is the recipient of a granted DCO for the Cottam Solar Project in Lincolnshire and Nottinghamshire, which was consented on 5 September 2024 (Planning Inspectorate Case Reference: EN010133) and of a granted Development Consent Order for the West Burton Solar Project in Lincolnshire and Nottinghamshire, which was consented on 24 January 2025 (Planning Inspectorate Case Reference: EN010132). IGP is currently in the examination stage for the Green Hill Solar Farm (Case Reference: EN010170) and the pre-examination stage for the Lime Down Solar Project (Case Reference: EN010168).

1.3 Legislative Context Review

1.3.1 The Scheme is an onshore generating station in England (which does not generate electricity from wind) with a generating capacity exceeding 50MW and is therefore classed as an NSIP under sections 14(1)(a), 15(1) and 15(2) of the PA 2008. The PA 2008 requires a DCO to be obtained for the development of NSIPs.

1.3.2 Section 115(1)(b) of the PA 2008 provides that a DCO can include consent for 'associated development', which is development that is not an NSIP in its own right, but that is associated with the delivery of an NSIP. The elements of the Scheme that constitute the NSIP and the elements that constitute associated development are defined in Schedule 1 of the **draft Development Consent Order (DCO) [APP/3.1]** and are summarised in Section 4.3 of this Planning Statement.

1.3.3 Section 104 of the PA 2008 prescribes that DCO applications must be determined in accordance with any relevant National Policy Statement (NPS) where the NPS has effect in relation to development of the description to which the DCO Application relates, subject to a number of specific exceptions.

1.3.4 The following NPSs (hereafter referred to as the NPSs or individually as NPS EN-1, NPS EN-3 or NPS EN-5) have effect in relation to the Scheme. They are therefore the primary policy basis for the SoS determination of the DCO Application:

- Overarching National Policy Statement for Energy 2023 (NPS EN-1) **[Ref. 2]**
- National Policy Statement for Renewable Energy 2023 (NPS EN-3) **[Ref. 3]**, which includes specific policies for solar PV generation NSIPs; and
- National Policy Statement for Electricity Networks Infrastructure 2023 (NPS EN-5) **[Ref. 4]**.

1.3.5 Since the submission and acceptance of this DCO Application, the draft energy NPSs which had been published for consultation in April 2025 have since been formally adopted. The Application was accepted for examination on 16 December 2025 and was therefore accepted prior to the adoption of the 2025 energy NPSs. This means that, in accordance with the transitional provisions, the 2023 energy NPSs continue to provide the primary policy basis for the SoS' determination of the DCO Application. However, and in accordance with section 104(2)(d) of the PA 2008, the Applicant considers the adopted 2025 energy NPSs are important and relevant in the decision-making process for this DCO Application. With this in mind, the Applicant confirms that there are no material changes to the assessment of the DCO Application under the adopted 2025 energy NPSs.

1.3.6 A more detailed explanation of the legislative and policy context of the Scheme is set out in Section 6 of this Planning Statement.

1.3.7 The Scheme is 'EIA Development' as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations') **[Ref. 5]**. An EIA has been undertaken and is reported in the **Environmental Statement (ES) [APP/6.1 – 6.5]** submitted with the DCO Application. In undertaking the EIA and preparing the **ES [APP/6.1 – 6.5]**, the Applicant has taken account of the EIA Scoping Opinion received and adopted by the SoS on 18 December 2024, which can be found in **ES Appendix 2.2: Scoping Opinion Response [APP/6.4]**.

1.4 Pre-Application Consultation

1.4.1 The PA 2008 requires applicants for DCOs to carry out Statutory pre-application consultation on their proposals. The PA 2008 and related regulations set out the requirements for how this consultation must be undertaken, and the Applicant has also undertaken non-statutory consultation as part of developing its proposals and seeking feedback from consultees. The Applicant has undertaken a three-stage engagement process, detailed throughout the **Consultation Report [APP/5.1]**. The stages are as follows:

- Early-engagement
- Statutory consultation

- Targeted consultation.

1.4.2 The Applicant has adopted a three-stage approach to pre-application consultation. Early-engagement (non-statutory consultation) (Phase One Consultation: Early plans and proposals) was carried out between 17 September and 1 October 2024. The Applicant held a series of early-engagement workshops with invited stakeholders, including local councils, community groups and technical consultees, to introduce the proposals and help understand key issues and potential constraints in the local area.

1.4.3 A Statutory consultation (Phase Two Consultation: Updates plans and proposals) in compliance with Sections 42, 47 and 48 of the PA 2008 was undertaken between 21 May and 9 July 2025, supported by a Preliminary Environmental Impact Report (PEIR) in accordance with the EIA Regulations. The Applicant has continually sought feedback from stakeholders regarding its consultation approach and has made changes where possible. The Applicant notes the additional 'pop-up' event in Castle Acre as an example (see **Section 5.4** of the **Consultation Report [APP/5.1].**

1.4.4 A targeted consultation (Phase Three Consultation: Design refinement and final proposals) in compliance with Section 42 of the PA 2008 was between 3 September 2025 and 1 October 2025, during which feedback was encouraged on four localised changes to the Scheme boundary.

1.4.5 In addition to the three-stage approach outlined above, the Applicant has undertaken extensive engagement with BC and NCC, statutory prescribed persons, relevant statutory undertakers, those with an interest in the land, and those who may be affected by the Scheme throughout the development of the proposals. This ongoing engagement with the host authorities has comprised regular meetings where updates have been provided on the Scheme, including the design development and technical meetings with the host local authorities' technical specialists.

1.4.6 The Applicant has had regard to all feedback received in response to the consultations when developing the Scheme, as set out in the **Consultation Report [APP/5.1]**.

1.5 Supporting Documents

1.5.1 This Planning Statement draws on the evidence and information set out in the other documents that accompany the DCO Application when assessing the Scheme against planning policy and drawing conclusions on planning compliance. This Planning Statement should be read alongside the following documents:

- **draft DCO [APP/3.1]**
- **Consultation Report [APP/5.1]**
- **Statutory Nuisance Statement [APP/5.3]**
- **Statement of Need [APP/5.4]**

- **Design Approach Document [APP/5.7]**
- **Design Principles, Parameters and Commitments [APP/5.8]**
- **ES Chapters [APP/6.1 – 6.2]**, **ES Figures [APP/6.3]**, **ES Appendices [APP/6.4]**, **Non-Technical Summary [APP/6.5]** and **Commitments Register [APP/6.5]**
- **Biodiversity Net Gain Assessment Report [APP/7.4]**
- **outline Construction Environmental Management Plan (oCEMP) [APP.7.6]**
- **outline Construction Traffic Management Plan (oCTMP) [APP/7.7]**
- **outline Operational Environmental Management Plan (oOEMP) [APP/7.8]**
- **outline Operational Traffic Management Plan (oOTMP) [APP/7.9]**
- **outline Decommissioning Strategy (oDS) [APP/7.10]**
- **outline Landscape and Ecological Management Plan (oLEMP) [APP/7.11]**
- **outline Public Right of Way and Permissive Path Management Plan (oPRoWPPMP) [APP/7.12]**
- **outline Soil Management Plan (oSMP) [APP/7.13]**
- **outline Battery Safety Management Plan (oBSMP) [APP/7.14]**; and
- **outline Employment, Skills and Supply Chain Strategy (oESSCS) [APP/7.15]**.

1.6 Purpose and Structure of the Planning Statement

1.6.1 This Planning Statement is submitted to support the DCO Application, in accordance with regulation 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended) (the APFP Regulations) **[Ref. 50]**.

1.6.2 The purpose of the Planning Statement is to provide an overview of the Scheme and its impacts, and to present the Applicant's consideration of the Scheme against the provisions of the legislation and policies considered relevant to the SoS's decision.

1.6.3 The remainder of this Planning Statement is structured as follows:

- **Section 2:** describes the design approach which has informed the design development of the Scheme
- **Section 3:** describes the site context, including land within the Order limits and surrounding areas, and summarises the planning history within the Order limits
- **Section 4:** provides a summary of the Scheme and its components
- **Section 5:** describes the need for, and benefits of, the Scheme
- **Section 6:** provides an overview of the decision-making framework including legislation and policy context as well as other important considerations

- **Section 7:** sets out details of engagement to date including through statements of common ground and the plans for how this will be developed post-submission
- **Section 8:** provides an assessment of the Scheme against the relevant legislative and policy context as well as other important and relevant considerations
- **Section 9:** applies the planning balance of the Scheme and sets out how the Scheme complies with the PA 2008
- **Section 10:** provides an overall conclusion in terms of the Scheme's compliance with relevant legislation and policy; and
- **Appendix 1:** Site Evaluation Report.

2 Design Approach

2.1.1 The achievement of good design for NSIPs is a key requirement of national planning policy, and the Applicant fully recognises the importance of achieving good design outcomes for the Scheme. The key policy documents that have informed the approach to good design include NPS EN-1 **[Ref. 2]**, NPS EN-3 **[Ref. 3]**, NPS EN-5 **[Ref. 4]** and the Planning Inspectorate's guidance note 'Nationally Significant Infrastructure Projects: Advice on Good Design' **[Ref. 6]**. The full list of planning policies regarding design, along with an analysis of the Scheme's compliance with them, is set out in the **Policy Compliance Document [APP/5.6]**.

2.1.2 IGP has adopted eight company-wide 'global design principles' for its projects, intended to ensure that the design of IGP projects delivers direct benefits to communities, enhances biodiversity, controls any adverse effects on the local environment throughout the lifecycle of projects, and helps tackle climate change by harnessing and storing renewable energy. These IGP company-wide design principles are discussed further in the **Design Approach Document [APP/5.7]**.

2.1.3 In line with IGP's company-wide design principles, the Applicant also developed a set of project-level design principles (known as Project Principles) early in the Scheme's development, which have been used to inform design development for the Scheme (the Project Principles). These Project Principles were developed in response to the vision of the Scheme, which is for The Droves Solar Farm to support the UK's transition to decarbonised, low-cost renewable energy while leaving a positive legacy for the people of Breckland and its natural environment. The main purpose of this vision was to ensure that the Scheme is sustainable in its creation of a new place and ensure that a clear goal holds the design together.

2.1.4 The Project Principles are based on an understanding of the Scheme's context, the people it would affect, and the potential benefits and outcomes it can deliver. The Project Principles drive design-related decision-making throughout the Scheme's lifecycle, providing a framework for developing the design over the course of the pre-application stage. The Design Principles are intended to be tested and refined in response to further baseline survey work, design evolution, environmental assessments, and stakeholder feedback, to secure the most appropriate outcomes at the detailed design stage.

2.1.5 The Scheme specific Design Principles are set out below:

- 1.1 – Reduce carbon emissions during all phases of the Scheme
- 2.1 – Respond to the character of the Site, informed by the Breckland Local Landscape Character Assessment
- 2.2 – Retain and enhance existing vegetation wherever practicable to retain the fabric of the Site and aid integration of the Scheme into its context

- 2.3 – Support objectives of Norfolk's Green Infrastructure Strategy
- 2.4 – Improve soil health during the lifetime of the Scheme
- 2.5 – Respect setting of heritage assets along the Nar Valley
- 2.6 – Protect and support engagement and understanding of local heritage assets
- 2.7 – Respect residential amenity
- 2.8 – Consider experience of people travelling along adjacent roads, including the A1065, South Acre Road, River Road and Narford Lane
- 2.9 – Consider experience of people using the Public Rights of Way
- 2.10 – Retain fields comprising entirely Grade 1 and fields comprising entirely of Grade 1 and 2 in agricultural use where practicable
- 3.1 – Integrate the Scheme into the local environment and allow the movement of wildlife through the Site
- 3.2 – Review and incorporate initiatives set out in the Local Nature Recovery Strategy where practicable
- 3.3 – Reduce the impact of water runoff on the Nar Valley
- 3.4 – Deliver a Biodiversity Net Gain of at least 10%
- 3.5 – Engage with Westacre Estate to explore opportunities to compliment rewilding project objectives
- 4.1 – Design for resilience and adaptation to future climate change
- 4.2 – Provide flexibility in design parameters to allow for technological advancement to maximise energy production
- 4.3 – Ensure the Scheme is resilient to flooding and does not increase flooding elsewhere
- 5.1 – Support the objectives set out in the Future Breckland programme
- 5.2 – Provide opportunities to boost local and regional economies
- 5.3 – Engage openly, transparently and meaningfully with stakeholders, using feedback to inform the Scheme
- 5.4 – Identify opportunities for wider community benefits in consultation with local stakeholders
- 5.5 – Behave as a considerate neighbour through all phases of the Scheme
- 5.6 – Provide clear lines of communication between the developer and the local community
- 5.7 – Provide education and interpretation of the Scheme and Site
- 5.8 – Collaborate with High Grove Solar Farm
- 5.9 – Route construction away from local villages and Swaffham town centre

- 5.10 – Retain all Public Right of Ways (PRoW) on the existing alignment during the Operational Phase where practicable
- 5.11 – Improve connectivity and accessibility through the Site
- 6.1 – Optimise generation and export capacity of the Scheme within the constraints of the Site to make the most efficient use of land and available grid connection
- 7.1 – Prioritise sustainable resource management and techniques during all phases of the Scheme
- 7.2 – Allow existing woodland blocks to continue to be managed sustainably
- 7.3 – Allow for dual use of land where practicable; and
- 8.1 – Mitigation is encapsulated within the project-level design principles set out above.

2.1.6 These design principles were consulted upon during the Scheme's statutory consultation. The responses to these are set out in the **Consultation Report Appendices [APP/5.2]**; however, the design principles did not change as a result of the comments made. The Project Principles are outlined in full in the **Design Approach Document [APP/5.7]**, along with commentary on how they have influenced the design evolution of the Scheme to date.

3 Site Context

3.1 Introduction

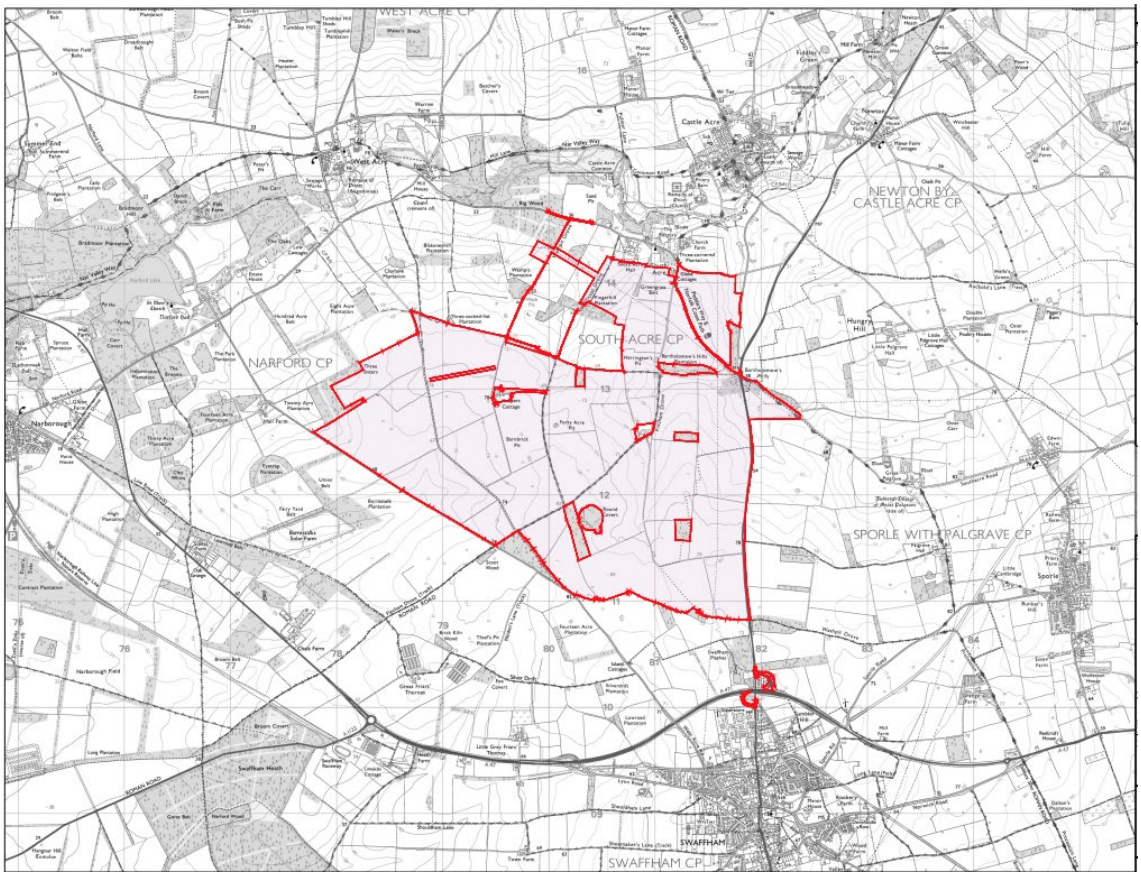
3.1.1 The following sections summarise: the existing context, the environmental designations, and other planning considerations of the land within and surrounding the Order Limits; and relevant planning history.

3.1.2 A detailed description of the Order Limits is set out in **ES Chapter 3: Order limits and Context [APP/6.1]**.

3.2 Site Description

3.2.1 The Order limits comprise a total area of approximately 840 hectares of land located entirely within the administrative boundaries of Breckland Council and Norfolk County Council. The Scheme lies adjacent to the administrative boundary of the Borough Council of Kings Lynn and West Norfolk.

Image 2 – Location Plan



3.2.2 The Scheme would be located within the Order limits, also referred to as 'the Site'. The Order limits contain all elements of the Scheme comprising the Solar PV Site, the Customer Substation, the National Grid Substation, the BESS, Grid Connection Infrastructure, Mitigation and Enhancement Areas, and the Highway Works (shown in **ES Figure 3.2: The Order limits [APP/6.3]** are described further in **ES Chapter 3: Order limits and Context [APP/6.1]).**

3.2.3 Highway Works are sections of the highway network that will contain localised improvements, such as improvements to road edge where it is deteriorated, or temporary highway and traffic works required to safely accommodate the Abnormal Indivisible Load (AIL) deliveries. These areas will support the movement of construction vehicles on narrower sections of the local highway network within parts of the construction vehicle routes to the Site (refer to **ES Chapter 9: Transport and Access [APP/6.2]).**

3.2.4 The Order limits can be broken down 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.

3.3 Site Location

3.3.1 The location of the Site is presented on the **Location Plan [APP/2.1]** and described in **ES Chapter 3: Order limits and Context [APP/6.1]**.

3.3.2 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 north-west. The market town of Swaffham is located to the south of the Site.

3.3.3 Keepers Cottage is located in the centre of the Site, but has been excluded from the Order limits. Residential dwellings in areas are located near the boundaries of the Site, Finger Hill Cabin and Hall Farm, along South Acre Road and Low Road, Narford Lane, Narford Road, and West Acre Road.

3.3.4 The Site consists of agricultural fields in the parishes of Narford, South Acre, and Sporle, with Palgrave Civil Parishes, within the Breckland Council and Norfolk County Council administrative area. On-site uses include agricultural activities, such as livestock and arable farming. The ALC grading, based on the site surveys undertaken by the Applicant, is discussed in Section 8 of this Planning Statement and outlined in **ES Chapter 11: Soils and Agriculture [APP/6.2]**.

3.3.5 The land is characterised by fields with grassland margins largely separated by hedgerows, tree belts/hedgerows and agricultural tracks. Woodland plantation/blocks are located outside of the Order limits. A number of marl pits (former clay extraction pits) are within the Order limits and have been incorporated into the Scheme. Fincham Drove, Petticoat Drove and Washpit Drove (former livestock driving routes) extend through the Order limits. There are existing agricultural/storage barn type buildings within the Order limits.

3.3.6 The Site slopes gently from north to south, ranging from approximately 105m to 135m Above Ordnance Datum, with a shallow valley and a small tree-lined stream in the centre-west.

3.3.7 A 400kV overhead power line (Norwich Main to Walpole) and pylons route east-west through the centre-north east, with additional below and above ground utilities within the Order limits.

3.3.8 The A1065 (merging into Castle Acre Road) runs north-south along and within much of the eastern Site boundary, before meeting South Acre Road at the A1065 junction. South Acre Road then runs along and within the Site boundary until the easternmost point. The Site's north-easternmost boundary runs parallel to unnamed roads. South Acre Road is located north of the Site, leading from Castle Acre and forming part of the northernmost boundary, where it merges into Low Road, eventually connecting to West Acre. Narford Road and Low Road are located to the west and North of the Site, respectively.

3.3.9 West Acre Road runs northwest, leading from the market town of Swaffham, merging with Narford Lane, forming the southwest boundary of the Site, before meeting Narford Road at its northwesternmost point. Narford Road runs north-east at this point to south of the village of West Acre, merging with Low Road.

3.3.10 River Road bisects through the Site where Narford Lane and Low Road merge before routing diagonally south-west, meeting where Narford Lane and West Acre Road merge.

3.3.11 The Highway Works area is located at the A47 / A1065 junction north of Swaffham.

3.4 Environmental Designations Within and Surrounding the Order Limits

3.4.1 Key environmental planning constraints within and surrounding the Order limits are shown on **ES Figure 4.2: Site Boundary and Layout Submitted at PEIR [APP/6.3]**. Further details regarding the Order limits and the surrounding areas are provided in the **ES Topic Chapters [APP/6.2]**.

Landscape

3.4.2 The Order limits have been selected and designed to avoid designated areas. The Order limits are not covered by any statutory ecological designations, nor does any part comprise

ancient woodland. None of the land within the Order limits is covered by any statutory landscape designations, i.e. National Parks or National Landscapes.

3.4.3 The Order limits are located within the National Character Area (NCA) as defined by Natural England as: NCA Profile: 85 The Brecks (NCA85).

3.4.4 The Order limits are located within two Landscape Character Types (LCT): LCT (D) The Brecks – Heathland with Plantation and LCT (E) Plateau Farmland, as defined by Breckland Landscape Character Assessment (2007).

3.4.5 The LCTs 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 north-eastern site area is situated within the LCA (B7) River Nar Tributary Farmland.

3.4.6 No recorded Ancient Woodlands are within the Order limits or in proximity (less than 1 km) to the Site. A full baseline description is provided within **ES Chapter 6: Landscape and Visual [APP/6.2]** and associated appendices.

Ecology and Biodiversity

3.4.7 The Order limits do not contain, nor are located immediately adjacent to, any internationally designated ecological sites. The Norfolk Valley Fens Special Area of Conservation is approximately 3.7km northwest of the Site.

3.4.8 The Order limits do not contain, nor are located immediately adjacent to, any nationally designated ecological sites. 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.

3.4.9 The Order limits do not contain, nor are located immediately adjacent to, any locally designated ecological sites. There are two Roadside Nature Reserves (RNR) located along River Road.

3.4.10 A full baseline description is provided within **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** and associated appendices.

Cultural Heritage

3.4.11 There are no World Heritage Sites, Registered Battlefields, or Protected Wrecks within close proximity of the Site. No designated heritage assets are located within the Site.

3.4.12 The Double moated site of Old Hall, 250m north west of Church Farm Scheduled Monument (Reference: 1015269) is located approximately 576m north of the Site, Castle Acre Priory Scheduled Monument (Reference:1015870) is located approximately 756m north of the Site, Castle Acre Castle, town defences and Bailey Gate Scheduled Monument (Reference: 1017909) is located approximately 1.2km north-east of the Site

and Deserted medieval village, Great Palgrave Scheduled Monument (Reference: 1002894) is located approximately 643m southeast of the Site.

3.4.13 Narford Hall (NHLE 1000337) is the nearest Registered Park and Garden located approximately 380m west of the Site.

3.4.14 South Acre Conservation Area is located adjacent to the north of the Site. There are several Conservation Areas within 3km of the Site, including: Castle Acre Conservation Area, approximately 474m to the north, Swaffham Conservation Area, located approximately 641m to the south, Narborough Conservation Area, approximately 2.5km to the west, and Pentney/Narborough Conservation Area, approximately 2.6km to the west.

3.4.15 There are a number of listed buildings located outside of the Order limits, but within 2km of the Order limits, including:

- There is a cluster of 5 listed buildings at South Acre to the north of the Site, the nearest being the Grade II listed South Acre Hall (NHLE 1077277), approximately 122m north of the Site's northern extent. These are all Grade II listed buildings apart from the Church of St George (NHLE 1306357), which is Grade I
- There is a cluster of 23 listed buildings at Castle Acre, the nearest being the Grade I listed Remains Of Cluniac Benedictine Priory Of St Mary And St Peter And St Paul (NHLE:1342389), approximately 646m north of the Site's northern boundary. These are all Grade I and II listed buildings apart from the Tudor Lodgings and Attached Wing/Cottage (NHLE 1077685), which is Grade II*
- There are 2 Grade II listed buildings along/off Low Road between South Acre and West Acre, the nearest of these being the listed building St Thomas A Becket's Chapel (NHLE 1077663), which is Grade II listed approximately 1 km northwest of the Site
- There is a cluster of 10 listed buildings at West Acre, the nearest being the Grade II listed Remains Of Domestic Range 140 Metres South of Abbey Farmhouse Across River Nar (NHLE 1342410), approximately 1.4km northwest of the Site. These are all Grade I, II, and II* listed buildings
- There is a cluster of 4 listed buildings at Narford Hall, the nearest being the listed building Sundial Approximately 5 Metres South of South East Quoin of Narford Hall (NHLE 1077307), which is Grade II listed, approximately 1.6km west of the Site; and
- There are multiple (above 25) listed buildings associated with Swaffham to the south of the Site, the nearest being the Grade II listed Baptist Chapel and Hall (NHLE 1269549), approximately 689 m from south of the Site's southernmost extent.

3.4.16 A full baseline description is provided within **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** and associated appendices.

Public Rights of Way

3.4.17 Public Rights of Way (PRoW) and highways within and surrounding the Order limits are shown on the **Access and Rights of Way Plan [APP/2.5]**.

3.4.18 PRoWs largely (not exclusively) route along the Droves and agricultural tracks. Restricted Byways and Footpaths within the Order limits include, from north to south:

- Swaffham FP64b (within Highways Works area)
- South Acre RB6 (tracks along Fincham Drove)
- Swaffham RB1 (tracks along Fincham Drove)
- South Acre RB1 (tracks along Petticoat Drove)
- South Acre RB2 (tracks along Washpit Drove)
- South Acre RB5 (tracks within Area for Mitigation and Enhancement); and
- South Acre RB7 (between Field no. 35 and 33/Area for Skylark Mitigation along agricultural track).

3.4.19 A full baseline description is provided within **ES Chapter 9: Transport and Access [APP/6.2]** and associated appendices.

Water Resources and Flood Risk

3.4.20 There are no Environmental Agency (EA) Main Rivers within the Site. The nearest EA Main Rivers are the River Nar and the River Wissey, located approximately 3.2km west and approximately 5.4km south-east, respectively, of the Site. The River Nar, a tributary of the River Great Ouse, is also located to the north of the Site routing in a general west-east alignment from the Site. The River Nar rises near the village of Mileham before flowing approximately 41km through Castle Acre and Narborough, joining the Ouse at King's Lynn. The River Wissey rises near Bradenham, flowing to meet the River Great Ouse at Fordham.

3.4.21 The vast majority of the Order limits is situated in Flood Zone 1. It therefore has less than a 1 in 1,000 annual probability of river or sea flooding. The exception to this is a small portion of Skylark Mitigation, a total area of 1.10ha, which is located in Flood Zones 2 and 3.

3.4.22 There are no natural watercourses within the Order limits. A series of agricultural land drains is located within the Order limits.

3.4.23 The EA's Historical Flood Map indicates that the Order limits have not historically flooded, and neither has the area immediately surrounding either Site.

3.4.24 The EA's Flood Risk from Surface Water Map indicates that the land within the Order limits ranges from a less than low risk of surface water flooding (less than 0.1% annual

probability) across much of the Site, to between low risk of surface water flooding (between a 1% and 0.1% annual probability) to high risk of surface water flooding (greater than 3.3% annual probability).

3.4.25 A full baseline description is provided within **ES Chapter 12: Water Resources [APP/6.2]** and associated appendices.

Airfields

3.4.26 Great Friars Thornes Farm Airstrip lies approximately 1.4km southwest of the Site. Royal Air Force (RAF) Marham lies approximately 5.1km southwest of the Site.

3.4.27 East Winch Airfield lies approximately 6.9km northwest, and Great Massingham Airfield lies approximately 7 km north of the Site.

3.4.28 A full baseline description is provided within **ES Chapter 16: Other Environmental Matters [APP/6.2]** and associated appendices.

Mineral Safeguarding

3.4.29 Small areas of the Order limits lie within Mineral Safeguarding Areas (sand and gravel) as defined in the adopted Norfolk Minerals and Waste Local Plan (2025) **[Ref. 7]**. **ES Appendix 2.2: Scoping Opinion Response [APP/6.4]** confirms that, *"the Mineral Planning Authority does not consider that the proposed development would result in the needless sterilisation of safeguarded mineral resources, and although mineral resource safeguarding is not mentioned as a topic within the Scoping Report, mineral resource safeguarding issues can be scoped out of the assessment"*.

3.5 Relevant Planning History

3.5.1 As an agricultural site, the relevant planning history of the land within the Order limits is very limited. Below, Table 1.1 sets out the relevant planning history within the Order limits.

Table 3.1 Planning History

Application Reference	Description	Development Type	Status	Overlap with Scheme
Breckland Council: 3PL/2022/1215/F	Construction and operation of a solar photovoltaic farm with battery storage and associated infrastructure, including inverters, substations, security cameras, fencing, access tracks and landscaping	Solar photovoltaic farm with battery storage and associated infrastructure	Granted with conditions	A portion of the cable route for this application overlaps with the Scheme along the A1065 from the two southern land parcels to the land which lies in the field south of the junction between the A1065 and Southacre Road. The cable route passes through the southern part of this field, also before leaving to the east of the Order limits.

3.5.2 For the purposes of the EIA, a search of cumulative developments has been carried out and a 'long list' of developments has been compiled, which lists all relevant developments within a particular maximum Zone of Influence (ZoI) from the Scheme. The ZoI is defined by each technical topic in their responsive assessment methodologies, and the full list of ZoI per topic is set out in **ES Chapter 17: In-Combination Effects [APP/6.2]**.

3.5.3 Developments appearing in the long list have then been screened to determine their potential to interact with the Scheme in a manner that might generate cumulative effects, and a 'short list' of developments has been created, which lists the developments screened for further assessment.

3.5.4 There are no significant implications arising from the location of the Scheme upon any of the identified planning permissions.

4 The Scheme

4.1 Introduction

4.1.1 This section describes the Scheme, its main components and the activities that would take place during the construction, operation and maintenance, and decommissioning phases of the Scheme.

4.1.2 A full description of the proposed Scheme is provided in **ES Chapter 5: The Scheme [APP/6.1]**.

4.2 Definition of the Scheme in the DCO

4.2.1 Article 3 of the **draft DCO [APP/3.1]** provides that, subject to the provisions of the DCO, including the Requirements in Schedule 2, development consent is granted for the "*authorised development*".

4.2.2 For this purpose, "*authorised development*" is defined in Article 2 of the **draft DCO [APP/3.1]** and means "*the development described within the meaning of section 32 (meaning of "development") of the 2008 Act authorised by this order*".

4.2.3 If consented, the DCO would permit the authorised development defined in Schedule 1 of the **draft DCO [APP/3.1]** within the limits shown on the **Works Plan [APP/2.3]**. Schedule 1 of the **draft DCO [APP/3.1]** defines the NSIP (Work No.1) and the associated development (Work Nos. 2 to 11).

4.3 Components of the Scheme

4.3.1 This section provides a summary of the Work numbers as specified in Schedule 1 of the **draft DCO [APP/3.1]**. A full description of the Scheme is provided in **ES Chapter 5: The Scheme [APP/6.1]**.

4.3.2 The main components of the Scheme would include:

- **Work No. 1** comprising the solar photovoltaic generating station contained within the Solar PV Site comprising an area of approximately 608ha to include the Conversion Units / 33kV Sub-distribution Switch Rooms and the cabling between these elements and the Customer Substation. The Solar PV Site is also expected to include Ancillary Buildings, which could include containers for storage of materials, as well as operational monitoring and maintenance equipment.
- **Work No. 2** comprising the energy storage facility comprising the BESS contained within Fields 24 and 27, including access and temporary construction compounds

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

4.4 Flexibility and Development

4.4.1 The Applicant wishes to retain flexibility regarding the design detail of certain components of the Scheme, as is acknowledged in paragraphs 4.3.11 and 4.3.12 of NPS EN-1, plus section 2.6 and paragraph 2.10.70 of NPS EN-3.

4.4.2 The extent of flexibility sought by the Applicant is described in **ES Chapter 5: The Scheme [APP/6.1]**.

4.4.3 It is important to note that the exact design details of the Scheme cannot be confirmed until consent is granted and the construction tendering process for the design has been

completed. The local planning authorities would be required to approve the detailed design in advance of works commencing, should development consent be granted. The detailed design must be approved by the relevant planning authority pursuant to the Requirements in the **draft DCO [APP/3.1]** and must be in accordance with the **Works Plan [APP/2.3]**.

4.4.4 To maintain flexibility in the design and layout at this stage in the process and ensure maximum effects are assessed in the EIA and considered by the SoS, the Scheme has adopted the Rochdale Envelope approach in accordance with the Planning Inspectorate's Advice Note 9 **[Ref. 8]**. This involves specifying parameter ranges, including details of the maximum and where relevant minimum size (footprint, width, height), technology, and locations of the different elements of the Scheme where flexibility needs to be retained. The use of the Rochdale Envelope has therefore been adopted to ensure that the likely worst-case scenario is presented in the assessment of potential environmental effects from the Scheme.

4.5 Lifetime of the Development

4.5.1 Impacts on the use of the land are assessed in the Environmental Statement. The Applicant is seeking a time limited consent, and the Scheme will be operational for up to 60 years, after which time it will be decommissioned.

4.5.2 When the operational phase ends, the Solar PV Site would be decommissioned and the land returned to its original use and condition as far as practicable and returned to the landowner.

4.5.3 n. The National Grid Substation and the Grid Connection Infrastructure would remain in situ as these assets will form part of the NETS.

4.5.4 In line with paragraph 2.10.69 of NPS EN-3, the ES sets out how the Scheme would be decommissioned at the end of the operational life of the generating station. The **draft DCO [APP/3.1]** includes a requirement that the Scheme must be decommissioned in accordance with the **oDS [APP/7.10]**.

4.6 Construction, Operation and Decommissioning

Construction

4.6.1 A detailed description of the construction activities that are likely to be required is set out in **ES Chapter 5: The Scheme [APP/6.1]**.

4.6.2 The Construction Phase is anticipated to take place over up to 24 months. The final programme will be dependent on the detailed layout design and potential environmental constraints on the timing of construction activities. However, the Scheme is anticipated to energise in Q4 2033 or as early as National Grid can offer. Based on Q4 2033 energisation, it is anticipated that the earliest the Construction Phase would commence

would be Q3 2031. There will likely be a pre-construction period preceding the Construction Phase, approximately six months (Q1 and Q2 2031), to allow for site preparation works. Construction activities will be undertaken in accordance with the principles set out within the **oCEMP [APP/7.6]**.

4.6.3 A CEMP will be implemented to manage the environmental impacts of construction activities. This is secured by a Requirement in Schedule 2 of the **draft DCO [APP/3.1]**. The Applicant has produced an **oCEMP [APP/7.6],** which is submitted with the DCO Application and with which the detailed CEMP will need to substantially accord.

4.6.4 A Construction Traffic Management Plan (CTMP) will be implemented to manage construction traffic during the construction phase, to minimise disruption and implications on the wider road network surrounding the Scheme. Production of a detailed CTMP is secured by a Requirement in Schedule 2 of the **draft DCO [APP/3.1]** and will need to substantially accord with the **oCTMP [APP/7.7]**.

Operation

4.6.5 A detailed description of the operational activities that are likely to be required is set out in **ES Chapter 5: The Scheme [APP/6.1]**.

4.6.6 The Applicant is seeking a time-limited consent with respect to the operation of the Scheme, which will start from the date of the final commissioning phase of the Scheme. The operational life of the Scheme is anticipated to be 60 years.

4.6.7 During the operational phase, two scenarios have been considered within the ES:

- General operational maintenance activities; and
- Programme of replacement activities.

4.6.8 The **oOEMP [APP/7.8]** sets out the general environmental principles to be followed during the operation of the Scheme. The **oOEMP [APP/7.8]** will be used as the basis for a detailed OEMP to be prepared prior to commencement of operation, which is secured via a Requirement in Schedule 2 to the **draft DCO [APP/3.1]**.

4.6.9 The **oOTMP [APP/7.9]** sets out the measures to manage traffic during the operational phase, to minimise disruption and implications on the wider road network surrounding the Scheme. The **oOTMP [APP/7.9]** will be used as the basis for a detailed OTMP to be prepared prior to the commencement of operation, which is secured via a Requirement in Schedule 2 to the **draft DCO [APP/3.1]**.

4.6.10 An **oLEMP [APP/7.11]** has been prepared and submitted to support the DCO Application and secured via a Requirement in Schedule 2 of the **draft DCO [APP/3.1]**, which will focus on the management of both the landscape and ecological features.

Decommissioning

4.6.11 A detailed description of the decommissioning activities that are likely to be required is set out in **ES Chapter 5: The Scheme [APP/6.1]**.

4.6.12 Decommissioning is expected to take between 12 and 24 months, and for the purposes of the assessment, is expected to occur after the 60-year design life of the Scheme in 2093. A requirement to decommission the Scheme is secured via a Requirement in the **draft DCO [APP/3.1]**.

4.6.13 When the operational phase ends, the Solar PV Site would be decommissioned and the land returned to its original use and condition as far as practicable and returned to the landowner. All PV Panels, Mounting Structures, Cabling, inverters, transformers, switchgear, BESS, and the Customer Substation would be removed from within the Solar PV Site and recycled or disposed of in accordance with good practice and market conditions at the time. This will include areas of agricultural land where soil health, quality, and structure may have improved, as well as established habitats. Foundations and other below-ground infrastructure will be cut to 1 m below the surface to enable future ploughing. Any piles would be removed.

4.6.14 The National Grid Substation and the Grid Connection Infrastructure would remain in situ as these assets will form part of the NETS.

4.6.15 Post-decommissioning, the landowners would choose how the land is to be used and managed; the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained, given their potential benefits to agricultural land and the wider farming estate. Permissive paths would be removed during decommissioning, with the precise timing to be determined by the contractor(s) and communicated to BC and NCC in accordance with the **oDS [APP/7.10]**.

4.6.16 The obligation to decommission the Scheme is secured via a Requirement in Schedule 2 of the **draft DCO [APP/3.1]**. An **oDS [APP/7.10]** has been prepared as part of the DCO Application. A final Decommissioning Strategy would be prepared substantially in accordance with the **oDS [APP/7.10]**, secured via a requirement in Schedule 2 of the **draft DCO [APP/3.1]**, and agreed with relevant authorities at the time of decommissioning.

5 The Need for and Benefits of the Scheme

5.1 Introduction

5.1.1 This section of the Planning Statement summarises the need for the Scheme and the benefits it will deliver. It uses non-technical language and outlines the practical reasons as to why large-scale solar developments and the Scheme are needed.

5.2 The Need for the Scheme

5.2.1 The principal need for the Scheme is centred on the significant contribution it will make to the three key requirements of the UK energy market:

- Decarbonisation: The Climate Change Act 2008 (2050 Target Amendment) Order 2019 established the net zero by 2050 target, which is a target for the UK to reduce its greenhouse gas (GHG) emissions by 100% from 1990 levels by 2050. Carbon budgets set out the Government's framework of actions to meet this commitment. The Climate Change Committee's (CCC) Recommendations for the Seventh Carbon Budget (CB7) (2025) suggest a commitment for the UK to reduce greenhouse gas emissions by 87 per cent by 2042 compared to 1990 levels **[Ref. 9]**
- The demand for affordable electricity: the UK's demand for electricity is expected to double by 2050 as the country moves away from reliance on imported fossil fuels and towards renewable sources of energy for transport, industry, agriculture and powering homes. Due to the increased demand, sources of cheap electricity are now more important than ever; and
- The security of supply: "*Security of supply*" generally means ensuring there is enough electricity generation capacity available and operational to meet demand.

5.2.2 National planning policies and government policy papers support the achievement of the above requirements and must be viewed in the context of the ever-increasing demand for electricity.

5.2.3 The need, and presumption in favour of granting development consent, is set out in Part 3 of NPS EN-1. Paragraphs 3.2.1 and 3.2.2 of NPS EN-1 states that "*the government's objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with net zero emissions in 2050 for a wide range of future scenarios*" and that "*we need a range of different types of energy infrastructure to deliver these objectives*", including the infrastructure described in NPS EN-1.

5.2.4 Paragraph 3.2.6 of NPS EN-1 states that "*The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of*

infrastructure which is urgent, as described for each of them in this Part." Paragraph 3.2.7 goes on to state that "*the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008*." Paragraph 3.2.8 of NPS EN-1 notes that "*the Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS*." These key paragraphs in NPS EN-1 demonstrate the urgent need for nationally significant renewable energy projects such as the Scheme.

5.2.5 Further, low-carbon infrastructure such as solar power has been identified as critical national priority (CNP) infrastructure (NPS EN-1 paragraph 4.2.5). This means that if residual impacts remain after application of the mitigation hierarchy, the urgent need for solar and other forms of CNP infrastructure is likely to outweigh those residual impacts of development in all but the most exceptional circumstances (NPS EN-1 paragraph 4.1.7).

5.2.6 The government's Clean Power 2030 Action Plan (December 2024) **[Ref. 10]** is the most up-to-date policy paper and reinforces the urgent need for low-carbon generation schemes to come forward to pave the way to decarbonising the wider economy by 2050. The Clean Power 2030 Action Plan provides a foundation to prioritise the most critical infrastructure to meet Clean Power by 2030. 'Clean Power by 2030' means that, in a typical weather year, the 2030 power system will see clean sources produce:

- At least as much power as Great Britain consumes in total over the whole year; and
- At least 95% of Great Britain's generation.

5.2.7 The government's Clean Power 2030 Action Plan seeks major contributions from solar generation to achieve its aim, establishing a capacity range of 45-69 GW of solar generation operational by 2035 to achieve and sustain the Clean Power target (up from 16.6 GW as at quarter 2 of 2024).

5.2.8 The climate crisis has also been recognised at a local level. In September 2019 **[Ref. 11]**, Breckland Council declared a state of climate emergency and committed to achieving carbon neutrality within the District by 2035. Similarly, Norfolk County Council is committed to tackling climate change and achieving a net zero Norfolk through measures outlined in its Climate Strategy **[Ref. 12]**.

5.2.9 The **Statement of Need [APP/5.4]** provides a detailed explanation of why the Scheme is urgently needed, and how the Scheme addresses all relevant aspects of established and emerging government energy and climate change policy and commitments.

5.2.10 The following sections outline how the Scheme meets the key requirements of the UK energy market, in line with government policy.

Need for Decarbonisation

5.2.11 The global climate is rapidly changing as a result of human-induced warming, which in turn increases the risks of extreme weather events. There is therefore a compelling need

for global action to decarbonise in order to limit global temperature increases. The Paris Agreement **[Ref. 13]**, a legally binding international treaty on climate change entered into on 4 November 2019, aims to hold the increase in the global average temperature to well below 2°C above pre-industrial levels and pursue efforts to limit the temperature increase to 1.5°C above pre-industrial levels.

5.2.12 As a result of its commitments to the Paris Agreement, in June 2019, the UK became the first major economy to legislate for a 2050 net zero greenhouse gas (GHG) emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019 **[Ref. 14]**. As a result, decarbonisation is a UK legal requirement.

5.2.13 As set out in the **Statement of Need [APP/5.4]**, the Climate Change Committee (CCC) made clear in its Progress Report to Parliament in 2019 that the UK is not on track to meet its Fourth (2023-2027) or Fifth (2028 – 2032) Carbon Budgets, highlighting the urgent need to rapidly accelerate carbon emission reductions if the 2050 net zero target is to be met. The CCC's recommendations for The Seventh Carbon Budget (CB7) (2025) suggest a commitment for the UK to reduce greenhouse gas emissions by 87 per cent by 2042 compared to 1990 levels. Further, the CCC recommendations provide that to achieve the government's ambitions in the Clean Power 2030 Action Plan, the total operational capacity of renewables will need to more than double by 2030.

5.2.14 As set out in paragraph 4.2.1 of NPS EN-1, "*Government has committed to fully decarbonising the power system by 2035, subject to security of supply, to underpin its 2050 net zero ambitions. More than half of final energy demand in 2050 could be met by electricity, as transport and heating in particular shift from fossil fuel to electrical technology*". Paragraph 4.2.1 of the 2025 NPS EN-1 includes an update to replace the 2035 target with the Clean Power 2030 Mission (which requires clean power by 2030, rather than 2035), highlighting that the requirement to decarbonise is more urgent than ever.

5.2.15 Without a rapid increase in the supply of low-carbon electricity, the urgent requirement to decarbonise other sectors, such as transport (as will be required to meet future carbon budgets), is unlikely to be achieved. NPS EN-3 paragraph 2.10.9 confirms that solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector to meet the 2050 net zero target. NPS EN-3 paragraph 2.10.13 states that "*Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation*". They can also be built quickly (NPS EN-3 paragraph 2.10.14), making them ideally placed to meet the UK's decarbonisation targets, which require rapid change, at scale, if they are to be achieved. Therefore, the Scheme is an opportunity to significantly contribute towards the country's targets of net zero by 2050.

Meeting an Increasing Demand for Affordable Electricity

5.2.16 As the country moves towards its Clean Power 2030 Mission and net-zero 2050 target, reliance on electricity as a form of power is set to increase rapidly, and new nationally significant electricity infrastructure is needed to meet this increase in demand. NPS EN-1 paragraph 3.3.3 recognises that demand for electricity is likely to "*increase significantly*

over the coming years and could more than double by 2050 as large parts of transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity."

5.2.17 As set out above, the Clean Power Action Plan 2030 seeks major contributions from solar generation too, towards its aim of achieving clean power by 2030, and sustaining it thereafter, and establishes a capacity range of 45-69 GW of operational solar power generation capacity by 2035.

5.2.18 As set out in the **Statement of Need [APP/5.4]**, the capacity of new low-carbon schemes which will need to come online before 2030 to achieve "*clean power by 2030*" is unprecedented. An even greater capacity of new low-carbon schemes will need to come online in the 2030s to keep power clean beyond 2030 as other sectors also decarbonise. The Scheme will significantly contribute to meeting the country's growing electricity demand. Therefore, it will be a critical enabler in achieving the UK's wider decarbonisation aims of operating a clean power system on the way to achieving net zero by 2050.

5.2.19 It is acknowledged (as set out above and in the **Statement of Need [APP/5.4]**) that solar farms are one of the cheapest forms of electricity generation to deploy. Large-scale solar power lowers the price of electricity by generating power, thereby reducing the need for more expensive and carbon-intensive forms of generation. Further details are set out in the benefits section below. Therefore, the Scheme would help to provide affordable electricity to meet the ever-increasing demand.

Need to Provide Security of Supply

5.2.20 In addition to meeting decarbonisation targets, government policy requires that the security of the energy supply is maintained. NPS EN-1 paragraph 3.3.1 provides that the government needs to ensure that "*there is always sufficient electricity to always meet demand; with a margin to accommodate unexpectedly high demand and to mitigate risks such as unexpected plant closures and extreme weather events*". Paragraph 3.3.2 provides that the larger the margin (and, according to the 2025 NPS EN-1 paragraph 3.3.2, the more flexible the system), the more resilient the system is to deal with unexpected events, which helps to protect users, including vulnerable households, from volatile prices and service interruptions which might affect essential services.

5.2.21 NPS EN-1 paragraph 3.3.20 (or paragraph 3.3.23 of 2025 NPS EN-1) continues that "*wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable net zero consistent system in 2050 is likely to be composed predominantly of wind and solar*".

5.2.22 NPS EN-1 paragraph 3.3.22 also recognises that ensuring system reliability means that "*wind and solar need to be complemented with technologies which supply electricity, or reduce demand, when the wind is not blowing, or the sun does not shine*" (retained under paragraph 3.3.25 of 2025 NPS EN-1). Storage is acknowledged to have a key role to play in achieving new zero and providing flexibility to the energy system, by storing surplus

electricity in times of low demand, to be released when demand is higher (NPS EN-1 paragraph 3.3.25, retained under paragraph 3.3.26 of 2025 NPS EN-1).

5.2.23 The Scheme would significantly contribute to an adequate and dependable generation mix through enabling more UK-based, low-carbon power production. Furthermore, the inclusion of a BESS, as associated development in the Scheme enables the Scheme to store surplus electricity for release during periods of higher demand, thereby providing flexibility and supporting the transition to a fully low-carbon electricity system, and thereby helping to ensure security of supply.

Summary

5.2.24 In summary, decarbonisation is a legally binding climate change target for the UK and is of global significance. Urgent actions are required in the UK and abroad to keep decarbonisation on track to limit global warming. NPS EN-1 and EN-3 establish a critical national priority for the provision of nationally significant low-carbon infrastructure, which includes large-scale solar farms, as a combination of various types of such infrastructure is urgently required for both energy security and to meet the 2050 net-zero target.

5.2.25 The UK Government's Clean Power 2030 Action Plan reinforces the urgent need for low-carbon generation schemes to come forward to pave the way to decarbonising the wider economy by 2050 as the UK pursues the electrification of heat in buildings, transport, and industry.

5.2.26 The Scheme will help to ensure that the UK remains on track to meet its legally binding carbon emissions reduction targets, while enhancing national security of supply, and providing low-cost electricity to meet the increasing demand.

5.3 The Benefits of the Scheme

Decarbonisation

5.3.1 As set out above, the Scheme addresses three key requirements of the UK energy market: decarbonisation; the demand for electricity; and security of supply.

5.3.2 **ES Chapter 13: Climate Change [APP/6.2]** sets out the likely greenhouse gas (GHG) emissions arising from the Scheme's construction, operation and decommissioning and the potential impacts of the Scheme on climate change. It concludes that, over its lifespan, the Scheme will result in an estimated net saving of 800,202 tCO2e in comparison with a scenario whereby the Scheme does not come into effect and emissions from the grid in the baseline year of operation were used. As the GHG emissions from the Scheme in operation will offset emissions in a comparative scenario where energy generation may be from other sources with a higher carbon intensity, the overall GHG impact of the Scheme is beneficial and significant.

5.3.3 Therefore, if consented, the Scheme would make a significant and timely contribution to meeting the government's targets of Clean Power by 2030 and net zero by 2050 and therefore represents a benefit to the UK and its decarbonisation targets.

Nationally Significant Electricity Generation

5.3.4 The Scheme has a grid connection agreement with the National Energy System Operator (NESO) for connection at a new National Grid Substation. The actual amount of electricity generated by the Scheme will depend on the final design, layout and technology adopted. However, for the purposes of assessment, as outlined in **ES Chapter 13: Climate Change [APP/6.2]**, renewable energy generation from the Scheme during the first year of operation is estimated to be approximately 659,480 MWh/year for single-axis tracker panels. To account for product degradation, a 1% degradation factor has been applied for the first year, followed by a 0.35% degradation factor for each subsequent year. This results in an estimated energy generation figure of 610,809 MWh in the final year of operation. The total energy generated by the Scheme would be around 37.22 TWh over the 60-year Scheme lifespan.

5.3.5 Given that Ofgem estimates the average medium usage household uses 2,700 (kWh) of electricity per year [Ref. 15] and using the Estimating renewable generation and homes powered: methodology note[1], the Scheme could provide enough electricity to power around 218,947 homes in its first year. This represents a significant contribution towards the delivery of the government's energy objectives and the target of net zero by 2050.

Low-Cost Electricity

5.3.6 The **Statement of Need [APP/5.4]** provides that large-scale solar power lowers the price of electricity by generating power so that expensive and more carbon intensive forms of generation do not need to generate as much.

5.3.7 Due to technological advances, solar farms are already among the cheapest forms of electricity generation in the UK, and government-produced forecasts indicate that costs will continue to reduce in the future.

5.3.8 Scale is also important because maximising the generating capacity of a scheme improves its economic efficiency and so brings electricity generation to the market at a lower cost.

5.3.9 Larger solar schemes deliver more quickly, and at a lower unit cost, than multiple independent schemes which make up the same total capacity, bringing forward carbon reduction and energy security benefits as well as helping provide affordability, in line with government policy.

[1] Estimating renewable generation and homes powered: methodology note - GOV.UK

5.3.10 The Scheme will be an NSIP which, if consented, will deliver large amounts of cheap, secure, and low-carbon electricity, which will help the UK stay on track to achieve net zero by 2050.

Ecological and Landscape Enhancements

5.3.11 The Solar PV Site comprises arable and pastoral fields. There are features within the Solar PV Site, such as hedgerows, field margins, ditches, and watercourses, which are considered to have some ecological value.

5.3.12 The Scheme will involve new planting, field boundary enhancement and planting of seed mixes within the Solar PV Sites. Principles for how the land will be managed throughout the operational phase are set out within the **oLEMP [APP/7.11]**.

5.3.13 Whilst some significant adverse effects on landscape and visual are anticipated, these are outweighed by the substantial enhancements that are proposed. Further details are provided in Section 8 of this Planning Statement, which includes the policy appraisal, and in Section 9, which outlines the planning balance.

Biodiversity Net Gain

5.3.14 Biodiversity Net Gain: the Scheme will deliver biodiversity net gain as set out in the **Biodiversity Net Gain Assessment Report [APP/7.4]**. As presented in the **Biodiversity Net Gain Assessment Report [APP/7.4],** the ecological mitigation and enhancement areas will deliver a potential net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines. A Requirement in the **draft DCO [APP/3.1]** commits to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines.

Permissive Paths

5.3.15 Permissive paths are incorporated into the Scheme design, as shown in **Access and Rights of Way Plan [APP/2.5]**.

5.3.16 The Scheme includes the creation of approximately 3.8km of permissive path within the Order limits and approximately 1.2km of permissive paths outside of the Order limits for the lifetime of the Scheme to provide pedestrians and horse and bicycle riders improved accessibility to the countryside and improved connectivity of the wider PRoW network. The permissive paths will have a beneficial impact on PRoW use for local users and visitors by mitigating adverse impacts on other PRoWs and providing alternative access routes to the local highway network. These measures, when implemented, will enhance connectivity in the local area for recreation purposes, secondarily benefiting the health and wellbeing of the local population in the long term

5.3.17 The permissive paths will contribute to the wider network of footpaths in the area and facilitate greater public access to the countryside during the lifetime of the Scheme. The design and implementation of the permissive paths is set out in the **oLEMP [APP/7.11]**

and **oPRoWPPMP [APP/7.12]** and secured via corresponding requirements in the **draft DCO [APP/3.1]**.

Employment Generation

5.3.18 The Scheme is expected to support 1,145 net additional jobs during the Construction Phase, with between 285 and 575 of these being taken by LCA residents. Employment opportunities are also anticipated during the operational and decommissioning phases of the Scheme, as set out in **ES Chapter 14: Socio-Economics [APP/6.2]** and discussed further in Section 8.3 of this Planning Statement.

Skills Training

5.3.19 The Scheme is likely to produce a number of skills and education opportunities during its construction, such as through construction apprenticeships. The **oESSCS [APP/7.15]** sets out proposals to promote apprenticeship and training schemes, enhancing local skills and qualification rates, and helping to retrain people in work displaced by the Scheme, while decreasing the proportion of workers required to be brought in from further afield. This is intended to enhance local education, skills and attainment during construction and for periods of onsite infrastructure replacement during the operational phase of the Scheme. The Outline Employment and Skills Strategy also provides measures to secure opportunities for re-skilling of employees into new industries, including the energy sector. It includes supporting the local agricultural industry in diversified agricultural practices.

5.4 Community Liaison Group

5.4.1 A Community Liaison Group (CLG) will be established to facilitate liaison between representatives of people living in the vicinity of the Order limits and other relevant organisations in relation to the construction of the Scheme. It will continue to meet until the date of final commissioning of the Scheme.

5.4.2 The CLG is intended to provide an opportunity for regular and formal dialogue between the Applicant and the local community's representatives in relation to the construction and operational aspects of the Scheme. It is envisaged that local community representatives forming the CLG will be principally from the villages and communities neighbouring the Order Limits. A Community Liaison Manager will be appointed to lead discussions with local communities and also act as the primary point of contact should there be any queries or complaints. CLG meetings will enable members of the group to raise and formally record any issues that may arise in relation to the Scheme. It will also provide a regular forum for the Applicant to update interested parties about the construction and operational phases of the Scheme.

5.4.3 Details of the CLG are set out in the **oCEMP [APP/7.6]** and its delivery is secured via a Requirement in Schedule 2 to the **draft DCO [APP/3.1]**.

5.5 Community Benefit Fund

5.5.1 The Applicant has also committed to providing a Community Benefit Fund. The Community Benefit Fund does not form part of the DCO application, and this funding is not required to mitigate the impacts of the Scheme. Therefore, it cannot be considered in the decision-making process for determining the DCO application. The Community Benefit Fund is also therefore not taken into account in consideration of the planning balance within this Planning Statement. However, it will be available to fund local projects.

6 Legislation and Policy Framework

6.1 Introduction

6.1.1 This section summarises the legislative and planning policy context for the Scheme. It outlines the relationship of the Scheme with the PA 2008, sets out the relevant policy considerations from the NPSs, and summarises other legislation, policies and documents that the SoS is required to consider and may consider to be important and relevant in their decision-making.

6.2 Legislative Context and Policy

The Definition of an NSIP

6.2.1 The PA 2008 defines the application process under which development consent for NSIPs is sought. The PA 2008 sets out that projects meeting certain defined criteria are classified as NSIPs. It requires developers of NSIPs to obtain a DCO to permit the construction, operation and maintenance, and decommissioning of their project. The SoS is the decision-maker for applications for DCOs under Section 103 of PA 2008.

6.2.2 The Scheme is defined as an NSIP under Section 14(1)(a) and 15(2) of the PA 2008 (as amended) as it meets the following criteria:

- The Scheme comprises the construction of a generating station (Section 14(1)(a))
- It would be located in England (Section 15(2)(a))
- It would not generate electricity from wind (Section 15(2)(aa))
- It would not be an offshore generating station (Section 15(2)(b)); and
- Its capacity would be more than 50MW (Section 15(2)(c)).

6.2.3 In accordance with Part 4 of the PA 2008, a DCO is required for the development of an NSIP. This DCO Application primarily seeks consent for the construction, operation and maintenance, and decommissioning of a generating station with a capacity of more than 50MW, as the principal development. This includes solar PV panels fitted to mounting structures and the field stations which provide the transformers, inverters and switchgear.

Associated Development

6.2.4 Section 115(2) of the PA 2008 states that a DCO can include consent for development which "*is associated with the development*" for which development consent is required.

6.2.5 The Department for Communities and Local Government issued guidance on associated development **[Ref. 16]** which states that "*it is expected that associated development will,*

in most cases, be typical of development brought forward alongside the relevant type of principal development". This can include necessary infrastructure (e.g. grid connections, which solar could not function without), impact mitigation measures, innovative ideas aligned with policy guidance, and proportionate supporting facilities (like retail or business space for transport schemes).

6.2.6 As demonstrated in the **Explanatory Memorandum [APP/3.2]**, all aspects of the Scheme that comprise the associated development are considered against the relevant tests and examples set out in s115 of the PA 2008.

6.2.7 Accordingly, Work Numbers 2 to 11 listed above constitute associated development as they are typical development brought forward alongside and are necessary to deliver the NSIP (Work No. 1).

Framework for Determining DCO Applications

6.2.8 Part 6 of the PA 2008 sets out the procedure for deciding applications for DCOs.

6.2.9 Section 104(2) of the PA 2008 provides the basis for determining an application for a DCO in cases where an NPS has effect in relation to the type of development proposed. It states that, in deciding an application, the SoS must have regard to:

- Any relevant NPSs
- The appropriate marine policy documents (if any)
- Any Local Impact Report from local authorities that is submitted to the SoS
- Any matters prescribed in relation to the development of the description to which the application relates; and
- Any other matters which the SoS thinks are both important and relevant to the SoS' decision.

6.2.10 Marine policy documents cover licensable development within the marine area and areas involved in fishing and shipping that are not subject to a marine licence. Neither such areas are within or adjacent to the Order Limits and therefore are not affected by the Scheme. The SoS does not therefore need to have regard to marine policy documents for the determination of the DCO Application.

6.2.11 The following sections provide further detail on the other factors listed in Section 104(2) of the PA 2008.

6.3 Relevant National Policy Statements

6.3.1 The relevant NPSs for the determination of the DCO Application in accordance with Section 104(2) of the PA 2008 are:

- NPS EN-1: Overarching National Policy Statement for Energy (January 2024) **[Ref. 2]**

- NPS EN-3: National Policy Statement for Renewable Energy Infrastructure (January 2024) **[Ref. 3]**, which includes specific policies for solar photovoltaic generation NSIPs; and
- NPS EN-5: National Policy Statement for Electricity Networks Infrastructure (January 2024) **[Ref. 4]**.

6.3.2 NPS EN-1, NPS EN-3, and NPS EN-5 provide the primary policy basis for deciding the DCO Application. NPS EN-1 provides the overarching policy position, and solar PV generation falls within the NPS EN-1 definition of CNP infrastructure. NPS EN-3 outlines the SoS's decision making for solar PV generation considerations. NPS EN-5 sets out the SoS's decision making for energy network infrastructure considerations. The following paragraphs summarise each NPS. The relevant NPS policies are discussed further in Section 8 of this Planning Statement and the **Policy Compliance Document [APP/5.6]**, both of which appraise the Scheme's compliance with the relevant policies.

6.3.3 The Energy NPSs reflect the Government's current strategy and energy policies. They provide the planning policies necessary to facilitate the delivery of the energy infrastructure required to meet the Government's objectives for the energy system. There is a presumption under the NPSs that the urgent need for CNP infrastructure will outweigh any residual effects in all but the most exceptional cases (section 3.3.63 of NPS EN-1). This presumption does not apply to residual impacts that present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats, or unacceptable risk to achieving net zero (section 4.1.7 of NPS EN-1). Where no such residual impacts exist, the presumption weighs in favour of the need for CNP infrastructure where it has been demonstrated that the mitigation hierarchy has been applied (section 4.2.11 of NPS EN-1)

6.3.4 . Since the submission and acceptance of this DCO Application, the draft energy NPSs which had been published for consultation in April 2025 have since been formally adopted in January 2026. The Application was accepted for examination on 16 December 2025 and was therefore accepted prior to the adoption of the 2025 energy NPSs. This means that, in accordance with the transitional provisions, the 2023 energy NPSs continue to provide the primary policy basis for the SoS' determination of the DCO Application. However, and in accordance with section 104(2)(d) of the PA 2008, the Applicant considers the adopted 2025 energy NPSs are important and relevant in the decision-making process for this DCO Application. With this in mind, the Applicant confirms that there are no material changes to the assessment of the DCO Application under the adopted 2025 energy NPSs. The adopted 2025 energy NPSs are considered further in Section 6.6 below.

NPS EN-1: Overarching National Policy Statement for Energy

6.3.5 NPS EN-1 sets out the overarching national policy for the submission and assessment of applications relating to energy infrastructure, including solar renewable electricity generation. It covers government policy on the need for NSIPs (including projects

determined to be of CNP), applications for energy infrastructure will be assessed, and the way in which impacts and mitigations will be judged.

6.3.6 Part 3, paragraph 3.2.6 of NPS EN-1 confirms that the SoS should assess all applications for development consent for the infrastructure covered by NPS EN-1 on the basis that there is an established and urgent need for those types of infrastructure. This includes solar PV developments, such as the Scheme. NPS EN-1 paragraphs 3.2.7 and 3.2.8 confirm that substantial weight should be given to this need when considering applications, and the SoS is not required to consider separately the specific contribution of any individual project to satisfying the need established in NPS EN-1.

6.3.7 Further, the government has concluded that there is a CNP for the provision of nationally significant low-carbon infrastructure (NPS EN-1 paragraph 3.3.62), which includes solar PV projects such as the Scheme (NPS EN-1 paragraph 4.2.5). NPS EN-1 paragraph 3.3.63 confirms that, subject to any legal requirements, the urgent need for CNP Infrastructure to achieve the government's energy objectives, together with national security, economic, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. It confirms that the government strongly supports the delivery of CNP Infrastructure, and it should be progressed as quickly as possible.

6.3.8 NPS EN-1 paragraph 4.1.7 provides further guidance on how the SoS should weigh the impacts and benefits of a proposal in the decision-making process. It confirms that, where the application is for CNP Infrastructure, the need case will likely outweigh the residual effects in all but the most exceptional circumstances. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats, the achievement of net zero and onshore flood risk. NPS EN-1 paragraph 4.2.7 also confirms that the presumption applies following the normal consideration of the needs case, the impacts of the project, and the application of the mitigation hierarchy. Paragraph 4.2.10 confirms that applicants for CNP Infrastructure must continue to show how their application meets the requirements in the NPSs, together with any other legal and regulatory requirements, and must demonstrate how the mitigation hierarchy has been applied, to show that all residual impacts are those that cannot be avoided, reduced, or mitigated. Section 9 of this Planning Statement demonstrates how the application meets these tests.

NPS EN-3: National Policy Statement for Renewable Energy Infrastructure

6.3.9 NPS EN-3 provides the technology-specific policy to be considered by the SoS alongside NPS EN-1 when determining applications for renewable energy NSIPs, including solar PV infrastructure. It covers themes such as factors influencing site selection and design, technical considerations for solar PV infrastructure, and particular impacts usually associated with solar sites in terms of ecology, landscape, glint and glare, heritage, construction, agricultural land and decommissioning.

NPS EN-5: National Policy Statement for Electricity Networks Infrastructure

6.3.10 NPS EN-5 principally concerns high voltage long distance transmission and distribution infrastructure, but also applies to other kinds of electricity infrastructure, including underground cables at any voltage, and associated development linked to an NSIP. It is therefore considered relevant due to the inclusion of underground cabling, inverters, transformers, switchgear, cabling, overhead lines, and substations within the Scheme. NPS EN-1 identifies the existence of a CNP for nationally significant low-carbon infrastructure. This includes the electricity grid infrastructure, all power lines within the scope of EN-5, including network reinforcement and upgrade works, as well as associated infrastructure including, but not limited to, both the National Grid and Customer Substations and the Grid Connection Infrastructure.

6.4 Local Impact Reports

6.4.1 As host local authorities, BC and NCC will have the opportunity to prepare a Local Impact Report (LIR) following submission of the DCO Application, with reference to Section 60 of the PA 2008 and the Planning Inspectorate's NSIP Advice Page for Local Authorities: Local Impact Reports **[Ref. 17]**. The LIRs will address relevant local planning policies and outline the likely impact of the Scheme on the council's administrative area (or part thereof). It will be considered by the SoS in determining the DCO Application.

6.5 Prescribed Matters

6.5.1 The prescribed matters referred to in Section 104(2)(c) of the PA 2008 are set out in the Infrastructure Planning (Decisions) Regulations 2010 (as amended) **[Ref. 18]**. The relevant regulations for the Scheme are as follows:

- Regulation 3: this regulation sets out obligations on the SoS to have regard to the desirability of preserving listed buildings and scheduled monuments (and their settings) and preserving or enhancing the character of conservation areas. Details of the heritage assets relevant to the Order Limits are considered in Section 8.3 (Historic Environment) of this Planning Statement and **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]**; and
- Regulation 7: this regulation states that the SoS must have regard to the United Nations Environmental Programme Convention on Biological Diversity 1992. This is discussed in Section 8.3 (Biodiversity and Geological Conservation) of this Planning Statement and **ES Chapter 7: Ecology and Biodiversity [APP/6.2]**.

6.6 Other Important and Relevant Matters

Introduction

6.6.1 While the above National Policy Statements set out the principal policy considerations for decision making in relation to NSIPs, other national and local policies may also be considered 'important and relevant' to the SoS's decision making in accordance with Section 105(2)(c) of the PA 2008. This includes the adopted 2025 energy NPSs, parts of the National Planning Policy Framework (NPPF) **[Ref. 19]**, the associated Planning Practice Guidance **[Ref. 20]** and the local development plan. This section sets out the context of these other important and relevant policy documents.

2025 Revisions to National Policy Statements

6.6.2 In July 2024, the Chancellor announced a review of the energy National Policy Statements (NPS) to align them with current energy policy and support delivery of Clean Power by 2030 and Net Zero by 2050. This was followed by the Clean Power 2030 Action Plan and proposed updates to the energy NPSs, which were published for consultation in April 2025 and latterly adopted in January 2026.

6.6.3 Whilst the review of the NPSs was undertaken, the 2023 suite of energy NPS remained relevant government policy, and NPS EN-1 to NPS EN-5 have effect as the primary policy considerations for the purposes of the PA 2008 and the DCO Application. Transitional arrangements confirm that the 2023 NPSs apply to applications accepted for examination before the amended versions were formally adopted. The Applicant considers that the adopted 2025 energy NPSs are important and relevant matters to the SoS's decision under section 104(2)(d) of the PA 2008. Both the 2023 and 2025 suites of NPSs are therefore considered to be of significance to the assessment of the DCO Application.

6.6.4 The extent to which the 2025 NPSs should be considered relevant is at the discretion of the SoS, within the framework of the PA 2008 and with regard to the specific circumstances of each development consent order application. For the DCO Application, the adopted 2025 NPSs have been considered in the planning appraisal where relevant, and references to paragraphs of the adopted 2025 NPSs are included in the planning appraisal at Section 8 below.

6.6.5 The key updates to each NPS are set out below.

2025 NPS EN-1: Overarching National Policy Statement for energy

6.6.6 The key updates to NPS EN-1 relate to the introduction of the Clean Power Action Plan 2030 and ensuring it is embedded in policy. For example, paragraph 3.3.22 of 2025 NPS EN-1 sets out that, as part of the Clean Power 2030 Action Plan, the UK government has ambitions to deliver "*a range of possible installed capacities for each technology in 2030*". Additionally, paragraph 3.3.25 highlights the key role of electricity storage in meeting the

Clean Power 2030 Mission by reducing the amount of generation and associated network that needs to be built to meet peak demand. The added references to the Clean Power Action Plan 2030 further support the need to deliver low-carbon energy generation and to rapidly increase the deployment of relevant infrastructure.

6.6.7 The 2025 NPS EN-1 also refers to the Strategic Spatial Energy Plan, which will become a consideration in due course, once it has been published and consulted on.

6.6.8 There are also additions relating to the requirements around pre-application consultation, with paragraph 4.2.6 stating that only one such statutory consultation is required by the PA 2008, and paragraph 4.2.9 states that where further non-statutory consultation is undertaken, "*Applicants should avoid using these repeated consultations to test the minimum level of mitigation and compensation for impacts. Instead, mitigations should be built in from the start*." The 2025 NPS EN-1 also emphasises the need for early engagement with all stakeholders to identify issues early on.

6.6.9 In terms of generic impacts on infrastructure projects, there are a few additions within the 2025 NPS EN-1 that may be relevant to the Scheme. Paragraph 5.3.3 includes the need to mitigate climate change impacts, "*including by improving resource and energy efficiency in the construction, operation, and decommissioning of energy infrastructure where possible*".

6.6.10 Paragraph 5.10.19 notes that landscape and visual matters should be considered in the early stages of siting and design, allowing the applicant to demonstrate in the ES how negative effects have been minimised and opportunities for creating positive benefits or enhancement, as has been done with this application.

6.6.11 Paragraph 5.15.12 adds that "*Applicants are also encouraged to prepare a materials management plan to inform the use of construction best practices in relation to storing materials in an adequate and protected place on site to prevent waste, or degeneration of valuable materials, for example, from accidental damage or excessive weathering*".

6.6.12 These additions to policies set out in the 2025 NPS EN-1 are considered within the design of the Scheme, although noting that they should be considered together with the 2023 NPS EN-1.

2025 NPS EN-3: National Policy Statement for Renewable Energy Infrastructure

6.6.13 There have also been updates to NPS EN-3 to reflect the current energy policy. The 2025 NPS EN-3 places greater emphasis on the Clean Power 2030 Mission, with paragraph 2.10.2 stating that "*solar energy is at the heart of our Clean Power 2030 Mission*". The policy states that the government is committed to working with industry to radically increase solar capacity by 2030 to boost growth, create jobs and tackle the climate crisis.

6.6.14 The 2025 NPS EN-3 also reinforces the target deployment range for solar PV of between 45 – 47GW by 2030 as part of the Clean Power 2030 Action Plan, with scope to exceed the clean power capacity range.

2025 NPS EN-5: National Policy Statement for Electricity Networks Infrastructure

6.6.15 Again, the 2025 NPS EN-5 reflects alignment with the Clean Power 2030 Mission and the NESO's Clean Power 2030 Action Plan, rather than just 2050 net-zero targets.

6.6.16 The 2025 NPS EN-5 also highlights the need for grid infrastructure to match distributed and spatially diverse generation by providing energy generation in areas such as rural parts of the UK, which is crucial for solar development, which often occurs on inland greenfield sites where grid access has been limited.

6.6.17 As identified in NPS EN-1, the government has concluded that there is a CNP for the provision of nationally significant low-carbon infrastructure, including electricity grid infrastructure. Paragraph 1.1.7 reflects a step-change in priorities in relation to this, now noting that the appropriate investment and the right kind of technology to support CNP infrastructure should be brought in "as soon as possible".

National Planning Policy Framework (December 2024)

6.6.17 The NPPF (December 2024) (last updated February 2025) sets out the government's planning policies for England. It was written to guide the development of local planning policy documents and is a material consideration in the determination of planning applications under the Town and Country Planning Act 1990 **[Ref. 21]**. As such, its policies were designed with development that is of a scale so as to be of local or regional significance in mind.

6.6.18 Paragraph 5 of the NPPF confirms that it does not contain specific policies for NSIPs but that the NPPF may be a relevant matter in decision making. Whilst not specifically addressing NSIPs, the NPPF does set out its objectives to achieve sustainable development by pursuing economic, social and environmental objectives in development.

6.6.19 The NPPF is also supported by the Planning Practice Guidance (PPG), and NPS EN-1 does include footnote references to the PPG. The PPG covers a range of topics including climate change, renewable and low carbon energy, environmental impact assessment, flood risk, historic environment, light pollution, minerals, natural environment, noise, transport and waste. Therefore, the NPPF and PPG have been considered in relation to the Scheme, but only where relevant.

National Infrastructure Planning Guidance

6.6.20 There are a range of guidance documents published by the Government that relate to the PA 2008 process. Those considered of most relevance to the Scheme include:

- National Infrastructure Assessment (July 2018) **[Ref. 22]**
- Planning Act 2008: Content of a Development Consent Orders required for Nationally Significant Infrastructure Projects (April 2024) **[Ref. 23]**
- Planning Act 2008: Pre-application process for Nationally Significant Infrastructure Projects (April 2024) **[Ref. 24]**
- Planning Act 2008: Pre-examination stage for Nationally Significant Infrastructure Projects (April 2024) **[Ref. 25]**
- Planning Act 2008: Examination of applications for Nationally Significant Infrastructure Projects (April 2024) **[Ref. 26]**
- Guidance on the compulsory purchase process (January 2025) **[Ref. 27]**
- Planning Act 2008: associated development applications for major infrastructure projects (April 2013) **[Ref. 28]**
- Planning Act 2008: application form guidance (April 2013) **[Ref. 29]**
- Design Principles for National Infrastructure (February 2020) **[Ref. 30]**; and
- Flood Risk and Coastal Change (September 2025) **[Ref. 31**].

Local Planning Policy

6.6.21 Policies in adopted and emerging Local Plans are frequently considered important and relevant matters and can influence the content of Local Impact Reports, which the SoS will have regard to in their decision-making in accordance with s104(2)(b) of the PA 2008.

6.6.22 The **Policy Compliance Document [APP/5.6]** sets out local policies that the SoS may consider to be important and relevant in decision-making. It contains an appraisal of the Scheme's compliance against the relevant local policies.

6.6.23 The Scheme lies entirely within the administrative areas of BC and NCC. Therefore, the local planning policies relevant to the Scheme comprise of the following:

- Breckland Local Plan (Adopted September 2023) **[Ref. 32]**
- Adopted Norfolk Minerals and Waste Local Plan 2023-2038 (Adopted May 2025) **[Ref. 7]**; and
- Norfolk Local Transport Plan (Adopted July 2022) **[Ref. 33]**.

6.6.24 The adopted Breckland Local Plan (2023) is currently under review for the Local Plan Full Update 2024-2042. In September 2022, Breckland Council agreed to undertake a review of the Adopted Local Plan 2019 **[Ref. 34]**.

6.7 Other Policy and Legislation

6.7.1 There are other national legislation and policy documents relating to energy and climate change which are considered to be important and relevant considerations. Some of these are discussed in more detail within the **Statement of Need [APP/5.4]** and are summarised in the following paragraphs.

Solar Roadmap

6.7.2 The Solar Roadmap **[Ref. 35]** is a document published in June 2025 which outlines a comprehensive strategy to accelerate solar energy deployment, aiming for 45-47 GW of installed capacity by 2030, with scope to exceed the 47GW upper limit. The key action in the roadmap in relation to the Scheme is the aim to streamline the grid connection process for solar. The roadmap focuses on reforms to improve capacity and connection timelines, which is critical for NSIP schemes that need stable and predictable grid access to be viable. Additionally, the document is another indication of the Government's broad policy alignment with support for solar schemes, demonstrating how this Scheme is central to the UK's broader clean energy strategy.

Progress Report to Parliament Climate Change Committee (June 2025)

6.7.3 The 2025 Progress Report **[Ref. 36]** was laid before Parliament on 25 June 2025 pursuant to Section 36(1) of the Climate Change Act 2008 to provide an update on the UK's position in meeting its carbon budgets and targets. It reports that solar capacity is currently off track, with around 18GW of solar capacity installed, and a further 5 GW contracted to bring total capacity up to 23 GW in 2027. To meet the government's target of 45-47 GW of operational solar by 2030 as set out in its Clean Power 2030 Action Plan, operational solar capacity will need to increase four-fold compared to the average rate seen since the start of the decade.

Planning and Infrastructure Bill (2024-2025)

6.7.4 The Planning and Infrastructure Bill (2024-2025) **[Ref. 37]** is a bill which aims to accelerate critical housing and infrastructure delivery by reducing delays and legal hurdles. It is of particular relevance to NSIPs in that it includes reforms that aim to shorten the overall timeline for DCOs by reducing pre-application consultation requirements, limiting judicial review stages and simplifying minor amendments to applications post-submission. It is also important for solar projects as it aims to introduce a shift to a *"first ready, first connected*" grid access system, which means that schemes of earlier readiness can connect to the grid and avoid long delays due to grid queue backlogs. The Bill also indicates support for projects that help balance the grid through energy storage systems, such as BESS, which is included as Work No. 2 as part of the associated development in the Scheme. It should be noted that this is a bill, meaning it is currently only proposed legislation and has not yet become law. Hence, its provisions are subject to change during the parliamentary process.

Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025

6.7.5 The Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025 **[Ref. 38]** is a statutory instrument set to come into force on 31 December 2025 that amends the PA 2008 to adjust the thresholds and planning processes for onshore wind and solar energy projects. The key amendment for solar generation is that the threshold for solar projects to be considered NSIPs has been increased from 50MW to 100MW. Whilst even with this change the Scheme remains well beyond the new threshold, it is of note that this represents the Government's broader strategy to support new solar generation schemes and streamline the planning process.

Clean Power 2030 Action Plan: A New Era of Clean Electricity (December 2024)

6.7.6 Clean Power 2030 Action Plan: A New Era of Clean Electricity (December 2024) **[Ref. 39]** sets out how the Government will deliver on the Prime Minister's Plan for Change to build an energy system that can bring down bills for households and businesses for good. The Action Plan provides that electricity generated by renewables and nuclear power will be the backbone of a clean electricity system by 2030, and sets out actions to support the delivery of renewable generation projects (including BESS), including by de-risking the existing pipeline, accelerating new projects through the pipeline, and maximising the potential of existing capacity as assets approach end-of-life.

6.7.7 The action plan will herald a new era of clean energy independence and tackle three major challenges: the need for a secure and affordable energy supply, the creation of essential new energy industries, supported by skilled workers in their thousands, the need to reduce greenhouse gas emissions and limit our contribution to the damaging effects of climate change.

Powering Up Britain (March 2023)

6.7.8 Powering Up Britain (March 2023) **[Ref. 40]** presents the Government's ambition to double Britain's electricity generation capacity by the late 2030s and to deploy 70GW of solar energy generation by 2035, made up of both ground-mounted and rooftop solar. It recognises that ground-mounted solar is one of the cheapest forms of electricity generation and is readily deployable at scale. It confirms that the government considers meeting energy security and climate change goals as urgent and of critical importance to the country, and that these goals can be achieved together with maintaining food security for the UK. Whilst this policy paper was published under the 2022-2024 Sunak Conservative Government and the current Labour Government has since published a subsequent policy paper (see the Clean Power 2030 Action Plan), the broad aims of both are consistent.

6.7.9 In order to meet its goal of quintupling its solar power by 2035, the paper states, regarding large-scale solar development. "*Government seeks large scale solar deployment across*

the UK, looking for development mainly on brownfield, industrial and low/medium grade agricultural land. The Government will therefore not be making changes to categories of agricultural land in ways that might constrain solar deployment".

Mission Zero – The Skidmore Review (January 2023)

6.7.10 The Skidmore Review **[Ref. 41]** is an independent review of net zero and one of the largest engagement exercises on net zero in the UK. The Review conclusions recognise that net zero is the economic opportunity of the 21st century and that the UK is well placed to take advantage. It confirms that a doubling down is required on the production of renewables, nuclear and hydrogen and other low-carbon fuels to give the UK's future energy system a homegrown, secure platform. Recommendations in the Review show how action can be taken in the short, medium and long term to turbocharge delivery, set clear roadmaps that provide the certainty needed for investment and research and development, and deliver net zero in a pro-growth, pro-business, low-cost way. This includes recommendations on streamlining the planning process and deployment of a roadmap for solar power, including clear milestones to reach 70GW of solar power by 2035.

British Energy Security Strategy (2022)

6.7.11 The British Energy Security Strategy **[Ref. 42]** sets out the government's ambition to reach 70GW of solar power by 2035.The strategy sets out the immediate need to manage the financial implications of soaring commodity prices in the near term on households and businesses which are already feeling economic pain as the post-Covid cost of living has risen: "*The first step is to improve energy efficiency, reducing the amount of energy that households and businesses need*."

6.7.12 In the near-term, the strategy sets out a high-level action plan to upgrade the energy efficiency of at least 700,000 homes in the UK by 2025, and to ensure that by 2050 all UK buildings will be energy efficient with low-carbon heating. Further, the strategy sets out an intent to phase out the sale of new and replacement gas boilers by 2035.

6.7.13 The Strategy aims to:

- Cut planning consent process time by over half through, among other measures, strengthening the NPS EN-3 to reflect the importance of energy security and net zero.
- Increase the pace of deployment of Offshore Wind by 25% to deliver up to 50 GW by 2030, including up to 5 GW of innovative floating wind. Wind will contribute over half the UK's renewable generation capacity by 2030.
- Consider all options including Onshore Wind through the improvement of national electricity network infrastructure and support of a number of new English projects with strong local backing, so prioritising "*putting local communities in control*" of local onshore solutions.
- Repowering of existing onshore wind sites is also under consideration. (Ref.76, p18);

- Support a 5-fold increase in deployment of solar technology by 2035, recognising the abundant source of solar energy in the UK and an 85% reduction in cost over the last ten years of solar power. For ground-mounted solar, the strategy indicates a future consultation on planning rules to strengthen policy in favour of development on non-protected land, while ensuring communities continue to have a say and environmental protections remain in place.
- Increase UK plans for deployment of civil nuclear to up to 24 GW by 2050 – three times more than operational capacity in 2022 and representing up to 25% of our projected electricity demand. This includes the intention to take one project (Sizewell C) to FID during the current Parliament, and two projects to FID in the next Parliament, including Small Modular Reactors, subject to value for money and relevant approvals. The selection process for further UK projects is anticipated to be initiated in 2023.
- Double the UK ambition for hydrogen production to up to 10 GW by 2030, with at least half of this from electrolytic hydrogen facilitated by bringing forwards up to 1 GW of electrolytic hydrogen into construction or operational status by 2025.

Net Zero Strategy: Building Back Greener (2021)

6.7.14 The Net Zero Strategy **[Ref. 43]**, published in October 2021, sets out a long-term plan for the economy-wide transition to net zero that will take place over the next three decades. On power generation, it confirms that: "*By 2035 the UK will be powered entirely by clean electricity, subject to security of supply; […] 40 GW of offshore wind by 2030, with more onshore, solar and other renewables - with a new approach to onshore and offshore electricity networks to incorporate new local carbon generation and demand in the most efficient manner that takes account of the needs of local communities […]".*

Energy White Paper: Powering our Net Zero Future (2020)

6.7.15 The Energy White Paper: Powering our Net Zero Future (2020) **[Ref. 44]** was published in December 2020 and outlines a strategy to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply, and affordable bills for households and businesses.

National Infrastructure Strategy (2020)

6.7.16 The National Infrastructure Strategy (NIS) **[Ref. 45]** was published on 25 November 2020 and sets out plans to transform UK Infrastructure in order to level up the country, strengthen the Union and achieve net zero emissions by 2050. The Government acknowledges in the NIS that to deliver net zero, the share of generation from renewables needs to increase dramatically. It identifies that this can be achieved by the provision of greater generation capacity from onshore wind and solar, and sets out commitments for supporting solar generation.

6.7.17 One of the aims of the NIS is to achieve net zero carbon emissions by 2050. The Government acknowledges in the NIS that to deliver net zero, the share of generation from renewables needs to dramatically increase. It identifies that this can be achieved by the

provision of greater generation capacity from onshore wind and solar. As recommended by the NIC, the NIS sets out plans to include solar PV in the next auction round (2022) for Contracts for Difference (CfD), which is the Government's main mechanism for supporting low-carbon electricity generation. This incentivises investment in renewable energy by providing developers of projects with high upfront costs and long lifetimes with direct protection from volatile wholesale prices, and they protect consumers from paying increased support costs when electricity prices are high.

6.7.18 The NIS demonstrates the Government's commitment, including a financial commitment, to supporting solar generation now.

The Climate Change Act 2008 and the Climate Change Act 2008 (2050 Target Amendment) Order 2019

6.7.19 The Climate Change Act 2008 **[Ref. 46]** set up a framework for the UK to achieve its long-term goals of reducing greenhouse gas emissions and to ensure steps are taken towards adapting to the impact of Climate Change. The Act committed the UK to reducing its greenhouse gas emissions by at least 80% by 2050 when compared with 1990 levels.

6.7.20 In June 2019, the Climate Change Act 2008 (2050 Target Amendment) Order 2019 was passed to amend the Climate Change Act 2008 and to set a new target requiring the UK to bring all greenhouse gas emissions to net zero (i.e. 100% reduction by 2050, compared with the previous target of at least 80% reduction from 1990 levels).

6.8 Additional Consents

6.8.1 A DCO, if granted, has the effect of providing consent for development in addition to a range of other consents and licences where specified, as well as removing the need for some consents such as planning permission. Details of the consents and licences included in the **draft DCO [APP/3.1]** are explained in the **Explanatory Memorandum [APP/3.2]** and the **Consents and Agreement Position Statement [APP/7.5]**. The latter also includes a list of likely consents to be sought outside the DCO process.

7 Ongoing Engagement

7.1.1 Paragraph 4.1.9 of NPS EN-1 strongly encourages engagement both before and during the formal pre-application stage between an applicant and key stakeholders (inclusive of public regulators, statutory consultees and those likely to have an interest in the proposed energy infrastructure application) in line with the Government's pre-application guidance. This paragraph notes that only applications which are "*fully prepared and comprehensive*" can be accepted for examination.

7.1.2 Details of the engagement carried out by the Applicant in relation to the Scheme are set out in the **Consultation Report [APP/5.1]** and **Consultation Report Appendices [APP/5.2].** Pre-application consultation activities are also detailed in Section 1.4 of this Planning Statement.

7.1.3 The Applicant has prepared and maintained an Issues Tracker during the pre-application stage to identify and track key issues, identify affected parts, encourage engagement on matters and, where possible, achieve resolution prior to submission of the DCO Application.

7.1.4 The Issues Tracker has been used to inform production of the **Potential Main Issues for Examination (PMIE) [APP/5.9]**, which has been entered into the Examination as an application document.

7.1.5 The Applicant also intends to use the Issues Tracker to inform production of a number of Statements of Common Ground (SoCGs) to document matters between the Applicant and the stakeholder which are agreed, not agreed, and which are the subject of ongoing discussion. The Applicant expects the Examining Authority to request SoCGs with the following parties, if the DCO Application is accepted:

- Breckland Council
- Norfolk County Council
- Environment Agency
- Historic England
- Natural England
- National Grid
- National Highways
- Anglian Water; and
- Norfolk Wildlife Trust.

8 Planning Appraisal

8.1 Introduction

8.1.1 This section sets out the Applicant's appraisal of the Scheme's compliance with the main relevant policy and legislative requirements that are applicable to it, as identified in **Section 6** of this Planning Statement. The appraisal considers the construction, operation and maintenance, and decommissioning phases of the Scheme. This section addresses the following matters, as outlined in NPS EN-1, NPS EN-3, and NPS EN-5.

8.1.2 The following Assessment Principles, as set out in NPS EN-1:

- General Policies and Considerations
- The Critical National Priority for Low Carbon Infrastructure
- Habitats and Species Regulations
- Environmental Effects/Considerations
- Alternatives and Site Selection
- Health
- Environmental and Biodiversity Net Gain
- Criteria for good design for Energy Infrastructure
- Climate Adaptation and Resilience
- Network Connection
- Pollution Control and Other Environmental Regulatory Regimes
- Safety
- Hazardous Substances
- Common Law Nuisance and Statutory Nuisance; and
- Security Considerations.

8.1.3 The following Generic Impacts, as outlined in NPS EN-1 and NPS EN-3:

- Air Quality and Emissions
- Greenhouse Gas Emissions
- Biodiversity and Geological Conservation
- Civil and Military Aviation and Defence Interests
- Dust, Odour and Artificial Light

- Flood Risk
- Historic Environment
- Landscape and Visual Impact
- Land Use, including Open Space, Green Infrastructure, Green Belt and Agricultural Land
- Noise and Vibration
- Socio-economic Impacts
- Traffic and Transport
- Resource and Waste Management
- Water Quality and Resources
- Mineral Safeguarding
- Glint and Glare; and
- Cumulative Impacts.

8.1.4 This section is not intended to list all relevant planning policies but instead focuses on the Scheme's compliance with the main policies relevant to decision-making. The **Policy Compliance Document [APP/5.6]** provides a more detailed analysis of the specific policies relevant to the Scheme and how the Scheme aligns with them.

8.2 Assessment Principles

8.2.1 This subsection sets out an appraisal of the Scheme's compliance with the assessment principles set out in NPS EN-1, NPS EN-3 and NPS EN-5. This includes the general and solar-specific policies for the submission and assessment of energy infrastructure applications. Where appropriate, consideration has been given to the weighting that might be applied in the planning balance.

General Principles

8.2.2 NPS EN-1 Part 4.1 sets out the general considerations that the SoS should have in mind when assessing applications. These are summarised briefly below.

Presumption in favour of development

8.2.3 NPS EN-1 paragraph 4.1.3 provides that, given the level of urgency of need for energy infrastructure (including solar), the SoS "*will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused.*"

8.2.4 There is a clear and urgent need for the Scheme as set out in Section 5 of this Planning Statement. As outlined in the remainder of this Planning Statement, the Applicant considers that this presumption should apply and that there are no other relevant policies that would disapply it.

Weighing impacts and benefits

8.2.5 Paragraph 4.1.5 of the NPS EN-1 sets out the types of potential impacts and benefits that the SoS should take into account when considering a proposed development, including benefits and impacts at national, regional and local levels. Any residual adverse effects that remain after proposed mitigation measures should be weighed against the benefits of the proposed development. For projects that qualify as CNP Infrastructure, the need case will likely outweigh the residual effects in all but the most exceptional circumstances.

8.2.6 The substantial benefits of the Scheme are summarised in Section 5 of this Planning Statement. Potential residual adverse impacts are discussed in the relevant topic chapter of the **ES [APP/6.1 - 6.5]**, summarised in this Section, and the planning balance is applied in Section 9.

Land Rights

8.2.7 Paragraph 4.1.8 of NPS EN-1 includes provision for compulsory acquisition of land or rights over that land, applications for which will be considered by the SoS under the usual compulsory acquisition principles (NPS EN-1 paragraph 4.1.9). The rights being sought to construct, operate and decommission the Scheme are set out in the **Statement of Reasons [APP/4.1]** and the **Book of Reference [APP/4.3]**, as supported through the **Land and Rights Negotiations Tracker [APP/4.4]**.

Development Consent Obligations

8.2.8 The Secretary of State may consider any development consent obligations that an applicant agrees with local authorities (NPS EN-1 paragraph 4.1.18). The Applicant does not envisage development consent obligations under section 106 of the Town and Country Planning Act 1990 (as amended by section 174 of the Planning Act 2008) applying to the Scheme.

Early Engagement

8.2.9 Paragraph 4.1.19 of NPS EN-1 strongly encourages early engagement in line with the government's pre-application guidance between the applicant, key stakeholders and those likely to have an interest in the application. Only applications which are fully prepared and comprehensive can be accepted for examination. Details of the pre-application consultation carried out by the Applicant are set out in the **Consultation Report [APP/5.1]** and **Consultation Report Appendices [APP/5.2].**

Financial and technical feasibility

8.2.10 Paragraph 4.1.22 of NPS EN-1 confirms that where the SoS considers that the Applicant has properly assessed the financial viability and technical feasibility of the proposal, it is unlikely to be of relevance in SoS decision-making except in limited circumstances. The **Funding Statement [APP/4.2]** which accompanies this application considers the financial and technical viability of the Scheme and demonstrates that the Applicant has sufficient funds for the Scheme.

The Critical National Priority for Low-Carbon Infrastructure

8.2.11 As set out in Section 5 of this Planning Statement, the Scheme is classed as CNP Infrastructure.

8.2.12 Paragraph 4.2.4 sets out that the "*Government has therefore concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure*." The definition of CNP Infrastructure is provided at paragraph 4.2.5 of NPS EN-1 and includes all onshore and offshore electricity generation that does not involve fossil fuel production, such as the Scheme. Paragraph 4.2.6 of NPS EN-1 is clear that "*The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.6 to 3.2.8 of EN-1, is the starting point for all assessments of energy infrastructure applications*."

8.2.13 Whilst the urgent need for the Scheme is established, paragraph 4.2.10 of NPS EN-1 makes clear that "*Applicants for CNP infrastructure must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements*." Paragraph 4.2.11 of NPS EN-1 clarifies that applicants must show how the mitigation hierarchy has been applied, and paragraph 4.2.12 of NPS EN-1 states that applicants should set out how residual impacts will be compensated. In line with this, the mitigation hierarchy has been applied, and the Scheme has been appraised against planning policy before the CNP presumption has been considered.

8.2.14 **ES Chapter 2: EIA Process and Methodology [APP/6.1]** sets out the mitigation hierarchy approach adopted in the wider **ES [APP/6.1 - 6.5]** and demonstrates how this has been applied. Section 9.5 of this Planning Statement then goes on to consider the application of the CNP presumption in the context of any residual adverse effects, following consideration of the need case, the impacts of the Scheme, and the application of the mitigation hierarchy.

Habitats and Species Regulations

8.2.15 NPS EN-1 paragraph 4.2.18 (or paragraph 4.2.31 of the 2025 NPS EN-1) confirms that any Habitat Regulation Assessment (HRA) residual impacts will be considered under the framework set out in the Habitats Regulations (under the Conservation of Habitats and Species Regulations 2017).

8.2.16 The **Shadow Habitats Regulations Assessment [APP/7.3]** is discussed in further detail in Section 8.3 (Biodiversity and Geological Conservation) of this Planning Statement. It concludes that no significant adverse effects on the site integrity of the relevant protected sites are deemed likely, either in isolation or in combination with other projects.

Environmental Effects/Considerations

8.2.17 NPS EN-1 paragraph 4.3.1 states that "*All proposals subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) must be accompanied by an environmental statement (ES) describing the aspects of the environment likely to be significantly affected by the project.*" Paragraph 4.3.4 of NPS EN-1 provides that the applicant "*must set out information on the likely environmental, social and economic effects of a development, and show how any negative effects would be avoided, reduced or mitigated.*" Where precise details of the proposed development have not been defined, the applicant should explain this and assess the likely worst-case scenario of effects (the Rochdale Envelope) to ensure the impacts of the project have been properly assessed (NPS EN-1 paragraph 4.3.12) and, in decision making, the SoS should consider those worst-case impacts (NPS EN-1 paragraph 4.2.18). The SoS should also have regard to the ambitions, goals and targets set out in the government's Environmental Improvement Plan for improving the natural environment and heritage, including achievement of statutory targets set under the Environment Act 2021 (NPS EN-1 paragraph 4.3.20).

8.2.18 In accordance with the above assessment principles, the **ES [APP/6.1 - 6.5]** sets out the likely significant effects arising from the Scheme. The scope and methodology of the EIA are set out in **ES Chapter 2: EIA Process and Methodology [APP/6.1]**. The Scoping Opinion, published by the Planning Inspectorate on 18 December 2024 (**ES Appendix 2.2: Scoping Opinion Response [APP/6.4]**), forms the basis of the assessments undertaken. The **ES [APP/6.1 - 6.5]** has been prepared in accordance with the above paragraphs of NPS EN-1.

Alternatives and Site Selection

General Planning Policy Context

8.2.19 Part 4.3 of NPS EN-1, Part 2.3 of NPS EN-3 and Part 2.2 of NPS EN-5 set out the assessment principles applicable to the consideration of alternatives. There is no prescribed methodology in national planning policy or guidance for site selection in relation to solar development.

8.2.20 Paragraph 4.3.9 of NPS EN-1 states that "*This NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective*", and Paragraph 2.3.5 of NPS EN-3 is clear that, in general, the government does not seek to direct applicants for renewable energy infrastructure to specific sites. Instead, NPS EN-3 Paragraph 2.3.9 recognises that "*most renewable energy resources can only be developed where the resource exists and where economically feasible, and because there are no limits on the need established in*

Part 3 of EN-1, the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the re-use of previously developed land for renewable technology developments)".

8.2.21 Whilst there is no general legal or planning policy requirement to consider alternatives, applicants are obliged to include information about the reasonable alternatives they have studied in their ES (NPS EN-1 paragraph 4.3.15) and where there is a specific policy requirement to do so. Paragraph 4.3.22 of NPS EN-1 provides that, given the level of urgency for new energy infrastructure, the SoS should (subject to any specific policy indicating otherwise) be guided by the following principles when deciding what weight should be given to alternatives:

- Consideration of alternatives to comply with policy requirements should be carried out in a proportionate manner; and
- Only alternatives that can meet the objectives of the proposed development need to be considered.

8.2.22 "*The SoS should not refuse an application simply because fewer adverse impacts would result from developing...another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future energy proposals*" (NPS EN-1 paragraph 4.3.24).

8.2.23 "*Alternative proposals which mean the necessary development could not proceed, for example, because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded because they are not important and relevant to the SoS's decision*" (NPS EN-1 paragraph 4.2.27).

8.2.24 Paragraph 2.2.1 of NPS EN-5 recognises that "*The Secretary of State should bear in mind that the initiating and terminating points – or development zone – of new electricity networks infrastructure is not substantially within the control of the applicant."*

Appraisal

8.2.25 **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** describes the consideration of reasonable alternatives carried out by the Applicant in relation to the Site for the Scheme, layouts and choice of technology. It is supported by **Appendix 1: Site Evaluation Report** to this **Planning Statement**, which provides an appraisal of alternative sites and demonstrates consideration of relevant policy and its applicability to the site evaluation process undertaken by the Applicant.

8.2.26 The Applicant has split the site evaluation process into two parts: the first part is the National Grid Substation siting assessment, and the second part is the Site Evaluation of the solar development Site, as set out in **Appendix 1: Site Evaluation Report** to this **Planning Statement**.

8.2.27 Part one, the National Grid site selection assessment approach is based on the 'National Grid Company plc's (NGC's) Substation and the Environment: Guidelines on Siting and

Design' document **[Ref. 47],** which explains the approach taken towards the transmission system of electricity for England to assist those parties responsible for designing and locating substations.

8.2.28 The Applicant firstly identified potential siting zones for a new National Grid Substation by applying the criteria set out in Section 4.2.6 of **Appendix 1: Site Evaluation Report**, which are shown on Figure 1 – National Grid Substation Feasibility Search. Following the identification of these four potential siting zones, each zone has been reviewed against the guidelines set out in Section 4.2.8 of **Appendix 1: Site Evaluation Report**.

8.2.29 Following a detailed desk-based assessment of all potential siting zones, the review concluded that Zone 4 offers the most balanced and sustainable option when considering key environmental and technical criteria. Therefore, it was selected as the preferred site for the proposed National Grid Substation.

8.2.30 Paragraphs 2.10.23 – 2.10.25 of NPS EN-3 establish that the starting point for a site selection process is the availability of a nearby and suitable connection to the transmission network. Recent solar NSIP decisions, as outlined in Section 4.4 of **Appendix 1: Site Evaluation Report**, have confirmed that the Secretary of State supports this approach to selecting the grid connection point as an appropriate starting point.

8.2.31 There is no standard methodology for selecting sites for solar energy generating stations. However, as the NPS EN-3 paragraphs 2.10.21- 2.10.26 recognise, a viable grid connection is an essential material consideration for proceeding with development.

8.2.32 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 proposed Site for a solar farm development. This single, contiguous proposed Site would provide sufficient land to site the Scheme in its entirety.

8.2.33 The suitability of the land that the willing land owner agreed to make available was then considered against the key site selection criteria, as part of further assessment of the land surrounding Zone 4.

8.2.34 A site evaluation was carried out to determine the suitability of the nearby land for large-scale solar deployment, considering irradiance, topography, and environmental and planning constraints.

8.2.35 As set out in Section 5 of **Appendix 1: Site Evaluation Report**, available land fits the factors explored by the Applicant and set out in NPS EN-3, being without many constraints and with the benefit of a potential viable connection point to be included in the Site. When determining the appropriateness of a Site, the Applicant considers factors including, but not limited to, a large enough site area, topography, access and the lack of designations. The Applicant found it clear that the Site met their environmental site selection criteria. The Applicant, therefore, had identified a suitable site and concluded their site evaluation process.

8.2.36 Policies in NPS EN-1 is clear in that work should be undertaken on a proportionate basis and that any alternative would need to be a reasonable alternative. It is expected to deliver the same capacity in the same timeframes. Indeed, there is an acknowledgement that other sites may exist that potentially have less impact than the Scheme.

8.2.37 Given the critical and urgent need to deploy renewable energy to address the climate crisis and following consideration of other factors (as reported in **Appendix 1: Site Evaluation Report),** the Site location has been chosen as it is considered to be suitable for large-scale solar deployment. The availability of significant capacity in the existing overhead line between Walpole and Necton was the primary driver in identifying a site in this part of Norfolk.

Topic specific requirements to consider alternatives

8.2.38 Within the remainder of NPS EN-1, NPS EN-3 and NPS EN-5, there are also the following specific topic references to the consideration of alternatives:

- Compulsory acquisition: NPS EN-1 paragraph 4.3.9 confirms there are specific requirements to consider alternatives regarding compulsory acquisition. The Applicant is seeking compulsory acquisition powers over land if it cannot be secured through a voluntary agreement. Further details are contained within the **Statement of Reasons [APP/4.1]**.
- Air quality: NPS EN-1 paragraph 5.2.7 provides that projects near a sensitive receptor site for air quality should only be proposed in exceptional circumstances if no viable alternative is available. **ES Chapter 16: Other Environmental Matters [APP/6.2]** confirms that there are air quality sensitive receptors within the general vicinity of the Scheme, but none are in its immediate vicinity. Further, there are no likely significant effects identified as a result of the Scheme in relation to air quality and no need for additional mitigation measures beyond embedded mitigation.
- Biodiversity and geological conservation interests: NPS EN-1 paragraph 5.4.42 provides that development should aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives. As set out in **ES Chapter 7: Ecology and Biodiversity [APP/6.2]**, there is anticipated to be no significant adverse effects identified. However, there are four significant beneficial effects for Hedgerows and Tree Lines Habitat and Breeding Birds, Wintering Birds and Amphibians – Great Crested Newt, both during operational and decommissioning phases. Further, as set out in the **Biodiversity Net Gain Assessment Report [APP/7.4]**, the ecological mitigation and enhancement areas will deliver a potential net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines. A Requirement in the **draft DCO [APP/3.1]** commits to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines.
- Flood risk: NPS EN-1 paragraph 5.8.21 details the Sequential Test and the requirement to follow a sequential, risk-based approach to site selection, steering new development to areas with the lowest risk of flooding. The entirety of the built aspects of the Scheme

(Works No. 1-10) is situated in Flood Zone 1; only a small area of the Skylark Mitigation Works No. 11 (approximately 1.10 ha) is within the Flood Zone 2 and 3, which will continue to be used for agricultural activities; therefore, the Sequential Test is not triggered.

- Development within National Parks, the Broads and National Landscapes: NPS EN-1 paragraph 5.10.32 confirms that developments within National Landscapes may be granted development consent in exceptional circumstances and that such applications should include an assessment of alternatives which would see the development placed outside of the National Landscape. None of the land within the Order limits is covered by any statutory landscape designations, i.e. National Parks or National Landscapes.
- Agricultural Land: NPS EN-3 acknowledges that ground-mounted solar is not prohibited on BMV land (NPS EN-3 paragraph 2.10.30), and states that while land type should not be a predominant factor in determining a site's suitability for solar development, poorer quality land should be preferred. BMV land should be avoided where possible (NPS EN-3 paragraph 2.10.29). The choice of site should be explained by the Applicant, noting a preference for development to be situated on suitable brownfield, industrial and low and medium grade agricultural land. ALC was therefore an important factor for the Applicant when evaluating the proposed Site. **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** 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. Further appraisal of the use of BMV land, and why this is justified, is set out in section 8.3 of this Planning Statement.
- Landscape and Visual: NPS EN-5 paragraph 2.9.14 notes that "*where the nature or proposed route of an overhead line will likely result in particularly significant landscape and visual impacts...the applicant should demonstrate that they have given due consideration to the costs and benefits of feasible alternatives to the overhead line*." As set out in **ES Chapter 6: Landscape and Visual [APP/6.2]**, there are anticipated to be residual significant effects on:
  - D1: Swaffham Heath LCA: there are moderate adverse effects across all phases of the Scheme.
  - E6: North Pickenham Plateau LCA: there are moderate adverse effects across all phases of the Scheme.
  - VRG1: Central Site Area: there are major-moderate adverse effects across construction, decommissioning, and operational (short and medium term) phases of the Scheme.
  - VRG2: North-Eastern Site Area: there are major-moderate adverse effects across construction, decommissioning, and operational (short and medium term) phases of the Scheme.
  - VRG3: Nar Valley Southern Slope and Settlement Edge of South Acre: there are moderate adverse effects across construction, decommissioning, and operational (short term) phases of the Scheme.

- The Peddars Way and Norfolk Coastal Path: there are moderate adverse effects across the construction and decommissioning phases of the Scheme.
- The Peddars Way and Norfolk Coastal Path, over a limited extent only. Within and up to 300m from the Site, there are moderate adverse effects across the operational (short and medium term) phase of the Scheme.
- Rebellion Way Cycle Route: there are moderate adverse effects across the construction and decommissioning phases of the Scheme.
- Rebellion Way Cycle Route, Over a limited extent only. Within the Site, there are moderate adverse effects across the operational (short and medium term) phase of the Scheme.

8.2.39 In summary, reasonable alternatives have been studied in line with the above policy requirements.

Health

8.2.40 NPS EN-1 paragraphs 4.4.1 and 4.4.2 set out some of the potential impacts of energy infrastructure on health, including increased traffic, air or water pollution, dust, odour, hazardous waste and substances, noise, exposure to radiation and an increase in pests. New energy infrastructure may also affect the size and composition of the local population, which can have impacts on access to public services, transport and access to recreation spaces (NPS EN-1 paragraph 4.4.3). Where a proposed project has an effect on humans, the ES should assess these effects and identify measures to avoid, reduce or compensate for these impacts (NPS EN-1 paragraph 4.4.4).

8.2.41 In decision-making, generally those impacts which are most likely to have a significantly detrimental impact on health are subject to separate regulation, which will constitute effective mitigation of them, and therefore it is unlikely that health concerns by themselves will constitute a reason to refuse consent or require specific mitigation under NPS EN-1 paragraph 4.4.7. However, not all impacts can be mitigated in this way, and NPS EN-1 paragraph 4.4.8 confirms that the SoS may want to take account of health concerns when setting requirements relating to a range of impacts, such as noise.

8.2.42 **ES Chapter 15: Human Health [APP/6.2]** provides an assessment of the likely significant effects on human health as a result of the Scheme including on social environment (housing, open space leisure and play, transport modes access and connections, community identity culture resilience and influence) economic environment (education and training, employment and income), bio-physical environment (air quality, water quality or availability, land quality, noise and vibration), and institutional built environment (health and social care services). It concludes that no residual significant effects from the Scheme on human health are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation.

8.2.43 Therefore, it is considered that health should be afforded neutral weight in the planning balance.

Environment and Biodiversity Net Gain

8.2.44 NPS EN-1 paragraph 4.6.6 provides that "*Energy NSIP proposals… should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity and the wider environment where possible*". Applicants are encouraged to calculate the biodiversity net gain outcomes in line with the latest version of the biodiversity metric and present the calculation data in full as part of their application (NPS EN-1 paragraph 4.6.7).

8.2.45 Applicants for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered and, where appropriate, incorporated into proposals as part of good design (including any relevant operational aspects) of the project (NPS EN-1 paragraph 4.6.15). Examples of wider environmental gains are set out in NPS EN-1 paragraph 4.6.13 and include reduction in GHG emissions, reduction in flood risk, improvements to air or water quality, climate adaptation, landscape enhancement, increased access to natural greenspace and or the enhancement, expansion or provision of trees and woodland.

8.2.46 NPS EN-1 paragraph 4.6.10 confirms that biodiversity net gain is not currently an obligation on applicants. Still, Schedule 15 of the Environment Act 2021 contains provisions which, when it comes into effect, the SoS may not grant an application for a Development Consent Order unless satisfied that a biodiversity gain objective is met in relation to the onshore development in England to which the application relates. NPS EN-1 paragraph 4.6.1 confirms that, in decision making, *"the Secretary of State should give appropriate weight to environmental and biodiversity net gain, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited*".

8.2.47 As presented in the **Biodiversity Net Gain Assessment Report [APP/7.4],** the ecological mitigation and enhancement areas will deliver a potential net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines. A Requirement in the **draft DCO [APP/3.1]** commits to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines.

8.2.48 The **oLEMP [APP/7.11],** which is also secured by a requirement of the **draft DCO [APP/3.1]**, secures the ongoing management and maintenance measures required for the upkeep of the landscape and ecological mitigation. Therefore, the Applicant does not consider there to be a need for the Secretary of State to impose further requirements in the **draft DCO [APP/3.1]** to secure the Scheme's BNG.

8.2.49 The **Design Approach Document [APP/5.6]** includes the adoption of project level design principles (Project Principles) to guide decision making and embed good design outcomes into the Scheme. Principle 3.4 secures the delivery of a Biodiversity Net Gain of at least 10%.

Good Design for Energy Infrastructure

Planning Policy Context

8.2.50 NPS EN-1 Paragraph 4.7.2 states: "*Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible*". This paragraph also recognises, importantly, that the nature of energy infrastructure development often limits the extent to which development can contribute to the enhancement of the quality of an area.

8.2.51 Paragraph 4.7.4 of NPS EN-1 states that design principles should be established during the early stages of the project lifecycle. Footnote 122 of NPS EN-1 states that "*Design principles should take into account any national guidance on infrastructure design, this could include for example the Design Principles for National Infrastructure published by the National Infrastructure Commission*".

8.2.52 Paragraph 4.7.6 of NPS EN-1 recognises that applicants may have very limited choice in the physical appearance of some energy infrastructure. Given the importance PA 2008 places on good design and sustainability, paragraph 4.7.10 of NPS EN-1 states that the SoS needs to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable, and adaptable (including taking account of natural hazards such as flooding) as they can be.

8.2.53 Paragraph 4.7.7 of NPS EN-1 requires applicants to demonstrate in their application how the design process was conducted and how the proposed design evolved.

8.2.54 Paragraphs 2.5.1 and 2.5.2 of NPS EN-3 reference section 4.7 of NPS EN-1, emphasising that proposals for renewable energy infrastructure should "*demonstrate good design with respect to landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage*".

8.2.55 Regarding solar development itself, Paragraph 2.10.60 of NPS EN-3 notes that applicants should *"consider several factors when considering the design and layout of sites*". These factors include proximity to available grid capacity to accommodate the scale of generation, orientation, topography, previous land use, and ability to mitigate environmental impacts and flood risk.

8.2.56 PINS has provided advice on good design, it explains why good design is important, what success might look like and how it might be delivered across NSIPs. The Guidance details how Energy NSIPs are to contribute to sustainable development by responding to climate change, achieving excellent functionality, positive place-making and resilience in design. Good Design is inherently multi-faceted and requires the balancing of environmental, economic and social factors. Therefore, the Guidance outlines a good design process which offers a structured approach to resolving problems to secure good design outcomes.

8.2.57 The National Infrastructure Commission released Design Principles for National Infrastructure which include four pillars of good design: climate, people, place and value. In addition, the National Design Guide sets out components of good design.

8.2.58 The National Fire Chiefs Council also provides guidance on the design of BESS, including advice on design and siting, aimed at removing or reducing potential fire and safety risks.

Applicant Assessment

8.2.59 The Applicant's design approach is summarised in Section 2 of this Planning Statement.

8.2.60 In direct response to Paragraph 2.10.60 of NPS EN-3, the Applicant confirms, through **Appendix 1: Site Evaluation Report** to this **Planning Statement**, that irradiance and topography, grid connection and capacity, ALC and land type, and the ability to mitigate environmental impacts factored heavily in undertaking the site evaluation process. The site evaluation process is therefore considered to comply with the relevant design criteria from an early stage.

8.2.61 Section 3 of the **Design Approach Document [APP/5.7]** sets out, in detail, the Applicant's design actions and decisions, demonstrating compliance with design-related policy in NPS EN-1, NPS EN-3 and relevant guidance on good design.

8.2.62 The **Design Principles, Parameters and Commitments [APP/5.8]** sets out the parameters and commitments by which the EIA has been undertaken, along with the design principles which are to inform the detailed design, should the Scheme receive consent. The project-level design principles, parameters and commitments are secured by Requirement 5 in the **draft DCO [APP/3.1]** in order to prescribe the guiding design principles, parameters and commitments to inform the detailed design of the Scheme post-consent.

Climate Change Adaptation and Resilience

Planning Policy Context

8.2.63 Paragraph 4.10.1 of NPS EN-1 outlines that "*whilst we must continue to accelerate efforts to end our contribution to climate change by reaching Net Zero greenhouse gas emissions, adaptation is also necessary to manage the impacts of current and future climate change*". This means that if new energy infrastructure is not sufficiently resilient against the impacts of climate change, it will not be able to satisfy the energy needs detailed in Part 3 of NPS EN-1 (the need for new energy NSIPs).

8.2.64 Hotter and drier summers and warmer and wetter winters as well as a heightened risk of flooding, drought, heatwaves, more intense rainfall events etc. are anticipated as a result of climate change (paragraph 4.10.2 of NPS EN1).

8.2.65 Resultingly, paragraph 4.10.8 of NPS EN-1 states that applicants must consider the direct and indirect impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure.

8.2.66 Paragraph 4.10.5 of NPS EN-1 states that applications should consider nature-based solutions. Such solutions can also result in biodiversity benefits as well as increasing the absorption levels of carbon dioxide from the atmosphere in adapting to climate change.

8.2.67 Paragraph 2.3.2 of NPS EN-5 requires the consideration of the effects of flooding (particularly on substations which are vital for the electricity transmission and distribution networks), winds and storms (on overhead lines), higher average temperatures (leading to increased transmission losses), earth movement or subsidence caused by flooding or drought (on underground cables) and coastal erosion (for the landfall of offshore transmission cables and their associated substations in the inshore and coastal locations respectively).

8.2.68 As written into the 2025 NPS EN-1, Paragraph 2.3.5 makes clear that all routes to a clean power system will require the mass deployment of solar. The Paragraph goes on to establish in policy the capacity objectives as written it to the Clean Power 2030 Action Plan. This includes between 45 – 47GW of solar.

Applicant Assessment

8.2.69 The Schemes design has taken into account impacts from climate change. Site-specific hydraulic modelling has been carried out to assess the actual risks of fluvial and pluvial flooding to the Scheme and includes a simulation of the credible maximum climate change scenario.

8.2.70 The credible maximum climate change scenario accounts for the plausible worst-case impacts of climate change and has been applied in accordance with the policy requirement set out in Paragraph 4.10.12 of NPS EN-1 to ensure the design and layout of the safety critical elements (i.e. Customer Substation, National Grid Substation, and BESS) re sufficiently resilient to extreme climate change. Further detail on the flood modelling undertaken is provided in **ES Chapter 12: Water Resources [APP/6.1]** and the **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]**, noting that the Scheme does not have a significant effect on flood risk.

8.2.71 Embedded climate resilience measures are secured through Section 13.8 of **ES Chapter 13: Climate Change [APP/6.2]**. These include sustainable construction practices, maintenance regimes to optimise plant efficiency, retention of vegetation, low-carbon transport initiatives, flood-resilient design principles, and measures to safeguard workers, equipment, and infrastructure during extreme weather. Section 13.9 further confirms that the mitigation measures contained within the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]** and **oDS [APP/7.10]** are adaptable to a range of future climate scenarios.

8.2.72 Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2]** identifies the potential climate change impacts relevant to the Scheme, including changes in precipitation, increased temperatures, and greater storm intensity. While increased flood risk presents the greatest in-combination climate vulnerability, significant changes in surface run-off are limited to the Customer Substation, National Grid Substation, and BESS areas, where appropriate mitigation has been embedded through design. The Scheme will also contribute to

national greenhouse gas (GHG) emissions reduction and is therefore not anticipated to give rise to significant in-combination climate effects on species or habitats.

8.2.73 In accordance with Paragraphs 4.10.7 and 4.10.11 of NPS EN-1, Project Principle as set out in the **Design Approach Document [APP/5.7]**, requires the building in of resilience and adaptation in a changing climate through design. Project Principle also secures that proposed planting will be cognisant of future climate change and species that are drought tolerant and/or require relatively less watering will be favoured.

8.2.74 Therefore, it is considered that climate change adaptation and resilience effects should be afforded substantial positive weight in the planning balance.

Network Connection

Planning Policy Context

8.2.75 Paragraph 4.11.1 of NPS EN-1 notes that the grid connection point of a generating station to the electricity network is an important consideration for applicants.

8.2.76 Paragraph 4.11.4 of NPS EN-1 notes that transmission network infrastructure, and related network reinforcement and upgrade works, associated with nationally significant low carbon infrastructure is considered as CNP Infrastructure.

8.2.77 Paragraph 4.11.5 of NPS EN-1 states that the applicant must liaise with National Grid who own and manage the transmission network in England and Wales or the relevant regional DNO or TSO to secure a grid connection.

8.2.78 Paragraph 4.11.6 of NPS EN-1 states that applicants may wish to take a commercial risk where they have not received or accepted a formal offer of a grid connection from the relevant network operator at the time of the application. In this situation applicants should provide information as part of their application confirming that there is no obvious reason why a network connection would not be possible.

8.2.79 Paragraph 4.11.12 of NPS EN-1 states that the SoS should be satisfied that appropriate network connection arrangements are/will be in place for a given project regardless of whether one or multiple (linked) applications are submitted.

8.2.80 Paragraph 2.10.21 of NPS EN-3 notes that applicants should consider issues relating to network connection in Section 4.11 of NPS EN-1 and across NPS EN-5. In particular, and where appropriate, applicants should proceed in a manner consistent with the regulatory regime for offshore transmission networks.

8.2.81 Paragraph 2.10.24 of NPS EN-3 states that the connection voltage, availability of network capacity, and the distance from the solar farm to the existing network can have a significant effect on the commercial feasibility of a development proposal.

8.2.82 Paragraph 2.10.25 of NPS EN-3 states that to maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce

overall costs, applicants may choose a site based on nearby available grid export capacity. Paragraph 2.10.26 of NPS EN-3 continues to state that where this is the case, applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure.

8.2.83 Paragraph 2.8.4 of NPS EN-5 states that the SoS should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design. Paragraph 2.8.5 of NPS EN-5 continues to state that TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and electricity distributors have a statutory duty to provide a connection where requested.

Applicant Assessment

8.2.84 Due to the grid connection offer offering a 500MW connection into the existing overhead line between Walpole and Necton, as set out in the **Grid Connection Statement [APP/7.1]**. The offer outlines the need for the Applicant to source land suitable for a National Grid Substation as detailed in Section 4.2 of **Appendix 1: Site Evaluation Report** to this **Planning Statement.**

8.2.85 In accordance with Paragraph 4.11.5 of NPS EN-1, the Applicant engaged with NGET to discuss potential opportunities for a connection offer within the Norfolk area. During this ongoing engagement, the Applicant and National Grid reached an agreement on a connection offer of 500MW into the existing 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 proposed Site for a solar farm development. This single proposed Site would provide sufficient land to site the Scheme in its entirety.

Pollution Control and Other Environmental Regulatory Regimes

Policy Summary

8.2.86 Paragraph 4.12.1 of NPS EN-1 states that discharges or emissions from a proposed project, and which lead to other direct or indirect impacts on terrestrial, freshwater, marine, onshore, and offshore environments, or which include noise and vibration may be subject to separate regulation under the pollution control framework or other consenting and licencing regimes.

8.2.87 As part of the Secretary of State's decision making, Paragraph 4.12.9 of NPS EN-1 confirms that the Secretary of State should focus on whether the development itself is an acceptable use of the land or sea, and that the impact of that use, rather than the control of processes, emissions and discharges themselves. Paragraph 4.12.10 of NPS EN-1 notes that the Secretary of State should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes will be properly applied and enforced by the relevant regulator.

Applicant Assessment

8.2.88 The DCO Application is accompanied by a **Consents and Agreements Position Statement [APP/7.5]**. This Schedule outlines the other consents, permits and licenses that would be required to facilitate the Scheme, other than those written into the **draft DCO [APP/3.1]**.

8.2.89 The Applicant acknowledges the preference (set out in Paragraph 4.12.8 of NPS EN-1) for applicants to submit applications for other necessary consents at the same time as seeking development consent from the SoS, however, the level of detail required to obtain such permits and licenses is not fully available at this stage. The **Consents and Agreements Position Statement [APP/7.5]** sets out the Applicant's position on expected subsequent applications expected to be undertaken by the relevant contractor at detailed design stage when the relevant information becomes available, should DCO consent be granted.

8.2.90 The Applicant considers that, under paragraph 4.12.16 of NPS EN-1 and based on the **Consents and Agreements Position Statement [APP/7.5]**, there should be no reason for the Secretary of State to believe that any operational pollution permits, licenses and/or other consents will not be granted.

8.2.91 The construction phase environmental impacts of the Scheme will be managed through the implementation of detailed Construction Environmental Management Plan(s). An **oCEMP [APP/7.6]** has been submitted with the DCO Application and sets out a series of measures, based on best-practice guidance, to control the environmental effects of construction of the Scheme. A detailed Construction Environmental Management Plan(s), in accordance with a Requirement of the **draft DCO [APP/3.1],** must be approved prior to the commencement of works and is to be substantially in accordance with the **oCEMP [APP/7.6]**. These measures will form an important part of the Applicant's efforts to control construction phase impacts.

8.2.92 Ongoing impacts arising from the operational phase of the Scheme are assessed to be limited. Impacts arising from the operational phase will be controlled through the **oOEMP [APP/7.8]** and **oLEMP [APP/7.11]** submitted with the DCO Application. In accordance with the Requirements of the **draft DCO [APP/3.1]** respectively, the detailed Operational Environmental Management Plan(s) and detailed Landscape and Ecological Management Plan(s) must be substantially in accordance with the **oOEMP [APP/7.8]** and **oLEMP [APP/7.11]**.

8.2.93 The **oDS [APP/7.10]** will control environmental effects as identified in **ES Topic Chapters [APP/6.2]** during the decommissioning phase of the Scheme. In accordance with a Requirement of the **draft DCO [APP/3.1]**, the detailed Decommissioning Environmental Management Plan(s) must be substantially in accordance with the **oDS [APP/7.10]**.

8.2.94 In terms of SoS's decision making, the Applicant considers that, under Paragraph 4.12.16 of NPS EN-1 and based on the above, there should be no reason for the Secretary of

State to believe that any operational pollution permits, licenses and/or other consents will not be granted

Safety/Hazardous Substances

Planning Policy Context

8.2.95 Paragraph 4.13.1 of NPS EN-1 explains that the Health and Safety Executive (HSE) is the independent regulator responsible for enforcing a range of occupational health and safety legislation, some of which is relevant to the construction, operation and decommissioning of energy infrastructure.

8.2.96 Paragraph 4.13.3 of NPS EN-1 confirms that some energy infrastructure will be subject to the Control of Major Accident Hazards (COMAH) Regulations 2015.

8.2.97 Paragraph 4.13.5 of NPS EN-1 states that applicants should consult with the HSE on matters relating to safety.

Applicant Assessment

8.2.98 As per Section 3 of the COMAH Regulations 2015, Solar and BESS development is not applicable to the regime and therefore no further response is required.

8.2.99 As the Scheme is not subject to the COMAH Regulations 2015, Paragraphs 4.13.6 - 4.13.8 of NPS EN-1 are not engaged. Notwithstanding the fact that BESS is not applicable to the COMAH Regulations 2015, this DCO application is accompanied by an **oBSMP [APP/7.14]**, which sets out the key fire safety provisions for the BESS including measures to reduce fire risk and fire protection measures.

8.2.100 The Applicant confirmed to the HSE that Hazardous Substance Consent is not required for the Scheme because there are no in-scope hazardous substances as per Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 on site. Therefore, Hazardous Substance Consent has not been considered further. Regulation 6 of the Infrastructure Planning (Decisions) Regulations 2010 is not applicable. This is set out in the **ES Appendix 2.2: Scoping Opinion Response [APP/6.4]**.

8.2.101 Therefore, it is considered that safety and hazardous substances should be afforded neutral weight in the planning balance.

Common Law Nuisance and Statutory Nuisance

Planning Policy Context

8.2.102 Paragraph 4.15.5 of NPS EN-1 requires that at the application stage, "*possible sources of nuisance under section 79(1) of the EPA 1990 and how they may be mitigated or limited should be identified by the applicant so that appropriate requirements can be included in any subsequent order granting consent*".

8.2.103 Paragraph 4.15.6 of NPS EN-1 continues to advise that, at the application stage of an energy NSIP, it is important that the Secretary of State considers possible sources of nuisance under section 79(1) of the Environmental Protection Act 1990 (EPA 1990) and how they may be mitigated or limited so that appropriate requirements can be included in any subsequent DCO.

Applicant Assessment

8.2.104 The Applicant has prepared and submitted a **Statutory Nuisance Statement [APP/5.3]** as is required under APFP Regulation 5(2)(f) and Paragraph 4.15.5 of NPS EN-1. The **Statutory Nuisance Statement [APP/5.3]** draws upon the assessment conclusions from **ES Chapter 16: Other Environmental Matters** and **ES Chapter 10: Noise and Vibration [APP/6.2]** to set out that the construction, operational and decommissioning phases of the Scheme would not cause a statutory nuisance.

8.2.105 With the measures set out under the **oCEMP [APP/7.6]**, **oCTMP [APP/7.7]** and **oDS [APP/7.10]** in place, it is considered that the construction and decommissioning phases of the Scheme will not give rise to impacts which would constitute a statutory nuisance under Section 79(1)(a) or (e) of the EPA.

8.2.106 Though a statutory nuisance is not expected, Article 7 of the submitted **draft DCO [APP/3.1]** adopts a well-precedented approach of a defence to statutory nuisance proceedings and provides that no person is able to bring statutory nuisance proceedings under the EPA 1990 in respect of noise, if the noise is created in the course of carrying out construction, maintenance or decommissioning of the authorised development and for which notice has been given under Section 60 or consent obtained under Section 61(9) of the Control of Pollution Act 1974 or which cannot be reasonably avoided as a consequence of the authorised development.

Security Considerations

Planning Policy Summary

8.2.107 Paragraph 4.16.1 of NPS EN-1 explains that national security considerations apply across all national infrastructure sectors.

8.2.108 Paragraph 4.16.2 of NPS EN-1 notes that DESNZ works closely with Government security agencies including the National Protective Security Authority (NPSA) and the National Cyber Security Centre (NCSC) to provide advice to the most critical infrastructure assets on terrorism and other national security threats, as well as on risk mitigation.

8.2.109 Paragraph 4.16.4 of NPS EN-1 states that Government policy is to ensure that proportionate protective security measures are designed into new infrastructure projects at an early stage.

8.2.110 In terms of SoS's decision making, Paragraph 4.16.8 of NPS EN-1 states that if "*NPSA, ONR (for civil nuclear) and/or DESNZ are satisfied that security issues have been adequately addressed in the project when the application is submitted to the Secretary of*

State, it will provide confirmation of this to the Secretary of State. The Secretary of State should not need to give any further consideration to the details of the security measures in its examination".

8.2.111 Paragraph 2.10.47 of NPS EN-2 states that applicants should assess the visual impact of these security measures, as well as the impacts on local residents, including, for example, issues relating to intrusion from CCTV and light pollution in the vicinity of the site. Paragraph 2.10.48 goes on to state that applicants should consider the need to minimise the impact on the landscape and the visual impact of security measures.

Applicant Assessment

8.2.112 The Applicant has not identified any relevant considerations relating to national security in relation to the Scheme. Security requirements have, however, been embedded into the design of the proposals from the outset and are considered proportionate.

8.2.113 **ES Chapter 5: The Scheme [APP/6.1]** sets out that during operation; a perimeter fence will enclose the operational area of the Scheme. A deer fence will enclose the PV Arrays, whilst a palisade fence will enclose the Conversion Units, 33kV Sub-distribution Switch Rooms, BESS, Customer Substation and National Grid Substation. The deer fence will be wooden or metal posts with a wire mesh up to 2.5m in height. Palisade fencing would be up to 3m in height.

8.2.114 Pole mounted internal facing closed circuit television (CCTV) systems installed at a height of up to 3m will be deployed around the perimeter of the Site. The CCTV cameras would use night-vision technology, which would be monitored remotely and avoid the need for night-time lighting of the Solar PV Site, as secured via the **Design Principles, Parameters and Commitments [APP/5.8]**.

8.2.115 The Scheme is therefore considered compliant with paragraphs 4.16.1 to 4.16.8 of the NPS EN-1 and paragraphs 2.10.47 to 2.10.48 of NPS EN-3.

8.3 Generic Impacts

8.3.1 This subsection considers the Scheme's compliance with main planning policy requirements regarding the generic impacts that arise from energy infrastructure, as set out in the energy NPSs. As above, this section is not intended to list all relevant planning policies but instead focuses on the Scheme's general compliance with the main policies relevant to decision making. The **Policy Compliance Document [APP/5.6]** sets out a more detailed analysis of the specific policies relevant to the Scheme and how the Scheme accords with them.

Air Quality and Emissions

Planning Policy Context

8.3.2 This section reviews the Scheme in the context of planning policies relating to air quality. This section should be read in conjunction with the **Policy Compliance Document [APP/5.6]**.

8.3.3 Paragraph 5.2.1 of NPS EN-1 notes that energy infrastructure development can have adverse effects on air quality across all phases of development on health, protected species and on the wider countryside and species.

8.3.4 Paragraph 5.2.8 of NPS EN-1 requires development that is likely to have adverse effects on air quality to undertake an assessment of the impacts of the proposed project as part of the ES. Paragraph 5.2.9 of NPS EN-1 outlines what the ES should include regarding air quality.

8.3.5 Paragraph 5.2.16 of NPS EN-1 states that substantial weight will generally be given to air quality considerations where a project would lead to a deterioration in air quality.

8.3.6 Paragraph 199 of the NPPF makes clear that planning decisions should "*sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement*".

8.3.7 Policy COM 01 (Design) of the Breckland Local Plan (2023) sets out that development should be designed to reduce the impact on local air quality, particularly from road traffic, especially in those areas in or likely to impact on areas identified as 'at risk' of exceeding air quality objectives. Policy COM 02 (Healthy Lifestyles) sets out the requirements for development in AQMAs.

Applicant Assessment

8.3.8 **ES Chapter 16: Other Environmental Measures [APP/6.2]** discusses potential Air Quality impacts arising as a result of the Scheme. As set out in the **ES Appendix 2.1: EIA Scoping Opinion Request [APP/6.4]**, it was proposed to scope out effects on air quality receptors due to the lack of potential for likely significant effects. In Section 3.5 of the **ES Appendix 2.2: Scoping Opinion Response [APP/6.4]**, PINS confirmed that air quality effects are not likely to be significant, on the basis that air quality information was to be provided in the ES.

8.3.9 Dust emissions associated with construction activities will be controlled through mitigation measures outlined in the **oCEMP [APP/7.6]**. A **Construction and Decommissioning Phase Dust Assessment** is provided as **Appendix 1** to the **oCEMP [APP/7.6]**. Mitigation measures to control dust emissions during the construction phase will also be implemented during the decommissioning phase and outlined in the **oDS [APP/7.10]**.

8.3.10 Vehicle traffic emissions produced during the construction and decommissioning phases, including exhaust and non-exhaust emissions such as brake and tyre wear, as well as measures to minimise dust emissions arising from vehicles entering and leaving the Site, will be controlled through mitigation measures specified in the **oCTMP [APP/7.7]** and **oDS [APP/7.10]**.

8.3.11 With the measures set out in the **oCEMP [APP/7.6]**, **oCTMP [APP/7.7]** and the **oDS [APP/7.10]**, **ES Chapter 16: Other Environmental Measures [APP/6.2]** concludes that the Scheme is not likely to result in significant air quality effects.

8.3.12 A **Battery Plume Assessment** has been produced and is provided as Appendix 1 to the **oBSMP [APP/7.14],** which considers combustion emissions in the event of a battery fire.

Summary

8.3.13 An assessment of air quality effects has been undertaken for the construction, operational, and decommissioning phases of the Scheme. The assessment concludes that, with embedded mitigation, the Scheme is not anticipated to give rise to any significant or residual adverse effects on identified air quality receptors.

8.3.14 Accordingly, it is considered that no substantial weight should be attributed against the Scheme in the planning balance with respect to air quality, in accordance with Paragraph 5.2.16 of the NPS EN-1.

8.3.15 The Scheme is assessed to be compliant with the relevant policy requirements set out within NPS EN-1, NPS EN-3, and NPS EN-5, as well as the NPPF and the Breckland Local Plan (2023), insofar as they relate to air quality.

8.3.16 It is therefore concluded that there are no adverse material considerations or negative decision-making implications in relation to the air quality assessment tests outlined within Paragraphs 5.2.15–5.2.19 of NPS EN-1.

Greenhouse Gas Emissions

Planning Policy Context

8.3.17 This section reviews the Scheme in the context of planning policies relating to climate. This section should be read in conjunction with **Policy Compliance Document [APP/5.6]**.

8.3.18 Paragraph 4.10.1 of NPS EN-1 states that new energy infrastructure must be sufficiently resilient against the possible impacts of climate change or else it will not be able to satisfy the energy needs outlined in Part 3 of NPS EN-1. As a result, Paragraph 4.10.8 of NPS EN-1 requires applicants to consider the impacts of climate change when planning the location, design, construction, operation, and, where appropriate, decommissioning of new energy infrastructure.

8.3.19 Paragraph 4.10.5 of NPS EN-1 goes on to stipulate that "*applicants should take reasonable steps to maximise the use of nature-based solutions*", which can also result in

biodiversity benefits as well as increasing absorption of carbon dioxide from the atmosphere in adapting to climate change.

8.3.20 Paragraph 4.10.13 NPS EN-1 continues to advise that, in decision making, the Secretary of State "*should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change*". Paragraph 4.10.15 of NPS EN-1 states that the Secretary of State should "*be satisfied that there are not features of the design of new energy infrastructure critical to its operation which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections*".

8.3.21 Paragraph 2.4.11 of NPS EN-3 discusses the introduction of solar PV and how they are typically proposed within low-lying exposed sites. For these types of proposals, applicants should consider how the equipment is resilient to increased flooding risk and the impact of higher temperatures.

8.3.22 Paragraph 2.3.2 of NPS EN-5 requires the consideration of the effects of flooding (particularly on substations that are vital for the electricity transmission and distribution network), winds and storms (on overhead lines), higher average temperatures (leading to increased transmission losses), earth movement or subsidence caused by flooding or drought (on underground cables) as well as coastal erosion. The latter consideration of coastal erosion is not relevant to the Scheme.

8.3.23 Paragraph 161 of the NPPF supports the position of Paragraph 4.10.13 of NPS EN-1 as it makes clear that the planning system should "*support the transition to net zero by 2050 and take full account of all climate impacts, including overheating, water scarcity, storm and flood risks and coastal change*".

8.3.24 Breckland Local Plan has 'Policy ENV 10 – Renewable Energy Development' which supports renewable and low-carbon energy projects where their impacts are, or can be made, acceptable. Proposals will be assessed in terms of their effects on landscape, townscape, heritage assets, residential amenity, agricultural land, biodiversity, and cumulative local impacts, with reference to relevant policies. Developments must demonstrate that adverse effects can be mitigated and that the overall benefits of energy generation outweigh any harm. The Council may impose conditions for decommissioning and land restoration upon cessation of use. For solar energy schemes, the use of previously developed or lower-quality agricultural land is encouraged, with large-scale projects expected to maintain agricultural activity where possible and enhance biodiversity around installations.

Applicant Assessment

8.3.25 The Applicant's Climate Change assessment, including Lifecycle Greenhouse Gas (GHG) Impact Assessment, In-Combination Climate Impacts (ICCI) Assessment, and Climate Change Resilience, is set out in **ES Chapter 13: Climate Change [APP/6.2]**. These assessments conclude that the construction and decommissioning of the Scheme will result in a not significant effect on the global climate while the operation of the Scheme

will result in a significant beneficial effect on the global climate, due to the clean energy it produces, thereby providing a net reduction in GHG emissions compared to a scenario without the Scheme based on forecast UK grid average energy emissions available from the Department for Energy Security and Net Zero for the year 2033 .

8.3.26 In compliance with NPS EN-1, the Applicant's assessment in **ES Chapter 13: Climate Change [APP/6.2]** outlines the potential for GHG impacts for the construction, operation and decommissioning phases of the Scheme. Paragraph 5.3.7 of NPS EN-1 requires the production of a GHG Reduction Strategy. The reduction strategy measures are included within the **oCEMP [APP/7.6]** and **oOEMP [APP/7.8]**, rather than as a standalone document.

8.3.27 The GHG assessment concludes that the predicted GHG emissions for the construction phase (2031-2033) are 505,958 tCO_2e, made up of emissions from products during the construction phase for the Scheme. The greatest contributor of GHGs during the construction phase arises from the embodied carbon in the materials used for constructing the Scheme. As mentioned in **ES Chapter 13: Climate Change [APP/6.2]**, the solar PV Panels are expected to be sourced from China or a country of similar distance. The manufacture and supply of PV Panels and BESS will be the largest source of GHG emissions. The summary of GHG emissions during the construction phase is shown in Table 13.24 'Construction GHG Emissions' of **ES Chapter 13: Climate Change [APP/6.2]**.

8.3.28 The Scheme construction emissions will fall under the 5th and 6th UK carbon budgets. For the purposes of the Climate Assessment, it is assumed that 50% of construction emissions will fall under the 5th carbon budget and 50% under the 6th carbon budget. The annual emissions of the construction phase have been compared to the relevant annualised carbon budgets in Table 13.25 of **ES Chapter 13: Climate Change [APP/6.2]** to enable assessment of the construction phase in isolation. Therefore, GHG emissions from the construction of the Scheme are considered to have a minor adverse effect on the climate, which is not significant in EIA terms.

8.3.29 For the operation phase (2033-2093), GHG emissions will be generated through activities such as the transportation of operational workers, water consumption, energy usage, and replacement and maintenance activities, including associated replacement products, packaging and waste. Operational GHG emissions are expected to be 1,846,220 tCO_2e, and the total energy generated by the Scheme would be around 37.22 TWh over the 60-year Scheme operation phase.

8.3.30 The lifecycle carbon intensity of the Scheme, estimated to be 63.28 gCO_2e/kWh is mid-range for that generated from the poly-silicon, ground-mounted solar energy sources, as presented in Table 13.10 of **ES Chapter 13: Climate Change [APP/6.2]**.

8.3.31 For the decommissioning phase (2093 – 2095), there is uncertainty over the total estimate of GHG emissions that will be produced and the available technology. However, GHG emissions are expected to be significantly lower than during the construction phase. This is because decommissioning activities do not require extensive manufacturing,

transportation, or installation of new equipment. The GHG emissions for the decommissioning phase are estimated at 4,754 tCO2e, based on emissions from product removal, worker transportation, waste, energy use, and water use.

8.3.32 Based on the above considerations set out in **ES Chapter 13: Climate Change [APP/6.2]**, it is considered that the overall GHG impact of the Scheme is beneficial and significant (in EIA terms), as the Scheme achieves emissions mitigation that goes substantially beyond the reduction trajectory, or substantially beyond existing and emerging policy compatible with that trajectory. The Scheme is playing a part in achieving the transition rate required by nationally set policy commitments. The Scheme avoids GHG emissions in the without-project baseline.

8.3.33 Paragraph 5.3.10 of NPS EN-1 states that the Secretary of State should give appropriate consideration to developments that incorporate measures to mitigate or offset emissions arising from construction and decommissioning. It is acknowledged, however, that some residual emissions are inevitable and must be accepted, given the essential role of energy infrastructure in achieving economy-wide decarbonisation. As outlined above, the Scheme is anticipated to have minor adverse effects on the climate during its operation and decommissioning phases due to associated GHG emissions. These impacts are minimised through embedded mitigation measures. Overall, the Scheme is expected to deliver significant, long-term benefits across its lifecycle by generating clean energy and achieving a net reduction in GHG emissions compared to a scenario without the development.

8.3.34 The Climate Change Risk Assessment has considered the measures which are integrated into the design. These are considered an adequate response to the projected climate change impacts to which the Scheme would be exposed. Embedded mitigation measures to increase the resilience of the Scheme to climatic changes are outlined and summarised in Table 13.36, Table 13.37 and Table 13.36 of **ES Chapter 13: Climate Change [APP/6.2]**. These tables consider climate change effects on the Scheme itself as well as effects on human health.

Summary

8.3.35 The Scheme is considered to accord with the provisions of NPS EN-1 in respect of GHG emissions. This matter should be afforded substantial positive weight in the overall planning balance and supports the granting of development consent. The Scheme also demonstrates compliance with the relevant climate change resilience policies contained within NPS EN-1, NPS EN-3, NPS EN-5, and Policy ENV 10 of the Breckland Local Plan. Following the implementation of the mitigation measures set out in the accompanying **ES [APP/6.1-6.5]**, the residual and cumulative effects of the Scheme, taking account of climate change, are considered appropriately managed, effectively mitigated, and are not significant.

Biodiversity and Geological Conservation

Planning Policy Context

8.3.36 This section reviews the Scheme in the context of planning policies relating to Ecology and Biodiversity. This section should be read in conjunction with the **Policy Compliance Document [APP/5.6]**.

8.3.37 Paragraph 5.4.17 of NPS EN-1 states that projects should include an ES that clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity.

8.3.38 Paragraph 2.10.25 of NPS EN-3 recognises that applicants may, to minimise disruption to biodiversity, therefore choose a site based on the site's proximity to capacity in the grid.

8.3.39 Under Paragraph 5.4.19 of NPS EN-1, applicants should show how projects have taken opportunities to conserve and enhance biodiversity conservation interests. Paragraphs 5.4.21 of NPS EN-1 and 2.5.1 of NPS EN-5 recognise that the design process should embed opportunities for nature-inclusive design. As set out in sections 4.6 and 4.7 in NPS EN-1

8.3.40 Paragraph 5.4.35 of NPS EN-1 outlines that applicants are to apply the mitigation hierarchy with regard to biodiversity. The paragraph goes on to establish a number of matters that applicants are to demonstrate regard for.

8.3.41 An advising ecologist is recommended in the design process, such as to ensure the mitigation hierarchy is applied successfully to avoid, reduce, mitigate and compensate for adverse impacts whilst also maximising enhancements (Paragraph 2.10.78 of NPS EN-1).

8.3.42 At a local level, 'Policy ENV 02 – Biodiversity Protection and Enhancement' within the Breckland Local Plan requires that European Sites receive the highest level of protection, with development only permitted in line with the Conservation of Habitats and Species Regulations 2017. Proposals affecting biodiversity or geological sites at any level must demonstrate that harm has been avoided, minimised, and, where unavoidable, adequately mitigated or compensated. An Ecological Impact Assessment may be required where designated sites, protected species, or priority habitats could be affected. Development will only be allowed if there are overriding reasons, no suitable alternative sites are available, and residual harm is compensated. All proposals should secure proportionate net gains for biodiversity, and the Council may impose conditions or obligations to ensure mitigation and monitoring. Additional requirements for the Breckland Special Protection Area are set out in Policy ENV 03.

8.3.43 As part of the Secretary of State's decision-making process, Paragraph 5.4.41 of NPS EN-1 requires the Secretary of State to consider any net benefits for biodiversity and

geological conservation interests and that such benefits may outweigh harm to these interests.

Habitats Regulation

8.3.44 Paragraph 5.4.4 of NPS EN-1 confirms that the highest level of biodiversity protection is afforded to sites identified through international conventions and that the Conservation of Habitats and Species Regulations 2017, which sets out sites for which an HRA will assess the implications. Paragraph 5.4.49 of NPS EN-1 confirms that the Secretary of State must consider whether a project is likely to have a significant effect on a protected site which is part of the National Site Network (a habitat site), or any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans and projects.

8.3.45 In decision making, paragraph 5.4.49 of NPS EN-1 confirms the Secretary of State must consider whether a project is likely to have a significant effect on a protected site which is part of the National Site Network (a habitat site), or any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans and projects.

Ancient woodland, ancient trees, veteran trees and other irreplaceable habitats

8.3.46 With regard to ancient woodland, ancient trees, veteran trees and other irreplaceable habitats, paragraphs 5.4.14 and 5.4.15 of NPS EN-1 recognise that these habitats are valuable biodiversity resources that are very difficult to restore, recreate and replace if destroyed. It is therefore the objective of the Government to maintain and enhance existing areas of such habitat.

8.3.47 Paragraph 5.4.32 of NPS EN-1 states that applicants are required to "*include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phases*".

Protection and enhancement of habitats and species

8.3.48 Paragraph 5.4.7 of NPS EN-1 recognises that many SSSIs are also designated as sites of international importance and are protected accordingly, whilst those that are not sites of international importance should still be given a high degree of protection.

8.3.49 Further, paragraph 5.4.8 of NPS EN-1 makes clear that "*development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits (including need) of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs*".

8.3.50 For the protection and enhancement of habitats and species, paragraphs 5.4.33 and 5.4.34 of NPS EN-1 detail that applicants are to consider '*any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity*' with

improvement considerations given to habitats and species in, around and beyond developments. To enhance such improvements, applicants may consider the opportunities identified in Local Nature Recovery Strategies, for example.

8.3.51 Sites of regional and local biodiversity and geological interest include Regionally Important Geological Sites, Local Nature Reserves (LNR) and Local Wildlife Sites. The Secretary of State should give due consideration to regional and local designations. Still, NPS EN-1, through paragraph 5.4.52, makes clear that given the need for new nationally significant infrastructure, these designations should not, in themselves, be used to refuse development consent.

Applicant Assessment

8.3.52 In accordance with Paragraph 5.4.17 of NPS EN-1, **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** considers the ecological and biodiversity impacts of the Scheme across the construction, operational, and decommissioning phases. The Chapter outlines all designated sites (international, national, and local) of ecological and geological conservation importance, protected species, habitats and other species identified as being of principal importance for the conservation of biodiversity within the study area, as per the Order limits.

8.3.53 In taking a step back from the assessment, the Applicant confirms through the **Site Evaluation Report** appended to this Planning Statement that, having identified the point of connection and secured a connection agreement, a 'Search Area' was adopted by the Applicant to identify suitable areas of land for NSIP-scale solar development. This process was driven by the desire to be as close to the point of connection as possible, to minimise the risk of environmental impacts, disruption to multiple landowners, challenges with crossings, process losses and the cost and delay of a longer cable route, in accordance with Paragraph 2.10.25 of NPS EN-3.

8.3.54 The Scheme overarching approach to good design and evidencing of adherence to the mitigation hierarchy is outlined in the **Design Approach Document [APP/5.7]**. The **Design Approach Document [APP/5.7]** explains how good design has been embedded into the Scheme from the outset of the design process through a clear design framework, and how this has provided a shared understanding of the desired outcomes for the Scheme, informing decision-making.

8.3.55 A **Shadow Habitats Regulations Assessment [APP/7.3]** has been prepared in accordance with the requirements of Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) to set out whether the Scheme is likely to have any significant effect on European designated sites. This document is submitted in support of this DCO Application. The report concludes that there will be no significant effects on European Sites during the construction, operational, or decommissioning phases of the Scheme, or in combination with other plans and projects.

8.3.56 There are no SSSIs located on the land within the Order limits, nor is it located immediately adjacent to any statutory ecological designations, the closest of which is the River Nar

SSSI, which is located approximately 0.27km north of the Site and Castle Acre Common SSSI, which is located approximately 0.44km north of the Site. No direct or indirect impacts on River Nar SSSI and Castle Acre Common SSSI are anticipated for the construction, operational, and decommissioning phases of the Scheme, given its distance from the Order limits.

8.3.57 There is a single non-statutory ecological designation, Roadside Nature Reserve (RNR, ref U33086), located along River Road within the Order limits situated along River Road within the highway verge located between individual parcels. No direct or indirect impacts on River Road RNRs are anticipated for the construction, operational and decommissioning phases of the Scheme, given outside of the works area or the Order limits itself. Ecological buffers have been incorporated into the design of the Scheme from an early stage to mitigate adverse impacts, including damage to existing vegetation and the implementation of the **oCEMP [APP/7.6]**.

8.3.58 The relevant irreplaceable habitats in relation to the Scheme are ancient woodland, ancient trees and veteran trees. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** confirms that there are no ancient woodland or ancient trees contained within the Site. The closest identified Ancient Woodland to the site is Sporle Wood Ancient Replanted Woodland, which is located approximately 4km east of the site. The nearest area of Ancient Semi-natural Woodland is Necton Wood, which is located approximately 8km east of the site.

8.3.59 As set out in **Appendix 16.4: Arboricultural Impact Assessment [APP/6.4]**, there are 16 (possibly/likely) veteran trees.

8.3.60 No direct or indirect impacts on veteran and/or ancient trees and ancient woodland are anticipated for the construction, operational and decommissioning phases of the Scheme, given the retention of individual trees has been designed into the Scheme (including through routing of access via existing field entrances and access points), with suitable buffers of 15x stem diameter, to be maintained except as specified by detailed arboricultural advice. Therefore, no direct permanent loss of ancient woodland, other woodland, veteran and/or ancient trees within the Order limits is anticipated as all access, hardware and cabling installation will either avoid the woodland habitats which occur within and adjacent to the Site.

8.3.61 Mitigation is proposed to avoid and reduce impacts on existing woodland features. The Scheme has been carefully designed to avoid veteran trees and woodland through embedded mitigation, including tree buffer zones to avoid soil disturbance, micrositing to avoid root and canopy impacts. Further, any effects would be temporary and would likely be limited to the margins of woodland, whilst embedded mitigation measures are proposed (including as set out within the **oCEMP [APP/7.6]**), which will further prevent any potential effects.

8.3.62 **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** outlines the surveys completed in terms of ecological and biodiversity interest that have informed the DCO Application and further details of which are set out within the accompanying **ES Appendix 7.2: Baseline**

Ecological Survey Report [APP/6.4]. This approach aligns with the requirements of paragraph 5.4.42 of NPS EN-1, which first seeks to avoid potential impacts, then minimises them, and subsequently takes on-site measures to rehabilitate or restore biodiversity, before compensating for residual, unavoidable impacts in accordance with the mitigation hierarchy.

8.3.63 Impacts of the Scheme on relevant habitats and species have been considered, as reported in **ES Chapter 7: Ecology and Biodiversity [APP/6.2]**. This includes a number of habitats such as grassland, hedgerows, ponds, woodland and watercourses, and the following species: bats, badgers, other mammals (e.g., brown hares and hedgehogs), birds, otters and water voles, reptiles, and amphibians (e.g., great crested newts).

8.3.64 As a result of embedded and additional mitigation and enhancement measures, there are four direct residual significant (in EIA terms) beneficial effects as a result of the Scheme, which are anticipated in relation to the following ecological features: hedgerows and lines of trees; breeding birds – other species; wintering birds – other species and amphibians – Great Crested Newt.

8.3.65 No direct or indirect impacts of the Scheme on the other relevant habitats and species listed are anticipated for the construction, operational and decommissioning phases of the Scheme, given the implementation of the proposed embedded mitigation incorporates the retention of these features within appropriate development exclusion buffers, secured management plans and enhancement measures.

8.3.66 As secured in the **oLEMP [APP/7.11],** new habitats will be provided for as part of the Scheme, with the aim to improve biodiversity gains, where this does not conflict with construction, operational and decommissioning phases of the Scheme. Examples of habitat creation and enhancement measures to be implemented as part of the Scheme include:

- Creation of new grassland habitats, including wildflower grassland
- The gapping up of hedgerows and Tree Lines with additional native species
- Implementation of a rotational management strategy for hedgerows; and
- The selective thinning and management of vegetation associated with ponds and ditches.

8.3.67 Specific details relating to the locations of Badger setts within the Study Area can be located within **ES Appendix 7.2: Baseline Ecological Survey Report [APP/6.4]**. There are a small number of Badger setts and associated activity present on Site; these existing Badger setts will be fully retained, and a minimum 30m/20m (main/outlier sett) development exclusion buffers will be maintained as part of the embedded mitigation for the Scheme. Additional mitigation measures are proposed that updated Badger survey work is carried out prior to commencement of the construction phase in order to confirm the current status of Badgers on Site and to inform any detailed mitigation (including the need for works to be undertaken under licence should any active setts be affected at that

time). No direct or indirect impacts on badgers are anticipated during the construction and operational phases of the Scheme, given the implementation of the proposed embedded and additional mitigation measures, secured management plans, and enhancement measures.

Summary

8.3.68 From the outset of the Scheme, the Applicant has sought to embed biodiversity and nature conservation considerations into the design process. This is evident at the site selection stage, where the Applicant purposefully sought land which did not include any highly sensitive ecological/biodiversity-related statutory designations. As well as excluding blocks of woodland from the Order limits within the Site.

8.3.69 Mitigation of potential impacts is embedded into the design of the Scheme, with avoidance of impacts being prioritised, noting that the assessment concludes that there are no significant (in EIA terms) residual adverse effects as a result of mitigation. Additionally, for all phases of the Scheme, a suite of detailed management plans will be developed and implemented across each phase as relevant, as outlined within the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **oDS [APP/7.10]** and the **oLEMP [APP/7.11],** and are secured in the **draft DCO [APP/3.1]**. These management plans include mitigation measures intended to avoid or reduce adverse effects, in accordance with the mitigation requirements of EN-1, paragraph 5.4.35, and the monitoring requirements of EN-3, paragraph 2.10.90.

8.3.70 To ensure the beneficial effects of the newly created habitats are fully realised, an **oLEMP [APP/7.11]** forms part of the control documents submitted alongside this DCO Application. The **oLEMP [APP/7.11]** sets the framework for the detailed LEMP, which is to be submitted and approved by the relevant local planning authorities, and outlines how the newly created and retained habitats on site will be managed throughout the operational phase of the Scheme. An **oLEMP [APP/7.11]** is included as part of the DCO Application, and the detailed LEMP will be developed substantially in accordance with it.

8.3.71 Additional habitats are created across the Order limits, improving links between habitats within and adjacent to the Order limits, resulting in the Applicant providing a BNG of at least 10%. However, the delivery of BNG will likely be significantly higher for habitat and hedgerow; as set out in the **Biodiversity Net Gain Assessment Report [APP/7.4],** the ecological mitigation and enhancement areas will deliver a potential net gain of 23.46% for onsite habitats, and a net gain of 58.78%for onsite hedgerow and tree lines.

8.3.72 The **oLEMP [APP/7.11]** includes measures to ensure biodiversity net gain is achieved and maintained throughout the Scheme's operational phase. The biodiversity net gain strategy must be substantially in accordance with the **oLEMP [APP/7.11]**, as set out in a Requirement of the **draft DCO [APP/3.1]** which commits to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines.

8.3.73 It is therefore considered that the Scheme both addresses and demonstrates compliance with the specific NPS EN-1 tests as established under paragraphs 5.4.42 and 5.4.43. For

more information on how the Scheme has complied with the aforementioned tests, please refer to Table 1 of the **Policy Compliance Document [APP/5.6]**.

8.3.74 It is considered that the overall four direct residual significant (in EIA terms) beneficial effects on biological conservation and potential net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines of BNG should be given moderate positive weight in the planning balance.

Historic Environment

Planning Policy Context

8.3.75 This section reviews the Scheme in the context of planning policies relating to heritage. This section should be read in conjunction with the **Policy Compliance Document [APP/5.6]**.

8.3.76 Paragraph 5.9.1 of NPS EN-1 recognises that all phases of development have the potential to result in adverse impacts on the historic environment above, at and below ground. Paragraphs 2.10.107 – 2.10.109 of NPS EN-3 also recognise this.

8.3.77 Paragraph 5.9.3 of NPS EN-1 goes on to note that 'heritage assets' can constitute, for example but not limited to, buildings, areas or landscapes. A heritage asset's significance derives from the sum of its interests and, therefore, a heritage asset's significance derives both from its physical presence and its setting.

8.3.78 Paragraph 5.9.10 of NPS EN-1 states that 'as part of the ES, the applicant should provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by its setting'.

8.3.79 Paragraph 207 of the NPPF also requires applicants to describe the significance of any heritage asset affected, including any contribution made by its setting.

8.3.80 Paragraph 5.9.15 of NPS EN-1 states that should applicants seek to develop within Conservation Areas, World Heritage Sites and/or within the setting of heritage assets, opportunities should be explored to enhance or better reveal a heritage asset's significance.

8.3.81 Paragraph 5.9.13 of NPS EN-1 encourages applicants, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment. Paragraph 2.10.116 of NPS EN-3 also states applications should take account of the results of historic environmental assessments in their design.

8.3.82 Paragraph 5.9.14 of NPS EN-1 also requires applicants to carefully prepare schemes whilst also identifying the nature of any impact(s) (e.g., direct or indirect, temporary or permanent).

8.3.83 Paragraph 5.9.25 of NPS EN-1 sets out the presumption in favour of conservation and, where appropriate, enhancing the significance of heritage assets.

8.3.84 Paragraph 5.9.11 of NPS EN-1 states that *"where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation".*

8.3.85 Paragraphs 2.10.114 and 2.10.115 of NPS EN-3 confirm that field evaluations may be required and that these should be proportionate to the sensitivity of, and extent of, proposed ground disturbance.

8.3.86 5.9.22 of NPS EN-1 states that in determining applications, the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development, including by development affecting the setting of a heritage asset (including assets whose setting may be affected by the proposed development). The Secretary of State is to take account of: information submitted with the made application and in examination, historic landscape character records, the relevant HER(s), examination representations and expert advice.

8.3.87 Policy ENV 07 and ENV 08 of the Breckland Local Plan (2023) set out the council's policies on designated and non-designated heritage assets, respectively.

Substantial harm and less than substantial harm

8.3.88 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.

8.3.89 NPS EN-1 Paragraphs 5.9.28 to 5.9.30 provide guidance on the weighting that should be applied for each category of designated heritage asset, as summarised below:

- Any harm to or loss of significance of a designated heritage asset should require a clear and convincing justification
- Substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional; and
- Substantial harm to or loss of significance of the assets of the highest significance, including Scheduled Monuments, Protected Wreck Sites, Registered Battlefields, Grade I and II* Listed Buildings, Grade I and II* Registered Parks and Gardens, and World Heritage Sites, should be wholly exceptional.

8.3.90 Where a proposed development will lead to substantial harm to or loss of significance of a designated heritage asset, the Secretary of State should refuse consent unless the tests

set out in NPS EN-1 paragraph 5.9.31 can be met (for instance, that the harm is outweighed by the substantial public benefits of the development).

8.3.91 Paragraph 5.9.32 of NPS EN-1 states that *"where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use*".

8.3.92 Paragraph 5.9.33 of NPS EN-1 states that when "*weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset*".

8.3.93 Paragraph 215 of the NPPF outlines that where a development would lead to 'less than substantial harm' to the significance of a designated heritage asset, such harm should be weighed against the public benefits of the proposal.

8.3.94 Policy ENV 08 of the Breckland Local Plan (2023) states that "*in weighing applications that are likely to directly or indirectly affect non-designated heritage assets, a balanced judgement will be undertaken, having regard to the scale of any harm or loss and the significance of the heritage asset."*

Applicant Assessment

8.3.95 In accordance with Paragraph 5.9.1 of NPS EN-1 and Paragraphs 2.10.107 – 2.10.109 of NPS EN-3, **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** provides an assessment of the Scheme's impact on the historic environment, both on above and below ground assets, within the Order limits, or that will be impacted by the Scheme's construction, operational and decommissioning phases.

8.3.96 Section 8.6 of **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** outlines the baseline conditions of heritage assets. The section outlines the fifteen designated and other non-designated heritage assets that have 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.

8.3.97 The Applicant confirms that the ES has assessed the likely worst-case development scenario. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** has assessed the worst-case scenario of installing new pylons and retaining part of the existing overhead line and associated pylons (Scenario A). There is the possibility that part of the existing overhead lines and pylons could be decommissioned and removed; however, this aspect of the Scheme would not present the worst-case scenario for this assessment. For completeness, however, an assessment has also been presented, which covers the

removal of the decommissioned pylons (Scenario B). The ultimate conclusions, though, are as assessed from Scenario A, as the worst-case assessment.

8.3.98 In compliance with Paragraph 207 of the NPPF and Paragraph 5.9.10 of NPS EN-1, **ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment** [APP/6.4] and **ES Appendix 8.3: Archaeological Desk-Based Assessment [APP/6.4]** have been prepared and supports **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** in establishing the significance of any affected heritage assets, considering any setting contributions.

8.3.99 A number of embedded mitigation measures have been designed into the Scheme in accordance with the conservation objectives of Paragraph 5.9.25 of NPS EN-1 and design objectives of Paragraph 2.10.116 of NPS EN-3. Section 8.7 of **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** outlines the relevant embedded mitigation measures that have informed the assessment of cultural heritage impacts.

8.3.100 The following embedded mitigation measures have been incorporated into the Scheme design for the construction phase, detailed within the **oCEMP [APP/7.6]**:

- Where possible, transportation routes will avoid additional traffic movements past sensitive heritage assets
- The landscape strategy will include the gapping up and reinforcing of historic hedgerows, as well as the use of planting to provide screening from heritage assets
- The locations of Construction Compounds have been selected to avoid areas of known archaeological remains and to be unobtrusive to the settings of the heritage assets
- The locations of permanent above-ground assets have been selected to reduce/remove the impact on heritage assets from construction works to the north; and
- There may also be the overgrounding of cable runs in areas known to contain significant archaeological remains.

8.3.101 The following embedded mitigation measures have been incorporated into the Scheme design for the operational phase, as set out in the **oOEMP [APP/7.8]**:

- The landscape strategy will include the gapping up and reinforcing of historic hedgerows, as well as the use of planting to provide screening from heritage assets; and
- The locations of permanent above-ground assets have been selected to reduce/remove the impact on heritage assets from construction works to the north.

8.3.102 The following embedded mitigation measures have been incorporated into the Scheme design for the decommissioning phase, as set out in the **oDS [APP/7.10]**:

- No vehicle or plant movements that could impact the archaeological horizon will take place in areas with archaeological assets; and

- A Decommissioning Strategy will be agreed with the relevant Archaeological Advisor prior to decommissioning taking place; this will include further measures for safeguarding archaeological remains during the decommissioning phase.

8.3.103 In accordance with Paragraph 5.9.11 of NPS EN-1 and Paragraphs 2.10.114 and 2.10.115 of NPS EN-3, **ES Appendix 8.4: Geophysical Survey Report [APP/6.4]** and **ES Appendix 8.6: Archaeological Trial Trenching Report [APP/6.4]** have been produced in support of this DCO Application. A detailed Archaeological Mitigation Strategy is to be drafted in accordance with the **ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4],** and submitted to and approved by BC and is secured via a requirement of the **draft DCO [APP/3.1].**

8.3.104 The **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]**, assessment of the Scheme's impact during the operational phase on designated heritage assets has identified that, without additional mitigation, there would be a minor adverse effect under Scenario A and a Neutral effect under Scenario B on three designated heritage assets during the operational phase of the Scheme:

- Castle Acre Castle and Castle Acre Priory, both Scheduled Monuments with Grade I Listed elements; and
- St George's Church, a Grade I Listed Building.

8.3.105 Embedded mitigation in the form of additional planting at the north-east corner of Field 12 and the northern side of Field 26, along with the enhancement of existing hedgerows along the eastern limit of the Site at the A1065, will reduce impacts on views of the Site from Castle Acre Castle, Priory and Church of St George. However, this will not reduce visibility of the new pylons, resulting in a minor change to a small element of these heritage assets' settings. There are no additional mitigation measures that can be taken to reduce the scale of the effect. As such, there will be a residual Low/Negligible impact on these designated heritage assets only under Scenario A, which is not significant in EIA terms.

8.3.106 Before additional mitigation, there will be a Neutral effect on the remaining ten designated heritage assets. This will remain at the same residual level of effect following mitigation:

- Moated Site 230m and 100m north of All Saints Church (Scheduled Monument)
- Deserted Medieval village of Great Palgrave (Scheduled Monument)
- All Saints Church (Grade I Listed Building)
- Church of St James (Grade I Listed Building)
- High House (Grade I Listed Building)
- High House Stable Court and Curtain Wall (Grade I Listed Building)
- Little Palgrave Hall (Grade II Listed Building)
- Narford Hall (Grade II Registered Park and Garden)

- Castle Acre Conservation Area; and
- South Acre Conservation Area.

8.3.107 Under Scenario B, without additional mitigation, there will be a negligible impact on all 15 identified designated heritage assets, resulting in a neutral effect that is not significant in EIA terms. This will remain unchanged following additional mitigation, resulting in a residual Neutral effect.

8.3.108 The only development that has been considered to have any potential cumulative effect on Cultural Heritage is High Grove Solar. The only designated heritage assets likely to be sensitive to both schemes are Castle Acre Castle, Castle Acre Priory, Church of St James, Little Palgrave Hall and Great Palgrave Deserted Medieval Village.

8.3.109 For the majority of these assets, there are no cumulative significant effects caused by the Scheme, and it is not considered that the cumulative impact of High Grove Solar would result in cumulative harm.

8.3.110 The heritage assets of Castle Acre Castle and Castle Acre Priory, and when considering the cumulative effect of the Scheme and High Grove Solar, would be Minor adverse, resulting from a slight change to the heritage asset's settings that does not detract from its significance. Embedded mitigation in the form of landscaping initiatives will serve to minimise impacts on views between the Scheme and both heritage assets. Views to the east and west, directed along the Nar Valley, will remain unchanged under both projects, and only a small section of both settings will be potentially affected. As such, the magnitude of impact is considered to be low/negligible, resulting in residual effects of minor scale, which is not significant in EIA terms.

8.3.111 During construction, the archaeological remains of low sensitivity (as indicated by the informative trial trenching to be present within the Site), this negligible and low magnitude of impact to archaeological remains, prior to additional mitigation measures being put in place, would result in Neutral and Minor Adverse effects, which are not significant in EIA terms.

8.3.112 The archaeological remains in Fields 27 under the Scheme would be either substantially or wholly truncated by below-ground impacts required for the construction of the Customer Substation, National Grid Substation and BESS. This would have a high magnitude of impact on archaeological remains of low sensitivity, which, prior to additional mitigation measures being put in place, would result in a Moderate Adverse effect, significant in EIA terms.

8.3.113 There will be no residual effects on non-designated heritage assets or archaeological remains during the construction, operational, and decommissioning phases of the Scheme.

8.3.114 **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage-related effects expected across the Scheme's

construction, operational and decommissioning phases. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oDS [APP/7.10],** and **oLEMP [APP/7.11]** and are secured via requirements of the **draft DCO [APP/3.1].**

Substantial Harm and less than substantial harm

8.3.115 There is no anticipated substantial harm to, or total loss of, any designated heritage assets' significance as a result of the Scheme. Therefore, the policy tests regarding substantial harm outlined in NPS EN-1, paragraphs 5.9.29 to 5.9.31, do not apply.

8.3.116 **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** outlines that 'substantial harm' is afforded to any adverse effect that is of a major magnitude, whilst moderate, minor or negligible adverse effects represent effects that are of 'less than substantial harm' in nature.

8.3.117 Given, **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, all residual adverse effects constitute 'less than substantial harm'.

8.3.118 The summary of the assessment is set out in **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]**. This Chapter confirms that, due to the embedded mitigation measures designed into the layout of the Scheme, there will be no significant impact upon any above-ground designated or non-designated historic assets resulting from any phase of the Scheme. **ES Appendix 8.2: Stage 1 and Stage 2 Setting Assessment [APP/6.4]** and **ES Appendix 8.3: Archaeological Desk-Based Assessment [APP/6.4]**, provide detailed information on the predicted changes to the setting of designated heritage assets within the study area and the impact that these changes would have on the significance of the assets. These historic assets within the study area of the Scheme will experience less than substantial harm, as the impacts are assessed to be negligible at most. Therefore, there is no requirement for the Applicant to demonstrate exceptional or wholly exceptional circumstances to justify any unacceptable harm, as per the requirements of paragraphs 5.2.29 and 5.2.30 of NPS EN-1.

8.3.119 No impacts of major or moderate magnitude have been identified on any designated heritage assets. While there is no direct correlation between the significance of effect in EIA terms and the degree of harm referenced in national planning policy, it is acknowledged that assets identified as experiencing a significant adverse effect are more likely to experience substantial harm. As such, it is concluded that the harm caused to these assets falls within the 'less than substantial harm' threshold. No physical harm will occur to any of these designated and non-designated assets, and the indirect impact on the settings of these assets is less than substantial and reversible, specifically the removal of solar arrays and the possibility of returning the land to an agricultural function. The exception to this would be the Grid Connection Infrastructure and the National Grid Substation, both of which will not be decommissioned and will remain in place. However, the continued use of these elements of the Scheme would cause no additional impacts to

those identified during the operational phase. As such, it is not considered that any significant effects on cultural heritage will arise from this phase of the Scheme.

8.3.120 All of the impacts on designated heritage assets identified with regard to the Scheme have been assessed as experiencing less than substantial harm to the significance of those assets. Therefore, none of the identified impacts represent or result in substantial harm, as this is a particularly definitive policy test, as explained in the NPPF.

8.3.121 With regard to non-designated buried archaeological remains, it is possible that limited impacts (not significant) that can only be partially mitigated for may be experienced as a result of the Scheme.

8.3.122 The Scheme's design has been carefully considered to avoid, reduce, or mitigate potentially significant effects on cultural heritage and archaeology assets as set out in **Design Approach Document [APP/5.7]**. This resulted in a Scheme that avoids direct physical impact on any designated heritage assets. Whilst there will be some residual impacts resulting from changes to the setting of some designated heritage assets, these have been assessed to result in 'less than substantial harm', as outlined in the assessment.

8.3.123 Regarding the potential impacts upon buried archaeological remains, NPS EN-1 paragraph 5.9.33 and Paragraph 209 of the NPPF are engaged. The policies state that a balanced judgement is required, considering the scale of any harm or loss of significance to non-designated heritage assets.

8.3.124 In recognising that the Scheme will result in harm of a 'less than substantial' nature, the key policy test (as established under paragraph 5.9.32 of NPS EN-1) is that such harm is weighed against the public benefits. Given the clear and urgent need to deploy renewable energy at speed and scale, the Scheme demonstrably yields substantial public benefits that outweigh the less substantial harm identified.

Summary

8.3.125 The Scheme is not likely to result in any significant effects on cultural heritage. The Scheme's design development has sensitively considered the key heritage and archaeological receptors throughout, and appropriate mitigation measures are embedded into the Scheme's design. By implementing Good Design at the early stages of the process, the Scheme has avoided and minimised conflict with designated and non-designated heritage assets. Through the implementation of mitigation measures, all residual effects are assessed as being not significant and also equate to no more than 'less than substantial harm' on all designated and non-designated heritage assets impacted by the Scheme, as required by paragraph 5.9.32 of NPS EN-1 and paragraph 209 of the NPPF, respectively.

8.3.126 In accordance with NPS EN-1 paragraph 5.9.32 (and taking account of the principles set out by 4.2.16 and 4.2.17 of NPS EN-1), the substantial public benefits and need for the Scheme as set out in **Sections 3** and **6** of this Planning Statement, including the delivery

of CNP infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments, clearly and demonstrably outweigh the less than substantial harm to designated heritage assets, particularly so as the policy tests relating to substantial harm are not triggered.

8.3.127 Overall, the Scheme complies with the relevant policies in relation to the historic environment and no residual significant effects are anticipated. As a result, it is considered that the historic environment should be given neutral weight in the planning balance.

Landscape and Visual Impact

Planning Policy Context

8.3.128 This section reviews the Scheme in the context of planning policies relating to landscape and visual. This section should be read in conjunction with the **Policy Compliance Document [APP/5.6]**.

8.3.129 Paragraph 4.2.2 of NPS EN-1 explains that ensuring a smooth transition to abundant, low-carbon energy generation will ensure the UK is energy independent, resilient and secure. It identifies the criticality of deploying "*new low carbon sources of energy at speed and scale*" for our energy security and Net Zero ambitions. Meanwhile, Paragraph 3.1.2 of NPS EN-1 provides a position which is that "*it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impact*".

8.3.130 Paragraph 5.10.5 of NPS EN-1 goes on to make clear that *"virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*". Paragraph 5.10.13 of NPS EN-1 states that "*all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites".*

8.3.131 With the above in mind, Paragraph 5.10.1 of NPS EN-1 establishes that the context within which a project is proposed is important since "*landscape and visual effects of energy projects will vary on a case-by-case basis according to the type of development, its location and the landscape setting of the proposed development".*

8.3.132 With regard to the Scheme's context, Paragraph 5.10.12 of NPS EN-1 recognises that local landscapes may be highly valued locally. Should a local development document contain policies relating to landscape or waterscape character assessments, the Paragraph confirms that such *"locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development".*

8.3.133 Paragraph 5.10.35 of NPS EN-1 states that in decision-making, it is recognised that the scale of energy projects means that they tend to be visible across very wide areas. The SoS is to judge whether any adverse impact on the landscape would be "*so damaging that it is not offset by the benefits (including need) of the project*".

8.3.134 Paragraph 5.10.26 of NPS EN-1 recognises that any reduction in the scale of a project, to mitigate adverse effects, may result in a significant operational constraint or reduction in

function, such that the Secretary of State should balance the loss of function with any potential reduction in adverse landscape and/or visual effects.

8.3.135 Paragraph 2.9.7 of NPS EN-5 recognises that in practice, new overhead lines can give rise to adverse landscape and visual impacts, and paragraph 2.9.10 of NPS EN-5 states that 2.9.10 cumulative adverse landscape and visual impacts may arise where new overhead lines are required along with other related developments such as substations and/or other new sources of generation.

8.3.136 Paragraphs 2.9.16-2.9.19 set out the Holford Rules, which provide guidelines for the routeing of overhead high-voltage electricity lines to minimize visual and environmental impact; and the Horlock Rules, which provide guidelines for the siting and design of substations and other related infrastructure

8.3.137 Under Paragraph 5.10.14 of NPS EN-1, the SoS must evaluate whether the visual effects on sensitive receptors (e.g., local residents) and other receptors (e.g., visitors to the local area) outweigh the benefits of the project.

8.3.138 As part of a landscape and visual assessment, applicants are to:

- include references to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project
- include the effects on landscape components and character during construction and operation
- consider the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity; and
- address the landscape and visual effects of noise and light pollution, and other emissions from construction and operational activities on residential amenity and on sensitive locations, receptors and views (NPS EN-1 Paragraph 5.10.17-5.10.22, Policy ENV 05 Protection and Enhancement of the Landscape).

8.3.139 Paragraph 5.10.4 of NPS EN-1 recognises that landscape effects arise due to the combination of a landscape's sensitivity and the nature and magnitude of change proposed by development.

8.3.140 Paragraph 5.10.24 of NPS EN-1 states that applicants should consider how landscapes can be enhanced using landscape management plans to help enhance environmental assets where they contribute to landscape and townscape quality. Paragraph 187 of the NPPF also makes clear that planning decisions should contribute to and enhance the natural and local environment by, among other things, "*protecting and enhancing valued landscapes*" in "*a manner commensurate with their statutory status or identified quality in the development plan*".

8.3.141 Paragraph 5.10.6 of NPS EN-1 establishes that projects need to be designed carefully to take account of potential impacts on the landscape, whilst Paragraph 5.10.37 of NPS EN-

1 confirms that, in decision making, the SoS is to consider whether the development has been designed carefully to minimise harm to the landscape through the provision of appropriate mitigation.

8.3.142 Good design has a role to play in siting infrastructure within landscapes. Paragraph 4.7.1 of NPS EN-1 recognises that the visual appearance of a development and how it sits within and relates to a landscape is sometimes considered the most important factor in good design, but that the functionality of an object/infrastructure is equally important. Paragraph 2.10.98 of NPS EN-3 confirms that applicants are to follow the criteria for good design set out in Section 4.7 of NPS EN-1.

8.3.143 Paragraph 2.10.5 of NPS EN-5 sets out that in addition to good design in accordance with the Holford and Horlock rules, and the consideration of undergrounding or rerouting the line where possible, the principal opportunities for mitigating adverse landscape and visual impacts of electricity networks infrastructure are consideration of network reinforcement options (where alternatives exist) which may allow improvements and/or extensions to an existing line rather than the building of an entirely new line; selection of the most suitable type and design of support structure in order to minimise the overall visual impact on the landscape. In particular, ensuring that towers are of the smallest possible footprint and internal volume; and the rationalisation, reconfiguration, and/or undergrounding of existing electricity networks infrastructure in the vicinity of the proposed development.

8.3.144 Paragraph 2.11.2 of NPS EN-5 states that the Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford and Horlock Rules. Paragraph 2.11.3 of NPS EN-5 states that the Secretary of State should also be satisfied that all feasible options for mitigation – including the rationalisation, reconfiguration, or undergrounding of existing electricity networks infrastructure, have been considered and evaluated appropriately

8.3.145 Paragraph 5.10.27 of NPS EN-1 notes that adverse landscape and visual effects may be minimised through the appropriate setting of infrastructure within the development site and wider setting. Careful consideration of colours can also support the delivery of a well-designed, sympathetic scheme. Paragraph 4.7.6 of NPS EN-1 recognises that applicants may have very limited choice in the physical appearance of energy infrastructure. Paragraphs 4.7.11 – 4.7.12 state that the SoS must therefore weigh the ultimate purpose of the infrastructure (and bear in mind the operational, safety, and security requirements of a proposed development) against considerations of aesthetics.

8.3.146 Policy ENV 05 Protection and Enhancement of the Landscape of the Breckland Local Plan (2023), states that development should have particular regard to maintaining the aesthetic and biodiversity qualities of natural and man-made features within the landscape.

8.3.147 Paragraph 135 of the NPPF establishes that, among other things, planning decisions should ensure that developments are visually attractive as a result of appropriate and effective landscaping and layout, as well as being sympathetic to the surrounding landscape setting.

8.3.148 Paragraph 5.10.19 of NPS EN-1 notes the importance of giving landscape and visual matters early consideration in the establishment of design principles and the early siting and design phase.

8.3.149 Paragraph 2.10.100 of NPS EN-3 states that applicants should "*consider as part of the design, layout, construction, and future maintenance plans how to protect and retain, wherever possible, the growth of vegetation on site boundaries, as well as the growth of existing hedges, established vegetation, including mature trees within boundaries*".

8.3.150 Paragraph 2.10.43 of NPS EN-3 makes clear that applicants are "*encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape*".

Applicant Assessment

Approach to the assessment

8.3.151 In accordance with Paragraph 5.10.16 of NPS EN-1 and Paragraph 2.10.97 of NPS EN-3, a landscape and visual impact assessment has been carried out and is included within **ES Chapter 6: Landscape and Visual [APP/6.2]** and is supported by **ES Appendices 6.1 - 6.8 [APP/6.4].**

8.3.152 **ES Chapter 6: Landscape and Visual [APP/6.2]** has been produced in accordance with the relevant requirements of a landscape and visual assessment as set out in NPS EN-1. In evidencing each requirement in turn:

- **ES Chapter 6: Landscape and Visual [APP/6.2]** is supported by **ES Appendix 6.6: Extracts from Relevant Landscape Character Assessments [APP/6.4]** which has collated the relevant extracts from the published landscape character assessments which cover the study area in relation to the landscape and visual assessment of the Scheme (in accordance with Paragraph 5.10.17 of NPS EN-1).
- The scope of **ES Chapter 6: Landscape and Visual [APP/6.2]** assesses all phases of the Scheme and considers both landscape components and landscape character, in accordance with Paragraph 5.10.20 of NPS EN-1 and Policy ENV 05 Protection and Enhancement of the Landscape.
- To assess the worst-case scenario of visibility (and associated conspicuousness) of the Scheme's construction and operational phases, visualisations have been produced to assist with the assessment of the potential impacts and serve to inform the identification of any likely significant effects. This is compliant with the requirement under Paragraph 5.10.21 of NPS EN-1. These visualisations **[APP/6.3]** include:
  - **Figure 6.10: PP1-16 and PPa-g Winter Photograph Panels**
  - **Figure 6.11: PP1-16 and PPa-g Summer Photograph Panels**
  - **Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires**

- **Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires**
- **Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme; and**
- **Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme.**

- In accordance with Paragraph 5.10.22 of NPS EN-1, **ES Chapter 6: Landscape and Visual [APP/6.2]** details that nighttime and lighting impacts have been scoped out of the LVIA. Further detail on lighting is provided in **ES Chapter 5: The Scheme [APP/6.1]**. Noise is principally assessed under **ES Chapter 10: Noise and Vibration [APP/6.2]** whilst intra-project combined effects are outlined in Section 6.11 of **ES Chapter 6: Landscape and Visual [APP/6.2]**.
- Section 6.11 of **ES Chapter 6: Landscape and Visual [APP/6.2]** describes the existing levels and assesses the anticipated cumulative landscape and visual effects of the Scheme's construction, operational (short, medium and long term), and decommissioning.

Good design, evolution and application of the mitigation hierarchy

8.3.153 In accordance with Paragraph 4.7.1 of NPS EN-1, Paragraph 2.10.98 of NPS EN-3 and Paragraph 135 of the NPPF, fulfilling the requirement for good design whilst demonstrating full adherence to the mitigation hierarchy has been of paramount importance. The Scheme's design and evolution have placed ongoing consideration for landscape and visual matters.

8.3.154 The Applicant has split the site evaluation process into two parts: the first part is the National Grid Substation siting assessment, and the second part is the Site Evaluation of the solar PV Site , as set out in the **Site Evaluation Report (Appendix 1** to this **Planning Statement).** The **Site Evaluation Report** confirms that a key principle in the site evaluation process was to avoid areas of particular environmental and landscape sensitivity where possible to minimise potential impacts. **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** adds that, among other considerations, the Applicant sought to develop a Scheme that would avoid impacts on sensitive landscapes and environmental features as far as practicable.

8.3.155 With Paragraph 5.10.19 of NPS EN-1 in mind, **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** notes changes that took place following non-statutory consultation:

- Development of a hedgerow management and enhancement strategy across all fields; and
- Inclusion of a potential area for publicly accessible amenity space in Field 4.

8.3.156 **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** also notes a number of changes that took place following statutory consultation:

- 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. This change applied to Fields 26, 27, 33 and 35
- 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. This change applied to Fields 26, 27, 33 and 35
- PV panels were removed from Field 35. PV panels were reduced within Field 33, set further back from South Acre
- 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
- Additional areas of permanent woodland belt planting were included along the western and eastern boundaries of Field 27
- Provision of advance planting along the A1065 where there are gaps in the roadside hedgerow and around the boundaries of Field 27; and
- The crossing over River Road has been relocated further north.

8.3.157 The Project Principals in the **Design Approach Document [APP/5.7]** relevant to the consideration of landscape and visual effects and subsequent inclusion of embedded mitigation measures are:

- 2.1 – Respond to the character of the Site, informed by the Breckland Local Landscape Character Assessment
- 2.2 – Retain and enhance existing vegetation wherever possible to retain the fabric of the Site and aid integration of the Scheme into its context
- 2.3 – Support objectives of Norfolk's Green Infrastructure Strategy
- 2.4 – Improve soil health during the lifetime of the Scheme
- 2.5 – Respect setting of heritage assets along the Nar Valley
- 2.7 – Respect residential amenity.
- 2.8 – Consider experience of people travelling along adjacent roads, including the A1065, South Acre Road, River Road and Narford Lane
- 2.9 – Consider experience of people using the Public Rights of Way
- 3.1 – Integrate the Scheme into the local environment and allow the movement of wildlife through the Site
- 3.4 – Deliver a Biodiversity Net Gain of at least 10%
- 4.1 – Design for resilience and adaptation to future climate change

- 5.3 – Engage openly, transparently and meaningfully with stakeholders, using feedback to inform the Scheme
- 5.4 – Identify opportunities for wider community benefits in consultation with local stakeholders
- 5.6 – Provide clear lines of communication between the developer and the local community
- 5.7 – Provide education and interpretation of the Scheme and Site
- 5.8 – Collaborate with High Grove Solar
- 5.10 – Retain all PRoWs on the existing alignment during the operational phase
- 5.11 – Improve connectivity and accessibility through the Site; and
- 7.2 – Allow existing woodland blocks to continue to be managed sustainably.

8.3.158 To minimise the landscape and visual impacts of new infrastructure, the **Design Principles, Parameters and Commitments [APP/5.8]** secure embedded mitigation measures which include but are not limited to the planting of new hedgerows, native woodland belts and scrub planting within the buffers.

8.3.159 Mitigation is encapsulated within the project principles set out above. The Scheme's embedded mitigation measures are broadly summarised above and explained in full in **ES Chapter 6: Landscape and Visual [APP/6.2]**. The Scheme also secures additional mitigation measures which serve to further mitigate (post-embedded mitigation measures) adverse landscape and visual effects. With regard to landscape and visual impacts, the additional mitigation measures evidence the Applicant's proper application of the mitigation hierarchy. The residual effects concluded in **ES Chapter 6: Landscape and Visual [APP/6.2]** are not considered capable of being mitigated or compensated further.

8.3.160 The hierarchical approach taken toward mitigation has been to:

- First to avoid where possible, any effects through the overall design and layout of the Scheme and disposition of its elements; this constitutes primary mitigation by preventing effects occurring through sensitive design and layout
- Subsequently reducing effects arising through the careful siting of strategic landscape mitigation measures and careful consideration of the siting of each of the different elements of the Scheme; and
- Additional mitigation is achieved through the compensation of potential losses.

8.3.161 The **oCEMP [APP/7.6]** would include the following mitigation measures in relation to landscape and visual effects:

- A pre-construction tree survey would be required prior to starting construction works to re-establish the baseline. This survey would inform the tree protection zones to be applied during construction. Site hoarding and construction exclusion zones would be

introduced around retained vegetation in accordance with the requirements of BS 5837:2012 'Trees in relation to design, demolition and construction'. An approved Arboricultural Method Statement (AMS) would be adopted incorporating best practice guidance set out in British Standard 5837:2012 Trees in Relation to Design, Demolition and Construction which would ensure retained trees and other vegetation are not adversely affected during the construction process

- The use of visual screening, such as hoardings, would be implemented for more sensitive visual receptors in proximity to the Site, including residential and PRoW receptors that have the greatest potential to be affected by the Scheme
- Ensuring a tidy and neat working environment and covering stockpiles in accordance with best practice measures
- Temporary lighting during construction required to enable safe working in the hours of darkness would be designed as far as reasonably practical to avoid light spill onto areas beyond the Site. Construction lighting would include directional fittings and would be restricted to the construction working hours sets out in **ES Chapter 5: The Scheme [APP/6.1]**; and
- Construction works which create dust would be kept to a minimum within proximity to existing pedestrian routes and residential properties, and dust prevention measures, such as damping, would be undertaken to reduce the impact on users of the PRoW network.

8.3.162 During the operation phase, existing and newly established habitats and planting would be maintained in accordance with the principles established under the **oLEMP [APP/7.11]**. Whilst not relied upon in the assessment, the **oLEMP [APP/7.11]** also secures the establishment and management of early planting across the Site.

8.3.163 The **oLEMP [APP/7.11]** sets out specific strategic landscape and ecological opportunities and creation and management prescriptions linking where appropriate to Design Principles and Project Level Design Principles; **Design Principles, Parameters and Commitments [APP/5.8]**. Such opportunities and prescriptions measures would be put in place to create and enhance habitats, protect and enhance existing landscape/ ecological features, strengthen Green Infrastructure across the Order limits and provide visual screening whilst aligning with local conservation priorities.

Residential visual amenity assessment

8.3.164 To understand the potential impacts on residential properties, a Residential Visual Amenity Assessment (RVAA) has been undertaken, and its detailed findings are presented in **ES Appendix 6.7: Residential Visual Amenity Assessment [APP/6.4]**. The scope of the RVAA comprises an assessment of residential properties situated within 800m of the Site.

8.3.165 **ES Appendix 6.7: Residential Visual Amenity Assessment [APP/6.4]** concludes that the Residential Visual Amenity threshold would not be reached for any properties within

the study area. Effects on all properties would not be sufficiently "oppressive" or "overbearing" that any property would be rendered an unattractive place in which to live.

Residual landscape effects

8.3.166 Section 6.10 of **ES Chapter 6: Landscape and Visual [APP/6.2]** describes the existing levels and assesses the anticipated residual landscape effects of the Scheme's construction, operational (short, medium and long term), and decommissioning, in accordance with this policy. Mitigation for LVIA involves planting throughout the Site which is embedded into the Scheme and secured in the design, meaning additional mitigation is not available. No additional mitigation measures for the Scheme are proposed. In the absence of any additional mitigation, the residual effects are the same as the potential effects set out in Section 6.8 of **ES Chapter 6: Landscape and Visual [APP/6.2].**

8.3.167 Having applied the mitigation hierarchy properly (and with Paragraphs 3.1.2, 5.10.5, 5.10.13 of NPS EN-1 in mind), the secured embedded and additional mitigation measures lead **ES Chapter 6: Landscape and Visual [APP/6.2]** to conclude the following significant residual adverse impacts:

- D1: Swaffham Heath LCA: there are moderate adverse effects across all phases of the Scheme
- E6: North Pickenham Plateau LCA: there are moderate adverse effects across all phases of the Scheme

8.3.168 The mitigation hierarchy has been applied throughout the design and development of the Scheme landscape, and visual impacts have been minimised as far as practicable. The residual effects above cannot be mitigated further. Through the application of good design principles, including the application of the mitigation hierarchy, a robust approach to secure good design would be achieved. Despite this approach, some significant residual visual effects would remain for two landscape receptors as summarised above. Paragraph 5.10.14 of NPS EN-1 states that "*The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project*". Paragraph 5.10.35 of NPS EN-1 confirms that "*The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project*."

8.3.169 Section 5 of this Planning Statement and the **Statement of Need [APP/5.4]** sets out the critical need for the Scheme. Section 9.4 below sets out the assessed planning balance of the Scheme and concludes that the adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from the provision of low carbon energy to meet the need identified in NPS EN-1.

8.3.170 The extensive planting proposed throughout the Site, as part of the **Appendix 1: Green Infrastructure Strategy Plans** to the **oLEMP [APP/7.11]**, would provide long term beneficial effects upon the landscape fabric of the Site itself. New planting and maintenance regimes outlined within the **oLEMP [APP/7.11]** would both serve to increase the sense of enclosure within the central plateau landscape. In the long term, hedgerow would be maintained to 3m in height as a minimum, with gaps infilled and additional trees planted within them, where appropriate. In the long term, the droves would become more enclosed as new planting matures and serves to reinforce the existing hedgerow and tree belts within the Site.

Residual visual effects

8.3.171 Section 6.10 of **ES Chapter 6: Landscape and Visual [APP/6.2]** describes the existing levels and assesses the anticipated residual visual effects of the Scheme's construction, operational (short, medium and long term), and decommissioning, in accordance with this policy. Mitigation for LVIA involves planting throughout the Site which is embedded into the Scheme and secured in the design, meaning additional mitigation is not available. No additional mitigation measures for the Scheme are proposed. In the absence of any additional mitigation, the residual effects are the same as the potential effects set out in Section 6.8 of **ES Chapter 6: Landscape and Visual [APP/6.2].**

8.3.172 Having applied the mitigation hierarchy properly (and with Paragraphs 3.1.2, 5.10.5, 5.10.13 of NPS EN-1 in mind), the secured embedded and additional mitigation measures lead **ES Chapter 6: Landscape and Visual [APP/6.2]** to conclude the following significant residual adverse impacts:

- VRG1: Central Site Area: there are major-moderate adverse effects across construction, decommissioning, and operational (short and medium term) phases of the Scheme
- VRG2: North-Eastern Site Area: there are major-moderate adverse effects across construction, decommissioning, and operational (short and medium term) phases of the Scheme; and
- VRG3: Nar Valley Southern Slope and Settlement Edge of South Acre: there are moderate adverse effects across construction, decommissioning, and operational (short term) phases of the Scheme.
- The Peddars Way and Norfolk Coastal Path: there are moderate adverse effects across construction, decommissioning phases of the Scheme
- The Peddars Way and Norfolk Coastal Path, Over a limited extent only. Within and up to 300m from the Site: there are moderate adverse effects across the operational (short and medium term) phase of the Scheme
- Rebellion Way Cycle Route: there are moderate adverse effects across construction, decommissioning phases of the Scheme; and

- Rebellion Way Cycle Route, Over a limited extent only. Within the Site: there are moderate adverse effects across the operational (short and medium term) phase of the Scheme.

8.3.173 The mitigation hierarchy has been applied throughout the design and development of the Scheme landscape and visual impacts have been minimised as far as practicable. The residual effects above cannot be mitigated further. Through the application of good design principles, including the application of the mitigation hierarchy, a robust approach to secure good design would be achieved. Despite this approach, some significant residual visual effects would remain to seven visual receptors as summarised above. Paragraph 5.10.14 of NPS EN-1 states that "*The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project*". Paragraph 5.10.35 of NPS EN-1 confirms that "*The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project*."

8.3.174 Section 5 of this Planning Statement and the **Statement of Need [APP/5.4]** sets out the critical need for the Scheme. Section 9.4 below sets out the assessed planning balance of the Scheme and concludes that the adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from the provision of low carbon energy to meet the need identified in NPS EN-1.

Cumulative effects

8.3.175 Section 6.11 of **ES Chapter 6: Landscape and Visual [APP/6.2]** describes the existing levels and assesses the anticipated cumulative landscape and visual effects of the Scheme's construction, operational (short, medium and long term), and decommissioning, in accordance with this policy.

8.3.176 **ES Chapter 6: Landscape and Visual [APP/6.2]** concludes the following significant residual adverse cumulative impacts, cumulatively with High Grove Solar:

- E6: North Pickenham Plateau LCA: there are significant adverse effects across all phases of the two developments; and
- VRG4: Great Palgrave and Little Palgrave: there are significant adverse effect for users of PRoW Sporle with Palgrave BR5 across the construction and decommissioning phases of the two developments.

Summary

8.3.177 With the critical and urgent need for the Scheme enshrined in national and local policy, it is considered that the identified residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case in accordance with Paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1.

8.3.178 Further, the Secretary of State is to consider, under paragraph 5.10.36 of NPS EN-1, whether significant residual adverse impacts are temporary. The majority of the identified residual adverse landscape and visual effects are of a temporary nature and, therefore, the Secretary of State should also take into account the reversibility of the Scheme and its associated residual adverse effects.

8.3.179 As set out in Section 10 of the **Planning Statement [APP/5.5],** it is considered that the wider benefits of the Scheme as CNP infrastructure, delivery of a significant level of low carbon energy generation and biodiversity net gain and the provision of permissive paths outweigh the adverse residual effects of the Scheme. Therefore, the Scheme is considered acceptable in terms of its overall landscape, visual and residential amenity impacts and that the nature of the visual impacts are not considered to outweigh the substantial benefits of the Scheme.

8.3.180 Therefore, it is concluded that the wider benefits of the Scheme, which include: the delivery of a significant level of low carbon energy generation; BNG; other benefits such as the provision of permissive paths and the identification of a significant beneficial residual landscape and visual effect, outweigh the residual adverse landscape and visual effects.

8.3.181 On balance, and in accordance with paragraph 5.10.35 of NPS EN-1, the residual adverse landscape and visual effects are not considered to be of such magnitude or significance as to outweigh the demonstrable benefits of the Scheme. This conclusion is reached in the context of the careful and sensitive design approach adopted for the Scheme.

8.3.182 Therefore, the Scheme is considered acceptable in terms of its overall landscape, visual and residential amenity impact.

8.3.183 The Scheme is therefore considered compliant with NPS EN-1, NPS EN-3, NPS EN-5, the NPPF and the Breckland Local Plan (2023).

8.3.184 It is considered that landscape and visual impacts should be afforded moderate negative weight in the planning balance.

Land Use, including Open Space, Green Infrastructure, Green Belt and Agricultural Land

Planning Policy Context

8.3.185 This section reviews the Scheme in the context of planning policies relating to Soils and Agriculture. This section should be read in conjunction with **Policy Compliance Document [APP/5.6]**.

8.3.186 NPS EN-1 paragraph 5.11.3 recognises that the re-use of previously developed land may not be possible for many forms of energy infrastructure. NPS EN-1 paragraph 5.11.18 continues that where developments are proposed on previously developed land, applicants should ensure they have considered the risks posed by land contamination and opportunities for remediation. NPS EN-3 includes solar-specific policy regarding previously developed land and provides that while land type should not be a predominant

factor in site selection for a development, applicants should, where possible, utilise suitable previously developed land.

8.3.187 Where new developments cannot avoid development in the countryside and/or on undeveloped greenfield land, applicants should seek to minimise impacts on best and most versatile (BMV) land. As stated in paragraph 5.11.12 of NPS EN-1, BMV is defined as Grades 1, 2 and 3a of the Agricultural Land Classification (ALC) while non-BMV agricultural land includes Grades 3b, 4 and 5. Agricultural land quality is graded by the ALC system, set by Natural England and is the only approved system for grading agricultural quality in England (Paragraph 2.10.33 of NPS EN-3).

8.3.188 Paragraphs 2.10.28 – 2.10.34 of NPS EN-3 relate to agricultural land classification and land type. It sets out a preference for the use of non or lower grade agricultural land but accepts that: land type should not be a predominating factor in site selection; that solar development is not prohibited on BMV. The policy also recognises that at this scale, it is likely that some use of agricultural land will be required and that applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land.

8.3.189 Paragraph 2.10.33 of NPS EN-3 goes on to note that, where necessary, field surveys should be conducted to establish the ALC grades to identify soil types and to inform soil management across all phases of an energy scheme.

8.3.190 As part of the decision-making process under Paragraph 5.11.34 of NPS EN-1, the SoS is to ensure that applicants do not site schemes on BMV land without justification. Should a scheme be proposed on BMV land, the Secretary of State should take account of the economic and other benefits of that land. Paragraph 2.10.145 of NPS EN-3 reflects the position of Paragraph 5.11.34 of NPS EN-1 and adds specificity to Solar PV Generation by noting that the Secretary of State is to ensure that an applicant puts "*forward appropriate mitigation measures to minimise impacts on soils or soil resources*". This approach is also reflected in the 2024 Written Ministerial Statement: 'Solar and protecting our Food Security and Best and Most Versatile Land (BMV) Land', the '2024 WMS') **[Ref. 48]** which emphasises that BMV land should be avoided where possible and that due weight be given to proposed use of such land when considering whether planning consent should be granted for solar developments.

8.3.191 Further reference is made to the use of BMV in the 2015 Written Ministerial Statement: Planning Update (the 'WMS 2015') **[Ref. 49]**. The WMS 2015 is now 10 years old and predates more recent expressions of Government policy, particularly in the current NPPF, where there is no longer a need to consider food production in land-use planning terms.

8.3.192 At a local level, Policy EC06 Farm Diversification of the Breckland Local Plan supports proposals for diversification on existing farm holdings where they contribute positively to the farm's long-term viability and respect the rural character. Developments should retain or enhance traditional farm buildings, preferably by reusing existing sound structures or by locating new buildings close to existing ones. Proposals must remain secondary to the main agricultural use, add value to farm or local produce, or support tourism. The scale

and nature of the diversification must suit the location and avoid unacceptable impacts on amenity, biodiversity, the landscape, or the enjoyment of the countryside. New dwellings and large hard-standing areas are discouraged, and traffic levels must be appropriate for the site's accessibility and the capacity of the local road network.

8.3.193 Naturally, the development of land affects soil resources, where such effects can include physical loss of and damage to soil resources (Paragraph 5.11.4 of NPS EN-1). Under Paragraph 5.11.13 of NPS EN-1, Applicants should identify such effects and should seek to minimise impacts on and protect soil health by taking account of mitigation measures.

8.3.194 Whilst in the case of most energy infrastructure, "*there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site*", applicants should seek to minimise effects through the protection of soils (Paragraph 5.11.23 of NPS EN-3).

8.3.195 Paragraphs 5.11.14 of NPS EN-1 and 2.10.34 of NPS EN-3 note that applicants are encouraged to develop and implement Soil Management Plans/Soil Resources Management Plans in line with good practice guidance to ensure the sustainable reuse and storage of soils. Paragraph 2.10.127 of NPS EN-3 goes on to note that the DEFRA 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites' provides guidance on mitigating and minimising damage to soils during the construction phase.

Applicant Assessment

8.3.196 **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1],** sets out how previously developed land has been considered in the search for alternative sites for the Scheme through a review of the relevant local brownfield land registers. It concludes that no brownfield land sites are available at a sufficient size to accommodate the Scheme, either individually or in combination with other sites. On this basis, the Applicant considers that the policy test to consider previously developed land has been met.

8.3.197 As set out in **ES Chapter 11: Soils and Agriculture [APP/6.2]**, due to the temporary nature of the Scheme, and the measures in place to restore the land to its original use and condition as far as practicable after the Scheme is decommissioned, there are no significant residual effects anticipated.

8.3.198 In accordance with Paragraph 2.10.34 of NPS EN-3, the **oSMP [APP/7.13]** defines the approach to managing soil resources during the construction, operational and decommissioning phases of the Scheme. The **oSMP [APP/7.13]** sets out procedures for soil stripping, stockpiling, reinstatement, and land restoration, with measures to minimise compaction and maintain soil quality. For example, soils would only be handled in dry, friable conditions, and topsoil and subsoil would be managed separately. In line with Paragraph 5.11.13 of NPS EN-1, these embedded measures are designed to ensure restoration to a comparable land quality standard. With this mitigation in place, only temporary moderate adverse effects on soil resources are anticipated, which are not considered to represent significant residual effects.

8.3.199 Further, by leaving the land undisturbed under long-term grassland, soil health, quality and structure within the Solar PV Sites are likely to improve during the lifetime of the Scheme. There will be beneficial impacts on soils resulting from long-term resting from arable production. There are no adverse impacts, and the benefits are temporary, as the land will be returned to the landowner after 60 years; however, it is noted as a benefit to the soil resource.

8.3.200 The Applicant, noting a preference for development to be situated on suitable brownfield, industrial and low and medium-graded agricultural land. NPS EN-3 paragraph 2.10.145 reiterates that the Secretary of State should take into account the economic and other benefits of any BMV land within a proposed development, and that it should ensure there are appropriate mitigation measures to minimise impact on soil resources.

8.3.201 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 3. The Natural England ALC maps do not differentiate between grades 3a and 3b.

8.3.202 The provisional map for the East of England shows the Site to be mostly of undifferentiated Grade 3 with areas of Grade 4. There is a small area of Grade 2 shown on the eastern edge.

Image 3 - Provisional ALC Map for the Site and Surrounding Area



8.3.203 Due to the size and nature of the Scheme, the Order limits are predominantly located on agricultural land. The ALC results are presented below in Image 4 and Table 1.2, which are from **ES Appendix 11.2: Agricultural Land Classification Survey [APP/6.4]** and Appendix 6 of the ALC Survey Report.

Image 4 - ALC Survey Results of the Site

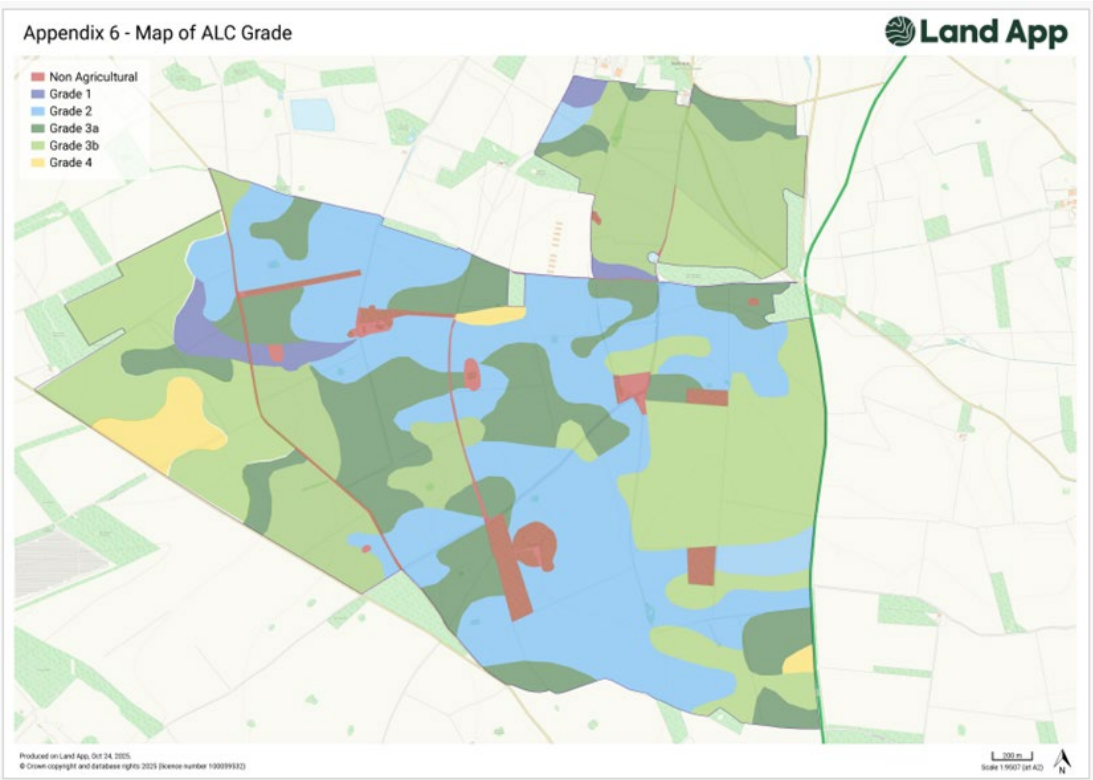


Table 1.2 ALC Survey Result of the Site

Grade	Description	Area (ha)	Proportion of Site (%)
1	Excellent	18	2
2	Very good	276	33
3a	Good	161	19
3b	Moderate	324	39
4	Poor	20	2
NA	Non-agricultural	13	2
NS	Not surveyed and roads	27	3
Total		839	100.0

8.3.204 The Order limits extend to approximately 840ha. Of this, approximately 455ha is of BMV quality. The ALC surveys have confirmed that approximately 54% of the Order limits comprises of BMV land.

8.3.205 At a site design level, the Applicant has sought to, where possible, reduce the use of BMV land; however, due to the nature of the land quality within the Order limits and the general classification both locally and on a wider scale in Norfolk, it has not been possible to avoid it entirely. The steps the Applicant has taken to avoid, reduce, and subsequently mitigate impacts on BMV are explained below.

8.3.206 The **Design Approach Document [APP/5.7]** sets out Project Principles which have framed the development of the design of the Scheme to date.

- Principle 2.10: Retain fields comprising entirely Grade 1 and fields comprising entirely of Grade 1 and 2 in agricultural use where practicable

8.3.207 Following ALC surveys, it was revealed that no fields proposed for Solar PV Arrays within the Order limits comprised entirely Grade 1 land. One Field (Field 32) was surveyed as entirely Grade 1 and 2. During Stage 2 design, Field 32 was identified as an area requiring mitigation and enhancement. At Stage 3, it was removed from the Order limits to enable its continued agricultural use by the landowner.

8.3.208 The Scheme is mostly temporary and reversible in nature and therefore will have a low magnitude affect the long-term agricultural resource. When the operational phase ends, the Solar PV Site would be decommissioned and the land returned to its original use and condition as far as practicable and returned to the landowner. The National Grid Substation and the Grid Connection Infrastructure would remain in situ as these assets will form part of the NETS. The decommissioning measures set out in the **oDS [APP/7.10]** are secured by Requirement 20 in Schedule 2 of the **draft DCO [APP/3.1]**.

8.3.209 As the detailed layouts of the substations, BESS, and some temporary construction compounds are yet to be finalised, a precautionary worst-case assessment has been applied, assuming certain areas fall within BMV agricultural land. On this basis, construction works could temporarily affect approximately 6.8 ha of BMV and 1.0 ha of non-BMV land, with longer-term temporary effects over 19.1 ha of BMV and 4.2 ha of non-BMV land. Permanent works would result in the loss of approximately 4.5 ha of BMV land, including the National Grid Substation and Grid Connection infrastructure, as well as 4.3 ha for mitigation planting.

8.3.210 During construction, the temporary and permanent loss of BMV land represents a low-magnitude impact on a high-sensitivity resource, resulting in minor adverse effects, which are not significant in EIA terms. Soils are predominantly of low sensitivity, with limited areas of medium sensitivity, and the effects of construction activities are assessed as minor adverse and not significant.

8.3.211 During operation, there would be no significant adverse effects on agricultural land or soil resources. Long-term rest from arable production may have minor beneficial effects on

soil condition, while the impacts on agricultural businesses would be minor and adverse, but not significant.

8.3.212 During decommissioning, impacts on soils and agricultural land would be temporary, reversible, and of low magnitude, leading to minor adverse effects, which are not significant in EIA terms. There will be some permanent land take associated with the National Grid Substation and grid connection infrastructure, amounting to less than 5 ha of BMV land.

8.3.213 Overall, **ES Chapter 11: Soils and Agriculture [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, the Scheme would not result in any significant adverse effects on soil or agricultural land resources throughout its lifecycle.

8.3.214 Cumulative effects between the Scheme and other existing and/or approved developments have been summarised and tabulated to demonstrate where these effects have the potential to occur and are presented in **ES Chapter 17: In-Combination Effects [APP/6.2].**

8.3.215 A worst-case assessment has been applied; there is the potential for permanent land loss of BMV quality from all the developments to exceed 50ha, which would result in a cumulative impact of a major adverse effect, which would be significant in EIA terms.

Summary

8.3.216 Overall, therefore, for the majority of land within the Order limits, where arable soils will go into long-term grassland land coverage, there will be a significant benefit for soils. This will be a temporary benefit, however, as the benefits may be reduced or lost if arable farming activities resume following decommissioning. Overall, therefore, the benefit is a temporary impact on a resource of medium and low sensitivity, resulting in a minor beneficial effect, which is not significant in EIA terms.

8.3.217 The land is, in part, grazed by sheep, which are flocks grazing over winter stubble and stubble crops. Sheep grazing has the potential to continue and expand under and around the PV panels. Regarding the impact on the sheep business, these are expected to be beneficial effects for the duration of the operational phase. They will be low-magnitude, long-term temporary benefits for enterprises with low sensitivity, resulting in long-term temporary beneficial effects of minor significance, which are not significant in EIA terms.

8.3.218 In summary, the Scheme demonstrates compliance with NPS EN-1, NPS EN-3 and local policy. Although the Scheme does include BMV land, the Applicant has sought to minimise the amount of BMV land by adopting a sequential approach in its site selection and can justify its inclusion for the reasons set out above, including the significant wider benefits that the Scheme will bring. Further, NPS EN-3 acknowledges that ground-mounted solar is not prohibited on BMV land and should not be a predominant factor in site selection. A worst-case assessment has been undertaken to determine the cumulative impacts within the area, resulting in a potential for permanent land loss of BMV quality from all the developments to exceed 20ha, which would be significant in EIA terms. However,

acknowledging that the Scheme requires the use of some BMV land and for the reasons set out above, it is still considered that agricultural land should be given a minor negative weight in the planning balance.

Noise and Vibration

Planning Policy Context

8.3.219 This section reviews the Scheme in the context of planning policies relating to noise. This section should be read in conjunction with **Policy Compliance Document [APP/5.6]**.

8.3.220 Paragraph 5.12.5 of NPS EN-1 identifies the factors that will determine the likely noise and vibration impacts of developments. This includes inherent operational noise, proximity to sensitive noise receptors, proximity to 'quiet places' and other potential impacts upon wildlife.

8.3.221 Paragraph 5.12.6 of NPS EN-1 sets out specific requirements for noise and vibration assessments and includes, for example, but not limited to, the requirement that applicants: describe noise generating aspects of a proposal; identify noise sensitive receptors and areas; establish the baseline condition; assess the changes to the noise environment and provide reasonable mitigation to minimise effects on health.

8.3.222 Paragraph 5.12.8 of NPS EN-1 makes clear that applicants should also consider the noise impacts of ancillary activities associated with the development, such as increases in road traffic.

8.3.223 In undertaking a noise and vibration assessment, Paragraph 5.12.9 of NPS EN-1 clarifies that operational noise (with respect to human receptors) should be assessed using the principles of the relevant British Standards and other guidance.

8.3.224 Paragraph 5.12.15 of NPS EN-1 confirms that, as forms of embedded mitigation, projects are to demonstrate good design through the selection of the quietest and most acceptable cost-effective plant available. The Paragraph also recognises that containment of noise within buildings is acceptable but may give rise to, for example, landscape and visual impacts.

8.3.225 Paragraph 2.10.161 states that, once operational, traffic movements to and from proposed solar farms are generally 'very light' and so, under Paragraph 2.10.162 of NPS EN-3, the Secretary of State is unlikely to give any more than limited weight to traffic and transport noise and vibration.

8.3.226 In decision-making, Paragraph 5.12.17 of NPS EN-1 outlines that the Secretary of State should not grant consent unless development proposals meet the following aims:

- Avoid significant adverse impacts on health and quality of life from noise
- Mitigate and minimise other adverse impacts on health and quality of life from noise; and

- Where possible, contribute to improvements to health and quality of life through the effective management and control of noise.

8.3.227 Section 2.10 (Solar Photovoltaic Generation) of NPS EN-3 considers solar photovoltaic generation and outlines impact considerations. Paragraph 2.10.120-126 specifically considers the impact of construction, including traffic and transport noise, as well as vibration.

8.3.228 In some cases, it may be requested by the local highway authority for the Secretary of State to impose controls on the number of vehicle movements during the construction phase over vehicle movements and routing, such as to make traffic and transport noise and vibration effects acceptable, as set out in Paragraph 2.10.139 of NPS EN-3.

8.3.229 Paragraphs 2.9.26 – 2.9.43 (Noise and Vibration) of NPS EN-5 set out specific considerations which apply to electricity network infrastructure. Noise can be generated by high-voltage transmission lines under certain conditions due to corona discharge. However, this is not considered relevant in this case due to the nature of the Scheme. NPS EN-5 also notes the potential for substation equipment, such as transformers and other voltage regulation equipment, to produce noise.

8.3.230 Paragraph 2.9.26 of NPS EN-5 states that all high voltage transmission lines have the potential to generate noise under certain conditions.

8.3.231 Paragraph 2.9.36 of NPS EN-5 states that noise may also arise from discharges on overhead line fittings such as spacers, insulators and clamps. Such noise should be mitigated through good design.

8.3.232 Paragraph 2.9.37 of NPS EN-5 states that audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors. Paragraph 2.9.38 of NPS EN-5 goes on to state that transformers are installed at many substations and generate low-frequency hum. Whether the noise can be heard outside a substation depends on a number of factors, including transformer type and the level of noise attenuation present (either engineered intentionally or provided by other structures).

8.3.233 Paragraph 187 of the NPPF states that planning decisions should prevent new development from contributing to unacceptable levels of noise pollution. Paragraph 198 of the NPPF adds to Paragraph 187 by requiring new development to mitigate and reduce to a minimum potential adverse impacts resulting from noise and to avoid significant adverse impacts of noise on health and quality of life.

8.3.234 Policy ENV 10 of the Breckland Local Plan states that the Council supports proposals for new renewable energy and low carbon development, subject to consideration of the impact of the development and whether this can be made acceptable. Proposals will be considered having regard to the extent to which there are adverse effects on noise and vibration. Proposals will be permitted where the impact is acceptable or can be made

acceptable. Applications will be expected to demonstrate that any adverse impacts can be mitigated.

8.3.235 Policy COM 03 of the Breckland Local Plan states that in assessing the impact of development on the living conditions of occupants, regard will be had to noise and vibration.

Applicant assessment

8.3.236 **ES Chapter 10: Noise and Vibration [APP/6.2]** includes a noise and vibration assessment of the Scheme which was prepared in accordance with the requirements set out in Paragraph 5.12.6 of NPS EN-1, including consideration of the existing noise environment, proximity to noise sensitive receptors, and wildlife habitats that might be sensitive to noise and how the noise environment will change as a result of the Scheme.

8.3.237 The assessment methodology considers the Lowest Observed Adverse Effect Level (LOAEL) and Significant Observed Adverse Effect Level (SOAEL) assessment indicators outlined in the NPSE, demonstrating compliance with NPS EN-1 paragraph 5.12.16. The guidance section of **ES Chapter 10: Noise and Vibration [APP/6.2]** confirms that, in accordance with Paragraph 5.12.9 of NPS EN-1, operational noise has been assessed against the relevant British Standards (being BS 4142:2014+A1:2019, BS 5228-1:2009+A1:2014, BS 5228- 2:2009+A1:2014, BS 7445-1:2003, BS 8233:2014, BS EN IEC 60942:2018, BS EN 61672-1:2013 and BS ISO 9613-2:2024).

8.3.238 In accordance with Paragraphs 5.12.5 and 5.12.8 of NPS EN-1, the scope of the noise and vibration assessment is outlined through Section 10.5 of **ES Chapter 10: Noise and Vibration [APP/6.2]**, which confirms that the following receptors have been scoped into the assessment:

- Noise impact during construction, decommissioning, and operational phases from National Grid Substation, Customer Substation, Battery Energy Storage System, and Conversion Units
- Vibration impacts from construction and decommissioning phases only from the construction and decommissioning of the National Grid Substation, Customer Substation, Battery Energy Storage System, and Conversion Units
- Noise and vibrational impacts on ecological receptors from across all phases from the National Grid Substation, Customer Substation, Battery Energy Storage System, and Conversion Units
- Noise impact from traffic generated during the construction, decommissioning, and operational phases
- Noise and vibrational impacts from construction and decommissioning phases of Grid Infrastructure and overhead/underground cables; and
- Noise and vibrational impacts from construction and operational phases on Public Right of Way.

8.3.239 **ES Chapter 10: Noise and Vibration [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse noise and vibration-related effects expected across the Scheme's construction, operation and decommissioning phases.

8.3.240 Section 10.11 of **ES Chapter 10: Noise and Vibration [APP/6.2]** presents an assessment of cumulative effects between the Scheme and other existing and/or approved developments on noise and vibration. The cumulative effect assessment finds that the Scheme, cumulatively with the High Grove Solar, would result in a significant adverse effect at the 'The Off Barn' high-sensitive receptor. However, the cumulative effects assessment concludes that it is likely that noise levels can be controlled through the implementation of additional mitigation measures, to reduce noise effects at the receptor would been made by both Schemes, to suitable levels at 'The Off Barn' receptor when considered cumulatively with the neighbouring High Grove Solar Farm, such that residual levels would represent at most a minor impact, which is considered not significant, in EIA terms.

8.3.241 Furthermore, High Grove Solar Farm have stated in their preliminary assessment for Statutory Consultation a commitment to reduce noise effects at the receptor by means of additional mitigation, and this should include consideration of cumulative effects where applicable. It is therefore understood that High Grove Solar Farm will take this into account as part of its final design considerations, which would be secured through a requirement of the DCO in the event that both schemes are approved. The Applicant is also committed to collaboration with High Grove Solar Farm in relation to the design of both schemes.

8.3.242 In compliance with Paragraph 5.12.15 of NPS EN-1, the Scheme has sought to design in the quietest and most acceptable cost-effective plant. For example, **ES Chapter 5: The Scheme [APP/6.1]** confirms that the earth removed to enable the construction of the Customer Substation and National Grid Substation will be placed in a bund alongside the BESS to create a noise buffer.

8.3.243 The noise and vibration impacts from construction traffic are also assessed as required by NPS EN-1 paragraph 5.12.8 and NPS EN-3 paragraphs 2.10.161 – 2.10.162, and the assessment concludes that no significant effects are anticipated as a result of construction traffic. The **oCTMP [APP/7.7]** provides a framework for the management of construction vehicle movements to and from the Scheme to minimise the effects of the temporary construction phase on the local highway network, including noise and vibration. Compliance with the final CTMP, which will substantially accord with the oCTMP, is secured via a Requirement in Schedule 2 of the **draft DCO [APP/3.1]**.

8.3.244 Effects on human health as a result of noise are specifically assessed in **ES Chapter 15: Human Health [APP/6.2]**, including consideration of the potential effects on vulnerable people such as those with sensory impairments, mental disabilities and those less able to move around or leave their properties.

8.3.245 **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** provides an assessment of the likely impacts of noise from the Scheme upon ecological receptors. No significant adverse effects are identified in relation to noise.

8.3.246 In accordance with NPS EN-1 paragraph 5.12.12, mitigation has been incorporated to minimise potential adverse effects on health and quality of life. Mitigation measures are summarised in Section 10.7 of **ES Chapter 10: Noise and Vibration [APP/6.2]**.

8.3.247 A construction noise monitoring scheme will be developed in line with the **oCEMP [APP/7.6]** and agreed upon with appropriate stakeholders following the appointment of a principal contractor and prior to the commencement of construction works as part of any Section 61 consent applications. Requirements for monitoring during the Decommissioning phase will be undertaken in line with the requirements of the **oDS [APP/7.10]**.

8.3.248 The Scheme demonstrates compliance with the decision-making requirements of NPS EN-1 paragraph 5.12.17 as follows:

- It avoids significant adverse impacts on health and quality of life from noise: as reported in **ES Chapter 10: Noise and Vibration [APP/6.2]**, the design of the Scheme avoids significant adverse impacts except at a small number of noise sensitive receptors when certain temporary construction activities are being carried out (e.g. HDD). Where potential significant adverse effects have been identified, these have been avoided through the implementation of appropriate mitigation, or are assessed as not significant due to the short-term nature of the works. As a result, there are no residual significant adverse effects anticipated as a result of the Scheme
- It mitigates and minimises other adverse impacts on health and quality of life from noise: embedded mitigation measures as outlined in **ES Chapter 10: Noise and Vibration [APP/6.2]** will mitigate and minimise other non-significant adverse impacts where predicted noise levels are anticipated to be either below LOAEL or between LOAEL and SOAEL; and
- Where possible, it contributes to the health and quality of life through the effective management and control of noise: embedded mitigation measures as outlined in **ES Chapter 10: Noise and Vibration [APP/6.2]** and includes acoustic barriers and minimum separation distances to the PRoW.

Summary

8.3.249 In summary, the Scheme is not anticipated to result in any residual adverse noise and vibrational effects across the Scheme's construction, operational and decommissioning phases on noise-sensitive receptors.

8.3.250 The assessment's conclusions are compliant with Paragraph 5.12.17 of NPS EN-1 and, therefore, enable the Secretary of State to grant consent from a noise and vibration perspective. Furthermore, the Applicant considers that the assessment's conclusions are

compliant with Paragraph 198 of the NPPF and therefore also complies with Paragraph 187 of the NPPF, and Policies ENV 10 and COM 03 of the Breckland Local Plan.

8.3.251 In summary, the Scheme demonstrates compliance with NPS EN-1, NPS EN-3, NPS EN-5, the NPPF and the Breckland Local Plan in relation to noise, and it is considered that noise and vibration should be given a neutral weight in the planning balance.

Socio-Economic Impacts

Planning Policy Context

8.3.252 This section reviews the Scheme in the context of planning policies relating to socio-economics. This section should be read in conjunction with **Policy Compliance Document [APP/5.6]**.

8.3.253 Paragraph 5.13.2 of NPS EN-1 establishes that, where a project is likely to have socio-economic impacts at local or regional levels, an applicant is to assess these impacts as part of an ES. Paragraph 5.13.4 of NPS EN-1 goes on to outline the considerations that such an assessment of socio-economics may contain. This includes job creation, contributions to the development of low-carbon industries, additional local services, and improvements to local infrastructure, as well as indirect beneficial impacts such as increased income for local supply chains, effects on tourism, effects resulting from the influx of construction workers, and cumulative effects.

8.3.254 In recognising that the assessment of socio-economic effects is multifaceted, Paragraph 5.13.6 of NPS EN-1 outlines that socio-economic impacts may be linked to other impacts (such as visual impacts). Furthermore, applicants are specifically encouraged to demonstrate how local supplies have been considered in supply chains.

8.3.255 Under Paragraph 5.13.3 of NPS EN-1 and Paragraph 39 of the NPPF, there is also encouragement for applicants to engage with the relevant local authorities to understand the socio-economic fabric of an area to secure developments that improve the economic, social and environmental conditions of the area.

8.3.256 In a similar vein to Paragraph 39 of the NPPF, Policy GEN 01 (Sustainable Development in Breckland) of the Breckland Local Plan (2023) makes clear that the Local Planning Authority's stance is that they will work proactively with applicants to find solutions to improve economic, social and environmental conditions in the area.

8.3.257 Importantly, the Secretary of State is also to consider on balance, under Paragraph 5.13.11 of NPS EN-1, any relevant positive provisions an applicant has made or proposes to make in mitigating impacts and any other legacy benefits of the development. Further, Paragraph 5.13.12 outlines that the Secretary of State may wish to include a specific requirement for the provision of an employment and skills plan.

Applicant Assessment

8.3.258 In response to Paragraph 5.13.2 of NPS EN-1, an assessment of likely significant effects arising from the construction, operation, and decommissioning of the Scheme upon population and socio-economics is presented in **ES Chapter 14: Socio-Economics [APP/6.2]**.

8.3.259 In order to assess the likely effects, **ES Chapter 14: Socio-Economics [APP/6.2]** provides an estimate of the likely employment generation for each phase of the Scheme. During construction, considering both the direct and indirect jobs, the Scheme is expected to support 1,145 net additional jobs, with between 285 and 575 of these being held by Local Catchment Area residents. During the Operational Phase of the Scheme, there will also be periods of maintenance requiring temporary workers. During this replacement period, an estimated gross 125 FTE jobs per annum would be supported, with the on-site workforce expected to peak at around 360 workers at any one time. The Decommissioning Phase is expected to start in 2093 and is assumed to support a lower number of direct, indirect, induced and local jobs than the Construction Phase. For the purposes of the assessment, it is assumed that a workforce the size of approximately 50%-80% of the construction workforce would be required for the Decommissioning Phase.

8.3.260 With regard for the first half of Paragraph 5.13.6 of NPS EN-1, it is confirmed that **ES Chapter 17: In-Combination Effects [APP/6.2]** considers the multifaceted and in-combination effects associated with population effects.

8.3.261 In compliance with the second half of Paragraph 5.13.6 and Paragraph 5.13.12 of NPS EN-1, an **oESSCS [APP/7.15]** has been submitted with the DCO Application. The **oESSCS [APP/7.15]** has been informed by the context provided in **ES Chapter 14: Socio-Economics [APP/6.2]** sets out the potential skills, supply chain, and employment opportunities associated with the Scheme. It sets out the Applicant's commitment to promoting competition, innovation, and skills within the communities surrounding the Scheme, as well as across the wider local authority areas of King's Lynn & West Norfolk, Breckland, and Norfolk County.

8.3.262 During the pre-application stage and in compliance with Paragraph 5.13.3 of NPS EN-1 and Paragraph 39 of the NPPF, the Applicant has had ongoing engagement with Breckland Council and Norfolk County Council on population matters to better understand the socio-economic fabric of the area and to agree the scope of the assessment, as set out in Section 14.2 of **ES Chapter 14: Socio-Economics [APP/6.2]**.

8.3.263 **ES Chapter 14: Socio-Economics [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse socio-economic related effects expected across the Scheme's construction, operational and decommissioning phases. There is a significant beneficial effect anticipated on the provision of education, skills, training and supply chain as a result of the Scheme's construction, operational and decommissioning phases.

8.3.264 The residual effects outlined in the **ES Chapter 14: Socio-Economics [APP/6.2]** rely on controls established within the **oCEMP [APP/7.6]**, **oESSCS [APP/7.15]**, **oOEMP [APP/7.8],** and the **oDS [APP/7.10]** and are secured in the **draft DCO [APP/3.1]**.

8.3.265 The Applicant therefore considers that the SoS should not need to consider (under Paragraph 5.13.8 of NPS EN-1) additional mitigation measures with regard to the residual adverse socio-economic impacts identified within **ES Chapter 14: Socio-Economics [APP/6.2]**.

8.3.266 Section 14.11 of **ES Chapter 14: Socio-Economics [APP/6.2.2]** describes the existing levels and assesses the anticipated cumulative socio-economic effects of the Scheme's construction, operational, and decommissioning phases. Section 14.11 concludes that there will be a major beneficial cumulative effect on the provision of education, skills, training and supply chain as a result of this Scheme, High Grove Solar and East Pye Solar's construction, operational and decommissioning phases. It also concludes a moderate adverse cumulative effect on agricultural land use and businesses during the operational phase, subject to the limitations of the information available for the Longmarsh Green Energy project (due to it only being at the scoping stage of the application process). As such, this represents a worst case scenario and the Applicant notes that, as that project progresses, further information may demonstrate that alternative arrangements would retain more land in agricultural use or otherwise reduce effects on agricultural businesses. If this is the case, then the magnitude of the cumulative impact could be lower.

Summary

8.3.267 In summary, the Scheme is not anticipated to result in any residual adverse effects on socio-economic receptors across the Scheme's construction and decommissioning phases. There is a significant beneficial effect anticipated on the provision of education, skills, training and supply chain as a result of the Scheme's construction, operational and decommissioning phases and a significant moderate adverse cumulative effect on agricultural land use and businesses during the operational phase.

8.3.268 The Scheme is considered, therefore, to comply with the relevant planning policy provisions in NPS EN-1, NPS EN-3, NPS EN-5 the NPPF and Policy GEN 01 of the Breckland Local Plan.

8.3.269 It is considered that job creation and employment and skills training should be afforded limited positive weight in the planning balance.

Traffic and Transport

Planning Policy Context

8.3.270 This section reviews the Scheme in the context of planning policies relating to traffic and transport. This section should be read in conjunction with the **Policy Compliance Document [APP/5.6].**

8.3.271 Paragraph 5.14.5 of NPS EN-1 states that where a project is likely to have significant transport implications, the applicant's ES should include a transport appraisal.

8.3.272 Paragraph 5.14.6 of NPS EN-1 states that National Highways (NH) and Highways Authorities should be consulted where appropriate for assessment and mitigation.

8.3.273 Paragraph 5.14.7 of NPS EN-1 states that the applicant must prepare a travel plan which includes demand management and monitoring measures to mitigate transport impacts. Paragraph 118 of the NPPF states that a travel plan is also required, and this should be supported by a transport statement or assessment that is vision-led to facilitate monitoring of the likely impacts.

8.3.274 Paragraph 5.14.11 of NPS EN-1 sets out possible mitigation measures, such as through the consolidation of trips, sustainable modes of transport, and reducing movements in peak travel times.

8.3.275 Paragraph 5.14.14 of NPS EN-1 states that the SoS may attach requirements to a consent where there is likely to be substantial HGV traffic that controls the number of movements and possibly the routing of these movements, provides sufficient parking for HGVs as well as driver facilities, avoids overspill parking onto public roads, and ensures reasonable arrangements for foreseeable abnormal disruption.

8.3.276 Paragraphs 2.10.35 – 2.10.39 of NPS EN-3 discuss accessibility. Applicants need to consider the suitability of the access routes to the Scheme for both the construction and operation of the solar farm. Due to the rural location of most solar farms, access for the delivery of solar arrays and associated infrastructure during construction can be a significant consideration for solar farm siting. On-site access routes are necessary for operation and maintenance activities, as well as providing access to the public road network where required. Applications should include the full extent of the access routes necessary for operation and maintenance, as well as an assessment of their potential effects.

8.3.277 Paragraphs 2.10.120 to 2.10.126 of NPS EN-3 relate to assessing the Transport and Access impacts of renewable energy projects. Notably, Paragraph 2.10.123 of NPS EN-3 states that the Applicant should assess potential routes to the site for deliveries, and that where the source of the material is known at the time of the application, the Applicant should select the most appropriate route.

8.3.278 Paragraphs 2.10.161 to 2.10.162 of NPS EN-3 state that once a solar farm is in operation, traffic movements are light and infrequent. The SoS is unlikely to give any more than limited weight to traffic and transport noise and vibration impacts from the operational phase of a project.

8.3.279 Paragraph 109 of the NPPF states that transport matters should be considered from the earliest stages of development proposals, using a vision-led approach to identify transport solutions.

8.3.280 Policy 2 of The Local Transport Plan 4 Strategy 2021-2036 (2022) states that emissions should be reduced by shifting to more sustainable modes of transport, including more efficient technologies such as cleaner fuels and lower carbon technology, which may require associated infrastructure.

8.3.281 Policy TR 01 of the Breckland Local Plan (2023) states that developments should minimise the need to travel, promote sustainable transport, avoid an adverse impact on the operation or safety of the strategic road network, improve accessibility to services and support transitioning to the low-carbon future.

8.3.282 Policy TR 02 of the Breckland Local Plan (2023) states that where developments are likely to produce a significant number of heavy goods vehicle movements, the Applicant will be required to provide a Routing Management Plan to demonstrate that no severe impacts will be caused to the safety and operation of the road network of living conditions of residents. Furthermore, an assessment of any impacts caused by the development on the existing transport network must be provided to demonstrate how connectivity will be maximised within and through the development and surrounding areas.

8.3.283 Where impacts are identified, Policy TR 02 of the Breckland Council Local Plan (2023) also requires the Applicant to produce a Transport Assessment to highlight and identify mitigation measures for these impacts in conjunction with Travel Plans where appropriate.

Applicant Assessment

8.3.284 In accordance with Paragraph 5.14.5 of NPS EN-1, **ES Chapter 9: Transport and Access [APP/6.2]** presents an assessment of likely significant effects as a result of the construction of the Scheme on traffic and transport and includes a transport appraisal (**ES Appendix 9.2: Traffic Assessment [APP/6.4]**).

8.3.285 To align with Paragraph 5.14.6 of NPS EN-1 and Paragraph 109 of the NPPF**, ES Chapter 9: Transport and Access [APP/6.2]** sets out that National Highways (NH) and NCC were consulted prior to the submission of the DCO Application and during the Statutory Consultation period. This engagement enabled early impact reviews to inform the assessment, and the engagement has been continued beyond this, as outlined in **ES Appendix 9.1: Consultation and Legislation, Planning Policy and Guidance [APP/6.4]**.

8.3.286 In accordance with Paragraph 5.14.7 of NPS EN-1 and Paragraph 118 of the NPPF, a Travel Plan (TP) is embedded within the **oCTMP [APP/7.7],** which has been prepared to support the DCO Application and is secured through the **draft DCO [APP/3.1]**.

8.3.287 In compliance with Paragraph 5.14.11 of NPS EN-1, **ES Chapter 9: Transport and Access [APP/6.2]** sets out the demand management measures embedded into the design of the Scheme, as set out in the **oCTMP [APP/7.7]**:

- Highway Condition Surveys to identify any defects directly attributable to the Scheme and which can then be corrected in agreement with the local highway authority

- Existing access to be used where possible, with any new access points restored to original condition post-construction
- Traffic management of access points during construction, with all construction vehicle movements to access and egress in a forward gear
- Signage to prevent on-street parking
- Construction vehicle movements outside of the network peak hours, with deliveries arranged 09:00 and before 17:00
- Banksmen to supervise the arrival and departure of vehicles following a set procedure of communication with other Site staff
- Wheel washing at each access
- A tracking scheme to monitoring construction vehicles both on and off-site
- Accreditation with the Freight Operator Recognition Scheme (FORS); and
- A temporary speed limit of 40mph along the A1065 between the two access points onto this road, as agreed with NCC.

8.3.288 To align with NPS EN-1 Paragraph 5.14.14, NPS EN-3 Paragraph 2.10.123 and TR 02 of the Breckland Local Plan, Section 4 of the **oCTMP [APP/7.7]** sets out the construction vehicle routing. The agreed routing for vehicles is as agreed with NCC and NH. It is proposed that all construction vehicles and HGVs access the Scheme from the A47, which is part of the Strategic Road Network (SRN) to the south, where possible, then travel along the A1065 before entering via the relevant access point onto the A1065. These routes provide the shortest distance between various access points associated with the Scheme and SRN (A47), preventing travel on unsuitable roads and avoiding material harm.

8.3.289 The **oCTMP [APP/7.7]** sets out delivery management mitigation measures which will ensure construction vehicles avoid travel during the morning and evening network peaks. Furthermore, the provision of high-quality facilities for HGV drivers as well as sufficient parking within the Scheme and signage to avoid on-street parking is set out in the **oCTMP [APP/7.7]**, the **oOTMP [APP/7.9]**, and the **oDS [APP/7.10]**.

8.3.290 To align with the requirements of Policy TR 01 of the Breckland Local Plan (2023), the Applicant has provided a Travel Plan (TP) within the **oCTMP [APP/7.7]**. This sets out aims for trip reduction and the promotion of sustainable transport opportunities. These include the use of a shuttle bus, promotion of car sharing, and increasing knowledge of public transport and Active Travel opportunities for Site staff.

8.3.291 While Paragraph 5.14.12 of NPS EN-1 supports the use of sustainable freight, it is considered that transport using rail connections would not be feasible and operationally reasonable, given the location of the Order limits, the duration of the construction and decommissioning phases and the limited impact on the public road network during the operational phase.

8.3.292 **ES Chapter 9: Transport and Access [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse transport and access related effects expected across the Scheme's construction, operational and decommissioning phases of the Scheme. Controls are established within the **oCTMP [APP/7.7]** and the **oOTMP [APP/7.9];** these outline management plans have been prepared in support of the DCO Application and set out measures to manage any potential transport and access effects that may arise from construction and operational activities and are secured by Requirements within the **draft DCO [APP/3.1]**.

Summary

8.3.293 In summary, the Scheme is not anticipated to result in any residual effects on transport and access receptors across the Scheme's construction, operation and decommissioning phases.

8.3.294 In accordance with Paragraph 5.14.21 of the NPS EN-1, the Secretary of State should only consider refusing consent on highway grounds where the impacts on the highway network, including any residual cumulative impacts, would be severe. The Applicant considers that no such severe impacts would arise from the Scheme. Accordingly, there are no grounds for refusal in relation to transport or highway matters, and the Scheme is considered to be compliant with the relevant policy tests.

8.3.295 Overall, the Scheme is considered to accord with NPS EN-1, NPS EN-3, NPS EN-5, the NPPF, the Local Transport Plan 4 Strategy (2021–2036), and the Breckland Local Plan (2023) in respect of transport and access considerations. The Applicant considers that traffic and transport should be afforded neutral weight in the planning balance.

Water Quality and Resources

Planning Policy Context

8.3.296 This section reviews the Scheme in the context of planning policies relating to water resources, reviews including flood risk, water quality and surface water drainage. This section should be read in conjunction with **Policy Compliance Document [APP/5.6]**.

8.3.297 Fundamentally, Paragraph 5.8.1 of NPS EN-1 recognises that flooding is a natural process which, as well as playing an important role in shaping the natural environment, can threaten life and cause substantial disruption and damage to property.

8.3.298 Paragraph 5.8.2 of NPS EN-1 goes on to note the importance of resilient energy infrastructure and how resilience not only reduces the risk of flood damage to the infrastructure but also reduces disruptive impacts on homes and businesses that rely on that same infrastructure.

8.3.299 Paragraph 5.8.18 of NPS EN-1 states that projects which may be affected by, or may add to, flood risk should arrange pre-application discussions with the Environment Agency, and, where appropriate, other bodies.

8.3.300 Paragraph 5.8.6 of NPS EN-1 recognises that the aim of planning policy with regard to development and flood risk is to ensure that flood risks from all flooding sources (i.e., pluvial and fluvial, factoring climate change) are taken into account at all stages of the planning process to steer new development to areas with the lowest risk of flooding.

8.3.301 Paragraph 5.8.7 of NPS EN-1 notes that, should new energy infrastructure be, exceptionally, "*necessary in flood risk areas*", planning policy aims to make it safe for its lifetime without increasing flood risk elsewhere, while, and where possible, seeking to reduce flood risk overall. Paragraph 5.8.7 of NPS EN-1 also notes that new energy infrastructure should be designed and constructed to remain operational in times of flood.

8.3.302 Paragraph 5.8.21 of NPS EN-1 establishes that a sequential, risk-based approach is to be followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites within medium-risk areas and then, only where there are no reasonably available sites in low- and medium-risk areas, within high-risk areas.

8.3.303 Paragraph 2.4.11 of NPS EN-3 recognises that "*solar photovoltaic (PV) sites may also be proposed in low lying exposed sites. For these proposals, applicants should consider, in particular, how plant will be resilient to increased risk of flooding; and impact of higher temperatures"*.

8.3.304 Paragraph 170 of the NPPF confirms that inappropriate development in flood risk areas should be avoided. Still, where development is necessary in such areas, it should be made safe for its lifetime without increasing risk elsewhere.

8.3.305 Paragraph 5.8.13 of NPS EN-1 requires applications for energy projects of 1 hectare or greater in Flood Zone 1 in England, and all proposals for energy projects located in Flood Zone 2 and 3 in England should be accompanied by a flood risk assessment (FRA). Policy ENV 09 (Flood Risk & Surface Water Drainage) of the Breckland Local Plan (2023) requires proposals for vulnerable development in medium (zone 2) and higher flood risk areas (zones 3a and 3b) to be accompanied by a site-specific FRA. The minimum requirements of an FRA are established through Paragraph 5.8.15 in NPS EN-1. Paragraph 2.10.88 of NPS EN-3 outlines that an FRA will need to consider the impact of drainage. However, since solar PV panels drain to the existing ground, the impact is recognised as not normally being significant.

8.3.306 Paragraph 182 of the NPPF and Policy ENV 09 (Flood Risk & Surface Water Drainage) of the Breckland Local Plan (2023) make clear that applications affecting drainage should incorporate Sustainable Drainage System (SuDS) in a proportionate manner to the scale of the proposal and confirm that SuDS should provide multifunctional benefits where possible. The risk of flooding should be mitigated through the design and implementation of SuDS principles.

8.3.307 With regard for water quality, Paragraphs 5.16.1-5.16.2 of NPS EN-1 recognise that development can have adverse effects on the water environment across all phases of

development. Therefore, there may be an increased risk of discharges and spills and leaks of pollutants to the water environment. Paragraph 5.16.7 requires for an ES to describe the existing quality of waters and the impacts of a development on water quality, water bodies or protected areas (including shellfish protected areas) under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and source protection zones (SPZs) around potable groundwater abstractions.

8.3.308 National Planning Practice Guidance was updated on 17 September 2025 in relation to the application of the Sequential Test for flood risk. Important changes relevant to the Scheme include that paragraph 027a has been updated to further emphasise that the Sequential Test should be applied proportionately, focusing on realistic alternatives in areas of lower flood risk that could meet the same development need. Paragraph 027 has also been updated in relation to the application of Paragraph 175 of the NPPF, which applies to the use of the Sequential Test for areas known to be at risk now or in the future from any form of flooding. The update confirms that, in applying Paragraph 175, a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by the Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the Sequential Test need not be applied.

Applicant Assessment

8.3.309 NPS EN-1 paragraph 5.8.21 details the Sequential Test and the requirement to follow a sequential, risk-based approach to site selection, steering new development to areas with the lowest risk of flooding. **ES Chapter 12: Water Resources [APP/6.2]** confirms that the entirety of the built aspects of the Scheme (Works No. 1-10) is situated in Flood Zone 1; only a small area of the Skylark Mitigation Works No. 11 (approximately 1.1 ha) is within the Flood Zone 2 and 3, which will continue to be used for agricultural activities; therefore, the Sequential Test is not triggered. This is supported by the updated National Planning Practice guidance on Flood Risk and coastal change.

8.3.310 In accordance with Paragraph 5.8.13 of NPS EN-1 and Policy ENV 09 (Flood Risk & Surface Water Drainage) of the Breckland Local Plan (2023), this DCO Application is supported by **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]**. The Flood Risk Assessment undertaken has been prepared in accordance with the requirements of Policy 5.8.15 of NPS EN-1 and Policy ENV 09 (Flood Risk & Surface Water Drainage).

8.3.311 As set out in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]**, surface water runoff from the Solar PV will be managed through Rural SuDS and Natural Flood Management techniques such as grassland/wildflower, which will act to bind soils, slow surface water, and increase water quality compared to the baseline scenario.

8.3.312 **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]** includes a Surface Water Drainage Strategy, which sets out how surface water runoff from the Site will be managed in line with the national, regional and local requirements regarding flood risk and drainage.

As the Scheme does not have a detailed layout, a detailed drainage strategy cannot be provided at this stage. However, the principles and design criteria presented in this document are applicable. These criteria will be applied at the detailed design phase.

8.3.313 In compliance with Paragraph 5.16.7, Section 12.6 **ES Chapter 12: Water Resources [APP/6.2]** describes the existing quality of waters. **ES Chapter 12: Water Resources [APP/6.2]** assess the impacts of the Scheme on water quality, water bodies or protected areas, and concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse water effects expected across the Scheme's construction, operational and decommissioning phases on water quality, water bodies or protected areas.

8.3.314 The residual effects outlined in the assessment rely on controls established within the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]** and the **oDS [APP/7.14].** These outline management plans and the Surface Water Drainage Strategy, which is embedded in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]** set out the water-related measures to manage any potential water effects that may arise from the Scheme's construction, operational and decommissioning phases.

8.3.315 Further to the assessment outcomes set out in **ES Chapter 12: Water Resources [APP/6.2]**, Section 12.2 confirms that the Application has engaged in pre-application discussions with the Environment Agency, the Borough Council of King's Lynn & West Norfolk and NCC (the Lead Local Flood Authority) on the matter of water resources.

Summary

8.3.316 In summary, the Scheme is not anticipated to result in any residual adverse effects on water receptors across the Scheme's construction, operational and decommissioning phases.

8.3.317 Paragraph 5.8.36 of NPS EN-1 provides the key water policy tests that the Secretary of State must be satisfied are met in order to grant development consent from a water perspective. In turn, the Applicant considers that:

- The DCO Application is accompanied by an appropriate Flood Risk Assessment
- **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]** sets out the Scheme's evidence and compliance with the sequential test at both the site selection and site-level
- The Surface Water Drainage Strategy, embedded in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]** has been developed in line with the relevant national, regional and local requirements on flood risk and drainage
- The Surface Water Drainage Strategy introduces and secures the use of suitable SuDS measures; and

- **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]** confirms that the Scheme has and will be designed and constructed to remain safe across the operational (including maintenance) phase and will not result in an increase of flood risk elsewhere.

8.3.318 The Applicant concludes that the SoS should be satisfied that the Scheme has adequately assessed and applied the mitigation hierarchy in order to satisfy water matters, specifically water quality, flood risk and surface water drainage.

8.3.319 Overall, the Scheme is considered to be in compliance with NPS EN-1, NPS EN-3, NPS EN-5, the NPPF and Policy ENV 09 (Flood Risk & Surface Water Drainage) of the Breckland Local Plan (2023) with regard for water effects and the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.

8.3.320 Therefore, it is considered that water resources should be afforded neutral weight in the planning balance.

Human Health

Planning Policy Context

8.3.321 This section reviews the Scheme in the context of planning policies relating to human health. This section should be read in conjunction with **Policy Compliance Document [APP/5.6]**.

8.3.322 Section 4.4 of NPS EN-1 outlines the assessment principles for health and how the direct impacts of development on health may include, for example, increased traffic, air or water pollution, noise pollution and increases in pests.

8.3.323 Paragraph 4.4.6 of NPS EN-1 sets out that opportunities should be taken to mitigate indirect impacts by promoting local improvements to encourage health and wellbeing. This includes potential impacts on vulnerable groups within society and impacts on those with protected characteristics.

8.3.324 Paragraph 5.12.17 of NPS EN-1 sets out that the Secretary of State should not grant consent unless development proposals meet the following aims in relation to human health and noise:

- Avoid significant adverse impacts on health and quality of life from noise
- Mitigate and minimise other adverse impacts on health and quality of life from noise; and
- Where possible, contribute to improvements to health and quality of life through the effective management and control of noise.

8.3.325 Paragraph 2.9.46 of NPS EN-5 sets out that EMFs can have both direct and indirect effects on human health.

8.3.326 Paragraph 8 of the NPPF sets the government's goals for achieving sustainable development, including to support vibrant and healthy communities. Section 8 of the NPPF confirms this goal in setting out the intention to promote healthy and safe communities.

8.3.327 Policy COM 02 (Healthy Lifestyles) of the Breckland Local Plan (2023) requires applicants to take appropriate steps to avoid/mitigate potential negative effects on the health of the population and facilitate enhanced health and well-being through the provision of conditions supportive of good physical and mental health.to take appropriate steps to avoid/mitigate potential negative effects on the health of the population and facilitate enhanced health and well-being through the provision of conditions supportive of good physical and mental health.

Applicant Assessment

8.3.328 **ES Chapter 15: Human Health [APP/6.2]** identifies and proposes measures to address the potential impacts and likely significant effects on human health of the Scheme's construction, operational, and decommissioning. The chapter concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse socio-economic related effects expected across the Scheme's construction, operational and decommissioning phases. There is a significant beneficial effect anticipated on:

- Construction jobs for vulnerable groups as a result of the Scheme's construction phase
- Provision of education, skills, training and supply chain for vulnerable groups as a result of the Scheme's construction and operational phases
- Provision of education, skills, training and supply chain for the general population as a result of the Scheme's operational phase
- Physical activity for vulnerable groups as a result of the Scheme's operational phase; and
- Decommissioning jobs for vulnerable groups as a result of the Scheme's decommissioning phase.

8.3.329 The embedded mitigation measures relevant to potential impacts on health are secured within the **oCEMP [APP/7.6]**, **oESSCS [APP/7.15]**, **oLEMP [APP/7.11]**, **oCTMP [APP/7.7]** and the **oDS [APP/7.10]**, which are secured via Requirements of the **draft DCO [APP/3.1].**

8.3.330 Section 15.11 of **ES Chapter 15: Human Health [APP/6.2]** describes the existing levels and assesses the anticipated cumulative health effects of the Scheme's construction, operational and decommissioning phases. There is a significant beneficial cumulative effect anticipated on:

- Construction jobs for vulnerable groups

- Provision of education, skills, training and supply chain for the general population and for vulnerable groups as a result of the Scheme's construction phase
- Provision of education, skills, training and supply chain for vulnerable groups as a result of the Scheme's operational phase; and
- Physical activity for vulnerable groups as a result of the Scheme's operational phase.

Summary

8.3.331 In summary, the Scheme is not anticipated to result in any residual adverse effects on health receptors across the Scheme's construction, operational and decommissioning phases. There are significant beneficial cumulative effects as a result of the Scheme's construction and operational phases.

8.3.332 The Scheme is considered, therefore, to comply with the relevant planning policy provisions in NPS EN-1, NPS EN-3, NPS EN-5, the NPPF and Policy COM 02 of the Breckland Local Plan.

8.3.333 It is considered that the human health effect of the Scheme should be afforded neutral weight in the planning balance and that the cumulative human health effect should be afforded limited positive weight in the planning balance.

9 Decision-Making and Planning Balance

9.1 Introduction

9.1.1 The determination of this DCO application will be made in accordance with Section 104 of the PA 2008. The following section outlines the relevant sections of the PA 2008 regarding decision-making, the application of the planning balance, and the consideration of the positive, neutral, and negative impacts of the Scheme, ultimately applying the CNP presumption.

9.2 Section 104(2) of the PA 2008

9.2.1 Section 104(2) of the PA 2008 provides that, in deciding an application for development consent, the SoS must have regard to:

- Any relevant NPS: the relevant NPSs for the Scheme are the 2023 suite of NPSs (being NPS EN-1, NPS EN-3 and NPS EN-5). Section 8 and **Policy Compliance Document [APP/5.6]** demonstrate the Scheme's compliance with the NPSs
- Any appropriate marine policy documents (of which none are relevant for the Scheme)
- Local impact reports: Local impact reports are expected to be prepared by the host authorities and submitted to the Examination at the appropriate time
- Prescribed matters: the relevant prescribed matters are Regulations 3 and 7 of the Infrastructure Planning (Decisions) Regulations 2010, which have been addressed in the planning appraisal sections regarding biodiversity and historic environment above; and
- Any other matters which the SoS thinks are both important and relevant to the SoS's decision: for example, policies within the local development plan. Whilst not forming the primary policy basis for assessment, the 2025 suite of NPSs (being NPS EN-1, NPS EN-3 and NPS EN-5) are also considered to be both important and relevant to the SoS's decision. **Policy Compliance Document [APP/5.6]** demonstrates the Scheme's compliance with the relevant local policies.

9.3 Section 104(3) of the PA 2008

9.3.1 Section 104(3) of the PA 2008 provides that "*applications for development consent must be decided by the Secretary of State in accordance with any relevant NPS except to the extent that one of more of subsections 104(4) to 104(8) apply*".

9.3.2 There are no exceptions in sections 104(4) to 104(8) that apply to the Scheme because there is no evidence that:

- In deciding the DCO for the Scheme in accordance with any relevant NPS would lead to the UK being in breach of any of its international obligations (section 104(4))
- Deciding the application in accordance with the relevant NPSs would lead to the SoS being in breach of any duty imposed by the SoS by or under any enactment (section 104(5))
- Deciding the application in accordance with any relevant national policy would be unlawful by virtue of any enactment (section 104(6))
- The adverse impacts of the Scheme would outweigh its benefits (section 104(7)). This Planning Statement sets out how the adverse impacts of the Scheme are outweighed by the substantial benefits; and
- There are any conditions relevant to the Scheme which are prescribed for deciding the application otherwise in accordance with a NPS (section 104(8)).

9.4 Planning Balance

9.4.1 NPS EN-1 paragraph 4.1.3 provides that, given the level and urgency of need for energy infrastructure, there will be a presumption in favour of granting consent to applications for energy NSIPs, unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused. Therefore, it is still necessary to apply the planning balance to determine whether any specific policy tests indicate that consent should be refused, with the need to weigh adverse impacts against benefits overall.

9.4.2 Paragraph 4.1.5 of NPS EN-1 sets out how the SoS, when making a decision, will weigh a project's "adverse impacts against its benefits". The SoS should take account of its potential benefits being long-term and wider, and any potential adverse impacts.

9.4.3 The glossary to NPS EN-1 sets out that the hierarchy of weight is defined as: 1) limited; 2) moderate; 3) great; 4) significant; and 5) substantial.

9.4.4 The following paragraphs summarise the outcomes of the planning appraisal at Section 8 of this Planning Statement, applying the hierarchy of weight.

Positive Impacts

9.4.5 In line with the legally binding targets to reach net zero by 2050, the Scheme will make a substantial positive contribution to meeting the urgent need for renewable electricity generation, as established in NPS EN-1. It would help to ensure the security of supply for the country. On that basis, it is considered that the need for renewable energy infrastructure and the contribution the Scheme would make to electricity generation and the security of supply should be afforded substantial positive weight in the planning balance.

9.4.6 Linked to the above, the Scheme would result in GHG emissions savings over its lifetime as a result of the low-carbon renewable electricity that will be generated during the

operational phase. This far outweighs the GHGs and impacts on climate change that are anticipated in the construction, operation and decommissioning of the Scheme. On this basis, it is considered that impact on climate change and GHG emissions should be given significant positive weight in the planning balance.

9.4.7 Further, the Scheme is committed to delivering ecological enhancements and net gain by providing a minimum of 10% biodiversity net gain in habitat units and hedgerow units and during its lifetime. However, the delivery of BNG will likely be significantly higher for habitat and hedgerow; as set out in the **Biodiversity Net Gain Assessment Report [APP/7.4],** the ecological mitigation and enhancement areas will deliver a potential net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines. As a result of embedded and additional mitigation and enhancement measures, there are four direct residual significant (in EIA terms) beneficial effects as a result of the Scheme, which are anticipated in relation to the following ecological features: hedgerows and lines of trees; breeding birds – other species and overwintering birds and amphibians – Great Crested Newt. On that basis, it is considered that the overall effects on biological conservation and BNG should be given moderate positive weight in the planning balance.

9.4.8 The Scheme will enhance and improve connectivity in line with NPS EN-1 and the project design principles through the creation of approximately 3.8km of permissive path within the Order limits and approximately 1.2km of permissive paths outside of the Order limits throughout the proposed 60-year operational lifetime of the Scheme, as set out in the **oPRoWPPMP [APP/7.12]**. There are no residual significant adverse effects anticipated on the existing PRoW network from a transport perspective, and combined with the significant beneficial effects that have been identified in relation to socio-economics. Paragraph 1.5.10 of the **oPRoWPPMP [APP/7.12]** states that opportunities associated with the provision of new permissive paths are outlined in the **oLEMP [APP/7.11]**. Coupled with the enhancements offered through the creation of permissive paths for the lifetime of the Scheme, it is considered that PRoW should be afforded moderate positive weight in the planning balance.

9.4.9 During construction, taking the net direct and net indirect jobs together, the Scheme is expected to support 1,145 net additional jobs, with between 285 and 575 of these being taken by Local Catchment Area residents. Additional jobs are anticipated to be created during replacement activities and in decommissioning, although these will not reach the levels anticipated for construction. During the Operational Phase of the Scheme, there will also be periods of maintenance requiring temporary workers. During this replacement period, an estimated gross 125 FTE jobs per annum would be supported, with the on-site workforce expected to peak at around 360 workers at any one time. The Decommissioning Phase is expected to commence in 2093 and is anticipated to support a lower number of direct, indirect, induced, and local jobs compared to the Construction Phase. For the purposes of the assessment, it is assumed that a workforce of approximately 50%-80% of the Construction Phase workforce would be required for the Decommissioning Phase.

9.4.10 Job creation provides employment and skills benefits and further enhancement measures are proposed and set out in the **oESSCS [APP/7.15]** to enhance local education through

promoting apprenticeship and training schemes, to promote local recruitment and procurement, and to support agricultural workers in moving to diversified farming practises (such as sheep grazing) which can continue alongside operation of the Scheme. It is considered that job creation and employment and skills training should be afforded limited positive weight in the planning balance.

Neutral Impacts

9.4.11 The following topics set out in EN-1 and assessed in the ES confirm there will be no significant effects from the Scheme, demonstrate general compliance with the relevant planning policies, and are therefore considered to have neutral weight in the planning balance:

- Air Quality, as assessed in **ES Chapter 16: Other Environmental Matters [APP/6.2]**
- Flood Risk and Drainage, as assessed in **ES Chapter 12: Water Resources [APP/6.2]**
- Historic Environment, as assessed in **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]**
- Soils, as assessed in **ES Chapter 11: Soils and Agriculture [APP/6.2]**
- Noise and Vibration, as assessed in **ES Chapter 10: Noise and Vibration [APP/6.2]**
- Traffic and Transport, as assessed in **ES Chapter 9: Transport and Access [APP/6.2]**
- Resource and Waste Management, as assessed in **ES Chapter 16: Other Environmental Matters [APP/6.2]**
- Water Quality and Resources, as assessed in **ES Chapter 12: Water Resources [APP/6.2]**
- Ground Conditions, as assessed in **ES Chapter 11: Soils and Agriculture [APP/6.2]**
- Glint and Glare, as assessed in **ES Chapter 16: Other Environmental Matters [APP/6.2]**
- Civil Aviation and Defence Interests, as assessed in **ES Chapter 16: Other Environmental Matters [APP/6.2]**
- Battery Safety, as assessed in **Appendix 1 – Battery Plume Assessment** to the **outline Battery Safety Management Plan [APP/7.14];** and
- Human Health, as assessed in **ES Chapter 16: Other Environmental Matters [APP/6.2].**

Negative Impacts

9.4.12 The Scheme is anticipated to result in a combination of significant adverse landscape and visual effects, along with long-term beneficial effects upon the landscape character of the Site itself.

9.4.13 **ES Chapter 6: Landscape and Visual [APP/6.2]** concludes the following significant residual adverse landscape and visual impacts:

- D1: Swaffham Heath LCA: there are moderate adverse effects across all phases of the Scheme.
- E6: North Pickenham Plateau LCA: there are moderate adverse effects across all phases of the Scheme.
- VRG1: Central Site Area: there are major-moderate adverse effects across construction, decommissioning, and operational (short and medium term) phases of the Scheme.
- VRG2: North-Eastern Site Area: there are major-moderate adverse effects across construction, decommissioning, and operational (short and medium term) phases of the Scheme.
- VRG3: Nar Valley Southern Slope and Settlement Edge of South Acre: there are moderate adverse effects across construction, decommissioning, and operational (short term) phases of the Scheme.
- The Peddars Way and Norfolk Coastal Path: there are moderate adverse effects across construction, decommissioning phases of the Scheme
- The Peddars Way and Norfolk Coastal Path, Over a limited extent only. Within and up to 300m from the Site: there are moderate adverse effects across the operational (short and medium term) phase of the Scheme
- Rebellion Way Cycle Route: there are moderate adverse effects across construction, decommissioning phases of the Scheme; and
- Rebellion Way Cycle Route, Over a limited extent only. Within the Site: there are moderate adverse effects across the operational (short and medium term) phase of the Scheme.

9.4.14 It is considered that landscape and visual impacts should be afforded moderate negative weight in the planning balance.

Cumulative Impacts

9.4.15 The assessment of likely cumulative effects is provided in each of the **ES Topic Chapter [APP/6.2]** and is summarised in **ES Chapter 18: Summary of Effects [APP/6.2],** which concludes the following significant residual adverse impacts:

- Landscape and Visual:
  - E6: North Pickenham Plateau LCA: there are significant adverse effects across all phases of the Scheme with High Grove Solar; and

- VRG4: Great Palgrave and Little Palgrave: there are significant adverse effect for users of PRoW Sporle with Palgrave BR5 across the construction and decommissioning phases of the Scheme with High Grove Solar.

- Noise and Vibration:
  - The Off Barn: there are significant adverse effects across the operational phase of the Scheme cumulatively with High Grove Solar. However, the cumulative effects assessment concludes that it is likely that noise levels can be controlled through the implementation of additional mitigation measures to suitable levels at 'The Off Barn' receptor when considered cumulatively with the neighbouring High Grove Solar Farm, such that residual levels would represent at most a minor impact, which is considered not significant, in EIA terms.
- Soils and Agriculture:
  - BMV Land: there are significant adverse effects across the operational phase of the Scheme cumulatively with High Grove Solar and East Pye Solar as a result of the permanent loss of BMV land.
- Socio-Economic:
  - Agricultural land use and businesses: There are significant adverse effects across the operational phase of the Scheme cumulatively with High Grove Solar, East Pye Solar and the Longmarsh Green Energy project.
- Resource and Waste Management:
  - Hazardous Waste void capacity: There are significant adverse effects across the operational and decommissioning phases of the Scheme cumulatively with High Grove Solar, East Pye Solar, and the Longmarsh Green Energy project. The likely significant effect at the operational phase is a result of the addition of the Longmarsh Green Energy project (due to the Longmarsh Green Energy project more than doubling the percentage of void capacity contribution, from 0.08% as a result of the Scheme, High Grove Solar and East Pye Solar, to 0.17% with the inclusion of the Longmarsh Green Energy project); however, it is noted that this project is only at scoping stage (as of October 2026) and therefore the assumptions made with regards to this waste are very high level, due to the lack of information available and, therefore, estimates are worst case. As the Longmarsh Green Energy project progresses towards submission, the applicant for that project will need to consider mitigation of this likely significant effect themselves. Further consideration of this is covered within **ES Chapter 16: Other Environmental Matters [APP/6.2.2]**; and
  - Non-hazardous waste void capacity: There are significant adverse effects at the decommissioning phase of the Scheme cumulatively with High Grove Solar, East Pye Solar, and the Longmarsh Green Energy project. This likely significant effect is the result of the addition of the Longmarsh Green Energy project (due to the Longmarsh Green Energy project increasing the percentage of void capacity contribution, by 66% beyond that contributed by the Scheme, High Grove Solar and East Pye Solar); however, it is noted that this project is only at scoping stage (as of October 2026) and therefore the assumptions made with regards to this waste are

very high level, due to the lack of information available and, therefore, estimates are worst case. As the Longmarsh Green Energy project progresses towards submission, the applicant for that project will need to consider mitigation of this likely significant effect themselves. Further consideration of this is covered within **ES Chapter 16: Other Environmental Matters [APP/6.2.2]**.

9.4.16 The assessment of likely cumulative effects, provided in each of the **ES Topic Chapter [APP/6.2],** concludes the following significant residual beneficial impacts:

- Socio-Economics:
  - Provision of education, skills and training: there are significant beneficial effects across all phases of the Scheme cumulatively with High Grove Solar.
- Human Health:
  - Provision of education, skills and training for the General Population: there are significant beneficial effects across the construction phase of the Scheme cumulatively with High Grove Solar.

9.4.17 Therefore, it is considered that cumulative effects should be afforded limited negative weight in the planning balance.

Summary of Policy Balance

9.4.18 Taking the above factors into account and having regard to all important and relevant matters, it is concluded that there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from providing low-carbon energy to meet the needs identified in NPS EN-1.

9.5 CNP Infrastructure

9.5.1 NPS EN-1 paragraph 4.2.5 confirms that solar development is considered to be CNP infrastructure and therefore the CNP presumption set out in NPS EN-1 paragraph 3.3.63 applies to this Scheme. This states that "*subject to any legal requirements, the urgent need for CNP Infrastructures to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by the application of the mitigation hierarchy*".

9.5.2 However, for the CNP presumption to apply, applicants are required to demonstrate "*how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements*" (NPS EN-1 paragraph 4.2.10). NPS EN-1 paragraph 4.2.14 provides that "*the Secretary of State will continue to consider the impacts and benefits of all CNP infrastructure applications on a case-by-case basis. The Secretary of State must be satisfied that the applicant's assessment demonstrates that the requirements set out*

above have been met. Where the Secretary of State is satisfied that they have been met, the CNP presumptions… will apply".

9.5.3 Paragraphs 4.2.15 to 4.2.22 of NPS EN-1 then go on to list specific presumptions in relation to CNP Infrastructure, including how impacts on Green Belt, SSSIs, designated landscapes, heritage assets, HRA derogations and marine conservation zone assessments would be dealt with.

9.5.4 The following section summarises how the Scheme complies with the tests set out in NPS EN-1 and therefore why the CNP presumption applies to the DCO Application.

Compliance with the Energy NPSs

9.5.5 As demonstrated in this Planning Statement, the Scheme accords with the relevant NPSs (both the 2023 and 2025 suites) and, where required, it has been demonstrated that any harm caused by the Scheme is outweighed by the substantial benefits that are delivered. It is considered that even without applying the CNP presumption, the planning case is firmly in favour of development consent being granted.

Application of the Mitigation Hierarchy

9.5.6 The mitigation hierarchy has been applied, in satisfaction of NPS EN-1 paragraph 4.2.10.

9.5.7 **ES Chapter 2: EIA Process and Methodology [APP/6.1]** sets out the mitigation hierarchy adopted for the ES. Where significant effects have been identified, the Applicant has sought to avoid, reduce and mitigate those effects through embedded mitigation and, where necessary, additional mitigation. Such mitigation measures are addressed in the various Outline Management Plans, which are secured via Requirements in Schedule 2 of the **draft DCO [APP/3.1]**. However, residual significant adverse effects that cannot be avoided, reduced, or mitigated remain in relation to landscape and visual impacts.

9.5.8 **ES Chapter 18: Summary of Effects [APP/6.2]** presents a summary of the residual significant effects concluded in the technical chapters of the ES (**Chapters 6-16 [APP/6.2]**). These are the residual effects that have been assessed as remaining after the consideration of embedded mitigation measures, and implementation of any additional mitigation measures, and are expected to be experienced as a result of the Scheme.

Compliance with other legal and regulatory requirements

9.5.9 As summarised below, the DCO Application has been prepared in compliance with other legal and regulatory requirements, in satisfaction of NPS EN-1 paragraph 4.2.10.

9.5.10 **Habitats Regulation Assessment**: A Habitats Regulation Assessment has been undertaken as set out in the **Shadow Habitats Regulations Assessment [APP/7.3],** which confirms that no significant adverse effects on the site integrity of the relevant **European sites are deemed likely, either in isolation or in combination with other projects.**

9.5.11 **Water Framework Directive: ES Appendix 12.3: Water Framework Directive Assessment [APP/6.4]** has been undertaken and concludes that the Scheme will not result in deterioration of waterbody status or to prevent the achievement of relevant environmental objectives. On that basis, the Scheme is compliant with the objectives of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.

9.5.12 **Infrastructure Planning (Application: Prescribed Forms and Procedures) Regulations 2009**: This DCO Application has been prepared in accordance with the requirements of the APFP Regulations 2009 as evidenced in the **Consultation Report [APP/5.1]** and the **Consultation Report Appendices [APP/5.2]**, as well as in the content of the DCO Application itself.

9.5.13 **The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017**: The Environmental Impact Assessment has been undertaken in accordance with the EIA Regulations, as explained in **ES Chapter 2: EIA Methodology and Methodology [APP/6.1]**.

Application of the CNP Presumption

9.5.14 Given the Applicant has demonstrated that the Scheme is in accordance with the NPSs, the mitigation hierarchy has been applied and compliance with other legal and regulatory requirements has also been demonstrated, it can be concluded the CNP presumption applies to the Scheme and accordingly should be taken into account in decision making.

9.5.15 Paragraph 4.2.15 of NPS EN-1 provides that "*where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts".* The exceptions to the presumption of consent are defined as *"residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk*". As demonstrated in this Planning Statement, there are no residual impacts as a result of the Scheme which would outweigh the need, nor are there any residual impacts which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats, the achievement of net zero, offshore navigation or onshore flood and coastal erosion.

9.5.16 As a result, decision making will be in accordance with NPS EN-1 paragraph 4.2.16 which states "*the Secretary of State will take as the starting point for decision making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances*". As demonstrated in this Planning Statement, the tests that require a clear outweighing of harm have been met.

9.5.17 Paragraph 4.2.17 of NPS EN-1 states that "*the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests:*

- Where *development within a Green Belt requires very special circumstances to justify development;*
- *Where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs;*
- *Where development in nationally designated landscapes requires exceptional circumstances to be demonstrated; and*
- *Where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional*".

9.5.18 The Scheme is not located within the Green Belt and no substantial harm to or loss of significance to heritage assets is anticipated.

9.5.19 The Order limits do not contain, nor are located immediately adjacent to, nationally designated ecological sites. The River Nar SSSI and Castle Acre Common SSSI are located approximately 322 m and 495 m north of the Site, respectively. Narborough railway Embankment SSSI and Breckland Forest SSSI are located beyond the A47 to the south of the Site. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** includes an assessment of the likely significant effects on SSSIs and concludes that, with appropriate mitigation, no significant adverse effects are anticipated.

9.5.20 The Order limits have been selected and designed to avoid designated areas. None of the land within the Order limits is covered by any statutory landscape designations, i.e., National Parks, or National Landscapes.

9.5.21 The Scheme does not cause substantial harm to or loss of significance to heritage assets evaluated as part of the ES and relevant to the Order limits. Details of these heritage assets relevant to the Scheme are discussed in Section 8.3 (Historic Environment) of this Planning Statement and **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2].**

9.6 Summary

9.6.1 In summary, it has been demonstrated that for decision-making in accordance with Section 104 of the PA 2008, the Scheme seeks to avoid and mitigate impacts on the environment and sensitive receptors where possible, with the benefits outweighing any impacts. There are no sensitive designations to prevent the Scheme from helping deliver the CNP infrastructure to contribute to the UK's urgent requirement for the delivery of new renewable energy generation capacity and infrastructure.

10 Conclusion

10.1.1 This Planning Statement has been prepared to support the application for a DCO for the construction, operation, maintenance and decommissioning of The Droves Solar Farm.

10.1.2 The Scheme will make a significant and timely contribution to the UK's renewable energy mix. By providing low-carbon, renewable electricity over its 60-year lifetime, it will help to ensure resilience, security of supply, and the provision of affordable electricity to the country, whilst making a significant contribution to meeting the UK government's legally binding target of achieving net zero by 2050. As set out in NPS EN-1, nationally significant solar projects, such as the Scheme, have been identified as of critical national priority (CNP) and NPS EN-1 paragraph 3.3.63 confirms that the "*government strongly supports the delivery of CNP Infrastructure, and it should be progressed as quickly as possible*".

10.1.3 The mitigation hierarchy has been appropriately applied to avoid, reduce and mitigate wherever practicable any likely significant adverse effects of the Scheme. As summarised in **ES Chapter 18: Summary of Effect [APP/6.2],** significant adverse effects remain in relation to landscape and visual receptors as a result of the Scheme's construction, operational (short term, medium term and long term) and decommissioning phases. However, the residual adverse effects would be localised. Further, the substantial benefits of the Scheme clearly outweigh the residual harms that would arise, including the Scheme's contribution to meeting Government targets on Clean Power by 2030 and Net Zero by 2050, together with more localised beneficial effects that are anticipated during the construction, operational and decommissioning phases of the Scheme, such as beneficial effects to ecology and biodiversity, jobs and permissive paths. The residual adverse effects would be localised, short-term, temporary and/or reversible at the end of the Scheme's lifetime. Further, the CNP presumption requires that the urgent need outweighs the residual impacts.

10.1.4 As a result, the Scheme is in accordance with national energy policy, national planning policy, and the relevant development plan documents when considered individually and as a whole. None of the exceptions in sections 104(4) to 104(8) of the PA 2008 applies.

10.1.5 The overall planning balance is therefore overwhelmingly in favour of the grant of development consent for the Scheme.

11 References

Ref. 1 Planning Act (2008) (as amended). Available at: https://www.legislation.gov.uk/ukpga/2008/29/contents

Ref. 2 Department for Energy Security and Net Zero (2024). Overarching National Policy Statement for energy (EN-1). Available at: https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1

Ref. 3 Department for Energy Security and Net Zero (2024). National Policy Statement for renewable energy infrastructure (EN-3). Available at: https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3

Ref. 4 Department for Energy Security and Net Zero (2024). National Policy Statement for electricity networks infrastructure (EN-5). Available at: https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5

Ref. 5 Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Available at: https://www.legislation.gov.uk/uksi/2017/572/contents

Ref. 6 Planning Inspectorate (2023). Nationally Significant Infrastructure Projects: Advice on Good Design. Available at: https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-good-design

Ref. 7 Norfolk County Council (2025). Adopted Norfolk Minerals and Waste Local Plan 2023-2038. Available at: https://norfolk.oc2.uk/docfiles/71/Adoption%20NM&WLP%20with%20main_add%20mods%20accepted%20-%20V4.pdf

Ref. 8 Planning Inspectorate (2018). Nationally Significant Infrastructure Projects - Advice Note Nine: Rochdale Envelope. Available at: https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-note-nine-rochdale-envelope/nationally-significant-infrastructure-projects-advice-note-nine-rochdale-envelope

Ref. 9 The Climate Change Committee (2025). The Seventh Carbon Budget. Available at: https://www.theccc.org.uk/publication/the-seventh-carbon-budget/

Ref. 10 Department for Energy Security and Net Zero (2025). Clean Power 2030 Action Plan. Available at: https://www.gov.uk/government/publications/clean-power-2030-action-plan

Ref. 11 Breckland Council (2020). Carbon Audit: Results and Recommendations. Available at: https://www.breckland.gov.uk/media/18116/Carbon-Audit-of-the-Organisation-December-2020/pdf/Breckland_Council_Carbon_Audit_Report.pdf?m=1629191304443

Ref. 12 Norfolk County Council (2023). Climate Strategy. Available at: https://www.norfolk.gov.uk/article/39033/Climate-strategy

Ref. 13 United Nations (2015). Paris Agreement. Available at: https://unfccc.int/sites/default/files/english_paris_agreement.pdf

Ref. 14 The Climate Change Act 2008 (2050 Target Amendment) Order 2019. Available at: https://www.legislation.gov.uk/ukdsi/2019/9780111187654

Ref. 15 Ofgem (2022). Average gas and electricity usage. Available at: https://www.ofgem.gov.uk/information-consumers/energy-advice-households/average-gas-and-electricity-use-explained

Ref. 16 Department for Communities and Local Government (2013). Guidance on associated development applications for major infrastructure projects. Available at: https://assets.publishing.service.gov.uk/media/5a7b5f04ed915d3ed9063f36/Planning_Act_2008_-_Guidance_on_associated_development_applications_for_major_infrastructure_projects.pdf

Ref. 17 Planning Inspectorate (2024). Nationally Significant Infrastructure Projects: Advice for Local Authorities. Available at: https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-for-local-authorities

Ref. 18 The Infrastructure Planning (Decisions) Regulations 2010. Available at: https://www.legislation.gov.uk/ukdsi/2010/9780111490266/contents

Ref. 19 Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government and Department for Levelling Up, Housing and Communities (2025). National Planning Policy Framework. Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2

Ref. 20 Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government and Department for Levelling Up, Housing and Communities (2024). Planning practice guidance. Available at: https://www.gov.uk/government/collections/planning-practice-guidance

Ref. 21 Town and Country Planning Act 1990. Available at: https://www.legislation.gov.uk/ukpga/1990/8/contents

Ref. 22 National Infrastructure Commission (2019). National Infrastructure Assessment. Available at: https://www.shiregroup-idbs.gov.uk/wp-content/uploads/2018/11/National-Infrastructure-Assessment.pdf

Ref. 23 Ministry for Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities (2024). Planning Act 2008: Content of a Development Consent Orders required for Nationally Significant Infrastructure Projects. Available at: https://www.gov.uk/guidance/planning-act-2008-content-of-a-development-consent-order-required-for-nationally-significant-infrastructure-projects

Ref. 24 Ministry for Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities (2024). Planning Act 2008: Pre-application process for Nationally Significant Infrastructure Projects. Available at: https://www.gov.uk/guidance/planning-act-2008-pre-application-stage-for-nationally-significant-infrastructure-projects

Ref. 25 Ministry for Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities (2024). Planning Act 2008: Pre-examination stage for Nationally Significant Infrastructure Projects. Available at: https://www.gov.uk/guidance/planning-act-2008-pre-examination-stage-for-nationally-significant-infrastructure-projects

Ref. 26 Ministry for Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities (2024). Planning Act 2008: Examination of applications for Nationally Significant Infrastructure Projects. Available at: https://www.gov.uk/guidance/planning-act-2008-examination-stage-for-nationally-significant-infrastructure-projects

Ref. 27 Ministry for Housing, Communities and Local Government (2025). Guidance on the compulsory purchase process. Available at: https://www.gov.uk/government/publications/compulsory-purchase-process-guidance/guidance-on-the-compulsory-purchase-process

Ref. 28 Ministry for Housing, Communities and Local Government (2013). Planning Act 2008: associated development applications for major infrastructure projects. Available at: https://www.gov.uk/government/publications/planning-act-2008-associated-development-applications-for-major-infrastructure-projects

Ref. 29 Department for Communities and Local Government (2013). Planning Act 2008: application form guidance. Available at: https://assets.publishing.service.gov.uk/media/5a75ac43ed915d6faf2b4ced/Planning_Act_2008_-_application_form_guidance.pdf

Ref. 30 National Infrastructure Commission (2020). Design Principles for National Infrastructure. Available at: https://cdn.rt.emap.com/wp-content/uploads/sites/4/2020/02/20195031/nicdesignprinciplesfinal-2.pdf

Ref. 31 Department for Levelling Up, Housing and Communities (2025). Flood risk and coastal change. Available at: https://www.gov.uk/guidance/flood-risk-and-coastal-change

Ref. 32 Breckland Council (2023). Breckland Local Plan. Available at: https://www.breckland.gov.uk/media/16659/Adopted-Breckland-Local-Plan/pdf/Appendix_4_-_Breckland_District_Council_Local_Plan.pdf?m=1704795365193

Ref. 33 Norfolk County Council (2022). Norfolk Local Transport Plan. Available at: https://www.norfolk.gov.uk/39074

Ref. 34 Breckland Council (2025). Local Plan Full Update. Available at: https://www.breckland.gov.uk/article/19942/Local-Plan-Full-Update-2024-2042

Ref. 35 Department for Energy Security and Net Zero (2025). Solar Roadmap. Available at: https://www.gov.uk/government/publications/solar-roadmap4

Ref. 36 The Climate Change Committee (2025). 2025 Progress Report to Parliament. Available at: https://www.theccc.org.uk/publication/progress-in-reducing-emissions-2025-report-to-parliament/

Ref. 37 Planning and Infrastructure Bill (2024-2025). Available at: https://bills.parliament.uk/bills/3946

Ref. 38 The Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025. Available at: https://www.legislation.gov.uk/ukdsi/2025/9780348269765

Ref. 39 Department for Energy Security and Net Zero (2025). Clean Power 2030 Action Plan. Available at: https://www.gov.uk/government/publications/clean-power-2030-action-plan

Ref. 40 Department for Energy Security and Net Zero (2023). Powering up Britain. Available at: https://www.gov.uk/government/publications/powering-up-britain

Ref. 41 Department for Energy Security and Net Zero (2023). Independent Review of Net Zero: government response. Available at: https://www.gov.uk/government/publications/independent-review-of-net-zero-government-response

Ref. 42 Department for Energy Security and Net Zero and Department for Business, Energy & Industrial Strategy (2022). British Energy Security Strategy. Available at: https://www.gov.uk/government/publications/british-energy-security-strategy

Ref. 43 Department for Energy Security and Net Zero and Department for Business, Energy & Industrial Strategy (2022). Net Zero Strategy: Build Back Greener. Available at: https://www.gov.uk/government/publications/net-zero-strategy

Ref. 44 Department for Energy Security and Net Zero and Department for Business, Energy & Industrial Strategy (2020). Energy white paper: Powering our net zero future. Available at: https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future

Ref. 45 HM Treasury (2020) National Infrastructure Strategy. Available at: https://www.gov.uk/government/publications/national-infrastructure-strategy

Ref. 46 Climate Change Act 2008. Available at: https://www.legislation.gov.uk/ukpga/2008/27/contents

Ref. 47 National Grid Company plc (n.d). NGC Substation and the Environment: Guidelines on Siting and Design. Available at: https://www.nationalgrid.com/document/350116/download

Ref. 48 UK Parliament. Written questions, answers, and statements (2024). Solar and protecting our Food Security and Best and Most Versatile (BMV) Land. Available at: https://questions-statements.parliament.uk/written-statements/detail/2024-05-15/hcws466

Ref. 49 UK Parliament. Written questions, answers, and statements (2015). Planning Update. Available at: https://questions-statements.parliament.uk/written-statements/detail/2015-03-25/HCWS488

Ref. 50 The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. Available at: https://www.legislation.gov.uk/uksi/2009/2264/contents/made

THE DROVES
SOLAR FARM

The Droves Solar Farm

Appendix 1 - Site Evaluation Report

Prepared by: DWD
Date: November 2025
PINS reference: EN0110013
Document reference: APP/5.5 (Original)
APFP Regulation Reg 5(2)(q)
Planning Act 2008
Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009



Contents

1 Introduction 1
1.1 Foreword 1
1.2 The Order Limits 1
1.3 The Scheme 1
1.4 Purpose of the Report 2
2 Site Evaluation Approach 2
3 Planning Policy 3
3.1 National Planning Policy 3
4 Site Evaluation Assessment 9
4.2 National Grid Substation Site Assessment 9
4.3 Grid Connection and Willing Landowner 15
4.4 Solar Development Site Evaluation 16
5 Suitability of Available Land 21
6 Conclusions 25

List of Tables

Table 1.1 Desktop Analysis for the four proposed locations of a National Grid Substation 13

List of Figures

Figure 1: Substation Feasibility Search – Main Roads and OHL Buffers

Figure 2: Zone 1 – Internationally and Nationally Designated Areas

Figure 3: Zone 1 – Locally designated areas

Figure 4: Zone 1 – Flood Zones

Figure 5: Zone 1 – Agricultural Land Classification

Figure 6: Zone 2 – Internationally and Nationally Designated Areas

Figure 7: Zone 2 – Locally designated areas

Figure 8: Zone 2 – Flood Zones

Figure 9: Zone 2 – Agricultural Land Classification

Figure 10: Zone 3 – Internationally and Nationally Designated Areas

Figure 11: Zone 3 – Locally designated areas

Figure 12: Zone 3 – Flood Zones

Figure 13: Zone 3 – Agricultural Land Classification

Figure 14: Zone 4 – Internationally and Nationally Designated Areas

Figure 15: Zone 4 – Locally designated areas

Figure 16: Zone 4 – Flood Zones

Figure 17: Zone 4 – Agricultural Land Classification

Figure 18: Internationally and Nationally Designated Areas within 5km of Zone 4

Figure 19: Locally designated areas within 5km of Zone 4

Figure 20: Agricultural Land Classification areas within 5km of Zone 4

List of Images

Image 1.1 Average Irradiance Levels within the UK 18

1 Introduction

1.1 Foreword

1.1.1 This Site Evaluation Report (the 'Report') has been prepared on behalf of The Droves Solar Farm Limited ('the Applicant') to present the reasoning for why The Droves Solar Farm (hereafter referred to as the 'Scheme') is located at this particular location, in relation to the Development Consent Order (DCO) application for the construction, operation and maintenance, and decommissioning of a solar generating station and its associated development.

1.2 The Order Limits

1.2.1 The extent of the Order limits is shown in **Location Plan [APP/2.1]**, and the Scheme is described in full in **ES Chapter 5: The Scheme [APP/6.1]** and shown spatially on the **Works Plans [APP/2.4].**

1.3 The Scheme

1.3.1 The Scheme comprises the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station and associated development comprising a Battery Energy Storage System (BESS), a Customer Substation, and Grid Connection Infrastructure, including a new National Grid Substation. The Scheme would allow for the generation and export of over 50MW Alternating Current (AC) of renewable energy, connecting into the National Electricity Transmission System (NETS) overhead line that passes through the Site.

1.3.2 As the Scheme would have a generating capacity in excess of 50MW, it is considered to be a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008.

1.3.3 The Scheme would be located within the Order limits, also referred to as 'the Site'. The Order limits contain all elements of the Scheme comprising the Solar PV Site, the Customer Substation, the National Grid Substation, the BESS, Grid Connection Infrastructure, Mitigation and Enhancement Areas, and the Highway Works (shown in **Figure 3.2: Site Boundary [APP/6.3]** are described further **in Chapter 2: Order limits and Context [APP/6.1]**).

1.3.4 Highway Works are sections of the highway network that will contain localised improvements, such as improvements to the road edge where it is deteriorated, or temporary highway and traffic works required to safely accommodate the Abnormal Indivisible Load (AIL) deliveries. These areas will support the movement of construction

vehicles on narrower sections of the local highway network within parts of the construction vehicle routes to the Site (refer to **Chapter 9: Transport and Access [APP/6.2]**).

1.4 Purpose of the Report

1.4.1 The purpose of this Report is to present the reasoning for why the Scheme is located at the Site's particular location, which includes the siting of the proposed new National Grid Substation. The Report provides an overview of the siting assessment for the National Grid substation and site evaluation of the solar development carried out by the Applicant following the identification of the entire Site.

1.4.2 **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** explains the legal and policy background relevant to the consideration of alternatives and the design development of the Order limits. The Chapter then covers the evolution of the design of the Scheme from the identification of the initial Order limits through to the Scheme's final design.

1.4.3 The **Planning Statement [APP/5.5]**, to which this Report forms an appendix, explains the planning tests and policy background relevant to the consideration of alternatives.

1.4.4 The Report should be read in conjunction with the **Statement of Need [APP/5.4]**, which presents further detail on the need for the Scheme, its locational value and its contribution to meeting the UK's decarbonisation requirements.

1.4.5 The **Design Approach Document [APP/5.7]** discusses the ongoing evolution of the Scheme from the identification of the Site to the final scheme now included within the Order limits.

2 Site Evaluation Approach

2.1.1 The Applicant has split the Report into two parts: the first part is the National Grid Substation siting assessment, and the second part is the site evaluation of the solar development Site.

2.1.2 The National Grid siting assessment approach is based on 'The National Grid Company plc's NGC Substation and the Environment: Guidelines on Siting and Design' **[Ref 1]**, which explains the approach taken towards the transmission system of electricity for England to assist those parties responsible for design and locating substations.

2.1.3 There is no standard methodology for selecting sites for solar energy generating stations. However, as the National Policy Statement (NPS) EN-3 **[Ref 2]** paragraphs 2.10.21-2.10.26 recognise, a viable grid connection is an essential material consideration for proceeding with development. It is instrumental in defining the search area, hence why this matter forms the starting point of this Report. This approach has been taken due to

the timing of the grid offer and the land becoming available, as explained below in Section 4.2.

2.1.4 There are also certain legal tests with regard to the consideration of alternative sites, for instance, where there would be an adverse effect on the integrity of a European protected site or where land and/or rights are being proposed to be acquired compulsorily. These are addressed in Section 3.1 below.

3 Planning Policy

3.1 National Planning Policy

Overarching National Policy Statement for Energy (NPS EN-1)

3.1.1 The compliance of the Scheme with planning policy is set out in the main body of the **Planning Statement [APP/5.5],** to which this Report forms an appendix. This section outlines the policies from NPS EN-1 **[Ref 3]** and NPS EN-3 that are relevant to the consideration of matters related to site selection.

3.1.2 There is a strong relationship between site selection and consideration of alternatives. Site selection outlines the process an applicant follows to determine the appropriate location for a scheme. It should demonstrate a trail of logical steps followed to determine a location that will achieve the scheme's objectives. These steps will normally be driven by a number of technical and environmentally led criteria, based on the guidance set out in NPS EN-3. This allows an applicant to propose development in a location that can accommodate functional requirements while also being subject to robust consideration of environmental constraints, thereby seeking to avoid areas of highest sensitivity.

3.1.3 Section 4.3 of NPS EN-1 establishes the circumstances under which NPS EN-1 requires the consideration of alternatives. Paragraph 4.3.9 of NPS EN-1 states that *"this NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective".*

3.1.4 Paragraphs 4.3.15 to 4.3.17 of NPS EN-1 establish the circumstances where there is a requirement to consider alternatives. These are as follows:

3.1.5 Paragraph 4.3.22 of NPS EN-1 advises that, in considering alternatives, the Secretary of State should be guided by the following principles:

- "*the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner; and*
- *only alternatives that can meet the objectives of the proposed development need to be considered."*

3.1.6 Paragraph 4.3.23 of NPS EN-1 advises that the Secretary of State "*should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development*".

3.1.7 Paragraph 4.3.24 of NPS EN-1 states that the Secretary of State "*should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals*". In a similar sense to paragraph 4.3.9 of NPS EN-1, this paragraph recognises that a proposed project does not have to demonstrate that it is the best option but rather that it is acceptable under the provisions of the relevant policy. This paragraph also recognises that alternative sites may come forward under other applications and that, critically, proposals are to be determined on their individual merits in accordance with the relevant policy, which forms the basis for decision-making in planning in England.

3.1.8 The Planning Inspectorate's Advice Note 7 sets out that the Inspectorate considers that a good ES is one that, amongst several other factors, "*explains the reasonable alternatives considered and the reasons for the chosen option taking into account the effects of the Proposed Development on the environment*".

3.1.9 As part of an Environmental Statement (ES), applicants are to provide information on the reasonable alternatives studied. This should include an indication of the main reasons for the applicant's choice, taking account of the environmental, social and economic effects and including, where relevant, technical and commercial feasibility matters:

- Where an NPS(s) may impose a policy requirement to do so; and
- Where there is a policy or legal requirement to consider alternatives, applicants should do so in compliance with these requirements.

3.1.10 There are also certain legal and policy tests with regard to the consideration of alternative sites, as contained within Sections 4.3, 5.2, 5.4, 5.8 and 5.10 of NPS EN-1. The circumstances relating to when the consideration of alternatives is required and the Applicant's response to these circumstances are set out below:

- Where a proposal would involve the compulsory acquisition of land or interests in land (NPS EN-1 paragraph 4.3.9). The DCO Application is seeking compulsory acquisition powers. Please see the **Statement of Reasons [APP/4.1]** for more details on this
- Where a development would be located near a sensitive receptor site for air quality (NPS EN-1 paragraph 5.2.7). The Scheme is not within an Air Quality Management Area (AQMA), and there are no AQMAs within the surrounding area
- Where a scheme would lead to significant harm to biodiversity and geological conservation interests (NPS EN-1 section 5.4). The Scheme would not likely give rise to significant harm to such receptors, as reported in **ES Chapter 7: Ecology and**

Biodiversity, ES Chapter 11: Soils and Agriculture, and **ES Chapter 12: Water Resources [APP/6.2]**

- Where a development would result in an adverse effect on the integrity of a European site that cannot be avoided (NPS EN-1 section 5.4). The **Shadow Habitats Regulations Assessment [APP/7.3]** has been submitted alongside the DCO Application, which confirms the Scheme would not result in an adverse impact on the integrity of a European Site; therefore, there is no requirement to consider alternatives
- Where a scheme would be located within, or partially within, Flood Zone 2 or Flood Zone 3 (NPS EN-1 section 5.8). In this case, the Sequential Test should be undertaken. If, after applying the Sequential Test, the project cannot be located in areas of lower flood risk, the Exception Test can be applied. This test provides a method for allowing necessary development to proceed in situations where suitable sites at a lower risk of flooding are not available. Regarding the application of the Sequential Test, paragraph 5.8.23 of NPS EN-1 states that the consideration of alternative sites should take into account the policy on alternatives described in section 4.3 of NPS EN-1. The entire Order limits are within Flood Zone 1, apart from a 1.10ha within the Skylark Mitigation area on the long side of the eastern field boundary, which is within Flood Zone 2 and 3; and
- Where a development would be located within a National Park, the Broads or a National Landscape (NPS EN-1 section 5.10). The Scheme is not located in or near such designations; therefore, no further consideration of alternatives in this regard is required.

National Policy Statement for Renewable Energy Infrastructure (NPS EN-3)

3.1.11 Section 2.10 of NPS EN-3 relates specifically to PV generation, including factors influencing site selection, and notes that *"the government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions by 2050*".

3.1.12 Paragraph 2.10.18 of NPS EN-3 states: "*The key considerations involved in the siting of a solar farm are likely to be influenced by factors set out in the following paragraphs, in addition to considerations specific to individual projects*".

3.1.13 Paragraphs 2.10.19 to 2.10.48, then list the following factors influencing site selection:

- 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.

3.1.14 Paragraphs 2.10.19 to 2.10.20 advise that irradiance will be a key consideration for applicants as it will impact the amount of electricity that can be generated. That irradiance can be influenced by topography.

3.1.15 Paragraphs 2.10.21 to 2.10.26 discuss mostly technical matters relating to the network connection. Importantly, paragraphs 2.10.24 and 2.10.25 recognise that distance to a connection can have a significant effect on project viability and that applicants may "*choose a site based on a nearby available grid export capacity*".

3.1.16 Paragraph 2.10.27 explains that NSIP scale development may have a significant zone of visual influence, recognising that likely impacts relate to visual amenity and glint and glare. These topics are considered in detail in Section 8 of the **Planning Statement [APP/5.5].**

3.1.17 Paragraphs 2.10.28 to 2.10.34 relate to agricultural land classification and land type. It sets out a preference for the use of non or lower grade agricultural land but accepts that: land type should not be a predominant factor in site selection; that solar development is not prohibited on BMV, and that large-scale solar is likely to include some agricultural land. A detailed response to these paragraphs is set out in the following Section of this Report and Section 8 of the **Planning Statement [APP/5.5].**

3.1.18 Paragraphs 2.10.35 to 2.10.39 discuss matters relating to accessibility and recognise that NSIP scale solar is likely to be located in rural areas and access is likely to be a significant factor in site selection. This is dealt with in Section 4.4 of this Report and under Transport and Access in Section 8 of the **Planning Statement [APP/5.5]**.

3.1.19 Paragraphs 2.10.40 to 2.10.45 discuss public rights of way (PRoW) and acknowledge temporary closures may be required, but that efforts should be made to ensure continued use during construction and operation. These paragraphs also advise that applicants should seek to ensure continued recreational use while seeking opportunities to facilitate enhancements. These paragraphs require that applications include a Public Rights of Way Management Plan (see the **outline Public Right of Way and Permissive Path Management Plan [APP/7.12]**). Consideration of impacts on PRoW from a planning policy perspective are set out in Section 8 of the **Planning Statement [APP/5.5]**, however there are no guidelines set out in these paragraphs of the NPS EN-3 about how these should be considered from a site selection perspective, with NPS EN-3 focusing on how PRoWs are addressed within an application and so there is no further assessment of these within this Report.

3.1.20 Paragraphs 2.10.46 to 2.10.48 advise that security may be a key consideration for applicants and that natural features of a landscape may assist in site security, as well as items such as CCTV and perimeter fencing. The nature of the landscape of the Scheme is such that natural features which may assist in security measures are less available, noting that it is a gently undulating topography. No further consideration is therefore necessary on this matter.

3.1.21 The above principles are effective provisions in terms of scoping the assessment. However, as previously stated, it is important to note that there is no statutory or specific planning policy requirement to consider alternative sites in relation to the development of best and most versatile (BMV) (or other) agricultural land in NPS EN1 or other planning policy documents.

National Policy Statement for electricity network infrastructure (EN-5)

3.1.22 NPS EN-5 **[Ref 4]** sets out, in paragraphs 2.2.1 to 2.2.12, which factors influence site selection and design for electricity network infrastructure.

3.1.23 Paragraph 2.2.2 states that the "*siting is determined by*:

- *the location of new generating stations or other infrastructure requiring connection to the network, and/or*
- *system capacity and resilience requirements determined by the Electricity System Operator.*"

3.1.24 The following paragraphs, 2.2.3 to 2.2.5, go on to state that "*these twin constraints, coupled with the government's legislative commitment to net zero by 2050, strategic commitment to new interconnectors with neighbouring North Seas countries7 and an ambition of up to 50GW of offshore wind generation by 2030, means that very significant amounts of new electricity networks infrastructure is required, including in areas with comparatively little build-out to date. However, a strategic and holistic approach to onshore and offshore network planning, as set out in paragraphs 2.7 – 2.8, will identify the most efficient way of meeting decarbonisation targets and should reduce the overall amount of network infrastructure required. Additionally, applicants retain control in managing the identification of routing and site selection between the identified initiating and terminating points or within the development zone. Moreover, the locational constraints identified above do not, of course, exempt applicants from their duty to consider and balance the site-selection considerations set out below, much less the policies on good design and impact mitigation detailed in sections 2.4-2.9.*"

3.1.25 Paragraph 2.2.7 states that "*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*".

3.1.26 Paragraph 2.2.8 states that "*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*".

3.1.27 The above paragraphs are effective provisions in terms of scoping the assessment. However, as previously stated, it is important to note that there is no statutory or specific planning policy requirement to consider alternative sites in relation to the development.

National Planning Policy Framework

3.1.28 The National Planning Policy Framework (NPPF) **[Ref 5]** was published in March 2012 and most recently updated in February 2025. The NPPF sets out the Government's planning policies for England and how these are to be applied, including in respect of the development of agricultural land and renewable energy. The NPPF does not contain specific policies for NSIPs and therefore does not have a direct effect in relation to the Scheme; however, it may be a relevant matter in the Secretary of State's decision-making.

3.1.29 Paragraph 161 of the NPPF states that "*the planning system should support the transition to net zero by 2050 and take full account of all climate impacts, including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure*".

3.1.30 Paragraph 168 of the NPPF continues to state that local planning authorities should "*not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future"*.

3.1.31 Paragraph 187 of the NPPF states that local planning authorities should balance the economic and other benefits of BMV agricultural land. Furthermore, where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. Whilst this provides some context, the approach to site selection has been led by the policy on agricultural land in NPS EN-3.

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations')

3.1.32 Regulation 14(2)(d) of the EIA Regulations requires that "*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*" be presented in the ES. In compliance with the EIA Regulations, the alternatives considered by the Applicant have been fully described through **Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]**.

Local Planning Policy

3.1.33 The Breckland Local Plan was adopted in September 2023. Policies were included that relate to Renewable Energy Development (Policy ENV 10), and a section on Solar Energy Development is included, stating that "*The effective use of land by focusing large scale solar farms on previously developed and non-agricultural land, will be encouraged*

provided that it is not of high environmental value. *Particular factors that the Council will need* to consider where a proposal involves greenfield land include:

- the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land, where possible; and
- that the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays".

4 Site Evaluation Assessment

4.1.1 This section sets out the background and approach to 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.

4.1.2 One high-voltage transmission circuit crosses Norfolk from the Midlands towards Norwich and from there turns towards demand centres in the south, as shown in Figure 7.3 of the **Statement of Need [APP/5.4]**. 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.

4.1.3 During discussions with National Grid in 2021, the Applicant discussed National Grid Electricity Transmission Plc's (NGET) 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.

4.2 National Grid Substation Site Assessment

National Grid's Approach to design and siting of substations

4.2.1 National Grid 's environmental policy statement highlights the importance of protecting and enhancing the environment while considering the impact of the organisation's actions. 'The National Grid Company plc's NGC Substation and the Environment: Guidelines on Siting and Design' **[Ref 1]** document outlines the approach taken towards the transmission system of electricity for England and Wales. It assists parties responsible for designing

and locating substations in mitigating the environmental effects of such developments and meeting the National Grid ’s environmental policy.

4.2.2 National Grid ’s environmental policy emphasises the importance of protecting and improving the environment by considering the impact of all its actions. The company aims to minimise adverse environmental effects and, in line with the Electricity Act (Schedule 9), take steps to preserve amenity and mitigate the impacts of its proposals. This approach is put into practice through guidelines (Section III of National Grid Company plc‘s NGC Substation and the Environment: Guidelines on Siting and Design), which address the amenity issues associated with the siting and design of new substations and major extensions or modifications to existing substations.

4.2.3 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.

Methodology for the proposed siting of a National Grid Substation

4.2.4 The NGC guidelines make clear that consideration must be given to environmental issues from the earliest stage to balance the technical benefits and capital cost requirements for new developments against the consequential environmental effects in order to keep adverse effects to a reasonably practicable minimum.

4.2.5 In light of the above, the Applicant has undertaken a desktop assessment to identify potential locations to site a new National Grid Substation along an approximately 45km stretch of the existing 400kV Transmission Line between Necton and Walpole, as shown in **Figure 1: Substation Feasibility Search**.

4.2.6 In order to narrow down the search, the Applicant has applied the following guidelines as a starting point to identify potential siting zones for the substation, as shown in Figure 1, National Grid Substation Feasibility Search:

- 1km search area, either side of the existing 400Kv overhead line; and
- 500m search area, either side of a main road (A and B roads) for accessibility

4.2.7 These criteria have been set to achieve the following:

- Reduce the length of any potential diversion of the existing overhead line into a new National Grid Substation, thereby minimising construction impacts and capital costs associated with new infrastructure; and
- Reduce the extent of highway upgrades and/or the need to lengthen new permanent access tracks to a new National Grid Substation from the public highway, thereby minimising construction impacts and capital costs associated with new infrastructure.

4.2.8 Following the identification of potential siting zones, each siting zone is reviewed against the guidelines within Section III of NGC Substation and the Environment: Guidelines on Siting and Design. The siting of new National Grid substations, sealing end compounds, and line entries should, as far as reasonably practicable, seek to avoid internationally and nationally designated areas of the highest amenity, cultural, or scientific value through the overall planning of the system connections. The following guidelines are to be applied:

- To avoid internationally and nationally designated areas of highest amenity, cultural or scientific value, e.g. Ramsar sites, Site of Special Scientific Interest (SSSI), and National Landscapes
- Care should be taken in relation to all historic sites with statutory protection, e.g. Ancient Monuments, Battlefields and Listed Buildings
- Account should be taken of the Government Planning Policy Guidance and established codes of practice
- Account should be taken of any development plan policies relevant to the siting or design of substations
- Areas of local amenity value, important existing habitats and landscape features, such as ancient woodland, historic hedgerows, surface and ground water sources and nature conservation areas, should be protected as far as reasonably practicable
- The siting of substations, extensions and associated proposals should take advantage of the screening provided by land form and existing features and the potential use of site layout and levels to keep intrusion into surrounding areas to a reasonably practicable minimum; and
- The proposals should keep the visual, noise and other environmental effects to a reasonably practicable minimum. The land use effects of the proposal should be considered when planning the siting of substations or extensions.

Desktop Analysis for the proposed siting of a National Grid Substation

4.2.9 Based on the methodology set out in the above section, the Applicant has undertaken a desktop assessment to identify potential siting zones for a new National Grid Substation along an approximately 45km stretch of the existing 400kV Transmission Line between Necton and Walpole, as stated within the **Grid Connection Statement [APP/7.1]**.

4.2.10 The Applicant firstly identified potential siting zones for a new National Grid Substation by applying section 4.2.6 of the report, which are shown on Figure 1 National Grid Substation Feasibility Search. Following the identification of these four potential siting zones, each siting zone has been reviewed against the guidelines set out above under section 4.2.8 of this report. The Applicant has used a RAG approach to determine the suitability of the siting zone:

- Red – The siting zone is completely within or covered by the designation or constraint, e.g. the site is entirely within a National Landscape

- Amber – The siting zone is partly within or covered by the designation or constraint, e.g. the siting is partly covered by Flood Zones 2 and 3; or
- Green – The siting zone is outside of the designation or constraint, e.g. an Ancient Monuments site is not located within the siting zone.

4.2.11 A desktop review of each of the siting zones has been undertaken, a summary of which is set out in the table below, supported by **Figures 2 – 17**.

Table 1.1 Desktop Analysis for the four proposed locations of a National Grid Substation

Considerations	Zone1	Zone2	Zone3	Zone4
Internationally and nationally designated areas	No designated sites	SSSI is present within the very southern boundary	SAC and SSSI are located within the siting zone	SSSI is present on the very northern boundary of the siting zone
Areas of local amenity value	No allocations in the West Norfolk Local Plan No county wildlife site No grassland priority habitats No wetland priority habitats Pockets of woodland priority habitats (Traditional Orchards and Deciduous Woodland) No Ancient Woodland No designated heritage assets There are numerous watercourses/field drains	Partially allocated for housing in the West Norfolk Local Plan County Wildlife Site present Coastal and floodplain grazing marsh, and good-quality semi-improved grassland priority habitats are present No wetland priority habitats Pockets of woodland priority habitats (Traditional Orchards and Deciduous Woodland) No Ancient Woodland	No allocations in the West Norfolk Local Plan County Wildlife Sites present Lowland meadows and good quality semi-improved grassland are priority habitats present. Lowland Fens Priority Habitat present Large blocks of woodland priority habitats (Deciduous Woodland) are present. No Ancient Woodland One Grade II listed building and a Scheduled Monument	Corridor of movement along A1065 identified on Breckland Local Plan Policy Map No County Wildlife Site Small area of Coastal and floodplain grazing marsh, and good-quality semi-improved grassland priority habitats are present No wetland priority habitats Pockets of woodland priority habitats (Deciduous Woodland) No Ancient Woodland No designated heritage assets

		Three Grade II buildings are present There are numerous watercourses/field drains		
Screening provided by landform and existing features	Limited screening is provided by existing blocks of woodland, and the topography is very flat	Limited screening is provided by existing blocks of woodland, and the topography is very flat	Large woodland blocks present	Woodland blocks present
Visual, noise and other environmental	Located entirely within flood zone 3	Approximately 20% located within Flood Zones 2 & 3 Siting zone includes large residential area	Less than 20% located within Flood Zones 2 & 3 Siting zone includes Norfolk Woods and Spa	Small extent of the Flood Zones 2 & 3. No residential properties within the siting zone
Land use **Grade 1 – Red** **Grade 2 – 3 Amber** **Grade 4 - Green**	Consists entirely of Grade 1 and 2 agricultural land	Consists of Grade 2 and 3 agricultural land. The unconstrained area consists of Grade 2	Consists of Grade 3 and 4 agricultural land	Entirely Grade 3 agricultural land

4.2.12 Following a detailed desk-based assessment of all potential siting zones, the review concluded that Zone 4 offers the most balanced and sustainable option when considering key environmental and technical criteria, as well as the guidelines set out above in Section 4.2. Therefore, it was selected as the preferred area for the siting of the proposed National Grid Substation.

4.2.13 Zone 4 avoids internationally and nationally designated areas of highest environmental, cultural, or scientific importance, such as National Landscapes, and SSSIs. Although a SSSI lies along the northern boundary, careful design and mitigation could ensure minimal impact. There are no designated heritage assets, County Wildlife Sites, or Ancient Woodland within the zone. Only small areas of priority habitats, such as coastal and floodplain grazing marsh, semi-improved grassland, and pockets of deciduous woodland, are present, which can be avoided through good design. These woodland blocks also offer potential valuable natural screening.

4.2.14 Zone 4 aligns well with Planning Policy Guidance and local development plan policies, avoiding residential properties and higher-quality farmland, as it comprises entirely Grade 3 agricultural land. While there is a minor extent of Flood Zones 2 and 3, these can be managed through design measures. The site's existing landform and vegetation could potentially be used to limit visual, noise, and environmental effects, ensuring intrusion into surrounding areas is kept to a practicable minimum. Overall, Zone 4 presents the most appropriate and policy-compliant location for the proposed National Grid Substation.

4.3 Grid Connection and Willing Landowner

4.3.1 As outlined in Section 3 above, NPS EN-3 paragraphs 2.10.23 – 2.10.25 establishes that the starting point for a site selection process is the availability of a nearby and suitable connection to the transmission network. Recent solar NSIP decisions, as set out in Section 4.4, have confirmed that the Secretary of State supports this approach to site selection of the grid connection point as an appropriate starting point.

4.3.2 During ongoing engagement, the Applicant and National Grid came to an agreement for a connection offer for 500MW into the existing 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 proposed Site for a solar farm development. This single proposed Site would provide sufficient land to site the Scheme in its entirety.

4.3.3 The Applicant was aware that minimising the number of landowners is beneficial for a number of reasons, including simplifying land negotiations, reducing the risk of project failure due to the added complexity of multiple landowners, and reducing reliance on compulsory acquisition in accordance with policy requirements. Therefore, single, contiguous sites with as few landowners as possible were prioritised.

4.3.4 Identifying a single landowner, located directly adjacent along the existing OHL, who was agreeable in principle to leasing sufficient land for a solar development, optimised the grid

connection offer. As part of that offer, National Energy System Operator (NESO) contracted the Applicant to provide the land and gain consent for the proposed National Grid Substation. This has therefore been included as part of the DCO Application as stated in the **Grid Connection Statement [APP/7.1]**.

4.3.5 Once it was clear that the landowner was amenable in principle to bringing forward a solar scheme on their land, which met the site selection criteria and offered a large landholding with opportunities for flexibility in precisely where solar and associated mitigation were located.

4.3.6 The suitability of the land that the willing land owner agreed to make available (the 'available land') was then considered against the key site selection criteria, as part of further assessment of the land surrounding Zone 4. This is set out in the Section below.

4.4 Solar Development Site Evaluation

4.4.1 Section 2.10 of NPS EN-3 relates specifically to Solar PV generation, and paragraphs 2.10.19 to 2.10.48 list factors influencing site selection. The initial evaluation of the available land was conducted in accordance with the 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 the point of connection
- 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 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.

Initial Constraints Consideration

4.4.2 To ensure that the available land is suitable and to determine the appropriateness of a Site, the Applicant carried out an evaluation, starting with a 5km radius surrounding Zone 4, which was established as a viable search area (the 'Search Area') for a potential solar scheme and its associated development, and is shown in **Figure 18 – 20**.

4.4.3 The radius of the Search Area was established as the commercially viable cable distance for this project, taking into account the capacity, distance from the grid connection, underground cable costs, capital costs and market conditions at the time. However, areas

closest to the Zone 4 OHLs were preferred in principle due to the benefits of a shorter cable route, which include ease and timeliness of key infrastructure delivery, minimisation of disruption to residents and businesses along the route, and reduced environmental disturbance and cost.

Irradiance and Site Topography

4.4.4 Paragraph 2.10.19 of NPS EN-3 notes that site topography and irradiance levels are key inputs to the site selection process.

4.4.5 Norfolk represents an appropriate and suitable area within the UK to construct a solar farm as the area benefits from higher levels of solar irradiance compared to other parts of the UK. Further details can be found in Section 6.4 of the **Statement of Need [APP/5.4]** and shown in **Image 1** below.

4.4.6 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 from both a constructability and operational perspective to ensure that the Site can produce a large amount of electricity.

4.4.7 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.

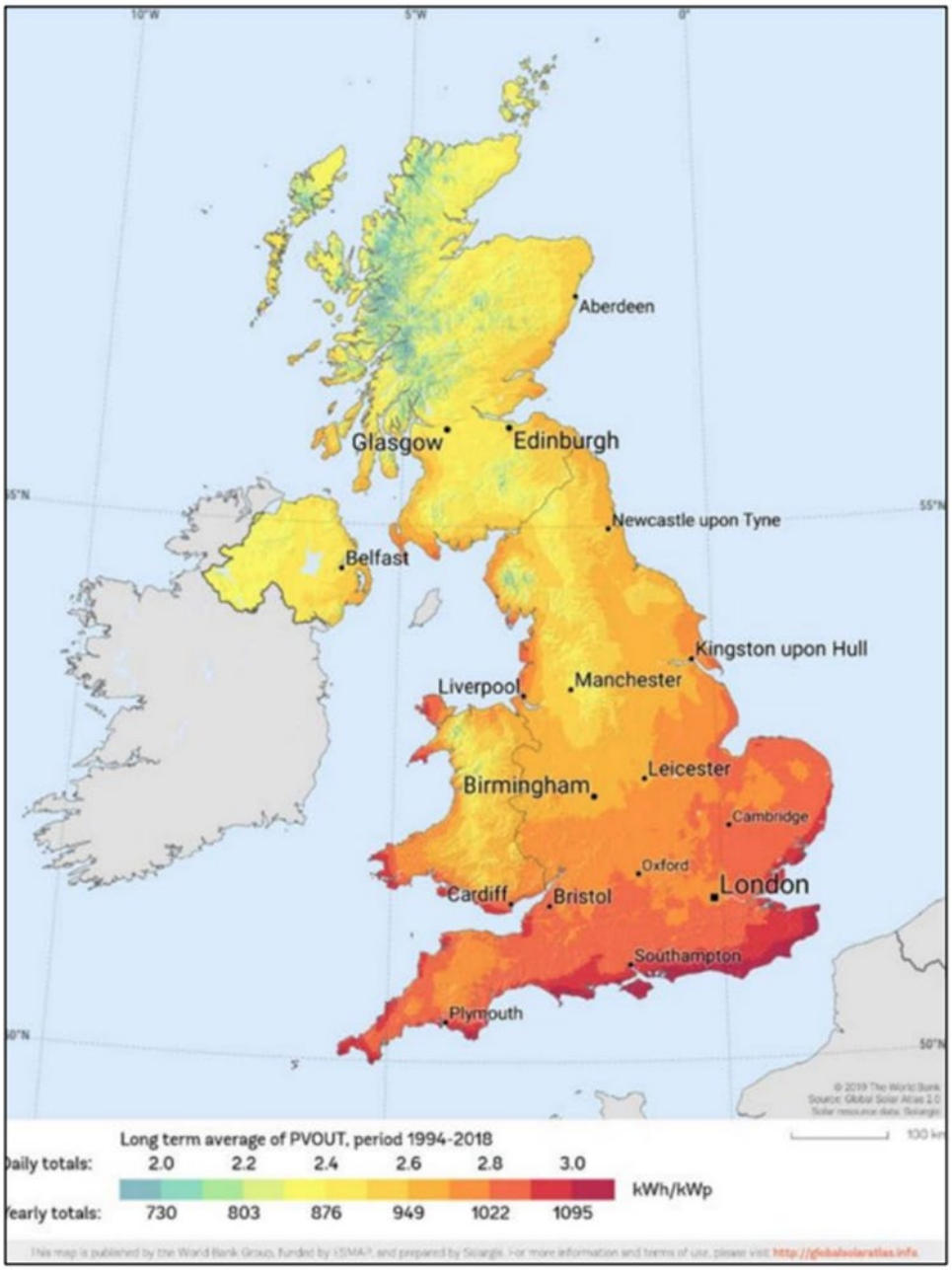


Image 1.1 Average Irradiance Levels within the UK

Network Connection

4.4.8 A viable grid connection is an essential material consideration for proceeding with the development and is instrumental in defining the Search Area.

4.4.9 The Site was identified as part of the pre-application process. The Applicant had considered existing substations (Walpole, Necton and Norwich Main) as the connection point only to find that these could not accommodate a suitable connection. Following discussions with NGET, it was identified that capacity was available on the circuits and

that the National Grid Substation was required for the Applicant to connect the Scheme to the grid.

4.4.10 The network has availability for a suitable grid connection into the existing OHL between Walpole and Necton, with sufficient capacity available to support a solar scheme of a viable size, as explained in the **Grid Connection Statement [APP/7.1]**.

4.4.11 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, which are assessed as part of the **Planning Statement [APP/5.5]** and **Policy Compliance Document [APP/5.6]**.

4.4.12 The Applicant used the Search Area to identify suitable areas of land for NSIP scale solar development, driven by the desire to be as close to the Zone 4 OHL, to minimise the risk of environmental impacts, disruption to landowners, challenges with crossings, process losses and the cost and delay of a longer cable route.

4.4.13 It should be noted that the size of the search areas adopted for solar NSIPs varies depending on the nature of the site, location of the point of connection and area characteristics. As an example, other consented solar NSIPs have adopted the following search areas:

- Longfield: 5km
- Mallard Pass: No search area adopted; suitable site found within close proximity to existing National Grid Substation
- Cottam: 5km to 20km
- Gate Burton: 8km search area with constraints mapped to 15km
- Byer Gill Solar: 6km to 12km
- Oaklands Farm Solar Park: 10km
- Tillbridge: 15km; and
- Stonestreet Green Solar: 5km.

Proximity of the site to dwellings

4.4.14 NPS EN-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, as assessed in **ES Chapter 6: Landscape and Visual [APP/6.2]**, and glint and glare, as assessed in **ES Chapter 16: Other Environmental Matters [APP/6.2]**. 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.

4.4.15 The Applicant focused on areas away from the major settlements to ensure there would be sufficient separation between the Order limits and surrounding towns and villages to minimise adverse visual and residential amenity impacts.

4.4.16 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, and its associated development.

Environmental Considerations

4.4.17 A key principle in the site selection process was to seek to avoid areas of particular environmental and landscape sensitivity where possible to minimise potential impacts. This is true from a natural and built environment perspective, including ecology and biodiversity, landscape, water resources, and cultural heritage.

4.4.18 The Applicant had regard to several environmental and spatial considerations when determining an appropriate location for the Order Limits in accordance with sections 2.3 and 2.10 of NPS EN-3, as shown on Figure 18: Internationally and Nationally designated areas within 5km of Zone 4 and Figure 19: Locally designated area within 5km of Zone 4 and detailed below:

- **Designated international and national ecological and geological sites –** nationally recognised designations such as SSSIs, National Nature Reserves, National Parks, Registered Parks and Gardens, and World Heritage Sites were considered as part of the site selection process in accordance with NPS EN-3 paragraph 2.3.6. As outlined in paragraph 3.1.9 of this Report, NPS EN-1 also outlines specific tests where development would lead to significant harm to biodiversity and geological conservation interests (NPS EN-1 section 5.4). Figure 18 shows that there are a few international and national ecological and geological sites within the Study Area. The Applicant sought to find appropriate land that avoided these sites.
- **Nationally Designated Landscapes –** in accordance with NPS EN-3 paragraph 2.3.6, nationally designated landscapes, previously referred to as ‘Areas of Outstanding National Beauty’, were considered as part of the site selection process. There were no nationally designated sites identified within the Search Area.
- **Flooding –** the site selection process considered areas of lower flood risk in accordance with paragraph 2.10.75 of NPS EN-3 and section 5.8 of NPS EN1. Flood Zones within the Search Area are as shown on Figure 19. This identifies that water courses and Flood Zones 2 and 3 are distributed evenly across the entire Search Area and that there are no large areas of solely Flood Zone 1 within which the Applicant could focus its search.
- **Heritage –** in accordance with paragraph 2.3.8 of NPS EN-3 and section 5.9 of NPS EN-1, the impact on the historic environment was considered as part of the site selection process. Figure 19 identifies Listed Buildings, Scheduled Monuments, Registered Parks and Gardens and Conservation Areas within the Search Area. In determining an appropriate site, the Applicant sought to avoid these heritage assets

and also any potential impacts on the settings of these assets as a result of the Scheme.

Agricultural Land Classification (ALC) and Land Type

4.4.19 NPS EN-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.*" ALC was therefore an important factor for the Applicant when evaluating the proposed Site.

4.4.20 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 3. The Natural England ALC maps do not differentiate between grades 3a and 3b.

4.4.21 According to the provisional ALC mapping from DeFRA and Natural England, the Search Area is predominantly made up of a mixture of grade 3 and 4, as shown in Figure 20.

4.4.22 This approach to considering ALC values, in terms of the use of provisional and predictive mapping, has been considered as both satisfactory and proportionate by the Examining Authorities and Secretary of State in relation to, for example, the made Heckington Fen Solar Farm, Gate Burton Energy Park and Mallard Pass Solar Farm DCOs

Accessibility

4.4.23 In accordance with NPS EN-3 paragraphs 2.10.35 to 2.10.39, consideration has been given in the site selection process to the suitability of the access routes to the Scheme for both construction and operation. Paragraph 2.10.36 emphasises the importance of accessibility: "*Given that potential solar farm sites are largely in rural areas, access for the delivery of solar arrays and associated infrastructure during construction can be a significant consideration for solar farm siting*".

5 Suitability of Available Land

5.1.1 Once the Applicant had identified a willing landowner who had sufficient land to optimise the grid connection, the Applicant evaluated the land to confirm the suitability for solar development. This included consideration of the available land against factors considered previously in this Report and set out in paragraphs 2.10.29 to 2.10.48 of NPS EN-3, as well as the relevant environmental constraints shown in Figure 18 Internationally and Nationally designated areas within 5km of Zone 4 and Figure 19 Locally Designated and Flood Zones areas within 5km of Zone 4.

Irradiance and Site Topography

5.1.2 As set out in Section 4.4 above, irradiance is sufficiently high in Norfolk to support solar development. The general topography of the available land is gently undulating, with much of the land sloping north to south, making it suitable for solar.

Network Connection

5.1.3 The Applicant submitted a grid application to NESO, the system operator of NETS, in May 2022 to connect the Scheme to the NETS overhead transmission line between Walpole and Necton via the new National Grid Substation.

5.1.4 The grid connection offer was accepted in the form of a Bilateral Connection Agreement (BCA) between the Applicant and NESO, allowing for a Transmission Entry Capacity (TEC) of 500 MW (AC) export to and 500 MW (AC) import from the NETS. This was entered into in May 2023.

5.1.5 The connection offer is into the existing overhead line between Walpole and Necton, as set out in the **Grid Connection Statement [APP/7.1]**. The offer outlines the need for the Applicant to source land suitable for a National Grid Substation as detailed in Section 4.2 of this report.

Proximity of the Site to Dwellings

5.1.6 The process sought to avoid sites in close proximity to residential dwellings or where it would not be possible to mitigate visual amenity, and glint and glare appropriately.

5.1.7 The available land has a relatively limited number of individual dwellings/farmsteads in close proximity to the Zone 4. 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.

5.1.8 The immediate surrounds 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, with the larger town of Swaffham to the south and separated from the Site by the A47.

Environmental Considerations

Designated international and national ecological and geological sites

5.1.9 The available land did not contain any statutory environmental or landscape designations; however, Breckland Forest SSSI is located approximately 2.5km South-West and the River Nar SSSI is located approximately 0.5km north of the available land. It was considered that any potential impacts on the species for which these SSSI are designated

could be mitigated through detailed design, including the use of setbacks from development and mitigation planting and screening.

Nationally Designated Landscapes

5.1.10 The available land does not fall within a Nationally Designated Landscape. The closest National Landscape is the Norfolk Coast National Landscape, located more than 14.5km North-West of the available land.

Ancient Woodland

5.1.11 There are no ancient woodlands within the available land when evaluating the initial area for solar development. The nearest block of Ancient Woodland is Sporle Wood (Ancient Replanted Woodland), located approximately 3.4km east of the available land.

Flooding

5.1.12 The majority of the available land was within Flood Zone 1; however, some parts of the land to the north have a small part of Flood Zones 2 and 3. These areas of Flood Zones 2 and 3 are not necessary for the solar development, including BESS and Customer Substation. The Flood Zones 2 and 3 areas are only used for skylark mitigation measures, with a total area of 1.10ha.

Heritage and Archaeological

5.1.13 There are no statutory designated heritage assets, listed buildings, Conservation Areas, or scheduled monuments located within the available land. There is one Registered Historic Park and Garden, Narford Hall, located approximately 380m west of the available land.

5.1.14 The nearest Listed Building to the Site is the Grade I Church of St George, located approximately 316m north of the Site. The Grade II Baptist Chapel and Hall, 686m south of the Site in the settlement of Swaffham and Grade I Remains of Cluniac Benedictine Priory of St Mary and St Peter and St Paul, approximately 945m north of the Site. The nearest Conservation Area, South Acre Conservation Area, is located approximately 146m north of the available land.

5.1.15 The nearest archaeological features are the Double moated site of Old Hall, 250m north west of Church Farm Scheduled Monument is located approximately 576m north of the Site, Castle Acre Priory Scheduled Monument is located approximately 756m north of the Site, Castle Acre Castle, town defences and Bailey Gate Scheduled Monument is located approximately 1.2km north-east of the Site and Deserted medieval village, Great Palgrave Scheduled Monument is located approximately 643m southeast of the available land.

Summary

5.1.16 Following the assessment above, it was concluded that the available land performed well against the site selection criteria outlined in section 2.10 of NPS EN-3 and assessed within

this Report. As a result, the initial Order limits, presented at the launch of the Scheme, were created. These are shown in Section 6, 'Design Evolution' of the **Design Approach Document [APP/5.7]**.

5.1.17 The initial Order limits were then further refined through engagement, additional surveys and design, as set out in **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** and as illustrated within **Design Approach Document [APP/5.7]** and **Figure 5.1: Concept Masterplan [APP/6.3]**.

5.1.18 The Order limits as presented in this DCO Application are shown in **Location Plan [APP/2.1]**, and the Scheme is described in full in **ES Chapter 5: The Scheme [APP/6.1]** and shown spatially on the **Works Plans [APP/2.4]**. The Order limits include all elements of the Scheme: the Solar PV Site, the Customer Substation, the National Grid Substation, the BESS, Grid Connection Infrastructure, Mitigation and Enhancement Areas, and the Highway Works. All elements of the Order limits performed well against the site selection criteria outlined in section 2.10 of NPS EN-3.

Agricultural Land Classification (ALC) and Land Type

5.1.19 The available land 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, within the Search Area.

5.1.20 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] Plate 11-23** (Provisional ALC) and **Plate 11-24** (Likelihood of BMV).

5.1.21 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 Works 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 Grades 1 and 2 fields from the Scheme in the north, as discussed in the **Design Approach Document [APP/5.7]** and **Figure 5.1: Concept Masterplan [APP/6.3].**

5.1.22 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 **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.

5.1.23 In the context of the wider BMV resource, the Applicant notes that Natural England estimates that about 42% of all farmland in England has an estimated 21% in Grades 1

and 2 and 21% in subgrade 3a. The resource is considered to be of national importance. The Institute for Sustainability and Environmental Professionals (ISEP, formerly IEMA) considers the land of ALC Grades 1 and 2 to be of “very high” sensitivity, the subgrade 3a to be of “high” sensitivity, and the land of Subgrade 3b to be of “medium” sensitivity. The land of Grades 4 and 5 is “low” sensitivity.

Accessibility

5.1.24 The available land 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, minimising the need for and extent of highway improvements. Being directly adjacent to the A1065 provides direct access to the Site, avoiding the need for on-site 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 Access [APP/6.2]**.

6 Conclusions

6.1.1 There is a demonstrable urgent and enduring need for renewable energy development in the UK, as set out in the National Policy Statements. The Scheme provides a significant opportunity to make a major contribution towards the government’s aim to deliver a clean electricity system as a key enabler to delivering net zero by 2050.

6.1.2 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 Grid Connection Offer required the Applicant to find land suitable for both a National Grid Substation and large-scale Solar development.

6.1.3 The Applicant considers that it followed a logical approach, starting with the siting zone of the proposed National Grid Substation along an approximately 45km stretch of the existing 400kV Transmission Line between Necton and Walpole. The Applicant has undertaken a study to identify potential siting zones for a new National Grid Substation, as outlined in Section 4.2 above, based on a desk-based review of each potential site.

6.1.4 Zone 4 was identified as the preferred and most suitable location for the proposed National Grid substation, offering a balanced outcome in environmental, technical, and planning terms. The site avoids major designated areas of ecological or cultural importance, with only limited priority habitats and no heritage assets, County Wildlife Sites, or Ancient Woodland present. Its existing landform and woodland provide natural screening, helping to reduce visual and environmental impacts. The area consists entirely of Grade 3 agricultural land, contains no residential properties, and only small areas fall within Flood Zones 2 and 3, which can be effectively managed through design. Overall, Zone 4

complies with national and local planning policies and represents a sustainable, low-impact, and policy aligned location for the substation and associated development.

6.1.5 Once the Applicant had a siting zone for the National Grid Substation, it carried out a site evaluation to determine the suitability of the land available nearby for large-scale solar deployment, from an irradiance and topography perspective and having regard to environmental and planning constraints.

6.1.6 As set out in Section 5 of this report, available land fits the factors explored by the Applicant and set out in NPS EN-3, being without many constraints and with the benefit of a potential viable connection point to be included in the Site. When determining the appropriateness of a Site, the Applicant considers factors including, but not limited to, a large enough site area, topography, access and the lack of designations. The Applicant found it clear that the Site met their environmental site selection criteria. The Applicant, therefore, had identified a suitable site and concluded their site evaluation process.

6.1.7 **ES Chapter 4: Reasonable Alternative and Design Evolution [APP/6.1]** considers the evolution of the initial Order limits, as a result of further engagement, additional surveys and design, through the pre-application period, and the Order limits proposed as part of the DCO Application as set out in **Location Plan [APP/2.1]**.

6.1.8 Policy in NPS EN-1 is clear in that work should be undertaken on a proportionate basis and that any alternative would need to be a reasonable alternative. It is expected to deliver the same capacity in the same timeframes. Indeed, there is an acknowledgement that other sites may exist that potentially have less impact than the Scheme.

6.1.9 The Applicant's site selection process and evaluation accords with the approach to the consideration of alternatives set out in section 2.10 of NPS EN-3. The Applicant considers that it has demonstrated compliance with the relevant site selection criteria set out in NPS EN-1, NPS EN-3 and NPS EN-5.

References

Ref 1 The National Grid Company plc's NGC Substation and the Environment: Guidelines on Siting and Design - https://www.nationalgrid.com/sites/default/files/documents/13796-The%20Horlock%20Rules.pdf

Ref 2 National Policy Statement (NPS) for Renewable Energy Infrastructure (EN-3)

Ref 3 Overarching National Policy Statement for Energy (NPS EN-1)

Ref 4 National Policy Statement (NPS) for electricity network infrastructure (EN-5)

Ref 5 National Planning Policy Framework (NPPF) February 2025

THE DROVES

SOLAR FARM