East Pye Solar

Planning Statement

Revision 1

March 2026

Planning Inspectorate Reference: EN0110014

Document Reference: APP/7.14

APFP Regulation 5(2)(q)

Contents

Tables

Appendices

Executive Summary

This Planning Statement has been prepared on behalf of East Pye Solar Limited (the 'Applicant') in relation to an application for a Development Consent Order (DCO) (the 'DCO Application') for East Pye Solar (the 'Scheme').

This Planning Statement provides an appraisal of the Scheme against the relevant policy and legislative framework, drawing upon the conclusions of the Environmental Statement (ES) and other DCO Application documentation to assess whether the Scheme complies with planning policy.

The needs and benefits of the Scheme are set out in this Planning Statement. 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, including employment generation, skills and training, permissive paths and community accessible space, together with ecological and landscape enhancements through a Green Infrastructure Strategy.

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, 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. South Norfolk Council and Norfolk County Council are the host authorities for the Scheme and will have an opportunity to prepare local impact reports during Examination. Consideration is given to the statutory development plan within this Planning Statement, where relevant.

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.

Based on the findings of the ES and other DCO Application documentation, this Planning Statement applies the planning balance in relation to the residual beneficial and adverse effects of the Scheme. It concludes that adverse effects have been appropriately managed and that the residual significant adverse effects are outweighed by the residual significant benefits. Consideration is also given to 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 considered 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 East Pye Solar Limited (the 'Applicant') in relation to an application for a Development Consent Order (DCO) (the 'DCO Application') for East Pye Solar (the 'Scheme'), pursuant to the Planning Act 2008 (PA 2008) (Ref 1).

1.1.2 The Scheme comprises the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station with a total capacity exceeding 100 megawatts (MW) and associated development including a Battery Energy Storage System (BESS), up to three 132kV Project Substations and up to three 400kV Project Substations, Grid Connection Infrastructure and a new National Grid Substation. A description of the Scheme can be found in **ES Volume 1, Chapter 4 – The Scheme [EN0110014/APP/6.1.4]**.

1.1.3 The Scheme would be located within the Order Limits (shown on the **Location Plan [EN0110014/APP/2.1]** and **Works Plan [EN0110014/APP/2.3]** submitted as part of the DCO Application and secured by Article 3 of the **draft DCO [EN0110014/APP/3.1]**). The Order Limits contain all elements of the Scheme comprising the Solar PV Arrays, 132kV and 400kV Project Substations, the National Grid Substation, the BESS, Grid Connection Infrastructure, interconnecting cables within the Cable Route Corridor (CRC), Mitigation and Enhancement Areas and Highway Works. A description of the Order Limits is provided in the **ES Volume 1, Chapter 3 - The Order Limits [EN0110014/APP/6.1.3]**.

1.1.4 The Order Limits are located entirely within the administrative boundary of South Norfolk Council (SNC) and Norfolk County Council (NCC). The Order Limits for the Scheme comprise 1,212.3 hectares (ha) of land.

1.1.5 The Applicant has secured a connection offer to export the electricity produced from the Scheme of 500MW (AC) through a new National Grid Substation. It also allows for the import of 500MW (AC) of electrical energy to be stored in an Energy Storage Facility (for the purposes of the DCO Application, this is assumed to employ battery technology and is therefore referred to as the BESS). This is set out further in the **Grid Connection Statement [EN0110014/APP/7.12]**. 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.

1.1.6 Delivering a clean power system is an important step towards delivering the UK's legally binding target of net zero carbon emissions by 2050. National Policy Statements (NPS) EN-1 (Ref 2) and EN-3 (Ref 3) confirm that large-scale ground mounted solar farms have a critical role to play in achieving the Government's energy policy aims of delivering a secure, low carbon and low-cost electricity supply for consumers on the way to delivering net zero carbon emissions by 2050. NPS EN-1 establishes a critical national priority (CNP) for low carbon infrastructure, including for large-scale solar farms because of the decarbonisation, energy security and affordability benefits that they deliver. The Government's Clean Power 2030 Action Plan (Ref 4) reinforces the urgent need for new low carbon generation schemes to come forwards to decarbonise the UK's electricity system to pave the way towards wider economy decarbonisation by 2050, as the country pursues the electrification of heat in buildings, transport, and industry. Further details are set out in the **Statement of Need [EN0110014/APP/7.11]**.

1.1.7 The Scheme which comprises large-scale solar generation with associated energy storage is therefore aligned with the Government's aims and would contribute to meeting the UK's targets to decarbonise the electricity supply and reduce overall carbon emissions.

1.2 The Applicant

1.2.1 The Applicant is part of Island Green Power (IGP), which was established in 2013.

1.2.2 IGP has 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 (NSIP) such as Cottam Solar Project, 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.

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 and of a granted DCO for West Burton Solar Project in Lincolnshire and Nottinghamshire, which was consented on 24 January 2025. IGP is currently in the examination stage for Green Hill Solar Farm and the pre-examination stages for The Droves Solar Farm in West Norfolk and Lime Down Solar Project in Wiltshire. Further information on the Applicant can be found in the **Funding Statement [EN0110014/APP/4.2]**.

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 100MW 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 NSIP.

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 DCO [EN0110014/APP/3.1]**.

1.3.3 Section 104 of the PA 2008 prescribes that DCO applications must be determined in accordance with any relevant 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 NPS' published in January 2026 have effect in relation to the Scheme. They are therefore the primary policy basis for the Secretary of State's (SoS) determination of the DCO Application:

- Overarching NPS for Energy (2025) (NPS EN-1) (Ref 2);
- NPS for Renewable Energy Infrastructure (2025) (NPS EN-3) (Ref 3); and
- NPS for Electricity Networks Infrastructure (2025) (NPS EN-5) (Ref 5).

1.3.5 The Scheme constitutes 'EIA development' as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations') (Ref 6). An EIA has been undertaken and is reported in the **Environmental Statement (ES) [EN0110014/APP/6.1** to **6.4]** submitted with the DCO Application. In undertaking the EIA and preparing the ES, the Applicant has taken account of the EIA Scoping Opinion received and adopted by the SoS on 25 February 2025, which can be found in **ES Volume 3, Appendix 2.2 - EIA Scoping Opinion [EN0110014/APP/6.3.2.2]**.

1.4 Pre-Application Consultation

1.4.1 The PA 2008 (Ref 1) 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. The Applicant has undertaken a three-stage engagement process detailed in the **Consultation Report [EN0110014/APP/5.1]**. The stages are as follows:

- Non-statutory consultation ('Phase One' consultation);
- Statutory consultation ('Phase Two' consultation); and
- Targeted consultation.

1.4.2 Early engagement with consultees including NCC, SNC and locally elected members and representatives, including ward and parish councillors and Members of Parliament (MP) was undertaken prior to non-statutory consultation to introduce the emerging Scheme. Non-statutory consultation was carried out between 23 October and 6 December 2024. During this non-statutory consultation period, the Applicant held six in-person information events and one online webinar.

1.4.3 Statutory consultation in compliance with Sections 42, 45, 46, 47 and 48 of the PA 2008 was undertaken between 18 June and 6 August 2025. This statutory consultation was supported by a Preliminary Environmental Information Report (PEIR) in accordance with the EIA Regulations. During statutory consultation the Applicant held six in-person information events and one online webinar.

1.4.4 Following statutory consultation and further refinement of the Scheme, the Applicant carried out targeted consultation (non-statutory) between 22 October and 26 November 2025 on a series of specific changes to the Scheme following the statutory consultation.

1.4.5 A post-consultation newsletter providing an update on the Scheme was published on the project's website in January 2026, with the host authorities, MP, Councillors, Parish Councils and interest groups, together with the 'keep informed' list notified of the publication of the newsletter.

1.4.6 In addition to the above, the Applicant has undertaken engagement with technical officers at NCC and SNC, relevant statutory undertakers, those with an interest in the land and local residents during the pre-application process. Engagement with the host authorities comprised regular meetings.

1.4.7 During and following the consultation, the Applicant sought and had regard to feedback from stakeholders, which alongside the findings of the environmental assessment process has informed the design of the Scheme. The Applicant has had regard to all feedback received, as set out in the **Consultation Report [EN0110014/APP/5.1]**. The design approach and evolution of the Scheme, including examples of design changes made in response feedback and the environmental assessment process is set out in the **Design Approach Document [EN0110014/APP/7.17]**.

1.5 Supporting Documents

1.5.1 This Planning Statement draws on the evidence and information set out in 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:

- **Draft DCO [EN0110014/APP/3.1]**;
- **Consultation Report [EN0110014/APP/5.1]**;
- **Statement of Need [EN0110014/APP/7.11]**;
- **Statutory Nuisance Statement [EN0110014/APP/7.13]**;
- **Policy Compliance Document [EN0110014/APP/7.15]**;
- **Design Approach Document [EN0110014/APP/7.17]**;
- **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]**;
- **Environmental Statement [EN0110014/APP/6.1.0-20]** and associated figures and appendices, together with the **Commitments Register [EN0110014/APP/7.26]**;
- **Equality Impact Assessment [EN0110014/APP/7.19];**
- **Biodiversity Net Gain Report [EN0110014/APP/7.23]**;
- **Shadow Habitat Regulations Assessment [EN0110014/APP/7.25]**;
- **Outline Construction Environmental Management Plan (Outline CEMP) [EN0110014/APP/7.1]**;
- **Outline Construction Traffic Management Plan (Outline CTMP) [EN0110014/APP/7.6]**;
- **Outline Operational Environmental Management Plan (Outline OEMP) [EN0110014/APP/7.2]**;

- **Outline Operational Traffic Management Plan (Outline OTMP) [EN0110014/APP/7.7]**;
- **Outline Landscape and Ecology Management Plan (Outline LEMP) [EN0110014/APP/7.4]**;
- **Outline Public Rights of Way and Permissive Paths Management Plan (Outline PRoWPPMP) [EN0110014/APP/7.8]**;
- **Outline Soil Resource and Management Plan (Outline SRMP) [EN0110014/APP/7.9]**;
- **Outline Battery Safety Management Plan (Outline BSMP) [EN0110014/APP/7.5]**;
- **Outline Employment, Skills and Supply Chain Strategy (Outline SSCEP) [EN0110014/APP/7.10]**; and
- **Outline Decommissioning Environmental Management Plan (Outline DEMP) [EN0110014/APP/7.3]**.

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 7).

1.6.2 The Planning Statement is structured as follows:

- **Section 2:** summarises the design approach which has informed the Scheme;
- **Section 3:** describes the context of the Order Limits and summarises the key planning history within the Order Limits;
- **Section 4:** provides a description of the Scheme;
- **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 and relevant considerations;
- **Section 7:** sets out on-going engagement 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 material considerations;
- **Section 9:** applies the planning balance of the Scheme and sets out how the Scheme complies with the PA 2008; and
- **Section 10:** provides an overall conclusion in terms of the Scheme's compliance with relevant legislation and policy; and
- **Appendix A:** sets out how the Sequential Test and Exception Test have been applied.

2 Design Approach

2.1.1 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 policies that have informed the approach to good design includes NPS EN-1 (Ref 2), NPS EN-3 (Ref 3) and NPS EN-5 (Ref 5), together with the Planning Inspectorate's guidance on 'Nationally Significant Infrastructure Projects: Advice on Good Design' (Ref 8). Analysis of the Scheme's compliance with planning policies regarding design is set out in **Policy Compliance Document [EN0110014/APP/7.15]**.

2.1.2 IGP has prepared a series of corporate level design principles, applicable to their projects within the UK to make sure that the design of IGP projects deliver benefits to communities, enhance biodiversity, manage adverse effects on the local environment throughout the lifecycle of the project, and help tackle climate change by harnessing and storing renewable energy. These are set out in the **Design Approach Document [EN0110014/APP/7.17]**.

2.1.3 In line with IGP's corporate level design principles, the Applicant also developed project level design principles (see **Table 2.1**) to inform design of the Scheme. These project level design principles were developed in response to the vision of the Scheme, which is to contribute to delivering the UK's transition to decarbonised and low-cost renewable energy provision whilst leaving a positive legacy of benefits for the people of South Norfolk and South Norfolk's natural environment.

2.1.4 The project level design principles are based on an understanding of the local context of the Sites and the potential benefits and outcomes the Scheme can deliver. The project level design principles were consulted upon during statutory consultation and were subsequently refined. The project level design principles have and will inform decision-making, including at detailed design, to secure the best outcomes. Illustrations of how the project level design principles have been applied to the design of the Scheme are given in the **Design Approach Document [EN0110014/APP/7.17]**.

Table 2.1: Project Level Design Principles

Design Principle Reference	Design Principle
IGP Design Principle: Decarbonisation and Energy Security Project Level Principle 1.1	
1.1	Reduce carbon emissions during all phases of the Scheme.
IGP Design Principle: Environmentally Led Design Project Level Principles 2.1 – 2.12	
2.1	Respond to the character of the Site, informed by Natural England National Character Area Profiles and South Norfolk Local Landscape Character Assessment and Place Making Guide SPD, including the character of the River Valleys.
2.2	Retain and enhance existing vegetation, where possible, and features of value to retain the fabric of the Site and aid the integration of the Scheme within the environment and the characteristics of the surroundings, as far as practicable.
2.3	Support the objectives of Norfolk's Green Infrastructure Strategy, creating green infrastructure for climate change resilience and enhancing biodiversity.
2.4	Create new woodland belts and native tree planting (a mixture of natural regeneration and planting) to provide screening to the Scheme, improve biodiversity and green infrastructure connectivity.
2.5	Restore key hedgerows to improve biodiversity and reinforce a sense of landscape character.
2.6	Improve soil health during the lifetime of the Scheme.
2.7	Consider the setting of heritage assets and mitigate any impact by design, where practicable.
2.8	Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.
2.9	Consider the opportunities for peoples' connection to nature, experience and access using quiet lanes, Public Rights of Way (PRoW) and recreational routes namely the Boudicca Way and Via Beata Way.
2.10	Prevent deterioration to the local water quality environment, such as the River Tas.
2.11	Operational lighting and light spill to be kept to a minimum and directional in response to Norfolk County Council's rural dark landscape.
2.12	Consideration will be given to the siting and layout of the batteries within the BESS, having regard to the relevant National Fire Chief's Council or the National Fire Protection Association guidelines at the time of detailed design.
IGP Design Principle: Biodiversity Net Gain and Nature Recovery Project Level Principles 3.1 – 3.5	
3.1	Deliver a quantifiable Biodiversity Net Gain of at least 10%.
3.2	Integrate the Scheme into the natural environment and strengthen habitat corridors through the farmed landscape; allowing the movement of wildlife and enhancement of biodiversity.
3.3	Incorporate initiatives set out in the Local Nature Recovery Strategy and Norfolk Clayland Initiative, where practicable.
3.4	Support creation of field-edge/field-corner habitats such as grass margins, hedges and ditches and trees to support rare arable weeds and farmland bird species.
3.5	Maintain isolated ponds and, where possible, reinstate ghost ponds, which are a characteristic feature of the clay plateau for their landscape and biodiversity value, particularly their populations of great crested newt.

Design Principle Reference	Design Principle
IGP Design Principle: Design Flexibility Project Level Principles 4.1 – 4.3	
4.1	Flexibility for resilience and adaptation to climate change.
4.2	Flexibility for design and technological advancement to maximise energy production.
4.3	Make sure the Scheme is resilient to flooding and does not increase flooding at the Site or elsewhere.
IGP Design Principle: Social Value and Community Benefits Project Level Principles 5.1 – 5.5	
5.1	Provide opportunities to boost the local and regional economy.
5.2	Support opportunities for delivery of wider community benefits and contributing to local community initiatives (in consultation with local stakeholders).
5.3	Behave as a considerate neighbour during the whole project lifecycle (all phases).
5.4	Seek to route construction vehicles away from local villages, as far as practicable.
5.5	Improve connectivity and accessibility through the Site, where practicable.
IGP Design Principle: Efficient Infrastructure and Ethical Supply Chain Project Level Principles 6.1	
6.1	Efficient use of land and maximising grid connection capacity.
IGP Design Principle: Sustainability, Durability and Reversibility Project Level Principles 7.1 – 7.3	
7.1	Prioritise sustainable resource management and techniques through the Scheme's lifecycle (all phases).
7.2	Sustainable management of woodland and hedgerows, along with meadows and other natural habitats.
7.3	Allow for dual use of land, where practicable.
IGP Design Principle: Our Commitment to Mitigation	
8	Mitigation is addressed through the above project level design principles, through the mitigation hierarchy and embedded mitigation will be applied throughout the design process.

3 Context of the Sites

3.1 Description of Order Limits

3.1.1 The Order Limits comprise a total area of 1,212.3ha of land located entirely within the administrative boundaries of SNC and NCC. The location of the Order Limits is shown on the **Location Plan [EN0110014/APP/2.1]** and a description of the Order Limits is provided in the **ES Volume 1, Chapter 3 - The Order Limits [EN0110014/APP/6.1.3]**. The CRC sections of the Order Limits referred to herein are shown on **ES Volume 2, Figure 1.1 - Site Location Plan [EN0110014/APP/6.2.1.1]**.

3.1.2 The land within the Order Limits comprises predominantly agricultural (arable) fields crossed by farm tracks, rural lanes, the A140, hedgerows, tree belts, scattered trees, watercourses, ponds and Public Rights of Way (PRoW), including the Boudicca Way and Via Beata recreational routes. An existing 400kV overhead line and associated transmission pylons pass through Site 1. Further existing overhead utilities and underground utilities are present within the Order Limits.

3.1.3 Site 1, Site 2 and Site 3 comprise a flat elevated plateau landform at around 48m Above Ordnance Datum (AOD) to 55m AOD, whilst Site 4, Site 5 and Site 6 are gently undulating to flat at around 30m AOD to 40m AOD. Similarly, Site 8, Site 9 and Site 10 slope gently between circa 30m AOD and 40m AOD, with a localised high point of circa 45m AOD in Site 9.

3.1.4 The Order Limits are bound by agricultural land, blocks of woodland, scattered individual properties and small villages including Great Moulton, Long Stratton, Tasburgh, Hempnall, Fritton, Lundy Green, Silver Green, Saxlingham Nethergate, Saxlingham Green, Woodton, Brooke and Seething.

3.2 Environmental Designations Within and Surrounding the Order Limits

3.2.1 A description of the characteristics of the Order Limits and the surrounding areas is provided in the **ES Volume 1**, **Chapter 6** to **Chapter 18 [EN0110014/APP/6.1.6-18]**.

Landscape

3.2.2 There are no national landscape designations or local landscape designations within or immediately adjacent to the Order Limits. However, Policy DM4.5 of the Development Management Policies Document (DMPD) for South Norfolk (Ref 9), which is retained with adoption of the Greater Norwich Local Plan (GNLP) (Ref 10), places particular regard to protecting the distinctive characteristics, special qualities and geographical extents of Rural River Valleys.

3.2.3 At the national level, the Order Limits are situated within the South Norfolk and High Suffolk Claylands National Character Area (NCA) (Ref 11). The NCA is a rural landscape that occupies the majority of East Anglia and is generally commonplace. Whilst there are areas with higher landscape and scenic value, the majority of the landscape is farmland. The landscape does offer conservation interest with historic settlements and routes, Conservation Areas and Ancient Woodland features.

3.2.4 Six District Landscape Character Areas (LCA) are situated within the Order Limits. Sites 1 and 2 are predominately located within E2 Great Moulton Plateau Farmland LCA. Site 3 straddles E2 Great Moulton Plateau Farmland LCA, and B1 Tas Tributary Farmland LCA. Sites 4, 5, 6, 7, 8 and 9 are predominately located within the B1 Tas Tributary Farmland LCA, whilst Site 10 is predominately located within the C2 Thurlton Tributary Farmland with Parkland LCA.

3.2.5 The Order Limits are not located within an International Dark Sky Nature reserve, but at the regional level, the Order Limits are within a Rural Dark Landscape as defined in Norfolk County Council's Environmental Lighting Zones Policy (Ref 12).

Ecology and Biodiversity

3.2.6 There are no statutory ecological designations within the Order Limits, however, several Sites of Scientific Interest (SSSI) are located close to the Order Limits. This includes Shotesham-Woodton Hornbeam Woods SSSI, Hedenham Wood SSSI, Pulham Market Big Wood SSSI and Fritton Common SSSI all within 1km of the Order Limits.

3.2.7 Non-statutory ecological designations within and adjoining the Order Limits include County Wildlife Sites (CWS) and Roadside Nature Reserves (RNR). Fritton Grange Meadows CWS is partially located within CRC7 and Lower Spring Wood CWS is partially located within CRC9, whilst other CWS are within proximity to the Order Limits, including, but not limited to, Spring Wood, Hempnall CWS, Saxlingham Grove CWS, Pope's Wood CWS and D'Oyly's Grove CWS. Market Lane RNR, Bussey's Loke RNR and Parkers Lane RNR are located within the Order Limits.

3.2.8 Ancient Woodlands are present surrounding the Order Limits, including the (replanted) Ancient Woodland (Spring Wood, Hempnall CWS) adjoining Site 3, Little Wood Ancient Woodland adjacent to Sub-Site 7H and Saxlingham Grove Ancient Woodland adjacent to Sub-Sites 7F and 7G. Ringers Grove Ancient Woodland sits adjacent to Sub-Site 8A. There is also an area of lowland fen habitat within CRC7 associated with the Hempnall Beck. Scattered veteran trees are located within the Order Limits.

3.2.9 The predominant habitat within the Order Limits is intensively managed arable farmland. Some fields are subject to the Countryside Stewardship Scheme.

3.2.10 Priority habitats identified within the Order Limits include arable field margins, native hedgerows (of varying species richness and condition), ponds, reedbed, lowland deciduous woodland, together with a small area of lowland fen (irreplaceable habitat) in CRC7.

3.2.11 Several ponds were identified within and adjacent to the Order Limits which have been found to support great crested newts. Other priority terrestrial mammals present or potentially present include brown hare, harvest mouse and hedgehog.

3.2.12 Priority bird species were confirmed to be breeding on the land within the Order Limits, including Red List species (Linnet, Skylark and Yellowhammer). Many of the breeding territories are associated with the mature boundary hedgerows and trees and associated with the field margins, albeit Skylark territories were recorded within the arable fields.

3.2.13 Trees within the Order Limits have the potential to support roosting bats. Bat roosts including brown long-eared bat and common pipistrelle, and barbastelle bat maternity have been confirmed adjacent to the Order Limits.

Cultural Heritage

3.2.14 There are no designated heritage assets within the Order Limits, however, there are listed buildings (Grade I, II* and II) and Conservation Areas immediately surrounding the Order Limits, with Scheduled Monuments and Registered Park and Gardens further afield. Designated heritage assets adjacent to the Order Limits include, but not limited to:

- Grade I listed Church of St Michael approximately 50m south of Sub-Site 4B;
- Grade I listed Church of St Catherine approximately 20m south of Sub-Site 5B;
- Grade II listed Barn north of the Old Rectory, Grade II listed Church Farmhouse and the Grade II* The Old Rectory approximately 15m, 50m and 70m south of Sub-Site 4B respectively, and the Grade II listed

Cottage occupied by Mr and Mrs Woods approximately 30m south west of Sub-Site 4B;

- Grade II listed Barn immediately north west of Church Farmhouse and Grade II listed Church Farmhouse approximately 30m and 60m south east Sub-Site 5B respectively;
- Grade II listed Moulton Farm House 150m east of Sub-Site 1B and Barn Cottages 280m south of the BESS Site;
- Saxlingham Green Conservation Area approximately 5m north of Sub-Site 7D;
- Fritton Conservation Area approximately 10m south of Sub-Site 5B; and
- Brooke Conservation Area approximately 50m north of Site 9.

Agricultural Land

3.2.15 The majority of the land within the Order Limits is used for arable cropping. Parts of the Order Limits are also used for agri-environmental farming uses, biofuels (miscanthus) and grassland grazed by livestock.

3.2.16 The survey results for the Agricultural Land Classification (ALC) are set out in **ES Volume 3, Appendix 15.1 - Agricultural Land Classification [EN0110014/APP/6.3.15.1]** and considered in **ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15]**. The ALC results for the area surveyed is presented in **Table 3.1**.

Table 3.1: ALC Survey Results of Sites

Grade	Description	Area (ha)	Proportion of Order Limits (%)T	Proportion of Sites (%)
1	Excellent	0	0	0
2	Very good	397.4	32.8	37.7
3a	Good	431.7	35.6	41.0
3b	Moderate	170.3	14	16.2
4	Poor	28.1	2.3	2.7
5	Very poor	0	0	0
N/S	Not surveyed	16.4	1.4	1.5
NA	Non-agricultural	9.5	0.8	0.9
Total Sites		1,051.4	-	-
CRC (not surveyed)		158.9	13.1	0
Highway Works (not surveyed)		2.02	0.17	
Total Order Limits		1,212.3	100.0	100.0

3.2.17 An ALC survey has not been undertaken for the CRC. A soil sampling survey within the CRC will be undertaken as part of a detailed Soil Resource Management Plan to be approved prior to construction. This will be secured through the **Outline SRMP [EN0110014/APP/7.9]** and a Requirement in the DCO, as set out in the **draft DCO [EN0110014/APP/3.1]**.

3.2.18 The wider area beyond the Order Limits consists largely of Grade 3 agricultural land with pockets of Grades 2 and 4 according to the Natural England Agricultural Land Classification map Eastern Region (ALC008) (Ref 13).

Access and Recreation

3.2.19 The main roads within and in the vicinity of the Order Limits comprise the A140, B1332 and B1527. The remaining roads in the locality are more rural in nature.

3.2.20 There are numerous well-defined PRoW extending through the Order Limits. A total of 84 PRoW has been identified along with two long distance walking/recreational routes: Via Beata Way and Boudicca Way cross the Order Limits.

3.2.21 There are also several areas of common land adjacent to the Order Limits, including Wacton, Crow Green, Fritton Common, Wood Green and Morningthorpe Common Land.

Water Environment

3.2.22 Within the Order Limits there is a network of field boundary drainage ditches and scattered ponds, together with the Hempnall Beck (main river and chalk stream) and River Tas (main river and chalk stream) that flow through the Order Limits.

3.2.23 The majority of land within the Order Limits is located within Flood Zone 1 ‘Low Probability’ of river/sea flooding, with localised areas of Sub-Site 7B, Sub-Sites 8A and 8B and parts of the CRC within Flood Zones 2 ‘Medium Probability’ and 3 ‘High Probability’ associated with the floodplains of the Hempnall Beck and the River Tas.

3.2.24 Most of the land within the Order Limits have a ‘Very Low’ risk of surface water flooding, although flow routes with ‘Low’ to ‘High’ surface water flood risk run through the Order Limits, notably in Site 9 and Sub-Sites 4B, 7A, 7E, 7F, 7K, 8A and 10A to 10D, together with parts of the CRC. These flow routes are associated with the main rivers and ordinary watercourses, along field lines or localised topographic depressions/crop lines within fields.

3.2.25 The south-western area of the Order Limits is located within a Drinking Water Safeguard Zone for surface water.

Airfields

3.2.26 Hardwick Airfield, Seething Airfield and Tibenham Airfield are located within proximity to the Order Limits.

3.2.27 As set out in the **High Level Investigative Report [EN0110014/APP/7.27]**, Tibenham Airfield, which is located west of Site 1, is an unlicensed aerodrome primarily operated by Norfolk Gliding Club, facilitating both powered aircraft and gliders.

3.2.28 A **Potential Impact on Seething Aerodrome Forced Landing Options report [EN0110014/APP/7.28]** identifies Seething Airfield, which is located north east of Site 10, also as an unlicensed aerodrome. Seething Airfield is used by privately-owned light aircraft as well as the flight training organisation Wingtask.

Mineral Safeguarding

3.2.29 Small parts of the Order Limits are underlain by superficial strata of Alluvium, Leet Hill Sand and Gravel Member, Lowestoft Formation - Sand and Gravel and River Terrace Deposits, which are classified as sand and gravel mineral resources and are safeguarded under the current Norfolk Minerals and Waste Local Plan (Ref 14). There are no allocated or safeguarded existing or proposed mineral sites nor consultations for these within 250m of the Order Limits in the current Norfolk Minerals and Waste Local Plan (Ref 14).

3.3 Relevant Planning History

3.3.1 For the purposes of the EIA, a search of cumulative schemes surrounding the Order Limits was undertaken and a ‘long list’ compiled. A ‘short list’ was then established for cumulative schemes for assessment in the ES. The assessment of the Scheme along with the cumulative schemes are set out set out in **ES Volume 1, Chapter 6** to **Chapter 20 [EN0110014/APP/6.1.6-20]**.

Planning History within the Order Limits

3.3.2 The key relevant planning history of the land within the Order Limits is set out within **Table 3.2**. This is not intended to be an exhaustive list and sets out notable and/or larger schemes where a planning application has been either approved or has been submitted to the local planning authority (LPA) but has not yet been determined. These planning applications in **Table 3.2** are within the administrative area of SNC, unless otherwise stated. There are no significant implications arising from the location of the Scheme upon any of the identified planning permissions.

3.3.3 In addition to the relevant planning history set out in **Table 3.2**, it is noted that there have been historical planning applications refused for wind turbines that overlap with the Order Limits of Sub-Sites 7G, 7H and 7J and CRC8. These are:

- 2013/0105: Application for the erection of three wind turbines with a maximum height of 126.5m and associated development for a period of 25 years on land surrounding Bussey's Loke, North of Bungay Road, Hempnall (Appeal for non-determination was dismissed in October 2013); and
- 2008/0917: Application for the installation of a seven wind turbine wind farm with associated switch house and interconnecting cables (Appeal dismissed August 2008).

Table 3.2: Relevant Planning History within the Order Limits

Planning Reference	Sub-Site/CRC	Address	Description	Status
2024/3817	Overlaps with Sub-Site 1C	Land east and north of Fenleigh Farm Station Road Tivetshall St Margaret, Norfolk	2024/3817 is for a solar photovoltaic farm development with ancillary infrastructure, security fencing, and access.	Approved 2025. Not present within the Order Limits
2010/0756	Site 3	Grange Farm, Lundy, Green Hempnall	Erection of 16,000 Hen free range egg production unit, 2 feed silos, access way and hard standing.	Approved 2010. Not present within the Order Limits.
2018/2278 (SNC reference) Y/7/2018/7013 (NCC reference)	Sub-Site 4A/4B	Hempnall Crossroads, Norwich Road, Long Stratton, Norfolk	Construction of roundabout to south-west of existing junction of A140, B1527 and C497 (junction locally known as 'Hempnall Crossroads') to replace the existing crossroads junction. Proposed street lighting, landscaping, surface water drainage and associated works. 2019/1890 Variation of condition 2 of planning permission Y/7/2018/7013 approved in December 2019.	Approved 2019. Built out.
2022/0949	CRC4	Land North Of Ashleigh Farm Wood Lane Pulham Market Norfolk	Farm diversification project for 16 acre field to maize maze, cut flowers and play area with new parking area.	Approved 2023.

Planning Reference	Sub-Site/CRC	Address	Description	Status
			Seasonal opening to school holidays.	
1995/0830 and 2001/1323	CRC6	Land Off Alburgh Road Hempnall Norwich	Change of use to sports field and renewal of permission 95/0830/CU - change of use to sports field.	Approved 1996 and renewal approved 2021. Not present within the Order Limits.
2002/0976	CRC6	Land Off Alburgh Road Hempnall Norwich	Erection of club house with associated parking	Approved 2002. Not present within the Order Limits.
2004/2253	CRC6	Land adjacent to Alburgh Road, Hempnall	Proposed siting of temporary changing facilities and storage unit.	Approved 2004. Not present within the Order Limits.
2007/0221	CRC6	Talbot Park Alburgh Road Hempnall	Siting of temporary changing facilities & storage unit.	Approved 2007. Not present within the Order Limits.

Planning History Adjacent to the Order Limits

3.3.4 **Table 3.3** lists planning applications for other renewable schemes such as solar and BESS adjacent to, or within 1km to the Order Limits. This is not intended to be an exhaustive list and sets out notable and/or larger schemes where a planning application has been either approved or has been submitted to the LPA but has not yet been determined. There are no significant implications arising from the location of the Scheme upon any of the identified planning permissions.

3.3.5 There are no Local Plan allocations adjacent to the Order Limits. It is noted that many of the villages surrounding the Order Limits have sites which are allocated under the Village Clusters Housing Allocations Plan (Ref 15) to deliver the 1,200 new homes that are targeted in the village cluster area by 2038 under the Regulation 19 Local Plan. The Village Clusters Housing Allocations Plan was submitted for independent examination in August 2025. This covers the following villages:

- Great Moulton;
- Tasburgh;
- Woodton;

- Brooke; and
- Hempnall.

Table 3.3: Relevant Planning History Adjacent to the Order Limits

Planning Reference / Name	Address	Description	Distance from Order Limits	Status
2018/0111	Land East of the A140, Long Stratton	Hybrid Application on 131.7 hectares of land to the east of the A140 seeking outline planning permission for 1275 no. dwellings, 8 hectares of employment land for uses within Classes B1, B2 and B8, 2-hectare primary school site, community facilities site, associated infrastructure and public open space. Together with application for full permission for a bypass including roundabouts and junctions.	Adjacent (within 100m) to the west of the Order Limits (CRC4) at the closest point.	Approved 2023. The Long Stratton Bypass has been completed and opened to traffic in August 2025. The residential element appears to be under construction to the north.
2014/0562	Land South of Hall Farm Bungay Road Tasburgh Norfolk.	Solar PV farm and ancillary development	Adjacent to the west of Sub-Site 4A.	Approved 2024 and built out.
2025/1689	Land North of The Junction of Market Lane and Carr Lane Great Moulton Norfolk	Erection of a BESS and associated infrastructure including access, drainage, landscaping and other incidental works	Approximately 900m to the north of Sub-Site 1B.	Application pending determination.
2011/0360	Woodgreen Farm North Wood Green Long Stratton	Installation of three 14.97 metre tall wind generators	Within 150m of CRC4.	Approved 2011 and built out.
2018/0112	Land west of the A140, Long Stratton, Norfolk	Hybrid application on 40.8 hectares seeking outline planning permission for 387 no. dwellings and 1.5 hectares of Class B1 employment land, associated infrastructure and public open space. Together with application for full planning permission for a western relief road.	200m south of Sub-Site 4A.	Approved 2024 and under construction.
2023/1386	Land South of Church Road Woodton Norfolk	Residential development for 50 dwellings with parking,	400m west of Sub-Site 10A.	Approved 2024.

Planning Reference / Name	Address	Description	Distance from Order Limits	Status
		landscaping and open space.		
Tasway Energy Park (DCO Application not submitted)	Land west of Long Stratton, South Norfolk,	Solar farm with a generating capacity of up to 700MW and BESS.	Adjacent to west of Sub-Site 4A.	Tasway Energy Park is understood to be at the non-statutory consultation stage of pre-application, and has been delayed.

4 The Scheme

4.1 Definition of the Scheme in the DCO

4.1.1 Article 3 of the **draft DCO [EN0110014/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.'

4.1.2 For this purpose, 'authorised development' is defined in Article 2 of the **draft DCO [EN0110014/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'*.

4.1.3 If consented, the DCO would permit the authorised development defined in Schedule 1 of the **draft DCO [EN0110014/APP/3.1]** within the Order Limits shown on the **Works Plan [EN0110014/APP/2.3]**. Schedule 1 of the **draft DCO [EN0110014/APP/3.1]** defines the NSIP (Work No.1) and the associated development (Work No. 2 to 11).

4.1.4 The following schedules of the **draft DCO [EN0110014/APP/3.1]** and related plans define, and secure, works related to streets:

- The **draft DCO [EN0110014/APP/3.1]** and the **Access and Public Rights of Way Plan [EN0110014//APP/2.7]** identifies new or altered means of access and PRoW to be temporarily closed and or diverted; and
- The **draft DCO [EN0110014/APP/3.1]** and the **Streets Plan [EN0110014/APP/2.6]** identifies streets to be temporarily suspended or restricted and subject to temporary traffic regulation measures that may be required for the Scheme.

4.2 Components of the Scheme

4.2.1 The main components of the Scheme as specified in Schedule 1 of the **draft DCO [EN0110014/APP/3.1]** includes:

- **Work No.1**: comprising works in connection with a ground mounted solar PV generating station, including 33kV Sub-Distribution Switch Rooms, Conversion Units (Inverters, Transformers, Switchgear) and cabling connecting to the Project Substations. Within the Solar PV Arrays of Work No.1 there would also be Operational and Maintenance Buildings (included under Work No.7);
- **Work No.2**: comprising the works in connection with the energy storage facility (BESS), including Conversion Units, monitoring and control systems, cabling connecting to the 400kV Project Substation and acoustic barriers;

- **Work No.3**: comprising works in connection with the 132kV Project Substations and 400kV Project Substations;
- **Work No.4**: comprising works in connection with the new National Grid Substation, including security and monitoring measures, landscaping and biodiversity measures, sustainable drainage systems, together with works in connection with access and temporary construction compounds;
- **Work No.5**: comprising works in connection to the existing 400kV overhead line, including modifying, reconfiguring, constructing and dismantling of the 400kV overhead line and pylons, together with works in connection with access and temporary construction compounds;
- **Work No.6**: comprising works in connection with laying electrical cables of up to 132kV and 400KV connecting to the Project Substations and National Grid Substation, together with laying down access tracks and temporary construction compounds;
- **Work No.7**: comprising works including fencing, security and monitoring measures, landscaping and biodiversity measures, access tracks, PRoW diversions, earthworks, sustainable drainage systems, acoustic barriers, cabling and temporary construction compounds;
- **Work No.8**: comprising works in connection with temporary construction compounds;
- **Work No.9**: comprising works in connection with facilitating construction and operational access;
- **Work No.10**: comprising works in connection with the creation and maintenance of habitat management areas; and
- **Work No.11**: comprising works in connection with the creation of permissive paths and provision of community accessible space with pedestrian access.

4.3 Flexibility and Development

4.3.1 As acknowledged in paragraphs 4.3.11 and 4.3.12 of NPS EN-1 (Ref 2), it may not be possible for all aspects of a proposal to be provided in detail at the time of the application. 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 detailed design must be approved by the relevant planning authority pursuant to the Requirements in the **draft DCO [EN0110014/APP/3.1]** and must be in accordance with the **Works Plan [EN0110014/APP/2.3]**.

4.3.2 The maximum parameters and extent of flexibility sought by the Applicant is described in **ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4]** and assessed within the ES. To maintain flexibility in the design and layout at this stage in the process and ensure worst-case effects are assessed in the EIA and considered by the SoS, the Scheme has adopted the Rochdale Envelope as set out in **ES Volume 1, Chapter 2 – EIA Methodology [EN0110014/APP/6.1.2]**. This involves specifying maximum parameters and extent of the locations of the different elements of the Scheme.

4.4 Lifetime of the Scheme

4.4.1 The Applicant is seeking a time limited consent for the Scheme, which apart from the National Grid Substation and associated Grid Connection Infrastructure, would be in operation for up to 60 years, after which time the Scheme will be decommissioned. The National Grid Substation is anticipated to be permanent and remain in-situ and in operation beyond 60 years as these assets will form part of the National Electricity Transmission System (NETS).

4.4.2 When the operational phase ends, the Sites, apart from the land associated with the National Grid Substation, would be decommissioned and the land returned to the landowner. In line with paragraph 2.10.61 of NPS EN-3 (Ref 3), the **Outline DEMP [EN0110014/APP/7.3]** sets out how the management measures relevant to decommissioning activities at the end of the operational life of the Scheme will be implemented.

4.5 Construction, Operation and Decommissioning

Construction

4.5.1 Construction activities are described in **ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4]** and the **Outline Cable Route Construction Statement [EN0110014/APP/7.21]**.

4.5.2 Subject to being granted consent, the construction of the Scheme is anticipated to commence in 2028 for a period of approximately 24 months. On this basis, it is expected that the Scheme could be completed by 2030 and energised in 2031. However, the construction period will vary depending on detailed layout design and potential environmental constraints on the timing of construction activities.

4.5.3 An **Outline CEMP [EN0110014/APP/7.1]** accompanying the DCO Application sets out mitigation measures, management and monitoring that will be in place to minimise the environmental impacts of the Scheme during construction. The **Outline CTMP [EN0110014/APP/7.6]** provides a framework for the management of construction vehicles to and from the Scheme during the construction to reduce, as far as practicable, the impacts of the Scheme on the local road network. The **Outline PRoWPPMP [EN0110014/APP/7.8]** provides a framework for the management of PRoW and recreational/walking routes within the Order Limits during the construction activities.

Operation

4.5.4 A description of the operational activities of the Scheme is provided in **ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4]**. The Scheme will be operational for up to 60 years. During operation, other than in the context of a programme of replacement activities, activity on the Sites would be limited principally to vegetation management, equipment maintenance and servicing, replacement of any components that fail or reach the end of their lifespan, periodic fence inspection, and monitoring to ensure the continued effective operation of the Scheme.

4.5.5 The **Outline OEMP [EN0110014/APP.7.2]** sets out mitigation measures, management and monitoring that will be in place to minimise the environmental impacts of the Scheme during operation. Specific fire safety provisions for the BESS proposed to be installed as part of the Scheme are set out in the **Outline BSMP [EN0110014/APP/7.5]**.

4.5.6 The traffic management measures that will be implemented to ensure safety and minimise disruption from traffic during the operation of the Scheme is set out in the **Outline OTMP [EN0110014/APP/7.7]**.

4.5.7 The landscaping and biodiversity of the Scheme, including the areas of community accessible space for pedestrian use would be implemented, managed and monitored through the **Outline LEMP [EN0110014/APP/7.4]**, whilst the **Outline PRoWPPMP [EN0110014/APP/7.8]** provides a framework for the management of PRoW and permissive paths within the Scheme during operation.

Decommissioning

4.5.8 A description of the decommissioning activities that are likely to be required is set out in **ES Volume 1**, **Chapter 4 - The Scheme [EN0110014/APP/6.1.4]** and the **Outline DEMP [EN0110014/APP/7.3]**.

4.5.9 Decommissioning is expected to occur after the 60-year life of the Scheme in 2091 and take between 12 and 24 months. A requirement to decommission the Scheme is secured via a Requirement in Schedule 2 the **draft DCO [EN0110013/APP/3.1]**.

4.5.10 Apart from the National Grid Substation and Grid Connection Infrastructure, the Scheme would be decommissioned. Foundations and other below ground infrastructure will be cut to 1.2m below the surface to enable future ploughing. Permissive paths and community accessible space would be removed during decommissioning.

4.5.11 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 anticipated that some areas of habitat and biodiversity mitigation and enhancement within the Sites may be left in-situ.

4.5.12 An **Outline DEMP [EN0110014/APP/7.3**] sets out the details the measures that will be in place to minimise the environmental impacts of the Scheme during decommissioning.

5 The Need for and Benefits of the Scheme

5.1 The Need for the Scheme

5.1.1 The principal need for the Scheme is centred on the significant contribution it will make to national energy policy aims:

- **Decarbonisation**: The Climate Change Act 2008 (2050 Target Amendment) Order 2019 (Ref 16) 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) recommended that the Seventh Carbon Budget (CB7) (2025) (Ref 17) should be set at 535 MtCO2e for the period 2038-42, which will require UK emissions to fall to 87% below their 1990 levels;

- **The demand for affordable electricity**: Government's national policy direction is to develop an integrated energy system which relies on low carbon electricity generation for a significant proportion of its supply. The UK's demand for electricity could double by 2050 as the country moves away from reliance on imported fossil fuels and towards low carbon electricity for transport, heating and industry. Due to the increased demand, sources of affordable electricity are now more important than ever; and

- **The security of supply**: generally means ensuring there is enough electricity generation capacity (geographically and technologically diverse supplies) available and operational to meet demand.

5.1.2 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.

5.1.3 The need and presumption in favour of granting development consent is set out in Part 3 of NPS EN-1 (Ref 2). Paragraphs 3.2.1 and 3.2.2 of NPS EN-1 (Ref 2) states that '*the government's objectives for the energy system are to decarbonise power generation to meet the Clean Power 2030 Mission, ensuring 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.

5.1.4 Paragraph 3.2.8 of NPS EN-1 (Ref 2) is clear on the point of need and 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 3.2.9 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*' and paragraph 3.2.10 continues in 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 (Ref 2) demonstrate the urgent need for nationally significant renewable energy projects such as the Scheme.

5.1.5 Further, low-carbon infrastructure such as solar has been identified as critical national priority (CNP) infrastructure in NPS EN-1 paragraphs 4.2.16 and 4.2.17 (Ref 2). There is a presumption that the urgent need for CNP Infrastructure will outweigh any residual effects in all but the most exceptional cases. This presumption does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence or irreplaceable habitats. Where no such residual impacts exist, the presumption weighs in favour of the need for CNP Infrastructure (NPS EN-1 paragraph 4.1.7).

5.1.6 The Government's Clean Power 2030 Action Plan (Ref 4) provides additional focus on both the scale and the urgency to deliver new low carbon generation capacity 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' target means that, in a typical weather year:

- Clean sources produce at least as much power as Great Britain consumes in total; and
- Clean sources produce at least 95% of Great Britain's generation.

5.1.7 The Government's Clean Power 2030 Action Plan (Ref 4) 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.

5.1.8 At local level, NCC is committed to tackling climate change and achieving net zero through measures outlined in its Climate Strategy (Ref 18), which encourages the use of renewable energy and promotes equipping Norfolk with the skills needed to harness the opportunities of the green economy to build on its potential as the '*emerging clean energy powerhouse of Britain*' (p.10). Strategic priority number 3 aims to '*support national decarbonisation of the Grid by expanding appropriate renewable energy generation across the county*' (p.80).

5.1.9 The **Statement of Need [EN0110014/APP/7.11]** provides an explanation of why the Scheme is urgently needed at the proposed scale and how the Scheme addresses all relevant aspects of established and emerging Government energy and climate change policy and commitments.

5.2 Need for Decarbonisation

5.2.1 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 to limit global temperature increases. The Paris Agreement (Ref 19), 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.

5.2.2 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 GHG emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019 (Ref 16). As a result, decarbonisation is a UK legal requirement.

5.2.3 As set out in the **Statement of Need [EN0110014/APP/7.11]**, CCC made clear in its Progress Report to Parliament in 2025 (Ref 20) that the UK is not on track to meet its Fifth (2028 – 2032) or Sixth (2033-2037) Carbon Budget commitments. CCC published their proposal for a Seventh Carbon Budget (CB7) covering 2038-2042 where the proposal is for UK emissions to fall to 87% below 1990 levels. The delivery of new low carbon electricity generation beyond 2030 is essential for progress to towards the Government's 2050 net zero legally binding target to continue to be made.

5.2.4 As set out in paragraph 4.2.1 of NPS EN-1 (Ref 2) the *'Government has committed to the Clean Power 2030 Mission, 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'*.

5.2.5 Without a rapid increase in the supply of low-carbon electricity, the urgent requirement to decarbonise other sectors (as will be required to meet future carbon budgets), is less likely to be achieved. NPS EN-3 paragraph 2.10.2 (Ref 3) confirms that solar is a key part of the Clean Power 2030 Mission, and that the Government is '*committed to working with industry to radically increase our existing solar capacity by 2030 to boost growth across the country, create thousands of high-skill, future-proofed jobs and tackle the climate crisis*'.

5.2.6 NPS EN-3 paragraph 2.10.5 (Ref 3) 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 2.10.6), making them ideally placed to meet the UK's decarbonisation targets, which require rapid change, at scale, if they are to be achieved.

5.2.7 Therefore, the Scheme is an opportunity to significantly contribute towards the targets of the Clean Power 2030 Mission and net zero by 2050.

5.3 Meeting an Increasing Demand for Affordable Electricity

5.3.1 The growth in the use of electric vehicles is expected to create significant new demands on the electricity network. Consequentially, low carbon electricity supply will need to increase further to meet that demand. NPS EN-1 paragraph 3.3.3 (Ref 2) 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*'.

5.3.2 As set out in the **Statement of Need [EN0110014/APP/7.11]**, electricity consumption met from carbon-emitting sources remains significant. The capacity of new low carbon schemes which will need to come online prior to 2030 to meet the anticipated 2030 demand and achieve a clean power system by 2030 is unprecedented. Demand growth through the 2030's and 2040's is expected to be even larger, presenting the need for an even greater capacity of new low carbon schemes to come online in the 2030's to keep power clean through to 2040 as other sectors also decarbonise. The Scheme will contribute to meeting the UK's growing electricity demand and a critical enabler in achieving the UK's decarbonisation and energy security aims.

5.3.3 It is acknowledged in the **Statement of Need [EN0110014/APP/7.11]** that solar is already among the cheapest form of electricity generation in the UK and the Government forecasts indicate that costs will continue to reduce in the future. By generating low carbon electricity at a low marginal cost, thereby reducing the energy required from more expensive and more carbon intensive forms of generation, solar therefore decarbonises the electricity system and lowers the wholesale market price of electricity.

5.3.4 The Scheme will help to address the climate change emergency that affects everyone's lives and the environment, by ensuring our energy supply is secure, low carbon and low-cost.

5.4 Need to Provide Security of Supply

5.4.1 Government policy requires that the security of the energy supply is maintained. NPS EN-1 paragraph 3.3.1 (Ref 2) states that '*We need to ensure that there is 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 of NPS EN-1 continues by stating that '*the larger the margin and the more flexible the system, the more resilient the system will be in dealing with unexpected events*', which helps to protect consumers, including vulnerable households, from volatile prices and supply interruptions that might affect essential services.

5.4.2 NPS EN-1 paragraph 3.3.23 (Ref 2) states 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'.* NPS EN-1 paragraph 3.3.24 (Ref 2) 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'*.

5.4.3 Paragraph 3.3.25 further recognises that storage has a key role to play in achieving net zero and providing flexibility to the energy system, by storing surplus electricity in times of low demand, to be released when demand is higher.

5.4.4 Integration technologies, which provide flexibility, will play an essential role in achieving full decarbonisation and therefore enhance the benefits brought by low carbon generation. NPS EN-1 supports the need for integration technologies and BESS is a suitable and beneficial integration technology.

5.4.5 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 flexibility and the Scheme to store surplus electricity for release during periods of higher demand, thereby providing flexibility to support the transition to a fully low-carbon electricity system and security of supply.

5.5 Summary

5.5.1 In summary, decarbonisation and achieving net zero by 2050 is a legally binding climate change target for the UK and is of global significance. Urgent actions are required in the UK to keep decarbonisation on track to limit global warming. NPS EN-1 (Ref 2) and EN-3 (Ref 3) establish a CNP for the provision of nationally significant low-carbon infrastructure, which includes large-scale solar, as a combination of various types of such infrastructure is urgently required for both energy security and to meet the 2050 net zero target.

5.5.2 The UK Government's Clean Power 2030 Action Plan (Ref 4) 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.

5.5.3 The Scheme will help the UK to be 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.

5.6 The Benefits of the Scheme

Decarbonisation

5.6.1 **ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6]** sets out the likely GHG emissions arising from the Scheme's construction, operation and decommissioning and the potential impacts on climate change. It concludes that over the lifespan, the Scheme will result in an estimated net saving of 1,294,630 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 (0.065kgCO2e/kwh) were used. Based on this, 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.

5.6.2 The overall GHG impact of the operation of the Scheme is beneficial and significant. Therefore, if consented, the Scheme would make a significant and timely contribution to meeting the Government's targets of Clean Power by 2030 (Ref 4) and net zero by 2050 and represents a benefit to the UK and its decarbonisation targets.

Nationally Significant Electricity Generation

5.6.3 As set in the **Grid Connection Statement** [**EN0110014/APP/7.12**], the Scheme has a Grid Connection Agreement for export capacity to the NETS with the National Energy System Operator (NESO). The Grid Connection Agreement allows the Applicant to export 500MW from the electricity produced at the Scheme through the new National Grid Substation. The actual amount of electricity generated by the Scheme will depend on the final design, layout and technology adopted.

5.6.4 However, for the purposes of assessment, as outlined in **ES Volume 1, Chapter 6 - Climate Change** [**EN0110014/APP/6.1.6**], renewable energy generation from the Scheme during the first year of operation is estimated to be approximately 667,760 MWh/year. To account for product degradation, a 2% degradation factor for the first year has been applied, followed by a 0.45% degradation factor for each subsequent year. This results in an estimated energy generation figure of 600,214 MWh in the final year of operation. The total energy generated by the Scheme would be around 36.33 TWh over the 60-year Scheme operation phase.

5.6.5 As reported in **ES Volume 1, Chapter 6 - Climate Change** [**EN0110014/APP/6.1.6**] the average UK household currently uses 11,500 kWh of natural gas per year for heating and cooking. The energy generated per year by the Scheme could therefore replace the use of natural gas in 58,066 homes annually.

Low-Cost Electricity

5.6.6 The **Statement of Need [EN0110014/APP/7.11]** provides that large-scale solar power lowers the market price of electricity by generating power so that expensive and more carbon intensive forms of generation do not need to generate as much. Growing capacity of renewable energy sources, including large-scale solar, supports consumers by reducing the energy system's exposure to gas price fluctuations arising from volatile global fossil fuel markets.

5.6.7 Due to technological advances, solar is 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 (Ref 22).

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

5.6.9 The Scheme will deliver large amounts of low cost, secure, and low carbon electricity in support of Government's energy policy aims to ensure that the national energy system always remains secure, reliable, affordable, and low carbon.

Storage

5.6.10 As set out within the **Statement of Need [EN0110014/APP/7.11]**, integration technologies which provide flexibility will provide an essential role in decarbonising the energy system and enhance the benefits brought by low carbon generation. BESS can import power when national supply outstrips demand and export power when demand outstrips supply, providing grid balancing services to ensure that energy is stored at times of low demand and released when demand is high. Co-located solar and storage provide these grid balancing services to support the operation of the solar and the electricity system, and in turn mitigate the impacts arising from an increasing portion of the UK's electricity being supplied from intermittent renewable sources.

Ecological and Landscape Enhancements

5.6.11 Within the Order Limits, the land is largely intensively managed arable farmland, although there are habitats of landscape and ecological value.

5.6.12 As set out in **Table 2.1**, project level design principles seek to retain and enhance existing vegetation, as far as practicable, together with creating green infrastructure, restoring habitats and enhancing biodiversity. Design buffers (offsets) as described in the **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]** have been embedded into the design to retain key landscape features.

5.6.13 No irreplaceable habitat is proposed to be removed as a result of the Scheme. As part of the **Green Infrastructure Strategy** (see **Outline LEMP [EN0110014/APP/7.4]**), landscaping features would retained as far as practicable and be enhanced, such as through strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) and new tree, woodland and wildflower or species rich mix grassland, together with the restoration of ghost ponds, where practicable. Skylark mitigation plots would also be provided. This would collectively strengthen habitat connectivity at a landscape scale and positively contribute to local green infrastructure. The **Green Infrastructure Strategy** illustrates that approximately 25ha of new tree planting (in addition to hedgerow tree improvements) within the Scheme.

5.6.14 The landscape and ecological management of the Scheme during construction and operation of the Scheme is set out in the **Outline LEMP [EN0110014/APP/7.4]**.

Biodiversity Net Gain

5.6.15 The Scheme has the potential to deliver Biodiversity Net Gain (BNG) as set out in the **Biodiversity Net Gain Report [EN0110014/APP/7.23]**. The ecological mitigation and enhancement within the Scheme (based on the Order Limits) will deliver a potential net gain of 37.42% for habitats, a net gain of 31.35% for hedgerows and 16.08% for watercourses.

5.6.16 A Requirement in the **draft DCO [EN0110014/APP/3.1]** commits to delivering a minimum net gain of 10% for habitats, a minimum net gain of net 10% for hedgerow and a minimum net gain of 10% for watercourses.

Permissive Paths

5.6.17 In response to providing accessible green space, new permissive paths would be created in Sub-Sites 7F, 8B and 10B, as shown in **ES Volume 2, Figure 4.1 - Indicative Masterplan [EN0110014/APP/7.8]**. In total, approximately 850m of permissive paths would be created within the Order Limits for the lifetime of the Scheme for pedestrian use to improve accessibility. These permissive paths, which would connect to existing PRoW, would collectively help to strengthen the network of greenways and active connections within the landscape. This would positively contribute to amenity and recreational opportunities and benefit local pedestrian users by providing alternative access routes to the local highway network. This would also indirectly benefit the health and wellbeing of the local users. Within Sub-Site 7F, opportunities for ecological enhancements also exist by diverting users of the existing PRoW away from the adjacent SSSI through the creation of permissive paths through grassland.

5.6.18 An **Outline PRoWPPMP [EN0110014/APP/7.8]** and **Outline LEMP [EN0110014/APP/7.4]** provides a framework for the management of permissive paths.

Community Accessible Space

5.6.19 In addition, the Scheme would include the provision of new community accessible spaces for pedestrian use in Sub-Site 4B and Sub-Site 7F, as indicated in **ES Volume 2, Figure 4.1 - Indicative Masterplan [EN0110014/APP/7.8]**. This would provide in total up to 19.8ha of new community accessible spaces for pedestrian use over the lifetime of the Scheme.

5.6.20 The community accessible space in Sub-Site 4B has potential opportunities for archaeological educational interaction and the capacity for interpretation signage boards, connecting educational spaces which could be used by local walking and community groups and provide a local educational feature to nearby schools. The community accessible space in Sub-Site 7F has been identified as an opportunity for an amenity use which could include dog walking, for example. The **Outline LEMP [EN0110014/APP/7.4]** sets out the objectives and targets of the community accessible space, together with a framework for the management during the operation of the Scheme.

Employment Generation and Gross Value Added

5.6.21 As set out in the **Outline ESSCS [EN0110014/APP/7.10]** during the construction phase, the Scheme is expected to support an equivalent to 233 full-time equivalent (FTE) jobs, peaking at an equivalent of 604 FTE jobs. It has been estimated that 360 net direct jobs and 684 net indirect and induced jobs would be created during the construction phase, totalling 1,044 net additional jobs. The Scheme is estimated to generate £137m in Gross Value Added over the construction phase.

5.6.22 Approximately 120 net direct jobs are estimated during the operational phase based on the peak replacement scenario.

Education and Skills Training

5.6.23 The Scheme is likely to produce a number of skills and education opportunities. As set out in the **Outline ESSCS [EN0110014/APP/7.10]** the Applicant is committed to apprenticeships in addressing both skill shortages and to provide local residents with pathways into meaningful employment. The Applicant will seek opportunities to collaborate with higher education providers, as well as alongside established initiatives.

5.6.24 The Applicant will also explore collaboration with partners to expand capacity in the sustainability sector skills. To raise awareness and aspirations among young people, the Applicant will explore opportunities to deliver targeted outreach activities focused on renewable energy and STEM careers. This may include school talks, curriculum linked workshops, placements and visits during the construction and operational phases to engage and inspire students.

5.6.25 In addition, consideration of other partnerships will be explored by the Applicant to support the training of employees and workers on the Scheme. Where feasible, the Applicant will seek to promote the development of transferable skillsets to aid workers affected by the Scheme to transition to adjacent or related careers.

5.6.26 The Applicant is also committed to maximising benefits to local workforce and businesses and will secure a Skills, Supply Chain, and Employment Plan in accordance with the **Outline ESSCS [EN0110014/APP/7.10]** to support partnerships with local businesses. This plan is intended to enhance local education, skills and attainment during construction and for periods of replacement activities during the operational phase of the Scheme. The Scheme will support a variety of supply chain opportunities for local businesses. It is anticipated that local suppliers will be utilised when acquiring certain materials and components. This will create partnerships between different stakeholders locally and in turn stimulate economic activity.

5.7 Community Liaison Group

5.7.1 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. 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.

5.7.2 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.

5.7.3 Details of the CLG are set out in the **Outline CEMP [EN0110014/APP/7.1]**. The **draft DCO [EN0110014/APP/3.1]** requires that terms of reference are agreed with the relevant planning authority for the establishment of a CLG during the construction period of the Scheme. The CLG will facilitate liaison between people living close to the Scheme and the relevant organisations.

5.8 Community Benefit Fund

5.8.1 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 Legislative Context and Policy

6.1.1 The PA 2008 (Ref 1) 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 an NSIP to obtain a DCO to permit the construction, operation and maintenance, and decommissioning of their project. The SoS is the decision-maker for DCO applications under Section 103 of PA 2008.

6.1.2 The Planning and Infrastructure Act 2025 received Royal Assent in December 2025 (Ref 23) which made a number of amendments to the PA 2008, with the aim of accelerating infrastructure delivery and shorten the overall timeframes for DCOs. This includes a removal of the requirement to undertake statutory consultation, a requirement for the NPS to be updated every 5 years and allowing applicants to opt out of the DCO regime through a Section 35 application if it can be demonstrated that another consenting regime would be more appropriate, among other changes including limiting the stages of judicial review.

6.1.3 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 100MW (Section 15(2)(c)).

6.1.4 The Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025 (Ref 24) is a statutory instrument which came into force in December 2025 that amends the PA 2008 (Ref 1) 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 NSIP has been increased from 50MW to 100MW.

6.1.5 This DCO Application primarily seeks consent for the construction, operation and maintenance, and decommissioning of a generating station with a capacity of more than 100MW, as the principal development. This includes Solar PV Panels fitted to Mounting Structures and the Project Substations which provide the Transformers, Inverters and Switchgear.

6.2 Associated Development

6.2.1 Section 115(2) of the PA 2008 (Ref 1) states that a DCO can include consent for development which '*is associated with the development*' for which development consent is required.

6.2.2 The Department for Communities and Local Government issued guidance on associated development (Ref 25) 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), mitigation measures, innovative ideas aligned with policy guidance, and proportionate supporting facilities.

6.2.3 As demonstrated in the **Explanatory Memorandum [EN0110014/APP APP/3.2]**, all aspects of the Scheme that comprise the associated development are considered against the relevant tests and examples set out in Section 115 of the PA 2008 (Ref 1). Accordingly, Work Numbers 2 to 11 in Schedule 1 of the **draft DCO [EN0110014/APP/3.1]** and on the **Works Plan [EN0110014/APP/2.3]** constitute associated development as they are typical development brought forward alongside and are necessary to deliver the NSIP (Work No. 1).

6.3 Framework for Determining DCO Applications

6.3.1 Part 6 of the PA 2008 (Ref 1) sets out the procedure for deciding applications for DCO. 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 NPS;
- The appropriate marine policy documents (if any);
- Any Local Impact Report (LIR) 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.

6.3.2 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.

6.3.3 The following sections provide further detail on the other factors listed in Section 104(2) of the PA 2008 (Ref.1).

6.4 Relevant National Policy Statements

6.4.1 NPS EN-1 (Ref 2), NPS EN-3 (Ref 3) and NPS EN-5 (Ref 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 relevant NPS policies are discussed further in this Planning Statement and the **Policy Compliance Document [EN0110014/APP/7.15]**, both of which appraise the Scheme's compliance with the relevant policies.

6.4.2 NPS 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 NPS that the urgent need for CNP Infrastructure will outweigh any residual effects in all but the most exceptional circumstances (paragraph 3.3.63 of NPS EN-1 (Ref 2)). This presumption does not apply to residual impacts that present an unacceptable risk to, or interference with, human health and public safety, defence or irreplaceable habitats (paragraph 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 (paragraph 4.2.20 of NPS EN-1).

Overarching National Policy Statement for Energy EN-1 (2025)

6.4.3 NPS EN-1 (Ref 2) sets out the overarching national policy for the assessment of applications relating to energy infrastructure, including solar electricity generation. It covers Government policy on the need for NSIP (including projects determined to be of CNP), how applications for energy infrastructure will be assessed, and the way in which impacts and mitigations will be judged.

6.4.4 Part 3, paragraph 3.2.8 of NPS EN-1 (Ref 2) confirms that the SoS should assess all applications covered by NPS EN-1 on the basis that there is an established and urgent need for those types of infrastructure, which includes onshore generation that does not involve fossil fuel generation such as solar. NPS EN-1 paragraphs 3.2.9 and 3.2.10 confirm that substantial weight should be given to this need when considering applications. The SoS is not required to consider separately the specific contribution of any individual project to satisfying the need established in NPS EN-1.

6.4.5 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 such as the Scheme (NPS EN-1 paragraph 4.2.17). 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.

6.4.6 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 or onshore flood risk. NPS EN-1 paragraph 4.2.20 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 4.2.23 confirms that applicants for CNP Infrastructure must continue to show how their application meets the requirements in the NPS, 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.

National Policy Statement for Renewable Energy Infrastructure EN-3 (2025)

6.4.7 NPS EN-3 (Ref 3) provides the technology-specific policy to be considered by the SoS alongside NPS EN-1 (Ref 2) when determining applications for renewable energy NSIP, including solar infrastructure. It covers themes such as factors influencing site selection and design, technical considerations for solar infrastructure, and particular impacts usually associated with solar in terms of ecology, landscape, glint and glare, heritage, construction, agricultural land and decommissioning.

National Policy Statement for Electricity Networks Infrastructure EN-5 (2025)

6.4.8 NPS EN-5 (Ref 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 (Ref 2) identifies CNP for nationally significant low-carbon

infrastructure. This includes the electricity grid infrastructure, all power lines within the scope of EN-5 (Ref 5), including network reinforcement and upgrade works, as well as associated infrastructure including, but not limited to, both the National Grid Substation, Project Substations and the Grid Connection Infrastructure.

6.5 Local Impact Reports

6.5.1 As host local authorities, SNC and NCC will have the opportunity to prepare a LIR following the submission of the DCO Application, with reference to Section 60 of the PA 2008 (Ref 1) and the Planning Inspectorate's NSIP Advice Page for Local Authorities: Local Impact Reports (Ref 25). The LIR will address relevant local planning policies and outline the likely impact of the Scheme on SNC's and NCC's administrative area (or part thereof). It will be considered by the SoS in determining the DCO Application.

6.6 Prescribed Matters

6.6.1 The prescribed matters referred to in Section 104(2)(c) of the PA 2008 (Ref 1) are set out in the Infrastructure Planning (Decisions) Regulations 2010 (as amended) (Ref 27). 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 within this Planning Statement and **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]**; and

- Regulation 7: this regulation states that the SoS must have regard to the United Nations Environmental Programme Convention on Biological Diversity 1992 (Ref 28). This is discussed in this Planning Statement and **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]**.

6.7 Other Important and Relevant Matters

6.7.1 While the above NPS set out the principal policy considerations for decision making in relation to NSIP, 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 (Ref 1). This includes the National Planning Policy Framework (NPPF) and the associated Planning Practice Guidance (PPG) and the statutory development plan.

National Planning Policy Framework (2024)

6.7.2 The adopted NPPF (last updated in 2025) (Ref 29) 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 30). As such, its policies were designed with development that is of a scale so as to be of local or regional significance in mind.

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

6.7.4 The NPPF is also supported by the PPG (and NPS EN-1 footnote refers 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, where relevant.

6.7.5 A revised version of the NPPF was published for consultation in December 2025 (Ref 31) and is currently under consultation until March 2026. Given this, the draft NPPF has been given 'very limited weight'.

National Infrastructure Guidance

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

- National Infrastructure Assessment (2018) (Ref 32);
- Planning Act 2008: Content of a Development Consent Orders required for Nationally Significant Infrastructure Projects (2024) (Ref 33);
- Planning Act 2008: Pre-application process for Nationally Significant Infrastructure Projects (2024) (Ref 34);
- Planning Act 2008: Pre-examination stage for Nationally Significant Infrastructure Projects (2024) (Ref 35);
- Planning Act 2008: Examination of applications for Nationally Significant Infrastructure Projects (2024) (Ref 36);
- Guidance on the compulsory purchase process (2025) (Ref 37);

- Planning Act 2008: associated development applications for major infrastructure projects (2013) (Ref 38); and
- Flood Risk and Coastal Change (2025) (Ref 39).

Local Planning Policy

6.7.7 Policies in adopted and emerging development plans are frequently considered important and relevant matters and can influence the content of LIR, which the SoS will have regard to in their decision-making in accordance with Section 104(2)(b) of the PA 2008.

6.7.8 The **Policy Compliance Document [EN0110014/APP/7.15]** 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.

6.7.9 The Scheme lies entirely within the administrative area of SNC and NCC. Therefore, the local planning polices relevant to the Scheme comprise the following:

- The GNLP (2024) (Ref 10);
- SNC's DMPD (2015) (Ref 9);
- NCC's Norfolk Minerals and Waste Local Plan 2023-2038 (2025) (Ref 14); and
- NCC's Local Transport Plan 4 Strategy 2021-2036 (2022) (Ref 40).

6.7.10 The following made Neighbourhood Plans are also considered to be relevant to the Scheme:

- Long Stratton Neighbourhood Plan 2019-2036 (made 2021) (Ref 41);
- Tasburgh Neighbourhood Plan 2023-2038 (made July 2024) (Ref 42); and
- Tivetshall Neighbourhood Plan 2022-2042 (made December 2022) (Ref 43).

6.7.11 A Neighbourhood Area Application for Shotesham was adopted in October 2020. SNC confirmed the designation, although '*are not aware of any further neighbourhood planning activity taking place at the current time'* in relation to this plan (Ref 44).

6.8 Other Policy and Legislation

6.8.1 There are other legislation and guidance 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 [EN0110014/APP/7.11]** and are summarised in the following paragraphs.

Solar Roadmap (2025)

6.8.2 The Solar Roadmap (Ref 45) which outlines a comprehensive strategy to accelerate solar energy deployment aims for 45-47 GW of installed capacity by 2030, with scope to exceed the 47GW upper limit. The key action in the roadmap relevant 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 that need stable and predictable grid access to be viable. Additionally, the roadmap is another indication of the Government's broad policy alignment with support for solar, demonstrating how this Scheme is central to the UK's broader clean energy strategy.

Progress Report to Parliament Climate Change Committee (2025)

6.8.3 The 2025 Progress Report (Ref 20) was laid before Parliament pursuant to Section 36(1) of the Climate Change Act 2008 (Ref 16) to provide an update on the UK's position in meeting the carbon budgets and targets. It reports that solar capacity is currently off track, with around 18GW of solar capacity installed and a further 5GW contracted to bring total capacity up to 23GW 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 2020.

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

6.8.4 Clean Power 2030 Action Plan (2024) (Ref 4) sets out how the Government will deliver on the Plan for Change to build an energy system that can bring down bills for households and businesses for good. The Clean Power 2030 Action Plan suggests that electricity generated by renewables and nuclear power will be the backbone of a clean electricity system by 2030 and therefore sets out actions to support the delivery of renewable generation projects (including BESS), de-risking the existing pipeline, accelerating new projects through the pipeline, and maximising the potential of existing capacity as assets approach end-of-life.

6.8.5 The Clean Power 2030 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 GHG and limit the contribution to the damaging effects of climate change.

Powering Up Britian: Energy Security Plan (2023)

6.8.6 Powering Up Britain (2023) (Ref 46) presents the Government's ambition to double Britain's electricity generation capacity by the late 2030's 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 previous 2022-2024 Government and the current Government has since published a subsequent policy paper (see the Clean Power 2030 Action Plan (Ref 4)), the broad aims of both are consistent.

6.8.7 To meet its goal of quintupling its solar power by 2035, Powering Up Britain states that the *'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 (2023)

6.8.8 The Skidmore Review (Ref 47) is an independent review of net zero and one of the largest engagement exercises on net zero in the UK. The Skidmore Review recognises 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 Skidmore 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)

6.8.9 The British Energy Security Strategy (Ref 48) 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*.' The Strategy aims to:

- Cut planning consent process time by over half through, among other measures, strengthening the NPS EN-3 (Ref 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 50GW by 2030, including up to 5GW 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 48 p.18);
- 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 nonprotected land, while ensuring communities continue to have a say and environmental protections remain in place;
- Increase plans for deployment of civil nuclear to up to 24GW by 2050 – three times more than operational capacity in 2022 and representing up to 25% of projected electricity demand. This includes the intention to take one project (Sizewell C) to Final Investment Decision (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; and
- Double the ambition for hydrogen production to up to 10GW by 2030, with at least half of this from electrolytic hydrogen facilitated by bringing forwards up to 1GW of electrolytic hydrogen into construction or operational status by 2025.

Net Zero Strategy: Building Back Greener (2021)

6.8.10 The Net Zero Strategy (Ref 49) 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)

6.8.11 The Energy White Paper: Powering our Net Zero Future (2020) (Ref 50) 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)

6.8.12 The National Infrastructure Strategy (NIS) (Ref 32) sets out plans to transform UK infrastructure to level up the country 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.

6.8.13 The NIS aimed to provide investors with confidence over the Government's plans to include solar in auctions for Contracts for Difference (CfD), which is the Government's main mechanism for supporting low-carbon electricity generation. This was targeted at incentivising 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.

6.8.14 The NIS sets out the Government's plans to financially support its ambition to *'deliver an infrastructure revolution: a radical improvement in the quality of the UK's infrastructure to help level up the country… and put the UK on the path to net zero emissions by 2050'*.

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

6.8.15 The Climate Change Act 2008 (Ref 16) provides a framework for the UK to achieve its long-term goals of reducing GHG and to ensure steps are taken towards adapting to the impact of climate change. The Climate Change Act committed the UK to reducing its GHG by at least 80% by 2050 when compared with 1990 levels.

6.8.16 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 GHG emissions to net zero (i.e. 100% reduction by 2050, compared with the previous target of at least 80% reduction from 1990 levels).

6.9 Additional Consents

6.9.1 A DCO, if granted, has the effect of providing consent for development, in addition to a range of other consents and licenses where specified, as well as removing the need for some consents such as planning permission. Details of the consents and licenses included in the **draft DCO [EN0110014/APP/3.1]** are explained in the **Explanatory Memorandum [EN0110014/APP/3.2]** and the **Consents and Agreement Position Statement [EN0110014/APP/7.22]**. The latter also includes a list of the likely consents to be sought outside of the DCO process.

7 Ongoing Engagement

7.1.1 Paragraph 4.1.20 of EN-1 (Ref 2) 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 Scheme) in line with the Government's pre-application guidance. 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 [EN0110014/APP/5.1]** and **Consultation Report** appendices **[EN0110014/APP/5.2-12]**.

7.1.3 During the pre-application stage, alongside meetings with stakeholders, the Applicant prepared and maintained an Issues Tracker to identify and track key issues, to identify matters and, where possible, achieve resolution prior to submission of the DCO Application. The Issues Tracker has been used to inform the **Potential Main Issues for Examination [EN0110014/APP/7.16]**.

7.1.4 The Applicant also intends to use the Issues Tracker to inform Statements of Common Ground (SoCG) 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 SoCG with the following parties, if the DCO Application is accepted:

- South Norfolk Council;
- Norfolk County Council;
- National Grid;
- Environment Agency;
- Historic England;
- Natural England;
- 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. The appraisal considers the construction, operation (and decommissioning) phases of the Scheme. Where appropriate, consideration has been given to the weighting that might be applied in the planning balance.

8.1.2 Consideration is given to matters and general impacts set out in NPS EN-1, NPS EN-3 and NPS EN-5. 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 [EN0110014/APP APP/7.15]** provides a more detailed analysis of the specific policies relevant to the Scheme and how the Scheme aligns with them.

8.2 Assessment Principles

General Policies and Considerations

8.2.1 NPS EN-1 Part 4.1 (Ref 2) sets out the general considerations that the SoS should have in mind when assessing applications.

Presumption in Favour of Development

8.2.2 NPS EN-1 paragraph 4.1.3 (Ref 2) states 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*'.

8.2.3 There is a clear and urgent need for the Scheme as set out in this Planning Statement and within the **Statement of Need [EN0110014/APP/7.11]**. 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

8.2.4 Paragraphs 4.1.5 and 4.1.6 of the NPS EN-1 (Ref 2) sets out the SoS should take into account certain types of potential benefits, together with the types of potential adverse impacts in the context of national, regional and local levels. Any residual adverse effects that remain after mitigation measures should be weighed against the residual effects of the benefits of the Scheme. For projects that qualify as CNP Infrastructure, such as the Scheme, the need case will likely outweigh the residual effects in all but the

most exceptional circumstances. This does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence or irreplaceable habitats (paragraph 4.1.7).

8.2.5 The substantial benefits of the Scheme are summarised within this Planning Statement. Likely residual adverse impacts are identified in the **ES [EN0110014/APP/6.1.6 - 6.1.20]** and summarised below. The planning balance is applied in Section 9.

Land Rights

8.2.6 Paragraph 4.1.8 of NPS EN-1 (Ref 2) 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 [EN0110014/APP/4.1]** and the **Book of Reference [EN0110014/APP/4.3]**, as supported through the **Land and Rights Negotiations Tracker [EN0110014/APP/4.4]**.

Development Consent Obligations

8.2.7 The SoS may consider any development consent obligations that an applicant agrees with local authorities (NPS EN-1 paragraph 4.1.19 (Ref 2)). 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 PA 2008) applying to the Scheme.

Early Engagement

8.2.8 Paragraph 4.1.20 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 [EN0110014/APP/5.1]** and **Consultation Report** appendices **[EN0110014/APP/5.2-12]**.

Financial and Technical Feasibility

8.2.9 Paragraph 4.1.23 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 [EN0110014/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

8.2.10 The Scheme is classed as CNP Infrastructure, as identified above. Paragraph 4.2.16 of NPS EN-1 (Ref 2) sets out that the '*Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure to meet the Clean Power 2030 Mission and net zero*'.

8.2.11 The definition of CNP Infrastructure is provided at paragraph 4.2.17 of NPS EN-1 (Ref 2) and includes all onshore and offshore electricity generation that do not involve fossil fuel production, such as the Scheme. Paragraph 4.2.19 of NPS EN-1 (Ref 2) 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 3.2.8 to 3.2.10 of EN-1, is the starting point for all assessments of energy infrastructure applications'.*

8.2.12 Whilst the urgent need for the Scheme is established, paragraph 4.2.23 of NPS EN-1 (Ref 2) 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 4.2.24 of NPS EN-1 (Ref 2) clarifies that applicants must demonstrate that the mitigation hierarchy has been applied, and paragraph 4.2.25 of NPS EN-1 states that applicants should set out how residual impacts will be compensated for as far as possible. 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.

8.2.13 **ES Volume 1, Chapter 2 - EIA Methodology [EN0110014/APP/6.1.2]** sets out the mitigation hierarchy approach adopted in the **ES [EN0110014/APP/6.1.6 - 6.1.20]**. This Planning Statement considers the application of the CNP presumption in the context of 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

8.2.14 NPS EN-1 paragraph 4.2.31 (Ref 2) confirms that for any Habitat Regulation Assessment (HRA) the residual impacts will be considered under the framework set out in the Habitats Regulations (under the Conservation of Habitats and Species Regulations 2017.

8.2.15 The **Shadow Habitats Regulations Assessment [EN0110014/APP/7.25]** found no mechanism for impacts arising at the identified European Sites via potential pathways. As such, no likely significant effects have been identified on the integrity of relevant protected sites, either alone or in-combination with any other plan or project.

Environmental Effects and Considerations

8.2.16 NPS EN-1 paragraph 4.3.1 (Ref 2) states that *'All proposals for projects that are 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 (Ref 2) advises that the applicant '*must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy'*.

8.2.17 Where precise details of the proposals have not been defined, the ES should, to the best of the Applicant's knowledge, provide an assessment of the likely worst-case scenario of effects (the 'Rochdale Envelope') to make sure the impacts have been properly assessed (NPS EN-1 paragraph 4.3.12 (Ref 2)). In decision-making, the SoS should consider the worst-case impacts (NPS EN-1 paragraph 4.3.18 (Ref 2)). 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 (Ref 2)).

8.2.18 In accordance with the above, the **ES [EN0110014/APP/6.1.6 - 6.1.20]** sets out the likely significant effects arising from the Scheme. The scope and methodology of the EIA are set out in **ES Volume 1, Chapter 2 - EIA Methodology [EN0110014/APP/6.1.2]**.

8.2.19 The Scoping Opinion, published by the Planning Inspectorate on 25 February 2025 (**ES Volume 3, Appendix 2.2 - Scoping Opinion [EN0110014/APP/6.3.2.2]**) forms the basis of the assessments undertaken and presented in the ES. The **ES [EN0110014/APP/6.1.6 - 6.1.20]** has been prepared in accordance with the above paragraphs of NPS EN-1.

Alternatives and Site Selection

Planning Policy Context

8.2.20 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.

8.2.21 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)'*.

8.2.22 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 an 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.

8.2.23 The SoS *'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'* (NPS EN-1 paragraph 4.3.24). Paragraph 4.2.27 of NPS EN-1 continues stating that '*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 on the grounds that they are not important and relevant to the Secretary of State's decision'*.

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 Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5]** describes the consideration of reasonable alternatives studied by the Applicant. The design approach and evolution of the Scheme, including examples of design changes made in response to the environmental assessment process and consultation feedback, is also set out in **Design Approach Document [EN0110014/APP/7.17]**. The approach and appraisal of reasonable alternative sites to the National Grid Substation and identification of areas for solar development considering relevant policy is set out in the **Site Selection Assessment [EN0110014/APP/7.20]**.

8.2.26 NPS EN-3 paragraphs 2.10.13-2.10.18 (Ref 3) 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 noted in the **Site Selection Assessment [EN0110014/APP/7.20]** shows that the SoS supports this approach to selecting the grid connection point as an appropriate starting point.

8.2.27 Following establishing that there was neither sufficient existing capacity at the Norwich Main Substation nor an opportunity to expand this existing substation, the **Site Selection Assessment [EN0110014/APP/7.20]** explains the approach to the identification of land for a new National Grid Substation, including consideration of alternative sites. This focused on identifying land within proximity of the existing Bramford to Norwich 400kV overhead line between Diss and Norwich, that was appropriate and available for a new National Grid Substation. This process had regard to the National Grid Company plc's 'Substation and the Environment: Guidelines on Siting and Design' as set out in the **Site Selection Assessment [EN0110014/APP/7.20]**. Informed by this, the Applicant had undertaken a desk-based analysis of potential alternative 'siting zones' and alternative sites for a new National Grid Substation. As well as environmental and planning constraints, a key consideration in the evaluation of alternative sites was proximity to the existing 400kV overhead line to minimise the length of diversions, the local road network and access, as set out in the **Site Selection Assessment [EN0110014/APP/7.20]**.

8.2.28 The **Site Selection Assessment [EN0110014/APP/7.20]** concludes that the alternative locations for the National Grid Substation had either similar or more constraints than the chosen location in Sub-Site 1B. This included consideration of the solar farm (planning application ref. 2024/3817) that was approved during the period of the statutory consultation for the Scheme (which overlapped with one of the land options for the National Grid Substation).

8.2.29 A site selection process was also undertaken for solar sites, as set out in the **Site Selection Assessment [EN0110014/APP/7.20]**. As well as the willingness of landowners, which is a key consideration for site selection, the site selection process considered a number of environmental and planning constraints, together with factors influencing site selection and design, including irradiance and topography, proximity of a site to dwellings, agriculture land classification and land type and accessibility, as set out in paragraph 2.10.10 to 2.10.40 of the NPS EN-3.

8.2.30 As set out the **Site Selection Assessment [EN0110014/APP/7.20]** as part of the site selection process consideration was given to potential suitable solar sites and 'alternative development zones' within a defined search area. This included consideration of previously developed land including brownfield land and commercial rooftops. However, no land was identified that would be of an adequate area to facilitate a utility-scale solar project (either individually or in combination with other sites). Following the identification of the PoC and to validate the site selection process previously carried out, the Applicant identified 'alternative development zones', however, these were not considered to be reasonable alternatives to the Scheme given that the land within them has not been made available to the Applicant.

8.2.31 The **Site Selection Assessment [EN0110014/APP/7.20]** demonstrates that a site selection process has been undertaken and concludes that the available land within the Order Limits fits the factors explored by the Applicant and set out in NPS EN-3, being without many constraints that are unable to be overcome within design and management, and with the benefit of a potential viable connection point. The Applicant, therefore, had identified a suitable site and concluded their site evaluation process. As set out in paragraph 4.3.24 of NPS EN-1, the SoS '. . .*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*.'

8.2.32 NPS EN-1 paragraphs 4.4.22 and 4.3.23 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. Given the critical and urgent need to deploy renewable energy to address the climate crisis and following consideration of factors in the **Site Selection Assessment [EN0110014/APP/7.20]**, together with the findings of the ES, the location of the Order Limits is considered to be suitable for large scale solar.

Topic-Specific Requirements to Consider Alternatives

Compulsory Acquisition

8.2.33 NPS EN-1 paragraph 4.3.9 (Ref 2) 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 [EN0110014/APP/4.1]**.

Air Quality

8.2.34 NPS EN-1 paragraph 5.2.7 (Ref 2) provides that projects near a sensitive site for air quality should only be proposed in exceptional circumstances if no viable alternative is available.

8.2.35 **ES Volume 1, Chapter 13 – Air Quality [EN0110014/APP/6.1.13]** sets out the air quality sensitive receptors (human and ecological) within the vicinity of the Scheme. No significant effects have been identified as a result of the Scheme in relation to air quality and no additional mitigation measures beyond embedded mitigation are considered necessary.

Biodiversity and Geological Conservation Interests

8.2.36 NPS EN-1 paragraph 5.4.42 (Ref 2) states that nationally significant low carbon energy infrastructure may include benefits for biodiversity and geological conservation interests, and these benefits may outweigh harm to these interests. Paragraph 5.4.43 refers to the mitigation hierarchy and the aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives.

8.2.37 As set out in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]**, with the implementation of embedded measures, no significant residual adverse effects have been identified during all phases of the Scheme. However, significant beneficial effects associated with the cessation of intensive arable farming, enhancements to the quality and extent of hedgerows and trees, ponds, rivers, woodland, scrub, other neutral grassland and ditches, together with the effect on breeding birds, bats, badgers, water vole and otter has been identified.

Flood Risk

8.2.38 NPS EN-1 paragraph 5.8.21 (Ref 2) details the Sequential Test and the requirement to follow a sequential, risk-based approach to steering new development to areas with the lowest risk of flooding. 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.

8.2.39 The majority of land within the Order Limits is located within Flood Zone 1 'Low Probability' of river/sea flooding, with localised areas of Sub-Site 7B, Site 8 and parts of the CRC within Flood Zones 2 'Medium Probability' and 3 'High Probability' associated with the floodplains of the Hempnall Beck and the River Tas. Most of the land within the Order Limits has a 'Very Low' risk of surface water flooding, although flow routes with 'Low' to 'High' surface water flood risk run through the Order Limits.

8.2.40 The entirety of the built aspects of the Scheme is located in Flood Zone 1, however, electrical cabling, fencing, maintenance tracks, landscaping and biodiversity of the Scheme (Work No.1(d), Work No.6B, Work No.7, Work No.9 and Work No.10) would encroach on Flood Zones 2 and 3. A Sequential Test and Exception Test have therefore been undertaken and is presented in **Appendix A.** It concludes that the Scheme meets the Sequential Test and Exception Test.

Development within National Parks, the Broads and National Landscapes

8.2.41 NPS EN-1 paragraph 5.10.32 (Ref 2) 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.

Landscape and Visual

8.2.42 NPS EN-5 paragraph 2.9.14 (Ref 5) 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'*.

8.2.43 In paragraph 2.9.17 of NPS EN-5 (Ref 5), the NPS provides a summary of the Holford Rules in respect to the overhead lines, which includes avoiding the major areas of highest amenity value, if possible. The NPS also refers to the Horlock Rules in relation to substations in paragraph 2.9.19, seeking to avoid altogether internationally and nationally designated areas of the highest amenity and, as far as reasonably practicable, local amenity value and to keep intrusion into surrounding areas to a reasonably practicable minimum. NPS EN-1 paragraph 4.7.6 (Ref 2) acknowledges that '*Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation*'.

8.2.44 The Scheme includes modifying, reconfiguring, constructing and dismantling the existing 400kV overhead line together with new pylons in Site 1 to enable the connection with the National Grid Substation that is proposed in proximity to the existing overhead line.

8.2.45 As set out in the **Site Selection Assessment [EN0110014/APP/7.20]**, the selection process has had consideration to the Horlock Rules. International and national designations, local amenity and landscape features have been considered, including existing landscape features for screening to minimise visual intrusion as far as practicable. Works in connection with the existing 400kV overhead line have considered the Holford Rules, for example, avoiding proximity to internationally or nationally designated areas of the highest amenity, Scheduled Monuments, Registered Historic Parks and Gardens, Conservation Areas and SSSI.

8.2.46 Owing to the proximity of the National Grid Substation and new pylons to the existing 400kV overhead line, this would concentrate this infrastructure together minimising the extent of intrusion onto the landscape as far as practicable. Effective use of space has sought to follow the landscape pattern and allow suitable space for landscape mitigation.

8.2.47 Along with the **Green Infrastructure Strategy** in the **Outline LEMP [EN0110014/APP/7.4]**, the project level design principles and the design evolution of the Scheme have considered the landscape context of the Order Limits, as set out in the **Design Approach Document [EN0110014/APP/7.17]**.

8.2.48 As described in **ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.1.7]**, significant adverse residual effects of the Scheme have been identified on:

- National Character Area 83 South Norfolk and High Suffolk Claylands, various District LCA and landscape character and features of the Order Limits during the construction phase;
- Visual amenity, as represented by view locations, during the construction phase, including at recreational route Via Beata Way and various PRoW during the construction phase;
- LCA B1 Tas Tributary Farmland (moderate adverse), LCA C2 Thurlton Tributary Farmland with Parkland (moderate adverse), LCA E2 Great Moulton Plateau Farmland (moderate adverse), landscape character and features of BESS Site, Sites 1 to 5, 7, 8 and 9 (moderate/major adverse) at Year 1 of operation. At Year 15, this would be reduced to LCA B1 Tas Tributary Farmland (moderate adverse), LCA E2 Great Moulton Plateau Farmland (moderate adverse), landscape character and features of BESS Site, Sites 1, 7 and 8 (moderate/major adverse);

- Visual amenity as represented by view locations at Year 1 and Year 15 of the operation of the Scheme. At Year 15, this includes:
  - Property at Station Road (moderate adverse);
  - Junction of PRoW Great Moulton FP15/RB18 (moderate adverse),
  - SE of Great Moulton settlement (moderate adverse);
  - PRoW Hempnall FP28 (moderate adverse);
  - PRoW junction of Long Stratton FP3 and FP4 (moderate adverse);
  - PRoW Long Stratton FP1 (moderate adverse);
  - Hall Lane, outside Church of St Mary, Tharston (moderate adverse);
  - Boudicca Way on Fairstead Lane (moderate adverse);
  - Junction of PRoW Saxlingham Nethergate FP12/FP14 (moderate adverse);
  - PRoW Shotesham FP21 (moderate adverse);
  - Junction of PRoW Saxlingham Nethergate FP10/FP11 (moderate adverse);
  - PRoW Saxlingham Nethergate FP10 (moderate adverse);
  - Origin of PRoW Shotesham FP18 on Wash Lane (moderate adverse);
  - Origin of PRoW Shotesham FP22 on Brooke Road (moderate adverse);
  - Brooke Road, edge of King's Farm (moderate adverse);
  - PRoW Brooke FP6 south of High Green Gardens (moderate adverse); and
  - PRoW Morningthorpe FP2/Boudicca Way north of Devil's Wood (moderate adverse).

8.2.49 In summary, following the discounting of the Point of Connection at the existing Norwich Main Substation, alternative locations for the National Grid Substation and the Point of Connection have been considered in relation to a range of factors, as set out in the **Site Selection Assessment [EN0110014/APP/7.20]**. The design of the Scheme has taken into consideration landscape and visual context of the Order Limits as shown in the **Design Approach Document [EN0110014/APP/7.17]** and the **Green Infrastructure Strategy** seeks to minimise impacts as far as practicable.

Agricultural Land

8.2.50 NPS EN-3 (Ref 3) acknowledges that ground-mounted solar is not prohibited on BMV quality land (paragraph 2.10.22) and states in paragraph 2.10.21 that while land type should not be a predominant factor in determining a site's suitability for solar development, previously developed land, brownfield land, contaminated land and industrial land should be used, where possible. Where agricultural land is shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of BMV agricultural land where possible. In light of this, paragraph 2.10.23 recognises it is likely some agricultural land will be used and applicants should explain their choice of the site.

8.2.51 It is acknowledged the Order Limits comprise BMV quality land. Previously developed land and BMV quality land has been considered as part of the site selection process as set out in the **Site Selection Assessment [EN0110014/APP/7.20]**. At an initial stage of the site selection process, Natural England's provisional mapping of ALC was used. This shows the area of the Order Limits is predominantly undifferentiated Grade 3, with scattered pockets of Grade 2 and Grade 4 land. The ALC map does not differentiate between Grades 3a and 3b. Natural England has also published a series of maps showing the likelihood of BMV land. Based on the maps, there are limited areas of low likelihood of BMV shown between Norwich and Diss.

8.2.52 BMV quality land was also a consideration in the design evolution of the Scheme, with some BMV quality land removed from the Solar PV Arrays, where practicable. Such examples are set out in the **Design Approach Document [EN0110014/APP/7.17]**.

8.2.53 Further appraisal of the use of BMV quality land and why this is justified, is set out in Section 8.3 of this Planning Statement.

Health

8.2.54 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 increases in pests. 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 and physical activity (NPS EN-1 paragraph 4.4.3).

8.2.55 Where a proposal has an effect on humans, the ES should assess these effects and identify measures to avoid, reduce or compensate for these impacts as appropriate (NPS EN-1 paragraph 4.4.4). In decision-making by the SoS, 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, so it is unlikely that health concerns by themselves constitute a reason to refuse consent or*

require specific mitigation under the Planning Act 2008' (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*'.

8.2.56 **ES Volume 1, Chapter 18 – Other Environmental Matters [EN0110014/APP/6.1.18]** provides a summary on human health, including effects from climate change, water environment, landscape and visual, transport and access, air quality, noise and vibration, socio-economics, agriculture, ground conditions and electromagnetic fields (EMF). It concludes that no residual significant adverse effects from the Scheme on human health are anticipated at any stage of the Scheme following the implementation of mitigation.

8.2.57 As part of energy security, NPS EN-1 paragraph 2.4.1 acknowledges that energy infrastructure has a '…*vital role of energy to economic prosperity and social wellbeing*', although also states that '…*the way energy infrastructure is deployed affects the wellbeing of the environment, society and the economy*' (paragraph 2.5.2) and has the potential to impact wellbeing (paragraph 4.4.1).

8.2.58 The **Equality Impact Assessment [EN0110014/APP/7.19]** considers the potential impacts of the Scheme on mental health and wellbeing. Overall, it is acknowledged that a proposal of the size and scale of the Scheme is likely to raise individual mental health and wellbeing concerns of residents. During the construction phase, the impact has overall been assessed as negative to recognise these concerns and need for ongoing engagement and potential additional mitigation that may be necessary to reduce mental health impacts. Once operational, the impact of the Scheme on mental health has been assessed as neutral on a population level.

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

Environmental and Biodiversity Net Gain

8.2.60 NPS EN-1 paragraph 4.6.6 states 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.'*

8.2.61 Applicants are encouraged to calculate the BNG 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). Applications 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, which depend on the scale,

type and location of the proposals, are set out in NPS EN-1 paragraph 4.6.13 and include reduction in GHG emissions, reduction in flood risk, improvements to air, water and soil quality, climate adaptation, landscape enhancement, increased access to natural greenspace and or the enhancement, expansion or provision of trees and woodland.

8.2.62 BNG 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 DCO 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 4.6.21 confirms that in decision making, the SoS '…*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*'.

8.2.63 As presented in the **Biodiversity Net Gain Report [EN0110014/APP/7.23]**, the ecological mitigation and enhancement areas will deliver a potential net gain within the Order Limits of 37.42% for habitats, 31.35% for hedgerows and 16.08% for watercourses. A Requirement in the **draft DCO [EN0110014/APP/3.1]** commits to delivering a minimum net gain of 10% for habitats, a minimum net gain of 10% for hedgerows and a minimum net gain of 10% for watercourses.

8.2.64 The **Outline LEMP [EN0110014/APP/7.4]**, which is also secured by a Requirement of the **draft DCO [EN0110014/APP/3.1]** sets out mitigation measures, management and monitoring with respect to landscape and ecology. In accordance with a Requirement of the **draft DCO [EN0110014/APP/3.1]** a BNG Strategy will need to be submitted to and approved by the relevant planning authority. The Applicant does not consider there to be a need for the SoS to impose further Requirements in the **draft DCO [EN0110014/APP/3.1]** to secure the Scheme's BNG.

8.2.65 The **Design Approach Document [EN0110014/APP/7.17]** includes the adoption of project level design principles to guide decision making and embed good design outcomes into the Scheme. Design Principle 3.1 secures the delivery of a BNG of at a minimum of 10%.

Good Design for Energy Infrastructure

8.2.66 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.

8.2.67 Paragraph 4.7.5 of NPS EN-1 states that as part of good design that design principles should be established during the early stages of the project lifecycle. Footnote 102 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, the National Design Guide and National Model Design Code, as well as any local design policies and standards*'.

8.2.68 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 the 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 is sustainable and, having regard to regulatory and other constraints, are as attractive, durable and adaptable as they can be.

8.2.69 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. Paragraphs 2.5.1 and 2.5.2 of NPS EN-3 also refers to good design emphasising that energy infrastructure should demonstrate '*good design, particularly in respect of landscape and visual amenity…and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage*'.

8.2.70 Regarding solar, paragraph 2.10.52 of NPS EN-3 notes that applicants should *'consider several factors when considering the design and layout of sites, including 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'*.

8.2.71 The Planning Inspectorate has provided advice on good design which 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.

8.2.72 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. 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.

8.2.73 In response to paragraph 2.10.52 of NPS EN-3, consideration has been given by the Applicant to several key factors within the **Site Selection Assessment [EN0110014/APP/7.20]** to establish whether the Scheme is in a suitable location. The **Site Selection Assessment [EN0110014/APP/7.20]** concludes that there are no locations within the search area that were found to be available and none were more suitable or preferable to the location of the Scheme. The site evaluation process 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.

8.2.74 Together with the design buffers to key landscape and ecological features, the project level design principles, as set out in **Table 2.1**, seeks an environmentally led approach to the design of the Scheme, which includes principles relating to landscape, biodiversity and the opportunities for peoples' connection to nature. How the project level design principles have been embedded into the design of the Scheme is illustrated in the **Design Approach Document [EN0110014/APP/7.17]**. The project level design principles have and will continue to be used, where relevant, to inform decision-making, including at detailed design, to secure the best outcomes.

8.2.75 The layout of the design of the Scheme has evolved through the design process in response to the environmental context of the Sites, the environmental assessment process and consultation feedback. The **Design Approach Document [EN0110014/APP/7.17]** sets out the design evolution of the Scheme and key design changes made by the Applicant through the design process, demonstrating compliance with design-related policy in NPS EN-1, NPS EN-3 and relevant guidance on good design.

8.2.76 The **Design Approach Document [EN0110014/APP/7.17]** sets out how good design measures are secured for the Scheme, including through Requirements in Schedule 2 of the **draft DCO [EN0110014/APP/3.1],** the **Works Plan EN0110014/APP/2.3]** and the various management plans. The project level design parameters and commitments are secured in the **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]** to prescribe the guiding design principles, parameters and commitments to inform the detailed design of the Scheme post consent.

Climate Adaptation and Resilience

8.2.77 Paragraph 4.10.1 of NPS EN-1 outlines that whilst efforts to reaching net zero GHG emissions must continue to be accelerated, adaptation and resilience is also necessary to manage the impacts of climate change. This means that if new energy infrastructure is not sufficiently resilient against climate change, it will not satisfy the energy needs detailed in Part 3 of NPS EN-1. Hotter and drier summers and warmer and wetter winters, as well as a heightened risk of flooding, drought, heatwaves, more intense rainfall events are anticipated as a result of climate change. Paragraph 4.10.8 of NPS EN-1 states that applicants must *'consider … the impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure*'.

8.2.78 Paragraph 2.3.2 of NPS EN-5 requires applicants to set out to what extent the proposals are expected to be vulnerable and as appropriate, how it has been designed to be resilient to a number of factors, including flooding, higher temperature and storms.

8.2.79 The project level design principles include commitments to reduce carbon emissions during all phases of the Scheme, together with retention and enhancement of existing vegetation, as far as practicable and to manage surface water drainage. Flexibility is sought in the design for resilience and adaptation to climate change through the design process.

8.2.80 **ES Volume 1, Chapter 6 – Climate Change [EN0110014/APP/6.1.6]** sets out the Scheme's resilience to climate change. This includes working practices, surface water drainage measures and cooling systems, which will be secured through various management plans submitted with the DCO Application, as set out in the **Outline LEMP [EN0110014/APP/7.4], Outline CEMP [EN0110014/APP/7.1]** and **Outline OEMP [EN0110014/APP/7.2]**. This includes, for example, consideration of the species and management of species that is resilient to disease and climate change.

8.2.81 The assessment in **ES Volume 1, Chapter 6 – Climate Change [EN0110014/APP/6.1.6]** concludes no significant adverse climate change risks during the construction, operational or decommissioning phases of the Scheme.

8.2.82 As described in **Appendix A**, as part of the Sequential Test, the design and layout of the Scheme have considered flood risk, including siting the most vulnerable elements towards areas of lower flood risk, taking account climate change. Surface water drainage systems are proposed for certain components of the Scheme and, as demonstrated in **Appendix A**, the Exception Test shows the Scheme would be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.

8.2.83 **Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]** sets out how the Scheme will take account of the projected impacts of climate change. This assessment demonstrates the management of surface water drainage for the National Grid Substation, Project Substations and BESS, together with that the Scheme as a whole is safe and will not detrimentally impact on flood risk within the Order Limits or elsewhere, in accordance with the requirements of national and local planning policy. The **Outline CEMP [EN0110014/APP/7.1]**, **Outline OEMP [EN0110014/APP/7.2]** and the **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]** set out commitments for flood risk, taking account climate change.

8.2.84 The Scheme is anticipated to result in significant beneficial residual effects on climate change as a result of the clean energy produced by the Scheme. This, together with climate change adaptation and resilience, the Scheme should be afforded **substantial positive weight** in the planning balance.

Network Connection

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

8.2.86 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 to secure a grid connection. Paragraph 4.11.6 of NPS EN-1 also acknowledges that that applicants may wish to take a commercial risk where they have not received or accepted a formal offer of a grid connection at the time of the application. Paragraph 4.11.12 of NPS EN-1 continues by stating 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.

8.2.87 Paragraph 2.11.13 of NPS EN-3 notes that applicants should consider form, routing and design with regard to Section 4.11 of NPS EN-1 and NPS EN-5. In particular, and where appropriate, applicants should proceed in a manner consistent with the regulatory regime for offshore transmission networks.

8.2.88 Paragraph 2.10.16 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.

8.2.89 Paragraph 2.10.17 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 2.10.18 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.

8.2.90 Paragraph 2.8.7 of NPS EN-5 states that the SoS should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNO) are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design. Paragraph 2.8.8 of NPS EN-5 continues to state that TO and DNO 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.

8.2.91 The grid connection offer is for the Scheme to connect to the NETS existing overhead transmission line between Norwich Main and Bramford via the new National Grid Substation, as set out in the **Grid Connection Statement [EN0110014/APP/7.12]**. As part of the offer, the Applicant is to provide the land and gain consent for new National Grid Substation.

8.2.92 The locations of the National Grid Substation considered by the Applicant are set out in the **Site Selection Assessment [EN0110014/APP/7.20]**. At a similar time as a grid connection offer and the site selection process was being discussed, land agents indicated to the Applicant that landowners were willing to put forward land for a solar farm development.

8.2.93 In accordance with NPS EN-1, the Applicant has been engaged in ongoing discussions with NGET as set out in the **Consultation Report [EN0110014/APP/5.1]** and **Grid Connection Statement [EN0110014/APP/7.12]**. NGET confirmed that there is sufficient space in the proposed area for the new National Grid Substation and ongoing discussions are being had between the Applicant and NGET with regard to the configuration and layout of the new National Grid Substation.

Pollution Control and Other Environmental Regulatory Regimes

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

8.2.95 As part of decision making, paragraph 4.12.9 of NPS EN-1 confirms that the SoS 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 SoS 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.

8.2.96 The DCO Application is accompanied by a **Consents and Agreements Position Statement [EN0110014/APP/7.22]**. This outlines information on the additional consents and licences that are or may be required to construct and operate the Scheme, other than those written into the **draft DCO [EN0110014/APP/3.1]**. 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 [EN0110014/APP/7.22]** sets out the Applicant's position on expected subsequent applications to be undertaken by the relevant contractor when the information becomes available through detailed design, should DCO consent be granted. The Applicant considers that, under paragraph 4.12.15 of NPS EN-1 and based on the **Consents and Agreements Position Statement [EN0110014/APP/7.22]** there should be no reason for the SoS to believe that any operational pollution permits, licenses and/or other consents will not be granted.

8.2.97 The environmental effects of the Scheme during construction will be managed through the implementation of detailed CEMP and detailed CTMP, which would be substantially in accordance with the **Outline CEMP [EN0110014/APP/7.1]** and **Outline CTMP [EN0110014/APP/7.1]**, respectively, submitted with the DCO Application. The **Outline CEMP [EN0110014/APP/7.1]** sets out a series of management measures based on best-practice guidance to control the environmental effects of construction of the Scheme. A detailed CEMP in accordance with a Requirement of the **draft DCO [EN0110014/APP/3.1]** must be approved by the relevant planning authority prior to the commencement of works. These measures will form an important part of the Applicant's efforts to control environmental effects.

8.2.98 Environmental effects from the operational phase of the Scheme will be controlled through the **Outline OEMP [EN0110014/APP/7.2]** and the **Outline LEMP [EN0110014/APP/7.4]**. In accordance with the Requirements of the **draft DCO [EN0110014/APP/3.1]** the detailed OEMP and detailed LEMP must be substantially in accordance with the **Outline OEMP [EN0110014/APP/7.2]** and **Outline LEMP [EN0110014/APP/7.4]**, respectively.

8.2.99 The **Outline DEMP [EN0110014/APP/7.3]** will control environmental effects as identified in ES during the decommissioning phase of the Scheme. In accordance with a Requirement of the **draft DCO [EN0110014/APP/3.1]**, the detailed DEMP must be substantially in accordance with the **Outline DEMP [EN0110014/APP/7.3]**.

8.2.100 In terms of SoS's decision making, the Applicant considers that, under paragraph 4.12.15 of NPS EN-1 and based on the above, there should be no reason for the SoS to believe that any operational pollution permits, licenses and/or other consents will not be granted.

Hazardous Substances

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

8.2.102 As per Section 3 of the COMAH Regulations 2015, solar and BESS are not applicable to the regime and therefore no further response is required. 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.

8.2.103 Notwithstanding the fact that BESS is not applicable to the COMAH Regulations 2015, this DCO Application is accompanied by an **Outline BSMP [EN0110014/APP/7.5]**, which sets out the key fire safety provisions for the BESS including measures to reduce fire risk and fire protection measures.

8.2.104 As identified during scoping of the ES, HSE advised (see **ES Volume 3, Appendix 2.2 - East Pye EIA Scoping Opinion [EN0110014/APP/6.3.2.2]**) that part of the Order Limits is within the Hazardous Substance Consent 'Consultation Zone' of the Gas Power Services Site and the Natural Gas 5 Feeder pipeline. Engagement has been undertaken with Natural Gas Transmission during the pre-application stage regarding the high-pressure gas pipeline that extends through the Order Limits, where easements have been applied.

8.2.105 Where necessary, separate Hazardous Substance Consent will be sought. Therefore, it is considered that safety and hazardous substances should be afforded **neutral weight** in the planning balance.

Common Law Nuisance and Statutory Nuisance

8.2.106 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 development consent*'. This is also emphasised in paragraph 4.15.6 of NPS EN-1 whereby the SoS should consider sources of nuisance as part of decision making.

8.2.107 The Applicant has submitted with the DCO Application a **Statutory Nuisance Statement [EN0110014/APP/7.13]** as is required under APFP Regulation 5(2)(f) and paragraph 4.15.5 of NPS EN-1. **The Statutory Nuisance Statement [EN0110014/APP/7.13]** draws upon the findings of the ES and concludes that the construction, operational and decommissioning phases of the Scheme would not give rise to impacts which would constitute a statutory nuisance under Section 79(1)(a) or (e) of the EPA.

8.2.108 Though a statutory nuisance is not expected, the **draft DCO [EN0110014/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, operation 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

8.2.109 Paragraph 4.16.1 of NPS EN-1 explains that national security considerations apply across all national infrastructure sectors. In paragraph 4.16.2 of NPS EN-1, it 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. 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, where possible, 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 *'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 2.10.39 of NPS EN-3 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 lighting. Paragraph 2.10.40 states that applicants should consider the need to minimise the impact on the landscape and the visual impact of security measures.

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 Scheme from the outset and are considered proportionate. The **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]** set out the parameters and commitments for the design of the Scheme, including security measures. This includes 'deer fencing' up to 2.5m around individual fields or groups of fields of the Solar PV Arrays and metal palisade fencing around the BESS Compound, National Grid Substation and Project Substations. Pole mounted internal facing CCTV systems installed at a height of up to 3m and would use night-vision technology, which would be monitored remotely and avoid the need for night-time lighting. **ES Volume 3, Appendix 7.11 - Lighting Strategy [EN0110014/APP/6.3.7.11]** provides a strategy to make sure that external lighting for the Scheme is designed to provide a safe working environment while avoiding unnecessary light pollution and reducing potential effects on the key receptors. Such measures are secured by the **Outline CEMP [EN0110014/APP/7.1]** and the **Outline OEMP [EN0110014/APP/7.2]**.

8.2.113 The Scheme is therefore considered compliant with paragraphs 4.16.1 to 4.16.8 of the NPS EN-1 and paragraphs 2.10.39 and 2.10.40 of NPS EN-3.

8.3 Generic Impacts

8.3.1 This Section considers the Scheme's compliance with the main planning policy requirements regarding the generic impacts, 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 [EN0110014/APP/7.15]** 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 Paragraph 5.2.1 of NPS EN-1 notes that energy infrastructure can have adverse effects on air quality across all phases of development on health, protected species and habitats or on the wider countryside and species. Paragraph 5.2.8 of NPS EN-1 requires where this is likely to be the case, an air quality assessment should be undertaken. Paragraph 5.2.9 of NPS EN-1 outlines what the ES should include regarding air quality.

8.3.3 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.

8.3.4 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'*.

8.3.5 Policy DM3.14 'Pollution, Health and Safety' of the SNC's DMPD (2015) requires developments not to have unacceptable impacts from air quality on human health, sensitive designated species or habitats, and general amenity, unless adequate mitigation can be ensured. Developments should not result in an Air Quality Management Area being designated or the worsening of air quality in an existing Air Quality Management Area.

Applicant Assessment

8.3.6 **ES Volume 1, Chapter 13 – Air Quality [EN0110014/APP/6.1.13]** provides an assessment of the construction and decommissioning phases of the Scheme on air quality in terms of both human health and ecological receptors. The assessment found that the residual air quality effects would not be significant during the construction and decommissioning phases of the Scheme. Nevertheless, the **Outline CEMP [EN0110014/APP/7.1]**, **Outline CTMP [EN0110014/APP/7.6]**, **Outline OEMP [EN0110014/APP/7.2]** and **Outline DEMP EN0110014/APP/7.3]** set out measures to reduce emissions to air. The construction routing has been designed such that Heavy Goods Vehicles (HGV) do not travel through the Norwich Air Quality Management Area.

8.3.7 The dusk risk assessment in **ES Volume 3, Appendix 13.1 – Construction and Decommissioning Dusk Risk Assessment [EN0110014/APP/6.1.13.1]** determines the mitigation required for the construction and decommissioning phases of the Scheme, which is set out in the **Outline CEMP [EN0110014/APP/7.1]** and the **Outline DEMP [EN0110014/APP/7.3]**.

8.3.8 In agreement with the Planning Inspectorate as part of scoping of the ES, the impacts on air quality as a result of the operational phase of the Scheme, was scoped out of the assessment based on air quality effects being unlikely.

8.3.9 A **BESS Fire – Emissions to Air Risk Assessment** is included in the **Outline BSMP [EN0110014/APP/7.5]**, which considers combustion emissions in the event of a battery fire. The results of the risk assessment indicate that no Air Quality Assessment Levels are approached at any residential receptors, however, under the worst-case meteorological conditions, hydrogen fluoride concentrations are predicted to be in excess of the 1-hour mean, 4-hour mean and 8-hour mean Acute Exposure Guideline Limits (AEGLs) and carbon monoxide concentrations are predicted to be in excess of the 1-hour mean AEGL, along three PRoW. To mitigate this risk, the Emergency Response Plan would include measures in liaison with the emergency services. Through the implementation of the proposed mitigation secured through the **Outline BSMP** and Emergency Response Plan, it is considered that the potential risk of air quality impacts resulting from a BESS fire will be effectively controlled.

Summary

8.3.10 The air quality assessment concludes that, with embedded mitigation, the Scheme is not anticipated to give rise to any significant residual adverse effects. 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.

8.3.11 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 SNC's DMPD, insofar as they relate to air quality. 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

8.3.12 Paragraph 4.10.1 of NPS EN-1 states that new energy infrastructure must be sufficiently resilient against the possible impacts of climate change, otherwise 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. 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.

8.3.13 Paragraph 4.10.13 NPS EN-1 continues to advise that in decision making, the SoS *'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 SoS *'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'*.

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

8.3.15 Paragraph 2.3.2 of NPS EN-5 requires the consideration of how a proposal is expected to be vulnerable and, as appropriate, how it has been designed to be resilient in terms 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.

8.3.16 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. 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*'.

8.3.17 Policy DM4.1 'Renewable Energy' of SNC's DMPD makes reference to climate change and states that *'other than for proposals for wind energy development will be supported and considered (taking account of the impact of relevant ancillary equipment) in the context of sustainable development and climate change on the wider environmental, social and economic benefits of maximising use of renewable energy'*. The policy states that the proposal will need to consider landscape, heritage assets and residential amenity and that *'Permission will be granted where there are no significant adverse effects or where any adverse effects are outweighed by the benefits'*.

Applicant Assessment

8.3.18 **ES Volume 1, Chapter 6 – Climate Change [EN0110014/APP/6.1.6]** includes an assessment of Lifecycle GHG, considering embodied carbon and GHG emissions from the Scheme, together with climate change resilience and in-combination effects from other environmental disciplines contributing to climate change. This assessment concludes that the construction and decommissioning phases of the Scheme will not result in significant adverse residual effects on the global climate from GHG emissions. During the operation of the Scheme there would be a significant beneficial residual 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 where energy may be produced by other more highly emitting methods.

8.3.19 In compliance with paragraph 5.3.7 of NPS EN-1, which requires the production of a GHG Reduction Strategy, measures are included in the **Outline CEMP [EN0110014/APP/7.1]** and the **Outline DEMP [EN0110014/APP/7.3]** to minimise GHG emissions.

8.3.20 The GHG assessment concludes that the predicted GHG emissions for the construction phase is 347,673 tCO2e, with the greatest contribution from the BESS and Solar PV Panel products and associated embodied carbon. Annual emissions from the construction of the Scheme do not contribute to equal to or more than 0.05% of the Fifth UK carbon budget and less than 1% each year of the total electricity supply sector budget. GHG emissions from the construction of the Scheme are considered to have a minor adverse effect on the climate, which is considered not significant.

8.3.21 For the operation phase of the Scheme, 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 activities. GHG emissions during operation is expected to be 1,104,918 tCO2e and the total energy generated by the Scheme would be around 36.33 TWh over the 60 years of the Scheme. The Scheme will facilitate future uptake of low emissions technology outside of traditional electricity uses. The residual effects for the operational phase of the Scheme are defined as significant and beneficial in **ES Volume 1, Chapter 6 – Climate Change [EN0110014/APP/6.1.6]**.

8.3.22 GHG emissions from the decommissioning phase is expected to be significantly lower than the construction phase because the decommissioning activities do not require the extensive manufacturing, transportation and installation of new equipment. The main decommissioning activities, such as dismantling, removal and restoration, are generally less emission intensive. The decommissioning phase emissions account for less than 0.5% of the total GHG emissions of the Scheme calculated at 6,390 tCO_2e. GHG emissions from decommissioning of the Scheme are considered to have a minor adverse effect on the climate, which is considered not significant.

8.3.23 Accounting for the estimated construction, operation and decommissioning phase emissions, the Scheme's total carbon intensity value is 39.66 gCO2e/kWh. This is mid-range for that generated from the poly-silicon, ground mounted solar energy. In comparison to other energy generating methods, the Scheme is less emitting than non-renewable sources over the course of its lifetime and is typical of GHG emissions from solar energy generation.

8.3.24 Based on the above considerations and the assessment in **ES Volume 1, Chapter 6 – Climate Change [EN0110014/APP/6.1.6]**, 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 rate of transition required by nationally set policy commitments. The Scheme avoids GHG emissions in the without-project baseline.

8.3.25 Paragraph 5.3.10 of NPS EN-1 states that the SoS should give appropriate consideration to developments that incorporate nature-based or technological processes to mitigate construction and decommissioning emissions. It is acknowledged that the SoS must accept that there are likely to be some residual emissions.

8.3.26 As outlined above, the Scheme is anticipated to have minor adverse effects on the climate during its construction and decommissioning phases due to associated GHG emissions. These impacts are minimised through embedded mitigation measures. Overall, the Scheme is expected to deliver significant residual benefits across its lifecycle by generating clean energy and achieving a net reduction in GHG emissions compared to a scenario compared without the Scheme.

8.3.27 Embedded mitigation measures for the resilience of the Scheme to climatic hazards are outlined in the **Outline CEMP [EN0110014/APP/7.1]** and **Outline OEMP [EN0110014/APP/7.2]**. These are considered an adequate response to the projected climate change impacts to which the Scheme would be exposed.

Summary

8.3.28 The Scheme is considered to accord with the provisions of NPS EN-1 in respect of GHG emissions. This matter should be afforded **significant 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 and NPS EN-5.

Biodiversity and Geological Conservation

Planning Policy Context

8.3.29 Paragraph 5.4.18 of NPS EN-1 states that the ES should clearly set 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. Under Paragraph 5.4.20 of NPS EN-1, applicants should show how proposals have taken opportunities to conserve and enhance biodiversity conservation interests.

8.3.30 Paragraph 5.4.22 of NPS EN-1 recognises that the design process should embed opportunities for nature-inclusive design and paragraph 2.5.1 of NPS EN-5 recognises opportunities for reconnecting habitats and connecting people to the environment.

8.3.31 Throughout, NPS EN-1 outlines that applicants are to apply the mitigation hierarchy with regard to biodiversity and paragraph 2.10.70 of NPS EN3 advises that an ecologist is recommended in the design process, such as to ensure the mitigation hierarchy is applied to avoid, reduce, mitigate and compensate for adverse impacts whilst also maximising enhancements. Paragraph 5.4.43 of NPS EN-1 states that where significant harm cannot be avoided, impacts should be mitigated and as a last resort, compensated.

8.3.32 As part of the SoS's decision-making process, paragraph 5.4.42 of NPS EN 1 requires the SoS to consider any net benefits for biodiversity and geological conservation interests and that such benefits may outweigh harm to these interests.

8.3.33 Paragraph 187 of the NPPF seeks the protection of sites of biodiversity or geological value, together with minimising impacts on and providing net gains for biodiversity, including by establishing ecological networks and incorporating features which support priority or threatened species.

8.3.34 At local level, Policy 3 ‘Environmental Protection and Enhancement’ of the GNLP states that the natural environment should be enhanced and biodiversity net gain delivered, creating new or enhancing existing green infrastructure. The policy also seeks for the mitigation hierarchy to be demonstrated. Similarly, Policy DM1.4 ‘Environmental Quality and Local Distinctiveness’ of the SNC DMPD seeks positive environmental improvement, including enhancing biodiversity for net gain.

Habitats Regulation

8.3.35 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.

8.3.36 In decision making, paragraph 5.4.51 of NPS EN-1 confirms that the SoS 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

8.3.37 With regard to Ancient Woodland, ancient trees, veteran trees and other irreplaceable habitats, paragraphs 5.4.15 and 5.4.16 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 the resource of such habitat. Paragraph 5.4.16 of NPS EN-1 and paragraph 2.12.75 of NPS EN3 also recognise other irreplaceable habitats, including lowland fen, with paragraph 2.12.76 of NPS EN3 also acknowledging peatlands as a sensitive habitat.

8.3.38 Paragraph 5.4.33 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*'.

8.3.39 Footnote 23 of the NPPF refers to Section 5.4 of NPS EN-1 in relation to Ancient Woodlands.

Protection and Enhancement of Habitats and Species

8.3.40 Paragraph 5.4.7 of NPS EN-1 recognises that many SSSI 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.

8.3.41 Further, NPS EN-1 paragraph 5.4.8 states that development on land within or outside an SSSI and which is likely to have an adverse effect on it, should not normally be permitted. The 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*'.

8.3.42 In decision-making, the SoS should use requirements to mitigate the harmful aspects and where possible, ensure conservation and enhancement of the SSSI (NPS EN-1 paragraph 5.4.52).

8.3.43 For the protection and enhancement of habitats and species, paragraphs 5.4.34 and 5.4.35 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.

8.3.44 Sites of regional and local biodiversity and geological interest include Regionally Important Geological Sites, Local Nature Reserves and Local Wildlife Sites. The SoS should give due consideration to regional and local designations. Still, NPS EN-1, through paragraph 5.4.54, 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

8.3.45 The **Design Approach Document [EN0110014/APP/7.18]** explains how good design has been embedded into the Scheme through a design framework to guide decision-making at the detailed design stage. The project level design principles (see **Table 2.1**) seek to retain and enhance existing vegetation, where possible, restore features such hedgerows and ghost ponds as far as practicable and strengthen habitat corridors and connectivity. Design offset buffers from key landscape and ecological features have been embedded into the design of the Scheme as secured in the **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]** and the **Works Plan [EN0110014/APP/2.3]**.

8.3.46 Compliance with policy in paragraph 4.2.24 NPS EN-1 requires that the Scheme considers and adopts the mitigation hierarchy. Further to the mitigation hierarchy, BNG delivery should take into account the BNG hierarchy. **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]** confirms the mitigation hierarchy applied during the design of the Scheme where there is potential for impacts on relevant Important Ecological Features:

- Avoidance – actions taken to avoid causing impacts to the environment prior to beginning development (e.g. avoidance of installing Solar PV Arrays on or near Important Ecological Features to avoid direct and indirect impacts);
- Minimisation – measures taken to reduce the duration, intensity, extent and/or likelihood of the unavoidable environmental impacts caused by development (e.g. adapting the development design to minimise impacts);
- Restoration or rehabilitation – actions taken to repair environmental degradation or damage following unavoidable impacts caused by development; and

- Offsets – measures taken to compensate for any adverse environmental impacts caused by development which cannot be avoided, minimised and/or restored (e.g. including habitat creation to offset losses).

8.3.47 The Scheme's design evolution has sought to avoid relevant Important Ecological Features, such as hedgerows, watercourses and woodlands, as far as practicable. This includes the design buffers in the **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]** and **Works Plan [EN0110014/APP/6.1.8]**, together with directing the CRC away from designated ecological sites as far as possible during the design process and the removal of Sub-Site 3B from the Order Limits. As described in the **Outline Cable Route Construction Statement [EN0110014/APP/7.21]** and secured through the **Outline CEMP [EN0110014/APP/7.1]**, there will be 'Avoidance Areas' that will be subject to trenchless crossings during the laying of cables during the construction phase. Avoidance Areas include the two CWS within the CRC, lowland fen habitat and main rivers. The **Outline CEMP [EN0110014/APP/7.1]** also sets out that the trenchless crossing of the peat would be limited diameter and would not form a cut-off to groundwater flow or remove water supply to the overlying peat. No irreplaceable habitat (Ancient Woodland, veteran trees and lowland fen) is proposed to be removed as a result of the Scheme. Where hedgerow removal is required, the length of removal would be minimised, as secured through the **Outline LEMP [EN0110014/APP/7.4]**.

8.3.48 In addition to measures embedded into the design of the Scheme such as design offsets from key landscape and ecological features, management measures during the construction, operation and decommissioning phases are secured through the **Outline CEMP [EN0110014/APP/7.1]**, **Outline OEMP [EN0110014/APP/7.2]** and **Outline DEMP [EN0110014/APP/7.3]** to minimise ecological impacts during all phases of the Scheme. These include for example, pollution prevention measures, control of dust and lighting and adherence to 'BS5837:2012 Trees in relation to design, demolition and construction'.

8.3.49 The **Outline LEMP [EN0110014/APP/7.4]** describes habitat creation, management and monitoring prescriptions to mitigate and enhance biodiversity. Enhancement includes the provision of varied mosaic of habitat creation such as flower rich pollinator, tussocky, neutral and modified grassland and restoration of ghost ponds, where practicable, increasing habitat connectivity. Local conservation priorities in relation to the Norfolk Wildlife Trust South Norfolk Claylands and initiatives of the Norfolk Local Nature Recovery Strategy have been considered within the **Outline LEMP [EN0110014/APP/7.4]**. The **Outline LEMP [EN0110014/APP/7.4]** also includes the provision of habitat boxes for birds, bats and hedgehogs, together with the provision of skylark plots within retained agricultural land.

8.3.50 The **Shadow Habitats Regulations Assessment [EN0110014/APP/7.25]** found no mechanism for impacts arising at the identified European Sites via potential pathways. As such, no likely significant effects have been identified on the integrity of relevant protected sites, either alone or in-combination with any other plan or project. This identified no likely significant effects on Norfolk Valley Fens Special Area of Conservation (SAC), The Broads SAC, Broadland Special Protection Area (SPA) and Broadland Ramsar that are within 10km of the Order Limits. The Shadow Habitats Regulations Assessment does not proceed to Appropriate Assessment stage. This is considered to satisfy paragraph 5.4.51 of NPS EN-1.

8.3.51 **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]** considers the ecological and biodiversity impacts of the Scheme across the construction, operational and decommissioning phases. The assessment outlines designated ecological sites (international, national and local level) and non-designated ecological sites, together with protected species and priority habitats. The relevant irreplaceable habitats within the Order Limits include ancient/veteran trees, as identified in the **ES Volume 3, Appendix 7.10 - Preliminary Arboriculture Impact Assessment [EN0110014/APP/6.3.7.10]**, together with lowland fen located within the Fritton Grange Meadows CWS within CRC7. Ancient Woodlands adjoin the Order Limits, including the (replanted) Ancient Woodland (Spring Wood, Hempnall CWS) adjoining Site 3, Little Wood Ancient Woodland adjacent to Sub-Site 7H, Saxlingham Grove Ancient Woodland adjacent to Sub-Sites 7F and 7G and Ringers Grove Ancient Woodland sits adjacent to Sub-Site 8A.

8.3.52 There are no statutory ecological designations within the Order Limits, however, several SSSI are located adjacent to the Order Limits, together with Local Nature Reserves. There are also no SSSI designated for geological conservation within the Order Limits. **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]** concludes that with regard to SSSI within proximity to the Order Limits, with embedded measures in place, no significant residual adverse effects have been identified.

8.3.53 Non-statutory ecological designations within the Order Limits include Fritton Grange Meadows CWS, which is partially located within CRC7 and Lower Spring Wood CWS is partially located within CRC9. Peat deposits (as mapped by the BGS) are adjacent to the Hempnall Beck within the Fritton Grange Meadows CWS. There are also RNR partially located within the Order Limits. **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]** concludes that with regard to the CWS and RNR within and surrounding the Order Limits, with embedded measures in place, no significant residual adverse effects have been identified.

8.3.54 Air quality effects as a result of road traffic emissions associated with the Scheme on the sensitive ecological sites that were assessed were deemed to be not significant in **ES Volume 1, Chapter 13 – Air Quality [EN0110014/APP/6.1.13]**.

8.3.55 The relevant irreplaceable habitats relevant to the Scheme are Ancient Woodland, ancient/veteran trees and lowland fen habitat. Lowland fen habitat and ancient/veteran trees have been identified within the Order Limits and Ancient Woodland is located adjacent to the Order Limits. No irreplaceable habitat (Ancient Woodland, veteran trees and lowland fen) is proposed to be removed as a result of the Scheme. **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]** concludes with embedded measures in place, no significant residual adverse effects have been identified in relation to Ancient Woodland, ancient/veteran trees and lowland fen habitat.

8.3.56 Various priority habitats have been recorded within the Order Limits as set out in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]**. With embedded measures in place, the assessment concludes for priority habitats no significant residual adverse effects on arable field margins, flood plain grazing marsh and traditional orchard. Further, no significant residual adverse effects have been identified on hedgerow and tree lines, woodland, rivers, ponds, other neutral grassland, scrub and ditches during the construction and decommissioning phases, although owing to the cessation of intensive arable farming, enhancements to the quality and extent of habitats, significant residual beneficial effects have been identified on these habitats during the operation of the Scheme.

8.3.57 **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]** includes an assessment of protected and notable species. With embedded mitigation in place, no significant residual adverse effects have been identified during the construction and decommissioning phases. Significant residual beneficial effects during the operation phase have been identified in relation to breeding birds, bats, badgers and riparian mammals.

Summary

8.3.58 The Applicant has sought to take into account biodiversity and nature conservation considerations within the site selection and design process in accordance with paragraph 2.10.70 of NPS EN-3. The mitigation hierarchy has been followed with avoidance of impacts prioritised as far as practicable.

8.3.59 Detailed management plans will be developed and implemented across each phase of the Scheme that will be substantially in accordance with the **Outline CEMP [EN0110014/APP/7.1]**, **Outline OEMP [EN0110014/APP/7.2]** and **Outline DEMP [EN0110014/APP/7.3]** that are secured through the **draft DCO [EN0110014/APP/3.1]**. These management plans include mitigation and management measures intended to avoid or reduce adverse effects in accordance with the mitigation requirements of NPS EN-1 paragraph 5.4.36 and 5.4.43, and the monitoring requirements of NPS EN-3, paragraph 2.10.122. The **Outline CEMP [EN0110014/APP/7.1]** and **Outline LEMP [EN0110014/APP/7.4]** also set out measures to mitigate impacts on Ancient Woodland, ancient/veteran trees and other irreplaceable habitats in line with paragraph 5.4.33 of NPS EN-1.

8.3.60 To ensure the beneficial effects of the newly created habitats are fully realised, the **Outline LEMP [EN0110014/APP/7.4]** forms a control document submitted alongside the DCO Application. This includes creation and enhancement of habitats and, where practicable, restoration including having regard to the Local Nature Recovery Strategy, in accordance with paragraph 2.10.82 of NPS EN-3. The **Outline LEMP [EN0110014/APP/7.4]** sets the framework for the detailed LEMP, which is to be submitted and approved by the relevant planning authority, and outlines how the habitats will be managed and monitored during the operational phase of the Scheme.

8.3.61 A mosaic of new habitats would be created within the Scheme, improving the extent and quality of habitats, together with increasing connectivity between habitats, resulting in the Applicant providing a BNG of at least 10%, as secured through the **draft DCO [EN0110014/APP/3.1]** as described above.

8.3.62 As set above, with the adoption of embedded, the significant residual adverse effects will be avoided. Significant residual beneficial effects have been assessed for the operation phase of the Scheme in relation to habitats and certain species. It is considered that the Scheme is in accordance with NPS EN-1 tests as established under paragraphs 5.4.42 and 5.4.43 and local policy.

8.3.63 On that basis, there are no likely significant effects on any protected European sites, it is considered that the Habitats Regulations should be afforded **neutral weight** in the planning balance. Similarly, a **neutral weight** has been afforded to statutory designated national and local sites. Overall, considering Ancient Woodland, ancient/veteran trees and other irreplaceable habitats together, a **neutral weight** has been afforded. Owing to the significant residual benefits identified on habitats and certain species and the potential BNG, a **moderate positive weight** has been afforded to the protection and enhancement of habitats and species.

Water Environment

Planning Policy Context

Flood Risk

8.3.64 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. Paragraph 5.8.2 of NPS EN-1 notes 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. Paragraph 5.8.2 also acknowledges that flooding cannot be wholly prevented, although its adverse impacts can be avoided or reduced through good planning and management.

8.3.65 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 and to steer new development to areas with the lowest risk of flooding. Paragraph 5.8.7 of NPS EN-1 notes that, should new energy infrastructure be, exceptionally, '*necessary in flood risk areas (for example where there are no reasonably available sites in areas at lower risk), policy aims to make it safe for its lifetime without increasing flood risk elsewhere and, where possible, by reducing 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.

8.3.66 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.

8.3.67 Paragraph 2.4.11 of NPS EN-3 recognises that solar may also be proposed in low lying exposed sites and for these, applicants should consider how plant will be resilient to increased risk of flooding; and impact of higher temperatures.

8.3.68 Paragraph 5.8.13 of NPS EN-1 requires applications for energy projects of 1ha or greater in Flood Zone 1 and all proposals for energy projects located in Flood Zones 2 and 3 should be accompanied by a Flood Risk Assessment (FRA). NPS EN-1 refers to the NPPF and the associated Flood Risk and Coastal Change Planning Practice Guidance (PPG) for further details regarding the minimum requirements for FRA. Paragraph 2.10.76 of EN-3 acknowledges, however, that '*As solar PV panels will drain to the existing ground, the impact will not, in general, be significant*'.

8.3.69 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. The NPPF sets out the requirement for the Sequential Test in paragraphs 171 to 177.

8.3.70 A draft NPPF under consultation includes an update on flood risk regarding Sequential and Exception Tests, which has been amended to reflect changes to paragraph 027 within the PPG. This states that:

- *'The sequential test should be applied to 'Major' and 'Non-major' development proposed in areas at risk of flooding, as set out in paragraphs 173 to 174 of the National Planning Policy Framework. Paragraphs 175, 176 and 180 set out exemptions from the sequential test'.*

- *'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 Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied.'*

8.3.71 At local level, Policy 2 'Sustainable Communities' of the GNLP seeks to locate development away from areas of flood risk by applying the Sequential and Exception Tests and ensuring that flood risk is not increased elsewhere. Policy DM4.2 'Sustainable Drainage and Water Management' of SNC's DMPD seeks sustainable drainage measures to minimise flood risk.

Water Quality

8.3.72 With regard to water quality, paragraphs 5.16.1 and 5.16.2 of NPS EN-1 recognise that infrastructure can have adverse effects on the water environment across all phases, through for example, an increased risk of discharges and spills and leaks of pollutants to the water environment.

8.3.73 Paragraph 5.16.6 of NPS EN-1 seeks for that '*Applicants should avoid locating potentially polluting activities in the most sensitive locations for groundwater, in particular Source Protection Zone 1 (SPZ) and close to nationally important drinking water supplies. Applicants should consider implementing protective measures to control the risk of pollution to groundwater, for example, through the use of protective barriers*'.

8.3.74 Paragraph 5.16.7 of NPS EN-1 (Ref 2) requires for an ES to describe the existing quality of waters and the impacts on water quality, water bodies or protected areas under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and SPZ around potable groundwater abstractions.

8.3.75 In decision making, paragraph 5.16.13 of NPS EN-1 (Ref 2) refers to the SoS requiring giving impacts on the water environment more weight where there is an adverse effect on the achievement of the environmental objectives established under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.

8.3.76 Policy DM4.2 'Sustainable Drainage and Water Management' of SNC's DMPD states that all developments most not cause any deterioration in water quality and treatment measures must be included in the drainage system.

Applicant Assessment

8.3.77 A sequential, risk-based approach has been adopted during the design process of the Scheme. Embedded mitigation such as design offsets buffers, surface water drainage systems and commitments to the design of access tracks have been incorporated within the design to manage flood risk and minimise impacts on water quality from pollution risks, are secured in the **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]** and the **Outline OEMP [EN0110014/APP/7.2]**.

8.3.78 As described in the **Outline Cable Route Construction Statement [EN0110014/APP/7.21]** and secured through the **Outline CEMP [EN0110014/APP/7.1]**, the two main rivers (Hempnall Beck and the River Tas), together with some tributaries of the Hempnall Beck, will be 'Avoidance Areas' that will be subject to trenchless crossings during the laying of cables in the CRC during the construction phase. Where crossings would be required over watercourses, the default will be to take the form of least invasive, most sensitive method as set out in **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]** and the **Outline CEMP [EN0110014/APP/7.1]**.

8.3.79 Small areas of Flood Zones 2 and 3 are located in Sub-Site 7B, Sub-Sites 8A, Sub-Site 8B and across parts of the CRC. Whilst the National Grid Substation, Project Substations, BESS and Solar PV Arrays would be located in Flood Zone 1, away from the highest areas of flood risk, works in connection with Work No.1(d), Work No.6B, Work No.7, Work No.9 and Work No.10) would encroach on Flood Zones 2 and 3.

8.3.80 As a result, a proportionate Sequential Test and Exception Test have been undertaken in accordance with the policy requirements, as presented in **Appendix A** of this Planning Statement. Annex 3 of the NPPF, which defines solar infrastructure as 'Essential Infrastructure' and permissible in Flood Zone 3 where the Exception Test can be demonstrated. **Appendix A** of this Planning Statement demonstrates that the Sequential Test is satisfied. The Exception Test demonstrates the substantial benefits that the Scheme would deliver and that the Scheme would be made safe for its lifetime without increasing risk elsewhere. Measures embedded within the Scheme are described in the **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]**, **Outline CEMP [EN0110014/APP/7.1]** and the **Outline OEMP [EN0110014/APP/7.2]**.

8.3.81 In accordance with policy requirements, the DCO Application is accompanied by an FRA which is presented in **ES Volume 3, Appendix 9.2 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**. This considers flood risk from all sources of flooding and the surface water drainage requirements for the Scheme. Whilst the National Grid Substation, BESS and the Project Substation in Sub-Site 1B contain isolated areas of surface water flood risk, this will be managed through the surface water drainage strategy, as secured in the **Outline OEMP [EN0110014/APP/7.2]** and the **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]**. The Solar PV Arrays would be raised up on pile driven supports (or concrete slab/feet in areas where sensitive archaeology is present) at a significant freeboard above the ground. The Solar PV Arrays would represent a negligible increase in impermeable areas within surface flood risk areas and there will be no detrimental impact on flow routes. The surface water drainage systems will ensure that the users will remain safe from surface water flood risk for the lifetime of the Scheme and that flood risk will not increase elsewhere. Similarly, the Solar PV Arrays would remain safe and operational for the lifetime of the Scheme in accordance with EN-1 and the NPPF.

8.3.82 Owing to the presence of a Drinking Water Safeguard Zone for surface water and to manage the potential impact of contamination from surface water runoff, the drainage systems of the BESS, National Grid Substation and Project Substations will be installed with an impermeable membrane to prevent interaction with the underlying strata. Regarding the potential for pollution runoff in the case of battery fire within the BESS, the drainage system, controls and management of fire water are set out in the **Outline BSMP [EN0110014/APP/7.5]**.

8.3.83 The **Water Framework Directive Assessment [EN0110014/APP/6.3.9.2]** concludes that with embedded mitigation, the Scheme will not cause deterioration of the Water Framework Directive (WFD) classifications or prevent future work improving the WFD water body classifications. Pollution risk will be mitigated and minimised through the adoption of best practice and measures set out in the **Outline CEMP [EN0110014/APP/7.1]**, **Outline OEMP [EN0110014/APP/7.2], Outline BSMP [EN0110014/APP/7.5]** and **Outline DEMP [EN0110014/APP/7.3]**. In summary, the Scheme is compliant with the WFD objectives.

8.3.84 Anglian Water Services has advised that the region is identified as 'seriously stressed' in the EA 2021 classification of water stressed areas and there is a significant risk that water supplies may not be available to meet new non-domestic demands. Consequently, a **Water Resources Assessment [EN0110014/APP/6.3.9.3]** has been undertaken that considers potable and non-potable water supply options for the Scheme. Water neutrality options have been given priority to reduce the supply requirements. These options include rainwater harvesting, water storage and tankering (to meet peak demand). Tankering is the preferred method.

8.3.85 **ES Volume 1, Chapter 9 – Water Environment [EN0110014/APP/6.1.9]** presents an assessment of the impacts of the Scheme on flood risk, water quality and water resource during the construction, operation and decommissioning phases. This includes consideration of impacts on thermal dynamics (heat pollution), water supplies, Water Resource Zones and SPZ. With embedded design and mitigation, no significant residual adverse effects have been identified, although a significant beneficial effect on watercourses have been identified in relation to nutrient loads. This relies on controls embedded within the design of the Scheme and the aforementioned management plans. The surface water drainage arrangements will be subject to further refinement at the detailed design stage.

Summary

8.3.86 Paragraph 5.8.36 of NPS EN-1 describes the tests that the SoS must be satisfied are met to grant development consent from a water environment. In turn, the Applicant considers that:

- The DCO Application is accompanied by an FRA as set out in **ES Volume 3, Appendix 9.2 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**;
- The Sequential Test has been applied during the site selection process as presented in the **Site Selection Assessment [EN0110014/APP/7.20]** and a sequential approach applied to the design and layout of the Scheme as described in **Appendix A** of this Planning Statement; and
- **ES Volume 3, Appendix 9.2 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]** has been prepared in accordance with planning policy and takes into account the

requirements of the Environment Agency, SNC and NCC policy and guidance. This sets out an appropriate drainage strategy for the Scheme. **ES Volume 3, Appendix 9.2 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]** confirms that the Scheme would remain safe and operational for the lifetime in accordance national planning policy and not increase flood risk elsewhere.

8.3.87 Overall, the Scheme demonstrates compliance with national and local planning policy, and the objectives of the WFD; through implementation of embedded mitigation, no significant residual adverse effects on the water environment during the construction, operational and decommissioning phases have been identified in the assessment. It is therefore considered that impacts on flood risk, drainage, water quality and resources should be afforded **neutral weight** in the planning balance.

Historic Environment

Planning Policy Context

8.3.88 Paragraph 5.9.3 of NPS EN-1 defines that 'heritage assets' can constitute, for example but not limited to, buildings, places or landscapes, or a combination of these. 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. Paragraph 2.10.102 of NPS EN-3 acknowledges that solar may have a positive effect though removing land from regular ploughing.

8.3.89 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. Paragraph 5.9.12 of NPS EN-1 states that a description of the significance of the heritage assets, including any contribution made by its setting, should be proportionate to the importance of the heritage asset and included in the ES. Paragraph 207 of the NPPF also requires applicants to describe the significance of any heritage asset affected, including any contribution made by its setting.

8.3.90 Paragraph 5.9.17 of NPS EN-1 states that where applicants seek to develop within Conservation Areas and/or within the setting of heritage assets, opportunities should be explored to enhance or better reveal a heritage asset's significance.

8.3.91 Paragraph 5.9.13 of NPS EN-1 states that where a site includes… *'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'*. Paragraphs 2.10.105 and 2.10.107 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.

8.3.92 Paragraph 2.10.108 of NPS EN-3 states applications should take account of the results of historic environmental assessments in their design.

8.3.93 In decision-making, paragraphs 5.9.25 and 5.9.26 of NPS EN-1 states that the SoS should consider the nature of the significance of the heritage assets and the value, together with '*the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution that their conservation can make to sustainable communities*'. When considering the significance of a designated heritage asset, the SoS should give great weight to the asset's conservation.

8.3.94 At local level, Policy 3 'Environmental Protection and Enhancement' of the GNLP seeks to avoid harm to heritage assets and their setting, having regard to their level of significance in accordance with the NPPF and in other Development Plan Documents and Neighbourhood Plans. The policy also seeks, where appropriate, heritage interpretation measures to enhance the appreciation and understanding of heritage assets. Policy DM1.10 'Heritage Assets' of SNC's DMPD places considerable importance and weight on the desirability of preserving listed buildings, their settings and the character and appearance of Conservation Areas.

Substantial Harm and Less than Substantial Harm

8.3.95 With regard to 'substantial harm' and 'less than substantial harm', paragraph 5.9.28 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'*.

8.3.96 Paragraph 212 of the NPPF aligns with paragraph 5.9.28 of NPS EN-1. NPS EN-1 paragraphs 5.9.29 to 5.9.31 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.

8.3.97 Where there is a substantial harm to or loss of significance of a designated heritage asset, the SoS should refuse consent unless the tests set out in NPS EN-1 paragraph 5.9.32 can be met (for instance, that the harm is outweighed by the substantial public benefits of the development).

8.3.98 Paragraph 5.9.33 of NPS EN-1 states that where there is a *'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'*. With regard to non-designated heritage assets, paragraph 5.9.34 of NPS EN-1 states that 'a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.

8.3.99 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.

8.3.100 At local level, Policy DM4.10 'Heritage Assets' of SNC's DMPD refers to substantial harm (or total loss) will only be justified where substantial benefits can be demonstrated and less than substantial harm (which is afforded considerable importance) will only be justified where the public benefits outweigh the harm. Proposals adversely affecting the significance of a heritage asset will only exceptionally be permitted where justification is provided. Policy DM4.1 'Renewable Energy' of SNC's DMPD states that when attributing weight to any harm, including heritage assets regard will be given to national policy and guidance, statutory duty and legislation.

Applicant Assessment

8.3.101 The Applicant has sought to apply the mitigation hierarchy during the design process to avoid, reduce or mitigate impacts on heritage assets and their setting. Embedded measures have been designed into the Scheme in accordance with the aim of paragraph 2.10.108 of NPS EN-3. A project level design principle (**Table 2.1**) is to consider the setting of heritage assets and mitigate any impact by design, where practicable. As part of the design process, measures have been embedded within the design of the Scheme, including but not limited to:

- The setback of Solar PV Arrays from northern Order Limits of Site 3 away from Lundy Green to ensure reduced or removed visibility from listed buildings within the settlement;
- The setback of Solar PV Arrays from the southern Order Limits of Sub-Site 4B to ensure reduced or removed visibility from the Grade I listed Church of St Michael and other listed buildings;
- The setback of the Solar PV Arrays from the southern Order Limits of Sub-Site 5B to remove and/or reduce visibility from Fritton Conservation Area and listed buildings;

- The setback of the Solar PV Arrays from the southern boundary of Sub-Site 7C to reduce visibility from listed buildings;
- Removal of Solar PV Arrays from the northern part of Sub-Site 8B to ensure no infringement on the setting of a listed building;
- Removal of Solar PV Arrays from the western part of Site 9 to minimise impacts on Brook Conservation Area; and
- Visual screening in the form of new hedgerow and tree planting and enhancement of existing vegetation.

8.3.102 Setbacks incorporated into the design of the built form of the Scheme are secured by the **Works Plan [EN0110014/APP/2.3]** and the **Design Principles, Parameters and Commitment [EN0110014/APP/7.18]**. The **Green Infrastructure Strategy** and the prescriptions and management of the proposed landscaping is secured through the **Outline LEMP [EN0110014/APP/7.4]**.

8.3.103 The locations of the temporary construction compounds have been sited to avoid areas of known archaeological remains wherever possible and to be unobtrusive to the settings of heritage assets. During construction, it is acknowledged that temporary hedgerow removal would be required for access and construction activities. As set out in the **Outline LEMP [EN0110014/APP/7.4]**, where required, temporary hedgerow removal would be a maximum of 10m in length. In addition, measures are documented in the **Outline CEMP [EN0110014/APP/7.1]**, **Outline OEMP [EN0110014/APP/7.2]** and **Outline DEMP [EN0110014/APP/7.3]** to minimise impacts on designated and non-designated heritage assets.

8.3.104 In accordance with paragraph 5.9.13 of NPS EN-1 and paragraphs 2.10.105 to 2.10.107 of NPS EN-3, desk-based assessments have been undertaken, as present in **ES Volume 3, Appendix 10.1 - Heritage Statement [EN0110014/APP/6.3.10.1]** and in **ES Volume 3, Appendix 10.2 – Archaeological Desk Based Assessment [EN0110014/APP/6.3.10.2]**. In consultation with the LPA, a geophysical survey and targeted archaeological trial trenching of the Sites have been undertaken, with the findings presented in **ES Volume 3, Appendix 10.3 – Geophysical Survey [EN0110014/APP/6.3.10.3]** and **ES Volume 3, Appendix 10.5 – Evaluation Trenching Report [EN0110014/APP/6.3.10.5]**. A geophysical survey of the CRC will be completed pre-consent.

8.3.105 Additional mitigation for the construction phase includes an **Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6]**. This provides the overarching methodology for undertaking a programme of archaeological mitigation. For buried archaeological remains, additional mitigation would be in the form of ‘preservation in situ’ or ‘preservation by record’. Mitigation will be led by, and proportionate to, the below ground impacts of the Scheme. The mitigation measures for the archaeological resource will be secured via a Requirement of the DCO.

8.3.106 **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]** and **ES Volume 3, Appendix 10.1 - Heritage Statement [EN0110014/APP/6.3.10.1]** presents an assessment of the impacts on archaeological assets and designated and non-designated heritage assets during construction, operation and the decommissioning phases. In accordance with paragraph 5.9.12 of NPS EN-1 and paragraph 207 of the NPPF, the assessment provides a description of the significance of the heritage asset.

8.3.107 With embedded and additional mitigation in place, **ES Volume 1, Chapter 10 – Cultural Heritage [EN0110014/APP/6.1.10]** concludes that:

- No significant adverse residual effects on archaeological remains during the construction phase (neutral);
- No significant adverse residual effects on the historic landscape character during the construction phase (negligible);
- No significant adverse residual effects on designated heritage assets (neutral);
- No significant adverse residual effects on the setting of the Camp in Village (Tasburgh Hillfort) Scheduled Monument (neutral) during the operational phase;
- No significant adverse residual effects on the setting of Fritton Conservation Area, Saxlingham Green Conservation Area and Brooke Conservation Area (neutral) during the operational phase; and
- No significant adverse residual effects on the setting of Grade I, II* or II listed buildings (neutral, minor/negligible) during the operational phase.

Substantial Harm and Less than Substantial Harm

8.3.108 **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]** outlines that ‘substantial harm’ is afforded to any adverse effect that is of a high magnitude of impact, whilst a medium magnitude of impact would represent ‘less than substantial harm’.

8.3.109 Substantial harm to, or total loss of, any designated heritage assets’ significance as a result of the Scheme is not anticipated. Therefore, the policy tests regarding substantial harm outlined in NPS EN-1 do not apply.

8.3.110 **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]** concludes that following embedded mitigation, there will be no harm to the majority of designated heritage assets and no harm to all the non-designated heritage assets. For two designated heritage assets, Moulton Farmhouse and Barn Cottages Grade II listed buildings, the assessment found minor adverse/negligible effects owing to the change in the settings. The level of harm caused by this impact is considered to be 'less than substantial harm' at the lower end of the scale. For Barn Cottages, this will be reduced to no harm once the landscaping screening has matured.

8.3.111 In recognising that the Scheme will result in harm of a 'less than substantial' nature, the key policy test of NPS EN-1 (5.9.33 of NPS EN-1) and local policy 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 shows substantial public benefits that outweigh the less substantial harm identified.

Summary

8.3.112 The design process of the Scheme has considered above and below ground heritage assets, with measures embedded into the design of the Scheme and management plans submitted with the DCO Application. By implementing good design during the design, such as setbacks from heritage assets, the Scheme has avoided and minimised conflict with designated and non-designated heritage assets as far as practicable. With embedded and additional mitigation measures in place, no significant residual effects on heritage assets have been identified.

8.3.113 Less than substantial harm has been identified in relation to two listed buildings: the Grade II listed Moulton Farmhouse and the Grade II listed Barn Cottages. No harm has been identified for the remaining designated heritage assets nor non-designated heritage assets. In accordance with NPS EN-1 paragraph 5.9.33 (and taking account of the principles set out by 4.2.16 and 4.2.17 of NPS EN-1 regarding CNP Infrastructure), the substantial public benefits and need for the Scheme as set out in Sections 5 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.

8.3.114 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

Planning Policy Context

8.3.115 Paragraph 5.10.5 of NPS EN-1 makes 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'*.

8.3.116 With the above in mind, paragraph 5.10.1 of NPS EN-1 establishes that the context of the proposal is important since *'the landscape and visual effects…will vary on a case-by-case basis according to the type of development, its location and the landscape setting'*.

8.3.117 With regard to the Scheme's context, paragraph 5.10.12 of NPS EN-1 recognises that 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*'.

8.3.118 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*'.

8.3.119 Paragraph 5.10.26 of NPS EN-1 recognises that any reduction in the scale of energy infrastructure, to mitigate adverse effects, may result in a significant operational constraint or reduction in function. There may be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function. In decision-making, the SoS should balance the loss of function with any potential reduction in adverse landscape and/or visual effects.

8.3.120 Paragraph 2.9.7 of NPS EN-5 recognises that in practice, new overhead lines can give rise to adverse landscape and visual impacts. Paragraph 2.9.10 of NPS EN-5 states that 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. Paragraphs 2.9.16-2.9.19 of NPS EN-5 set out the Holford Rules, which provide guidelines for the routing of overhead lines to minimise visual and environmental impacts; and the Horlock Rules, which provide guidelines for the siting and design of substations and other related infrastructure.

8.3.121 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.

8.3.122 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;
- Consider landscape and visual in the design process, where site choices and design principles are being established;
- Include the effects on landscape components and character during construction and operation;
- Consider the visibility and conspicuousness during construction and operation and potential impacts on views and visual amenity; and
- Address the landscape and visual effects of light pollution and other emissions from construction and operational activities and how these will be minimised (NPS EN-1 paragraph 5.10.17-5.10.22).

8.3.123 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.

8.3.124 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.

8.3.125 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*'.

8.3.126 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, having regard to other constraints, whilst paragraph 5.10.37 of NPS EN1 confirms that in decision-making the SoS should consider whether the project has been designed carefully to minimise harm to the landscape, including by appropriate mitigation.

8.3.127 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 and how it sits within and relates to a landscape is sometimes considered the most important factor in good design, however, that the functionality including fitness for purpose and sustainability, is equally important. Paragraph 2.10.90 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.

8.3.128 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 of lines 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 to minimise the overall visual impact on the landscape, ensuring that towers are of the smallest possible footprint and internal volume; and the rationalisation, reconfiguration, and/or undergrounding of existing electricity networks infrastructure.

8.3.129 Paragraph 2.11.2 of NPS EN-5 states that the SoS 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 SoS 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.

8.3.130 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 landscape setting. Careful consideration of colours and sympathetic landscaping can also support the delivery of a well-designed scheme. Paragraph 4.7.6 of NPS EN-1 recognises that applicants may have very limited choice in the physical appearance of energy infrastructure, although there may be opportunities to demonstrate good design. Paragraphs 4.7.11 – 4.7.12 of NPS EN-1 state that the SoS must therefore weigh the ultimate purpose of the infrastructure (taking into account operational, safety, and security requirements) against considerations of aesthetics.

8.3.131 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.

8.3.132 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. Paragraph 2.10.92 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*'.

8.3.133 Paragraph 2.10.35 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'*.

8.3.134 Policy 1 'The Sustainable Growth Strategy' of the GNLP and Policy 2 'Sustainable Communities' seek improvements to the green infrastructure network. Policy 3 'Environmental Protection and Enhancement' refers to the design respecting landscape character and retaining important views and features, having regard to LCA and sensitive areas. This policy also seeks contributions to the green infrastructure, having regard to green infrastructure strategies.

8.3.135 In SNC'S DMPD, Policy DM4.1 'Renewable Energy' refers to the effects on landscape character and appearance. Policy DM3.8 'Design Principles Applying to All Development' sets out the criteria for design, which includes that landscaping should retain important existing natural features and reflect the surrounding landscape characteristics. Similarly, Policy DM4.8 'Protection of Trees and Hedgerows' promotes the retention and conservation of significant trees, woodlands, traditional orchards and 'important' hedgerows. Policy DM4.5 'Landscape Character and River Valleys' states that all development should respect, conserve and, where possible, enhance landscape character. In particular, the policy states that regard will be had to protecting the distinctive characteristics, special qualities and geographical extents of the identified Rural River Valleys. Development will be refused where significant adverse impacts on the distinctive landscape characteristics. Policy DM4.9 'Incorporating Landscape into Design' seeks high quality of landscape design and management.

8.3.136 The Landscape Susceptibility in relation to Energy Generation, Storage and Transmission Supplementary Planning Document (SPD) consultation, concluded in September 2025. At the time of writing, the SPD has not yet been formally adopted. Further, the SPD was not developed specifically for NSIP and for reasons set out in **ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.1.7]**, it is not considered to be directly applicable to the Scheme.

Applicant Assessment

Good Design, Evolution and Application of the Mitigation Hierarchy

8.3.137 In accordance with paragraph 4.7.4 of NPS EN-1, paragraph 2.7.69 of NPS EN-3 and paragraph 135 of the NPPF, fulfilling the requirement for good design and demonstrating adherence to the mitigation hierarchy has been an important factor in the design process.

8.3.138 Landscape designations were considered in the site selection process as set out in the **Site Selection Assessment [EN0110014/APP/7.20]** and the landscape and visual context of the Order Limits in the design approach to the Scheme as described in the **Design Approach Document [EN0110014/APP/7.17]**.

8.3.139 The hierarchical mitigation approach adopted has been to:

- Avoid where practicable, effects through the overall design and layout of the Scheme;
- Reduce effects as far as practicable through **the Green Infrastructure Strategy** (see **Outline LEMP [EN0110014/APP/7.4]**); and
- Additional mitigation through the compensation of potential losses (for the Scheme, no additional mitigation has been identified).

8.3.140 Embedded mitigation within the Scheme is described in **ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.17]**. In accordance with the mitigation hierarchy, the design has focused on avoiding environmental constraints as far as practicable. This has included developing buffers (offsets) to existing green infrastructure assets to retain and protect key landscape features, offsets from PRoW and from individual residential dwellings. In addition, as far as practicable, Solar PV Arrays have been set back and reduced in parts of the Sites, for example, where the landscape is more visually prominent owing to the topography and within a more sensitive landscape area, such as at Sub-Site 8B.

8.3.141 As set out in **Table 2.1**, landscape has been a key design principle in the design evolution of the Scheme, for example, in terms of responding to the landscape character, retention of key landscape features and the fabric of Order Limits as far as practicable, strengthening and creating new habitat features and provision of green infrastructure that respond positively to the setting and the prevailing landscape character.

8.3.142 Alongside Ancient Woodland, significant trees such as veteran trees will be retained, as set out in **ES Volume 3, Appendix 7.10 - Preliminary Arboricultural Impact Assessment [EN0110014/APP/6.3.7.10]**. Hedgerows would be retained as far as practicable, although some hedgerow removal would be required.

8.3.143 Embedded mitigation is encapsulated within the project level design principles set out above, together with the measures secured through the **Outline CEMP [EN0110014/APP/7.1]**, **Outline OEMP [EN0110014/APP/7.2]**, **Outline LEMP [EN0110014/APP/7.4]**, **Outline PRoWPPMP [EN0110014/APP/7.8]** and **Outline DEMP [EN0110014/APP/7.3]** with respect to landscape.

8.3.144 As embedded mitigation, the **Outline CEMP [EN0110014/APP/7.1]** secures measures during the construction phase such as in relation to lighting, working practices, protection of trees (including veteran trees) and Avoidance Areas. Hedgerow removal in the CRC would be temporary and will be replanted/reinstated once the cable installation is complete, as set out in the **Outline LEMP [EN0110014/APP/7.4]**.

8.3.145 Embedded measures for the construction and operation phases are also set out in the **Outline LEMP [EN0110014/APP/7.4]**. This sets out prescriptions and the management for the proposed landscape and ecological measures. This is to support the establishment of the Scheme. The overall aim of the **Outline LEMP [EN0110014/APP/7.4]** is to provide ecological enhancement, strengthen the green infrastructure within the local area and support landscape and visual mitigation requirements as identified in **ES Volume 1, Chapter: 7 - Landscape and Visual [EN0110014/APP/6.1.7]**. In addition, the **Outline LEMP [EN0110014/APP/7.4]** outlines the prescriptions and management of community accessible space and permissive paths.

8.3.146 The **Outline LEMP [EN0110014/APP/7.4]** includes the **Green Infrastructure Strategy** for the Scheme, which includes:

- Visual screening: measures which provide a specific visual barrier to minimise and limit visibility of the Scheme and reduce effects on visual amenity from specific visual receptors;
- Landscape integration: measures which respond to their surrounding natural environment; and
- Nature conservation and biodiversity: measures to maintain and restore habitats (and features).

8.3.147 **ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.17]** confirms that no additional landscape and visual mitigation and enhancement measures have been identified owing to the incorporation of embedded mitigation as an integral part of the Scheme.

Landscape and Visual Residual Effects

8.3.148 An assessment of the construction, operation and decommissioning phases of the Scheme on the NCA and LCA and landscape character and features of within the Order Limits is provided in **ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.17]** and associated appendices.

8.3.149 Having applied the mitigation hierarchy and incorporated embedded measures within the design of the Scheme, significant residual adverse effects have been identified on the landscape character (NCA and LCA) in **Table 7.14** of **ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.17]** during the construction, operation (Year 1 and 15) and decommissioning phases. Policy DM4.5 of SNC's DMPD refers to protecting the distinctive characteristics, special qualities and geographical

extents of the Rural River Valleys. The Scheme extents into the A1 Tas Rural River Valley LCA and whilst during construction, the residual adverse effect is assessed as significant, during operation and decommissioning phases no significant residual effect has been identified on the A1 Tas Rural River Valley LCA.

8.3.150 As set out in **Table 7.14** of **ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.17]**, significant residual adverse effects have been identified on the landscape character and features within the Order Limits during the construction, operation (Year 1 and 15) and decommissioning phases. After Year 15 of operation, the number of significant residual adverse effects would reduce to 4 receptors compared to 10 receptors at Year 1 of operation. Significant residual adverse effects on the landscape character and features within the Order Limits would remain in relation to the BESS Site, Site 1, Site 7 and Site 8.

8.3.151 As reported in **Table 7.14** of **ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.17]**, a significant residual adverse effect on visual amenity have also been identified on a recreational route (Via Beata Way) during the construction phase. No significant residual adverse effects have been identified on Via Beata Way or Boudicca Way recreational routes during operation. Significant residual adverse effects have been identified in relation to various representative locations on PRoW during all phases of the Scheme. At Year 1 of operation the Scheme has been assessed to have significant adverse effects at 53 representative locations, reducing to 17 representative locations in Year 15 of operation.

8.3.152 **ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.17]** also presents an assessment of the cumulative landscape and visual effects during all phases of the Scheme. No significant adverse cumulative effects were identified in relation to NCA, LCA, recreational routes and PRoW.

8.3.153 The mitigation hierarchy for landscape and visual amenity have been applied during the design process of the Scheme and the landscape and visual impacts have been minimised as far as practicable. The **Green Infrastructure Strategy** (see **Outline LEMP [EN0110014/APP/7.4]**) has sought to balance the requirements for visual screening (achieved through a range of new vegetation) against the defining visual qualities, with the landscape comprising large scale field structure with relatively open views. Taking into account the landscape context, the significant residual adverse effects identified cannot be mitigated further. Through the adoption of good design, including the application of the mitigation hierarchy and project level design principes, a robust approach to secure good design would be achieved. Despite this approach, some significant residual landscape and visual effects would remain.

8.3.154 Extensive planting enhancements are proposed within the Sites of the Scheme as part of the **Green Infrastructure Strategy** in the **Outline LEMP [EN0110014/APP/7.14]**, which also sets out the proposed management and monitoring regime. Such landscape enhancement measures would include hedgerow infill planting, hedgerow tree planting, hedgerow laying/coppicing, which would improve green infrastructure and landscape connectivity. The Scheme would also provide community accessible spaces and permissive paths connecting people to the landscape.

8.3.155 Post-decommissioning, the landowners would choose how the land is to be used and managed, however, it is anticipated that some areas of habitat mitigation and enhancement within the Sites may be left in-situ.

8.3.156 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'*.

8.3.157 Section 5 of this Planning Statement and the **Statement of Need [EN0110014/APP/7.11]** sets out the critical need for the Scheme. Section 9 of this Planning Statement sets out the assessed planning balance of the Scheme and concludes that the significant adverse effects 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.

Residential Visual Amenity

8.3.158 Residential Visual Amenity refers to the overall quality, experience, and nature of views and outlook available to occupants of residential properties, including views from gardens and domestic curtilage. A Residential Visual Amenity is carried out to assist decision-makers in understanding whether a development result in a level of visual harm that could be considered a material consideration. As stated in Section 1.1.3 of TGN 2/19 '*The planning system is designed to act in the public interest; private interests are considered by planners in 'planning considerations', this includes weighing effects on Residential Amenity*'.

8.3.159 **ES Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [EN0110014/APP/6.3.7.8]** concludes that following an initial assessment of residential properties and a detailed assessment of two residential properties, no residential properties were found to meet the Visual Amenity Threshold. It was considered that the Scheme would overall not have overwhelming, dominating and/or overbearing effects on the visual amenity experienced by residents of the properties.

Summary

8.3.160 Residual landscape and visual effects have been reduced as far as practicable through the mitigation hierarchy and appropriate mitigation as recognised in paragraph 5.10.37 of NPS EN-1. Further, the SoS should 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 SoS should also take into account the reversibility of the Scheme and its associated residual adverse effects.

8.3.161 With the critical and urgent need for the Scheme enshrined in national policy, it is considered that the 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.

8.3.162 As set out in Sections 5.6 and 10 of the Planning Statement, it is considered that the wider substantial benefits of the Scheme as CNP Infrastructure, including delivery of a significant level of low carbon energy generation, ecological and landscape enhancements, biodiversity net gain, provision of permissive paths and community accessible space, together with employment, education and training outweigh the significant adverse residual effects of the Scheme. Paragraph 4.1.7 of NPS EN-1 explains that '*For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects not capable of being addressed by application of the mitigation hierarchy, in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, or irreplaceable habitats*'. This confirms that the significant residual adverse effects are unlikely to outweigh the urgent need for the Scheme in all but the most exceptional circumstances.

8.3.163 Therefore, the Scheme is considered acceptable in terms of its overall landscape, visual and residential amenity impacts and that the nature of the landscape and visual effects are not considered to outweigh the substantial benefits of the Scheme. 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 design approach adopted for the Scheme. The Scheme is also considered compliant with NPS EN-1, NPS EN-3, NPS EN-5, the NPPF and relevant local policy. Owing to the provision of extensive green infrastructure assets which would be beneficial, it is considered that overall and, on balance, the landscape effects of the Scheme should be afforded **moderate negative weight** in the planning balance and similarly the visual effects should be afforded a **moderate negative weight** in the planning balance.

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

Planning Policy Context

Green Belt

8.3.164 Applicants should determine whether their proposal is within Green Belt and, if it is, whether their proposal may be inappropriate development (paragraph 5.11.20 of NPS EN-1 (Ref 2)).

Land Use and Agricultural Land

8.3.165 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-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 (paragraph 2.10.21).

8.3.166 Where undeveloped greenfield land cannot be avoided, applicants should seek to minimise impacts on BMV quality land. Paragraphs 2.10.21– 2.10.26 of NPS EN-3 (Ref 3) relate to ALC and land type. It sets out a preference for poorer quality land to higher quality land avoiding the use of BMV land, where possible. However, the policy also recognises that BMV land is not prohibited and at this scale, it is likely that some use of agricultural land will be required. 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.

8.3.167 Paragraph 2.10.25 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.

8.3.168 As part of the decision-making, under paragraph 5.11.34 of NPS EN-1, the SoS is to ensure that applicants do not locate schemes on BMV land without justification. Should BMV land be used, the SoS should take account of the economic and other benefits of that land and measures put forward to minimise impacts on soils or soil resource (paragraph 2.10.137 of NPS EN-3. This approach is also reflected in the 2024 Written Ministerial Statement (WMS): ‘Solar and protecting our Food Security and Best and Most Versatile Land (BMV) Land’ (2024 WMS) 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. Further reference is made to the use of BMV in the 2015 WMS Planning Update (2015 WMS). The 2015 WMS 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.

8.3.169 Naturally, 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). 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 including the protection of soils (paragraph 5.11.23 of NPS EN-3) through mitigation measures.

8.3.170 Paragraphs 5.11.14 of NPS EN-1 (Ref 2) and 2.10.26 of NPS EN-3 (Ref 3) seeks the implementation of a Soil Management Plans/Soil Resources Management Plans in line with good practice guidance to ensure the sustainable use and management of soils. Paragraph 2.10.119 of NPS EN-3 (Ref 3) refers to Defra 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites' for guidance on mitigating and minimising damage to soils during the construction phase.

8.3.171 In supporting a prosperous rural economy, paragraph 88 of the NPPF supports sustainable growth in rural areas, including the diversification of agricultural land based rural businesses.

Green Infrastructure and Open Space

8.3.172 NPS EN-1 paragraph 5.11.27 (Ref 2) recognises the need to protect and retain existing trees and woodlands wherever possible, referring to the Governments' legally binding target to increase the tree canopy and woodland cover to 16.5% of total land area of England by 2050. The policy seeks for the impact on trees to be assessed and mitigation to implemented, including for example, the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management.

8.3.173 NPS EN-1, in paragraph 5.11.6, also seeks that there is adequate provision of high-quality open space to meet local community needs and recognises that connecting people with open spaces supports quality of life and healthy living. Paragraph 5.11.7 goes onto state that green and blue infrastructure can have positive environmental, social, health and economic benefits.

Contamination

8.3.174 NPS EN-1 paragraph 5.11.5 (Ref 2) states that where pre-existing land contamination is being considered within a development, the objective is to ensure the site is suitable for its intended use. NPS EN-1 paragraph 5.11.17 provides that applicants should ensure that a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination.

Applicant Assessment

Green Belt

8.3.175 The Order Limits are not located within Green Belt.

Land Use and Agricultural Land

8.3.176 The **Site Selection Assessment [EN0110014/APP/7.20]** sets out consideration of previously developed land, including brownfield land and commercial rooftops in the search for alternative sites for the Scheme. As part of the site selection process, brownfield land registers were reviewed. No suitable previously developed land was identified that covered a sufficient area to accommodate a utility-scale solar project. Previously developed land was therefore not considered as a reasonable alternative to the Scheme. On this basis, the Applicant considers that the policy test to consider previously developed land has been met.

8.3.177 Owing to the scale and nature of the Scheme, the Order Limits encompass agricultural land. At the time of the initial site selection process, the Applicant considered BMV quality land based on desk-based research using Natural England's mapping. This showed the area of the Order Limits as predominantly undifferentiated Grade 3, with scattered pockets of Grade 4 land. This map does not differentiate between Grades 3a and 3b. Natural England's map showing the likelihood of BMV land indicates the Order Limits largely as a moderate likelihood of BMV land, with pockets of higher likelihood near to the A140 Norwich Road and along the Hempnall Beck. Limited areas of low likelihood of BMV are shown between Norwich and Diss.

8.3.178 Norfolk as a County has an estimated area (from the provisional ALC maps from the 1970s) in the order of 479,000ha of agricultural land. Over 433,000ha of this is Grades 1, 2 and 3a. As calculated in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.15],** the proportion of BMV land in Norfolk is approximately 53%, which is higher than the national average and, for South Norfolk, the proportion is 42%, equivalent to the national average. The amount of BMV quality land within the Order Limits is approximately 0.22% of the land within the County and 1.2% of South Norfolk agricultural land.

8.3.179 As confirmed in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.15]**, the Order Limits was identified as likely to be some of the lowest quality land in the wider area. It is evident that, in respect of initial site selection within a reasonable distance of the grid connection point, no land is identified as likely to be of a lower quality or overall proportionate lower mix of BMV quality land.

8.3.180 As detailed in the **ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.15]**, an ALC survey of the Sites was undertaken, which excluded the CRC. This confirmed that land within the Sites of the Order Limits was a mix of mostly Grades 2 and 3a, with areas of Grade 3b, and small areas of Grade 4. BMV quality land within the Sites amounts to 829.1ha (78.7% of the Sites only; or 68.4% of the Order Limits).

8.3.181 Owing to the nature of the land quality within the Order Limits and on a wider scale, as reported in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.15]**, it has not been possible to avoid BMV quality land entirely. The steps the Applicant has taken to avoid, reduce, and subsequently mitigate impacts on BMV are summarised below.

8.3.182 The Applicant has worked with the landowners of the Sites of the Order Limits in developing the Scheme and the **Green Infrastructure Strategy** to enable the businesses to continue during the operation of the Scheme and to be converted back to agricultural use following decommissioning. No access to farms will be severed. The landowners of the Sites have entered into an option agreement for the Sites. The farms involved will benefit from the guaranteed income form the diversification of the enterprise base.

8.3.183 Along within many factors, BMV quality land was a consideration in the design evolution of the Scheme. During the design process, the Applicant sought to, where practicable, reduce the use of BMV quality land within the Solar PV Array areas, including for example, removal of pockets of BMV quality land from the Solar PV Arrays within Site 3, Sub-Site 5B, Site 6 and Sub-Site 8A during the design process. Sub-Site 3A was entirely removed from the Order Limits owing to serval factors, including its agricultural land quality (largely Grade 2). Such examples are set out in the **Design Approach Document [EN0110014/APP/7.17]**.

8.3.184 In accordance with paragraph 2.10.26 of NPS EN-3 (Ref 3), an **Outline SRMP [EN0110014/APP/7.9]** has been submitted with the DCO Application to manage soils as a resource and minimise adverse impacts during the construction and decommissioning phases of the Scheme. With the exception of the National Grid Substation and Grid Connection Infrastructure, the land would be restored to conditions as set out in the **Outline SRMP [EN0110014/APP/7.9]**.

8.3.185 **ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.15]** presents an assessment of the impacts from all stages of the Scheme on agricultural land quality, soils, local agricultural businesses and the wider effects on food production and the wider rural economy. During the construction phase, the assessment concludes that with embedded measures in place, there would be some potential permanent loss or downgrading of BMV quality land in relation to the location of Project Substations, BESS, National Grid Substation, Access Tracks and tree planting. Within these areas, this would result in significant (moderate adverse) residual adverse effects on BMV quality land. There would also be temporary residual adverse effects on soils as a resource during the

construction phase, although the assessment concluded that these would not be significant. Once operational, the assessment concludes that the Scheme would have a residual minor/negligible effect on agricultural land, with a residual minor adverse effect on farm businesses, which would not be significant. For soils, there would be a residual beneficial effect owing to the long-term resting of land from arable production, although this is not expected to be significant.

8.3.186 Impacts on agricultural land would be mostly temporary and reversible, with the exception of the land associated with the National Grid Substation and associated Grid Connection Infrastructure. The assessment concludes that for the decommissioning phase, the residual effects on agricultural land, soils and agricultural businesses would be minor adverse and not significant.

8.3.187 NPS EN-3 and the NPPF advises that the economic and other benefits of the use of BMV land should be considered. **ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.15]** provides an assessment of food production and the rural economy. Overall, the impact on the wider rural economy is expected to be limited. In respect of the economic and other benefits of BMV land within the Scheme:

- The economic benefits are about £190,000 per annum which is considered to be negligible on a regional basis; and
- The food production benefits are estimated at around 1,000 tonnes per annum incremental production benefit, which is negligible on a regional and national level.

8.3.188 No additional mitigation measures have been identified in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.15]**.

8.3.189 Paragraph 5.11.34 of NPS EN-1 (Ref 2), requires the justification of using BMV land. In summary the use of BMV land is justified because:

- During the initial site selection, no land was identified as likely to be of a lower quality or overall proportionate lower mix of BMV quality land within a reasonable distance of the point of connection;
- The location of the National Grid Substation, which would result in the permanent loss in BMV quality land, is restricted by its proximity to the existing 400kV overhead line;
- During the design evolution, BMV quality land has been removed from areas of Solar PV Arrays as far as practicable;
- The effects would be mostly temporary and reversible in nature. Taking the Scheme in its entirety, overall, for the majority of land within the Sites of the Order Limits where Solar PV Arrays are proposed, the land currently in arable production would be converted and managed as grassland coverage. This would lead to a temporary residual beneficial effect on soils;

- Parcels of land within the Sites have been retained for agricultural use. Whilst other land within the Sites would not be available for arable production, the design of the areas with Solar PV Arrays would be compatible with other farming practices, such as sheep grazing;
- Measures have been embedded into the **Outline SRMP [EN0110014/APP/7.9]** to minimise adverse impacts; and
- The Scheme's contribution to meeting the established and urgent need for renewable energy infrastructure, together with the substantial benefits identified in Section 5 of this Planning Statement.

Green Infrastructure and Open Space

8.3.190 As described above, NPS EN-1 (Ref 2) seeks an adequate provision of high-quality open space and recognises that connecting people with open spaces supports healthy living. Green and blue infrastructure can have positive environmental, social, health and economic benefits. NPS EN-1 also refers to the Governments' legally binding target to increase the tree canopy and woodland cover.

8.3.191 The PPG for the Natural Environment defines green infrastructure as *'a natural capital asset that provides multiple benefits, at a range of scales. For communities, these benefits can include enhanced wellbeing, outdoor recreation and access, enhanced biodiversity and landscapes, food and energy production, urban cooling, and the management of flood risk'*.

8.3.192 The Scheme, being located largely on existing agricultural land, is not anticipated to impact on the use and accessibility of dedicated recreational spaces such as parks, open spaces and playing fields. There are a number of PRoW and recreational routes through the Scheme and, to facilitate safe access and crossings, it is expected that there will be some temporary closures and diversions. These will be managed through measures incorporated into the **Outline PRoWPPMP [EN0110014/APP/7.8]**. The Scheme has been designed to incorporate buffers (offsets) of 15m from PRoW. The residual effects on PRoW and recreational routes have been considered above in terms of visual amenity and later in this Planning Statement in relation to access.

8.3.193 In accordance with NPS EN-1 (Ref 2), the Scheme includes the provision of permissive paths and community accessible space for pedestrian use throughout the lifetime of the Scheme, as described in Section 5 of this Planning Statement and as shown on the **Green Infrastructure Strategy** in the **Outline LEMP [EN0110014/APP/7.4]**. This would provide opportunities for greater connectivity, access and amenity use in the countryside.

8.3.194 The **Green Infrastructure Strategy** in the **Outline LEMP [EN0110014/APP/7.4]** includes for the retention and enhancement of green infrastructure assets, including restoration of ghost ponds, where practicable, together with new tree and hedgerow planting. The **Green Infrastructure Strategy** illustrates approximately 25ha of new tree planting (in addition to hedgerow tree improvements) within the Scheme. As a result, this is considered to support paragraph 5.11.27 of NPS EN-1 (Ref 2) and responds to the initiatives of the Local Nature Recovery Strategy.

Contamination

8.3.195 A ground conditions and contamination assessment is presented in **ES Volume 1, Chapter 16 – Ground Conditions [EN0110014/APP/6.1.16]** and **ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [EN0110014/APP/6.3.16.1]**. This considers potential risks and effects from existing ground contamination on human health and controlled waters. With embedded measures secured through the **Outline CEMP [EN0110014/APP/7.1]** and **Outline DEMP [[EN0110014/APP/7.3]**, the assessment concludes negligible or minor adverse effects during all phases of the Scheme, which are not deemed to be significant. **ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [EN0110014/APP/6.3.16.1]** also considers ground stability risk and unexploded ordnance (UXO) risk. Where further assessment and investigations are recommended post consent, for example, to control the risk from UXO, these have been secured in the **Outline CEMP [EN0110014/APP/7.1]**.

Summary

8.3.196 In summary, the Scheme demonstrates overall compliance with NPS EN-1 (Ref 2) and NPS EN-3 (Ref 3). Although the Scheme does include BMV land, the Applicant has sought to minimise the amount of BMV land by adopting a sequential approach. In accordance with national policy, the Applicant has sought to minimise impacts on soil health and promote soil quality through mitigation.

8.3.197 Further, NPS EN-3 (Ref 3) acknowledges that ground-mounted solar is not prohibited on BMV land and should not be a predominant factor in site selection. However, the use of agricultural land has been shown to be necessary, and the Applicant has considered the economic and other benefits of BMV quality land in line with the policy requirements. The Applicant has also provided justification for the inclusion of BMV land for the reasons set out above, including the substantial wider benefits that the Scheme will bring. However, acknowledging that the Scheme requires the use of BMV land and the significant adverse residual effects identified, it is still considered that agricultural land should be given a **moderate negative weight** in the planning balance.

8.3.198 In compliance with NPS EN-3 (Ref 3), the **Outline SRMP [EN0110014/APP/APP/7.9]** sets out the overall approach for managing soil resources affected by the Scheme during its construction, any monitoring, maintenance or replacement works, and during decommissioning of the Scheme. Soils as a resource should be afforded a **neutral weight** in the planning balance.

8.3.199 In recognition of the beneficial effects associated with the creation of permissive paths and community accessible space, these have been afforded a **moderate positive weight** in the planning balance.

8.3.200 As it is considered that the **Green Infrastructure Strategy** supports the Governments' legally binding target to increase the tree canopy, this has been afforded a **limited positive weight** in the planning balance.

8.3.201 In summary, the Applicant has assessed the existing ground conditions of the Order Limits for pre-existing ground contamination and the likely effects of the Scheme in relation to ground conditions. The risks and associated effects can be appropriately controlled to acceptable standards in accordance with relevant legislation and measures set out in the management plans. The Applicant considers the Scheme to be in compliance with NPS EN-1 (Ref 2) in relation to ground conditions, which should be given **neutral weight** in the planning balance.

Noise and Vibration

Planning Policy Context

8.3.202 Paragraph 5.12.5 of NPS EN-1 (Ref 2) identifies the factors that will determine the likely noise and vibration impacts. This includes inherent operational noise, proximity to sensitive noise receptors, proximity to 'quiet places' and other areas valued for landscape quality.

8.3.203 Paragraph 5.12.6 of NPS EN-1 (Ref 2) sets out requirements for noise and vibration assessments and includes, for example, but not limited to, the requirement that applicants to describe noise generating activities, identify noise sensitive receptors and assess the changes to the noise environment compared to the baseline and provide reasonable mitigation to minimise effects on health. Paragraph 5.12.8 of NPS EN-1 (Ref 2) makes clear that applicants should also consider the noise impacts of ancillary activities, such as increases in road traffic.

8.3.204 Paragraph 5.12.15 of NPS EN-1 (Ref 2) confirms that, as forms of embedded mitigation, good design should be demonstrated 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.

8.3.205 Paragraph 2.10.153 of NPS EN-3 (Ref 3) states that, once operational, traffic movements to and from proposed solar farms are generally 'very light' and so, under paragraph 2.10.154 of NPS EN-3 (Ref 3), the SoS is unlikely to give any more than limited weight to noise and vibration from traffic. In decision-making, paragraph 5.12.17 of NPS EN-1 (Ref 2) outlines that the SoS 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.

8.3.206 Section 2.10 of NPS EN-3 (Ref 3) considers solar generation and outlines impact considerations. Paragraphs 2.10.112-118 specifically considers the impact of construction, including traffic and transport noise, as well as vibration.

8.3.207 In some cases, it may be requested by the local highway authority for the SoS 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 2.10.131 of NPS EN-3 (Ref 3).

8.3.208 Paragraphs 2.9.27 to 2.9.44 of NPS EN-5 (Ref 5) set out specific noise 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.

8.3.209 Paragraph 2.9.27 of NPS EN-5 (Ref 5) states that all high voltage transmission lines have the potential to generate noise under certain conditions. Paragraph 2.9.37 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.

8.3.210 Paragraph 2.9.38 of NPS EN-5 (Ref 5) states that audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors. Paragraph 2.9.39 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).

8.3.211 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 requires noise mitigation to reduce potential adverse impacts from noise and to avoid significant adverse impacts of noise on health and quality of life.

8.3.212 Policy DM4.1 'Renewable Energy' of SNC's DMPD states that the noise effects should consider amenities and living conditions on nearby residents. Policy DM3.13 'Amenity, Noise and Quality of Life' of SNC's DMPD states that development will not be permitted where noise would be significantly detrimental to the amenity of noise sensitive uses. The policy sets out that proportionate mitigating measures may be required to reduce potential noise. Similarly, Policy 2 'Sustainable Communities' of the GNLP seeks to avoid unacceptable noise pollution.

Applicant Assessment

8.3.213 In accordance with Section 5.12 of NPS EN-1 (Ref 2), noise mitigation has been considered in the design of the Scheme.

8.3.214 It is expected that construction works will be undertaken in accordance with the best practicable means (BPM), as defined in Section 72 of the Control of Pollution Act 1974 (CoPA), to minimise noise and vibration effects. BPM, working practices and monitoring measures have been incorporated into the **Outline CEMP [EN0110014/APP/7.1]**. The **Outline CTMP [EN0110014/APP/7.6]** seeks to minimise the number of construction vehicles and, with regard to noise, engines will be switched off when vehicles are not in use to limit unnecessary idling and emissions. If required, the Applicant will seek prior consent for noisy works under Section 61 of CoPA. A Section 61 submission will demonstrate that noise and vibration have been controlled as far as reasonably practicable.

8.3.215 Embedded noise measures have also been incorporated into the design though design buffers (offsets) and measures included in the **Outline OEMP [EN0110014/APP/7.2]**. This includes, for example, a 4m high acoustic fence around the BESS, limits on sound levels at particular noise sensitive receptors and plant specification. The specification of plant machinery with low noise emission and properly attenuated supply and extract terminations will help to minimise noise emissions during the operational phase. The use of enclosures, local screening, mufflers, and silencers will also be used, as appropriate. Plant such as the National Grid Substation, Project Substations and BESS will be designed to have minimal tonal, impulsive or intermittent features as far as is practicable. Additional mitigation measures for the operational phase are set out in **ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12]**.

8.3.216 **ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12]** presents an assessment of noise and vibration effects on human (residential, non-residential uses and PRoW users) for all phases of the Scheme, including from road traffic, in accordance with relevant British Standard and best practice guidance.

8.3.217 The noise and vibration assessment concludes that with embedded and additional mitigation measures in place, no significant residual adverse noise effects have been identified across the Scheme's construction, operation and decommissioning phases. Whilst up to major adverse effects have been identified in relation to trenchless crossing methods, such as Horizontal Directional Drilling (HDD), based on guidance provided within BS 5228-2, **ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12]** concludes the effect as not to be significant.

8.3.218 **ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12]** also provides an assessment of cumulative noise effects. During the construction, operation and decommissioning phases of the Scheme with the cumulative schemes, no significant residual noise effects are reported.

8.3.219 The effects of noise on human health, including consideration of more vulnerable people, is considered in **ES Volume 1, Chapter 18 - Other Environmental Matters [EN0110014/APP/6.1.12]** and in the **Equality Impact Assessment [EN0110014/APP/7.19]**. This assessment on human health concludes that overall, with measures in place, the Scheme is not expected to give rise to significant noise or vibration effects on human health or result in disproportionate impacts on vulnerable groups.

8.3.220 The Scheme demonstrates compliance with the decision-making requirements of NPS EN-1 paragraph 5.12.17 (Ref 2) as follows:

- It avoids significant residual adverse impacts on health and quality of life from noise: as identified in **ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12]** and **ES Volume 1, Chapter 18 - Other Environmental Matters [EN0110014/APP/6.1.12]** following the implementation of embedded and additional mitigation. Where major adverse effects have been identified in relation to trenchless crossing and HDD activities, this has not been assessed as significant owing to the short-term nature of the works;

- Embedded measures have been incorporated into the design of the Scheme, as secured through the **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]**, **Outline CEMP**; **[EN0110014/APP/7.1]**, **Outline OEMP [EN0110014/APP/7.2]** and **Outline DEMP [EN0110014/APP/7.3]** to mitigate and minimise other adverse impacts on health and quality of life from noise. Additional mitigation measures have been provided in relation to operational noise from solar invertors to reduce noise levels below the No Observed Effect Adverse Level threshold; and

- As far as practicable, noise control measures have been embedded in the design, including design offsets from PRoW, acoustic barriers and limits on sound levels at particular noise sensitive receptors during the operation of the Scheme. Noise will be managed through the **Outline CEMP [EN0110014/APP/7.1]** and the **Outline OEMP [EN0110014/APP/7.2]**.

Summary

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

8.3.222 In compliance with national and local policy, with appropriate mitigation in place, no unacceptable levels of noise pollution on noise sensitive uses have been identified. Furthermore, as described above, the assessment's conclusions are compliant with paragraph 5.12.17 of NPS EN-1 (Ref 2) and, therefore, enable the SoS to grant consent from a noise and vibration perspective.

8.3.223 As a result, it is considered that noise and vibration should be given a **neutral weight** in the planning balance.

Socio-economics

Planning Policy Context

8.3.224 Paragraph 5.13.2 of NPS EN-1 (Ref 2) states 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 (Ref 2) goes on to outline the considerations that such an assessment may contain. This includes job creation, contributions to low-carbon industries, provision of additional local services, and improvements to local infrastructure, as well as impacts such as on local supply chains, tourism, influx of construction workers, and cumulative effects.

8.3.225 In recognising that the assessment of socio-economic effects is multifaceted, paragraph 5.13.6 of NPS EN-1 (Ref 2) 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.

8.3.226 Under paragraph 5.13.3 of NPS EN-1 (Ref 2) and paragraph 40 of the NPPF, there is also encouragement for applicants to engage with the relevant local authorities to understand the local and regional issues.

8.3.227 Importantly in decision-making, the SoS is to consider on balance, under paragraph 5.13.11 of NPS EN-1 (Ref 2) any relevant positive provisions an applicant has made or proposes to make in mitigating impacts and any other legacy benefits. Further, paragraph 5.13.12 outlines that the SoS may wish to include a specific requirement for the provision of an employment and skills plan.

8.3.228 At local level, Policy DM1.1 'Ensuring Development Management Contributes to Achieving Sustainable Development in South Norfolk' of SNC's DMPD makes clear that SNC will work proactively with applicants to find solutions to improve economic, social and environmental conditions in the area.

Applicant Assessment

8.3.229 Embedded measures for socio-economics during the construction and operational phases of the Scheme have been included in the **Outline ESSCS [EN0110014/APP/7.10]** in accordance with paragraph 5.13.12 of NPS EN-1. In line with paragraph 5.13.3 of NPS EN-1 (Ref 2) and paragraph 40 of the NPPF, the Applicant has engaged with NCC and SNC with regard to the **Outline ESSCS [EN0110014/APP/7.10]**.

8.3.230 As set out in the **Outline ESSCS [EN0110014/APP/7.10]** the Applicant is committed to apprenticeships in addressing both skill shortages and to provide local residents with pathways into meaningful employment. The Applicant will seek opportunities to collaborate with higher education providers, as well as alongside established initiatives. The Applicant will also explore collaboration with partners to expand capacity in the sustainability sector skills. To raise awareness and aspirations among young people, the Applicant will explore opportunities to deliver targeted outreach activities focused on renewable energy and STEM careers. This may include school talks, curriculum-linked workshops, placements and visits during the construction and operational phases to engage and inspire students. In addition, consideration of other partnerships will be explored by the Applicant to support the training of employees and workers on the Scheme. Where feasible, the Applicant will seek to promote the development of transferable skillsets to aid workers affected by the Scheme to transition to adjacent or related careers. The Applicant will seek opportunities to work with other projects in the area to ensure that employment, skills, and supply chain initiatives are aligned and coordinated, where possible.

8.3.231 Control measures are also established in the **Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2]** and **Outline DEMP [EN0110014/APP/7.3]**, which are secured through the **draft DCO [EN0110014/APP/3.1]**.

8.3.232 In response to paragraphs 5.13.2 and 5.13.4 of NPS EN-1 (Ref 2), an assessment of likely significant effects arising from the construction, operation and decommissioning of the Scheme on socio-economics is presented in **ES Volume 1, Chapter 14 - Socio-Economics [EN0110014/APP/6.1.14]**.

8.3.233 During construction, the Scheme is expected to support an equivalent to 233 FTE jobs, peaking at an equivalent of 604 FTE jobs. It has been estimated that 360 net direct jobs and 684 net indirect and induced jobs would be created during the construction phase, totalling 1,044 net additional jobs. The Scheme is estimated to generate £137m in GVA over the construction phase. The workforce for the decommissioning phase is expected to be comparable to the construction phase. Approximately 120 net direct jobs are estimated during the operational phase based on the peak replacement scenario, as set out **in ES Volume 1, Chapter 14 - Socio-Economics [EN0110014/APP/6.1.14]**.

8.3.234 In addition to the assessment of the Scheme on jobs, employment and supply chain, **ES Volume 1, Chapter 14 - Socio-Economics [EN0110014/APP/6.1.14]** provides an assessment in relation to construction workers on the temporary accommodation market and tourism industry in relation to the Scheme in isolation and cumulatively with other schemes.

8.3.235 With embedded mitigation, the assessment concludes significant beneficial residual effects on workplace based on jobs, employment and supply chain in South Norfolk, skills and the labour market during the construction and decommissioning phases, together with significant beneficial residual effects on the skills and the labour market during the operational phase. Residual effects on jobs, employment and supply chain across the wider area of Norfolk have also been assessed as beneficial during the construction and operational phases, although not identified as significant.

8.3.236 During all phases of the Scheme, residual minor adverse effects have been identified on the temporary accommodation market owing to the influx of workers, which is not significant. There is also the potential for the Scheme to have some disruption to the tourism industry during all phases relating to tourism visits to attractions within immediate proximity of the Order Limits associated with reduced amenity value, although this is not assessed to be significant in South Norfolk. No significant adverse cumulative effects on the temporary accommodation market and tourism industry have been identified.

8.3.237 In line with paragraph 5.13.6 of NPS EN-1 (Ref 2), the assessment presented in **ES Volume 1, Chapter 14 - Socio-Economics [EN0110014/APP/6.1.14]** recognises the multifaceted nature of socio-economics, referring to other impacts, where relevant, such as landscape and visual and traffic impacts, for example. Further, **ES Volume 1, Chapter 19 - In-Combination Effects Assessment [EN0110014/APP/6.1.19]** considers in-combination effects associated with socio-economics.

8.3.238 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 in **ES Volume 1, Chapter 14 - Socio-Economics [EN0110014/APP/6.1.14]**.

Summary

8.3.239 In summary, mitigation measures have been embedded to minimise adverse socio-economic impacts in compliance with paragraph 5.13.8 of NPS EN-1 (Ref 2). No significant residual adverse effects have been identified as a result of the Scheme during the construction, operational and decommissioning phases. However, significant residual beneficial effects are anticipated on jobs, employment and supply chain in South Norfolk.

8.3.240 The Scheme is considered to accord with relevant policy having conducted a socio-economic assessment in accordance with NPS EN-1 paragraph 5.13.2 (Ref 2) and minimises adverse impacts including through positive measures in compliance with NPS EN-1 5.13.8, the NPPF and the relevant local policies.

8.3.241 It is considered that jobs, employment and skills should be afforded **limited positive weight** in the planning balance. A **neutral weight** has been afforded to tourism and temporary accommodation.

Human Health

Planning Policy Context

8.3.242 Section 4.4 of NPS EN-1 (Ref 2) outlines the assessment principles for health and how the direct impacts on health may include, for example, increased traffic, air or water pollution, noise pollution and dust. Paragraph 2.9.47 of NPS EN-5 sets out that EMF can have both direct and indirect effects on human health.

8.3.243 Paragraph 4.4.6 of NPS EN-1 (Ref 2) sets out that opportunities should be taken to mitigate indirect impacts by promoting local improvements to encourage health and wellbeing. This includes in relation vulnerable groups within society and impacts on those with protected characteristics.

8.3.244 In decision-making, it is recognised in paragraph 4.4.7 of NPS EN-1 (Ref 2) that the aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation that will constitute effective mitigation, so that it is unlikely that health will either by themselves constitute a reason to refuse consent or require specific mitigation under the PA 2008 (Ref 1).

8.3.245 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.

8.3.246 In SNC's DMPD, Policy DM3.14 'Pollution, Health and Safety' and Policy DM 4.1 'Renewable Energy' make reference to no unacceptable risk the health of the public from air quality, noise, dust and odour, for example.

Applicant Assessment

8.3.247 Embedded measures relevant to minimising potential effects on human health are secured in the **Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], Outline DEMP [EN0110014/APP/7.3]** and **Outline ESSCS [EN0110014/APP/7.10]**, which are secured through the **draft DCO [EN0110014/APP/3.1]**. Additional mitigation has also been identified in relation to operational noise, as set out in **ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12]**.

8.3.248 A Human Health Statement is presented in **ES Volume 1, Chapter 18 – Other Environmental Matters [EN0110014/APP/6.1.18]** that provides an overview of the health-related impacts identified in the ES. Furthermore, protected characteristic groups, as defined under the Equality Act 2010, have been considered in the **Equality Impact Assessment [EN0110014/APP/7.19]**, ensuring that potential differential and disproportionate effects on these groups are identified and addressed. Consideration is also given to mental health in the **Equality Impact Assessment [EN0110014/APP/7.19]**.

8.3.249 With embedded and additional measures in place, the Human Health Summary concludes that there are no significant residual effects on population human health in relation to climate change, water environment, transport and access, air quality, socio-economics, soils and agricultural land, ground conditions, EMF and noise. Likely significant residual effects in relation to socio-economics have been identified, as described above.

8.3.250 The Human Health Summary also concludes that overall, taking account of the Scheme's design, embedded mitigation and the findings of the cumulative effects assessment, no likely significant standalone cumulative or in-combination effects on human health beyond those identified within the technical assessments of the ES.

Summary

8.3.251 In summary, the Scheme is not anticipated to result in any significant residual adverse effects on population human health across the Scheme's construction, operational and decommissioning phases. Significant residual beneficial effects have been identified in relation to socio-economics.

8.3.252 Overall, the Scheme is considered compatible with the protection of human health and wellbeing, does not exacerbate health inequalities and supports national policy objectives for sustainable development and clean energy infrastructure. The Scheme is considered to comply with the relevant planning policy provisions in NPS EN-1, NPS EN-3, NPS EN-5, the NPPF and relevant local planning policy. In accordance with NPS EN-1 paragraph 4.1.7, no residual effects which pose an unacceptable risk to, or interference with, human health have been identified.

8.3.253 It is considered that the human health effects of the Scheme should be afforded **neutral weight** in the planning balance.

Traffic and Transport

Planning Policy Context

8.3.254 Paragraph 5.14.5 of NPS EN-1 states that where there is likely to be significant transport implications, the ES should include a transport assessment of the potential impacts. Paragraph 5.14.7 of NPS EN-1 states that National Highways and the Highways Authorities should be consulted where appropriate for assessment and mitigation.

8.3.255 Paragraph 5.14.8 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.

8.3.256 Paragraph 5.14.12 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. Paragraph 5.14.15 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 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 in consultation with the police.

8.3.257 Paragraphs 2.10.27 to 2.10.37 of NPS EN-3 discuss accessibility in terms of vehicle access and PRoW. Applicants need to consider the suitability of the access routes for both the construction and operation phases. Due to the rural location of most solar farms, access for the delivery of infrastructure can be a significant consideration for solar farm location. Access routes are necessary for operation and maintenance activities and the NPS EN-3 recognises that usually there is a need to construct access routes.

8.3.258 Paragraphs 2.10.131 to 2.10.136 of NPS EN-3 relate to the management of deliveries, including highway works. Paragraph 2.10.153 of NPS EN-3 state that once a solar farm is in operation, traffic movements are generally very 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.

8.3.259 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. The draft NPPF retains a strong emphasis on sustainable development.

8.3.260 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.

8.3.261 Policy DM3.10 'Promotion of Sustainable Transport' of SNC's DMPD refers to development should support sustainable transport, be designed to reduce the need to travel and to maximise the use of sustainable forms of transport appropriate to the location. Policy DM3.11 'Road Safety and the Free Flow of Traffic' sates that development will not be permitted that endangers highway safety or the satisfactory functioning of the highway network.

Applicant Assessment

8.3.262 In accordance with paragraph 5.14.7 of NPS EN-1, the local highway authority (NCC) and National Highways were consulted during the pre-application stage in relation to the design, construction routes and assessment of the Scheme. The PRoW Officer was also consulted as was the police, the latter with regard to Abnormal Indivisible Loads (AIL).

8.3.263 Project level design principles (see **Table 2.1**) and **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]** include commitments relating to construction routing and access, which were considered in the design evolution of the Scheme following the environmental assessment process and consultation feedback, as described in the **Design Approach Document [EN0110014/APP/7.18]**.

8.3.264 Embedded measures are secured through various management plans to minimise the transport, traffic and access related effects from the Scheme, including within the **Outline CEMP [EN0110014/APP/7.1]**, **Outline OEMP [EN0110014/APP/7.2]**, **Outline DEMP [EN0110014/APP/7.3], Outline CTMP [EN0110014/APP/7.6], Outline OTMP [EN0110014/APP/7.7]** and **Outline PRoWPPMP [EN0110014/APP/7.8]**.

8.3.265 In response to paragraph 5.14.8 of NPS EN-1, a Framework Construction Worker Travel Plan and Replacement Activities Worker Travel Plan are provided in the **Outline CTMP [EN0110014/APP/7.6]** and **Outline OTMP [EN0110014/APP/7.7]** respectively. Specifically, the **Outline CTMP [EN0110014/APP/7.6]** incorporates targeted measures to manage construction traffic demand in line with policy requirements, including re-timing deliveries and consolidating loads to minimise overall trip volumes. These actions support the mitigation objectives set out in policy. The construction routes, including for AIL, is also set out in the **Outline CTMP [EN0110014/APP/7.6]** in response to paragraph 2.12.110 of NPS EN-3 (Ref 3). NPS EN-3, in paragraphs 2.12.23 to 2.12.28, refers to management of PRoW. In accordance with this policy, **Outline PRoWPPMP [EN0110014/APP/7.8]** sets out how safe use of the PRoW and permissive path network will be managed throughout the construction and lifetime of the Scheme. No additional mitigation measures beyond the embedded measures are required.

8.3.266 **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** demonstrates that the transport and access impacts associated with the construction phase of the Scheme have been assessed and will be managed to align with the aims outlined in NCC's Local Transport Plan 4.

8.3.267 In accordance with paragraph 5.14.5 of NPS EN-1, an assessment of likely significant transport and traffic effects is presented in **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** and in **ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]**. The assessment concludes that during the construction and demolition phases, whilst residual adverse effects have been identified in relation to severance, delay, amenity, fear and intimidation of non-motorised users and driver delay of motorised vehicles, none have been identified as significant. Further, no significant residual effects on road safety or from hazardous or large loads have been identified. **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]** also presents an assessment of cumulative effects, where no significant cumulative effects are reported.

Summary

8.3.268 In summary, the Scheme is not anticipated to result in any significant residual effects with regard to transport and access. In accordance with paragraph 5.14.22 of the NPS EN-1, the SoS 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.

8.3.269 Overall, the Scheme is considered to accord with NPS EN-1, NPS EN-3, NPS EN-5, the NPPF and relevant local planning policy, including the aims of NCC's Local Transport Plan 4.

8.3.270 It is considered that the transport and access effects of the Scheme should be afforded **neutral weight** in the planning balance.

Glint and Glare

Planning Policy Context

8.3.271 NPS EN-3 paragraph 2.10.94 recognises that at certain angles, solar panels can cause glint and glare. NPS EN-3 paragraphs 2.10.95 and 2.10.98 set out the requirements for applicants to assess glint and glare, whilst paragraph 2.10.126 to 2.10.128 of NPS EN-3 sets out considerations for mitigation.

8.3.272 In decision-making, paragraph 2.10.150 provides that the SoS *'should assess the potential impact of glint and glare on nearby homes, motorists, public rights of way, and aviation infrastructure (including aircraft departure and arrival flight paths)'*. NPS EN-3 paragraph 2.10.151 recognises that there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety and, unless significant impairment can be demonstrated the SoS, is unlikely to give any more than limited weight to claims of aviation interference as a result of glint and glare.

Applicant Assessment

8.3.273 Embedded mitigation has been incorporated into the design of the Scheme to, as far as practicable, avoid and reduce the effects of glint and glare. This includes setback of Solar PV Arrays from residential dwellings, vegetation screening and provision of instant hedgerows (or close boarded fence) to provide an immediate visual screening barrier to mitigate glint and glare of road users, as shown on the **Green Infrastructure Strategy** in the **Outline LEMP [EN0110014/APP/7.4]**. As identified in **ES Volume 1, Chapter 18 – Other Environmental Matters [EN0110014/APP/6.1.18]**, glint and glare can be further mitigated by changing the backtracking angle to tilt solar reflections away from receptors, changing the configuration of Solar PV Panels, such as the azimuth, tilt (for fixed panels) and backtracking angle (for single-axis tracking panels).

8.3.274 **ES Volume 1, Chapter 18 – Other Environmental Matters [EN0110014/APP/6.1.18]** presents an assessment of likely effects glint and glare. In compliance with the aims NPS EN-3 paragraph 2.10.150, the Applicant has considered solar reflection on residential dwellings and users of roads and aerodromes (no rail infrastructure was identified in the study area for the assessment and PRoW scoped out of the assessment). The assessment concluded that with mitigation in place, no significant residual effects would arise during the construction and operation phases of the Scheme. No cumulative effects have been identified.

Summary

8.3.275 In light of the conclusions above, in response to paragraph 2.10.151 of NPS EN-3, no significant impairment has been identified in relation to glint and glare.

8.3.276 Overall, the Scheme complies with the provisions of NPS EN-3 and it is considered that the effects of glint and glare should be afforded **neutral weight** in the planning balance.

Waste

Planning Policy Context

8.3.277 NPS EN-1 Section 5.15 recognises that sustainable waste management is through the waste hierarchy. Applicants are required to set out the arrangements that are proposed for managing any waste produced during demolition, excavation and construction activities (NPS EN-1 paragraph 5.15.8). Paragraphs 5.15.6 and 5.15.9 of NPS EN-1 seeks applicants to demonstrate that the circular economy objectives have been considered.

8.3.278 In decision-making, the SoS should '*consider the extent to which the applicant has proposed an effective system for managing hazardous and non-hazardous waste*' for each phase (NPS EN-1 paragraph 5.15.13). As set out in NPS EN-1 paragraph 5.15.14, the SoS should be satisfied that: any such waste will be properly managed; the waste can be dealt with appropriately by the waste infrastructure; and that adequate steps have been taken to minimise the volume of waste arisings and consider the circular economy.

8.3.279 Paragraph 8 of the NPPF focusses on the environmental objective of achieving sustainable development stating 'minimising waste and pollution' as a measure to protect and enhance our natural, built and historic environment.

8.3.280 At a local level, Norfolk's Mineral and Waste Local Plan (2023-2038) sets out strategic level waste facility and infrastructure policies. It sets out how NCC manages mineral extraction and waste disposal across the county and guides where these activities can take place.

Applicant Assessment

8.3.281 In accordance with the waste hierarchy and paragraph 5.15.2 of the NPS EN EN-1, the Scheme will prioritise waste prevention, followed by preparation for reuse, recycling, and recovery, with landfill disposal as the last resort.

8.3.282 Waste minimisation and management measures are secured in the **Outline CEMP [EN0110014/APP/7.1]**, **Outline OEMP [EN0110014/APP/7.2]** and **Outline DEMP [EN0110014/APP/7.3]**, whilst the management of soils is controlled through the measures in the **Outline SRMP [EN0110014/APP/7.9]**. As set out within the **Outline CEMP [EN0110014/APP/7.1]**, the contractor will consider the objectives of sustainable resource and waste management and seek to use material resources efficiently, reduce waste at source and reduce waste to landfill, applying the principles of the waste hierarchy. This would include, where reasonably practical, segregation of construction materials for appropriate re-use, recycling and recovery with landfill as a last resort. Similarly, the **Outline OEMP [EN0110014/APP/7.2]** commits to the waste management in line with the waste hierarchy. Specifically, Solar PV Panels and battery units that need to be replaced during the operational phase will be removed and recycled as far as practicable and in accordance with legislation and guidance applicable at the time, or if more suitable at the time, sold for refurbishment and reuse. It is considered that these measures would contribute to the objectives of the circular economy.

8.3.283 **ES Volume 1, Chapter 18 – Other Environmental Matters [EN0110014/APP/6.1.18]** presents an assessment of likely effects in relation to waste and materials. The assessment concluded that during all phases of the Scheme, there would be no significant adverse residual effects in relation to inert and non-hazardous waste void capacity nor on hazardous waste void capacity.

8.3.284 In accordance with NPS EN-1 paragraph 5.15.14, the Applicant has shown that waste would be appropriately managed and impacts from waste minimised, as far as practicable, together with demonstrating waste from the Scheme can be dealt with appropriately by the waste infrastructure.

Summary

8.3.285 No significant residual adverse effects from the construction, operation or decommissioning of the Scheme have been identified.

8.3.286 As demonstrated above, the Applicant has met the aims of NPS EN-1 in relation to the management of waste and materials. It is considered that this should be afforded **neutral weight** in the planning balance.

Mineral Safeguarding

Planning Policy Context

8.3.287 NPS EN-1 paragraph 5.11.19 seeks for any mineral resource to be safeguarded as far as possible, taking into account the long-term land use, including after decommissioning. In decision-making, the SoS should ensure that appropriate mitigation has been put in place to safeguard mineral resources.

8.3.288 The NPPF equally recognises the importance in protecting minerals as a finite natural resource and paragraph 225 advises local planning authorities to avoid permitting other development proposals in Mineral Safeguarding Areas if it might constrain future mineral extraction.

8.3.289 The Norfolk Minerals and Waste Local Plan include policies regarding minerals safeguarding (sand and gravel, silica sand and carstone resources) and identifies Mineral Safeguarding Areas. In particular, Policy MP11 'Mineral Safeguarding Areas and Mineral Consultation Areas of the Norfolk Minerals and Waste Local Plan' states that proposals within 250m of a safeguarded site should not prevent or prejudice the use of the site for mineral extraction. Proposals within Mineral Consultation Areas should be accompanied by a Mineral Resource Assessment that should assess whether there is any economic value to the mineral resource.

Applicant Assessment

8.3.290 The **ES Volume 3, Appendix 16.2 - Minerals Resource Assessment [EN0110014/APP/6.3.16.2]** states that the Policies Maps of the Norfolk Minerals and Waste Local Plan show Mineral Safeguarding Areas for sand and gravel within the Order Limits and identifies superficial deposits potentially containing sand and gravel mineral resources.

8.3.291 The assessment identifies that small parts of the Order Limits are underlain by superficial strata of Alluvium, Leet Hill Sand and Gravel Member, Lowestoft Formation - Sand and Gravel and River Terrace Deposits, which are classified as sand and gravel mineral resources and are safeguarded. The assessment concludes that these formations as not being economically viable and/or practicable to extract. Nevertheless, the Scheme will potentially sterilise the underlying sand and gravel mineral resources until the Scheme is fully decommissioned.

8.3.292 **ES Volume 1, Chater 16 – Ground Conditions [EN0110014/APP/6.1.16]** concludes that the construction, operational and decommissioning phases of the Scheme would have a negligible residual effect on mineral resources, which is not considered significant.

Summary

8.3.293 In summary, it is considered that the Scheme satisfies national and local policy regarding minerals safeguarding and that minerals should be afforded **neutral weight** in the planning balance.

Aviation

Planning Policy Context

8.3.294 Section 5 of NPS EN-1 sets out the generic impacts that energy infrastructure can have on civil, military aviation and defence interests including on communications, navigations and surveillance infrastructure. Paragraph 5.5.1 of NPS EN-1 states that all aerodromes can be affected by new energy development. Paragraph 5.5.7 recognises the importance that energy infrastructure is developed collaboratively with aerodrome operators to achieve net zero. This paragraph acknowledges that '*aerodromes can have important economic and social benefits, particularly at the regional and local level, but their needs must be balanced with the urgent need for new energy developments, which bring about a wide range of social, economic and environmental benefits*'.

8.3.295 In decision-making, paragraph 5.5.52 of NPS EN-1 the SoS should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes.

Applicant Assessment

8.3.296 In accordance with paragraph 5.5.7 NPS EN-1, during the pre-application stage, the Applicant engaged with Norfolk Gliding Club regarding the operations of Tibenham Airfield and the flight training organisation Wingtask for the operations of Seething Airfield.

8.3.297 As described above, **ES Volume 1, Chapter 18 – Other Environmental Matters [EN0110014/APP/6.1.18]** presents an assessment of likely effects of glint and glare on aerodromes, including on Tibenham Airfield and Seething Airfield. With embedded and additional mitigation (reorientating fixed panels and limiting the backtracking angle for single-axis tracking panels) in place, the assessment concludes a low impact on aerodromes from glint and glare, which is not considered significant.

8.3.298 The **High Level Investigative Report [EN0110014/APP/7.27]** concludes no significant risks when best practice is followed on Engine Failure After Take-Off (EFATO) and Glider Launch Failure, thermal updrafts, and wind shear and turbulence, upon aviation activity associated with Tibenham Airfield.

8.3.299 EFATO was also considered for the operations at Seething Airfield as reported in **Potential Impact on Seething Aerodrome Forced Landing Options [EN0110014/APP/7.28]**. In response to the findings of this assessment, Solar PV Panels were removed in the eastern part of Sub-Site 10B closest to Seething Airfield as embedded mitigation within the design of the Scheme. This would make sure that aircraft suffering an EFATO on departure from runway 24 at Seething Airfield would continue to have forced landing options available.

8.3.300 A **Green Infrastructure Strategy** included in the **Outline LEMP [EN0110014/APP/7.4]** has been developed. Extensive planting enhancements are proposed within the Scheme, however, the managed arable land, grassland and tree planting would be dispersed across the Sites. Whilst it is intended to restore ghost ponds, no large wetland areas would be created where birds may congregate and then take flight together which could cause an issue for aircraft. The risk of flocking birds to cause potential issues for aircraft is considered minimal.

Summary

8.3.301 In summary, there are anticipated to be no significant risks to civil, military aviation and defence interests from glint and glare and EFATO. It is envisaged no increase in risk of bird strike. With embedded and additional mitigation measures in place with regard to glint and glare, the design of the Scheme has sought to minimise impacts, where possible, in line with the aim of paragraph 5.5.52 of the NPS EN-1.

8.3.302 As a result of the above, the Scheme is considered in accordance with the aims of NPS EN-1 in relation to civil, military aviation and defence interests, and should be afforded **neutral 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 The PA 2008 provides that in deciding an application for development consent, the SoS must have regard to:

- Any relevant NPS: the relevant NPS' for the Scheme are NPS EN-1, NPS EN-3 and NPS EN-5. Section 8 of this Planning Statement and **Policy Compliance Document [EN0110014/APP/7.15]** demonstrates the Scheme's compliance with the NPS;
- Any appropriate marine policy documents: none are relevant for the Scheme;
- Local impact reports: LIR 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 described in Section 6.6 of this Planning Statement and addressed in Section 8 of this Planning Statement in relation to biodiversity and historic environment; and
- Any other matters which the SoS thinks are both important and relevant to the SoS's decision: for example, policies within the statutory development plan. The **Policy Compliance Document [EN0110014/APP/7.15]** 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*'. 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 NPS 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 NSIP, unless any more specific and relevant policies set out in the relevant NPS 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 the potential benefits, including any long-term or wider benefits; and the potential adverse impacts, including any long-term and cumulative adverse impacts, together with the application of the mitigation hierarchy.

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. The following paragraphs summarise the outcomes of the planning appraisal at Section 8 of this Planning Statement, applying the hierarchy of weight.

Positive Impacts

9.4.4 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.

9.4.5 In relation 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 outweighs the GHG and impacts on climate change that are anticipated in the construction, operation and decommissioning of the Scheme. The Scheme would be designed to be adaptive and resilient to climate change. On this basis, overall, it is considered that impact on climate change and GHG emissions should be given **significant positive weight** in the planning balance.

9.4.6 The Scheme is committed to delivering ecological enhancements and net gain by providing a minimum of 10% BNG for habitats, hedgerows and watercourses. However, the delivery of BNG will likely be significantly higher; as set out in the **Biodiversity Net Gain Report [EN0110014/APP/7.23**], which shows the potential net gain of 37.42% for habitats, a net gain of 31.35% for hedgerows and 16.08% for watercourses. Biodiversity and enhancement measures have been incorporated into the Scheme which has considered local conservation priorities in relation to the Norfolk Wildlife Trust South Norfolk Claylands and initiatives of the Norfolk Local Nature Recovery Strategy. As a result of embedded measures, significant residual beneficial effects of the Scheme have been identified in relation to hedgerow and tree lines, woodland, rivers, ponds, other neutral grassland, ditches and scrub during the operation phase. Further, significant residual beneficial effects have been identified on breeding birds, bats, badgers and riparian mammals during the operation of the Scheme. Overall effects on biological conservation and BNG should be given a **moderate positive weight** on the protection and enhancement of species and biological conservation.

9.4.7 In addition to the above, as it is considered that the **Green Infrastructure Strategy** supports the Governments' legally binding target to increase the tree canopy through the provision of approximately 25ha of new tree planting (in addition to hedgerow tree improvements), this has been afforded a **limited positive weight** in the planning balance.

9.4.8 Whilst significant residual adverse effects have been identified on the visual amenity at representative locations on PRoW at Year 15 of operation, the Scheme would include opportunities for greater connectivity and engagement of people to nature, help strengthen the network of greenways and active connections within the landscape. Together, the provision of 850m of new permissive paths and up to 19.8ha of community accessible space throughout the lifetime of the Scheme would positively contribute to amenity and recreational opportunities. The **Outline LEMP [EN0110014/APP/7.4]** sets out the community accessible space has the potential opportunities for dog walking, archaeological educational interaction, interpretation signage boards, and connecting educational spaces which could be used by local walking and community groups and provide a local educational feature to nearby schools. In recognition of the beneficial effects associated with the creation of permissive paths and community accessible space, a **moderate positive weight** should be given.

9.4.9 During the construction phase, a total of 1,044 net additional jobs is expected. Further jobs are anticipated to be created during replacement activities of the operational phase and in decommissioning, although these will not reach the levels anticipated for construction. During operation, periods of maintenance would require temporary workers. As a result of replacement activities, approximately 120 net direct jobs are anticipated to be supported. Job creation provides employment and skills benefits. Measures to maximise opportunities for employment, skills, education and supply chain are secured through the **Outline ESSCS [EN0110014/APP/7.10].** This includes commitments to enhance skills, local education through promoting apprenticeship and training opportunities and to promote local recruitment and procurement. It is considered that jobs, employment and skills should be afforded **limited positive weight** in the planning balance.

Neutral Impacts

9.4.10 The following topics set out in NPS EN-1 and assessed in the ES confirm there will be no residual 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:

- Human health, as considered in **ES Volume 1, Chapter 18 – Other Environmental Matters [EN0110014/APP/6.1.18]** and the **Equality Impact Assessment [EN0110014/APP/7.19]**;
- Hazardous Substances, as considered above and in **ES Volume 1, Chapter 18 – Other Environmental Matters [EN0110014/APP/6.1.18];**
- Habitat Regulations, as considered in the **Shadow Habitat Regulations Assessment [EN0110014/APP/7.25];**

- Statutory designated national and local sites, as considered in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]**;
- Ancient Woodland, ancient/veteran trees and other irreplaceable habitats as considered in **ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]**;
- Soils, as considered in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.1.15]**;
- Flood risk and drainage, as considered in **ES Volume 1, Chapter 9 – Water Environment [EN0110014/APP/6.1.9]**;
- Water quality and resources, as considered in **ES Volume 1, Chapter 9 – Water Environment [EN0110014/APP/6.1.9]**;
- Historic environment, as considered in **ES Volume 1, Chapter 10 – Cultural Heritage [EN0110014/APP/6.1.10]**;
- Ground conditions, as considered in **ES Volume 1, Chapter 16 – Ground Conditions [EN0110014/APP/6.1.16]**;
- Noise and vibration, as considered in **ES Volume 1, Chapter 12 – Noise and Vibration [EN0110014/APP/6.1.12]**;
- Tourism and temporary accommodation, as considered in **ES Volume 1, Chapter 14 – Socio-economics [EN0110014/APP/6.1.14]**;
- Transport and access, as considered in **ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]**;
- Glint and glare, as considered in **ES Volume 1, Chapter 18 – Other Environmental Matters [EN0110014/APP/6.1.16]**;
- Waste, as considered in **ES Volume 1, Chapter 18 – Other Environmental Matters [EN0110014/APP/6.1.16]**;
- Minerals safeguarding, as considered in **ES Volume 1, Chapter 16 – Ground Conditions [EN0110014/APP/6.1.16]**; and
- Civil, military aviation and defence interests, as considered in **ES Volume 1, Chapter 18 – Other Environmental Matters [EN0110014/APP/6.1.16]**, **High Level Investigative Report [EN0110014/APP/7.27]** and **Potential Impact on Seething Aerodrome Forced Landing Options [EN0110014/APP/7.28].**

Negative Impacts

9.4.11 Significant residual adverse effects have been assessed in relation to landscape and visual and BMV quality land.

9.4.12 Whilst the Scheme would provide extensive new and enhanced green infrastructure, significant residual adverse effects have been identified associated with the change to the national and local landscape character and the landscape character and features within the Order Limits. After Year 15 of operation, the number of significant residual adverse effects would reduce to 4 receptors compared to 10 receptors at Year 1 of operation. Significant residual adverse effects on the landscape character and features within the Order Limits would remain in relation to the BESS Site, Site 1, Site 7 and Site 8. The Scheme, however, was not found to have significant residual adverse effects on the special qualities of the Rural River Valleys once the Scheme is operational. Taking account the proposed Green Infrastructure Strategy, overall and on balance, it is considered that the landscape effects should be afforded **moderate negative weight** in the planning balance.

9.4.13 As to visual effects, owing to the introduction of built form into the landscape, the landscape and visual assessment concluded significant adverse effects on in relation to various representative locations on PRoW during all phases of the Scheme. At Year 1 of operation the Scheme has been assessed to have significant adverse effects at 53 representative locations, reducing to 17 representative locations in Year 15 of operation. Taking account the proposed Green Infrastructure Strategy, overall and on balance, it is considered that the visual effects should be afforded **moderate negative weight** in the planning balance.

9.4.14 It is acknowledged that there would be a temporary removal of BMV quality agricultural land from use for the 60-year lifetime of the Scheme. Most effects would be temporary and reversible, although it is also acknowledged that there would be a potential permanent loss or downgrading of BMV quality agricultural land in relation to the location of Project Substations, BESS, National Grid Substation, Access Tracks and tree planting. For soils, there would be a residual beneficial effect (not significant) owing to the long-term resting of land from arable production. For the reasons set out in the planning appraisal, it is considered that the use of BMV agricultural land can be justified. However, in acknowledgement of the removal of BMV quality land from agriculture, it is considered that agricultural land should be afforded **moderate negative weight** in the planning balance.

Cumulative Impacts

9.4.15 An assessment of the cumulative effects of the Scheme in combination with Cumulative Schemes are set out in **ES Volume 1, Chapter 6 to 18 [EN0110014/APP/6.1.6 – 6.1.18]**. These assessments concluded significant adverse cumulative effects in relation to:

- Hazardous waste void capacity (in peak replacement scenario of operation phase).

9.4.16 The following significant beneficial cumulative effects have been identified in relation to:

- Water environment in relation to the cessation of agricultural use and fertiliser application; and
- Socio-economics in relation to jobs, employment and the supply chain in South Norfolk, Norfolk and East of England and skills in South Norfolk during construction, and jobs, employment and the supply chain and skills in South Norfolk during the operation phase.

9.4.17 **ES Volume 1, Chapter 19 – In-Combination Effects Assessment [EN0110014/APP/6.1.19]** provides an assessment of effect interactions which identifies significant effects that are both adverse and beneficial during construction and operation of the Scheme.

9.4.18 Owing to both significant adverse and beneficial cumulative effects, overall and on balance, cumulative effects should be afforded a **neutral weight** in the planning balance.

Summary of Policy Balance

9.4.19 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 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 4.2.16-17 confirm that onshore electricity generation that does not involve fossil fuel combustion such as solar 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 infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, means that it is likely the need case will outweigh any other residual impacts not capable of being addressed by 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 4.2.23). NPS EN-1 paragraph 4.2.27 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…apply'*.

9.5.3 Paragraphs 4.2.28 to 4.2.35 of NPS EN-1 then go on to list specific presumptions in relation to CNP Infrastructure, including how impacts on Green Belt, SSSI, designated landscapes, heritage assets and HRA derogations would be dealt with. 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 National Planning Statements

9.5.4 As demonstrated in this Planning Statement, the Scheme accords with the relevant NPS and, where required, it has been demonstrated that any harm caused by the Scheme is outweighed by the substantial public 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

9.5.5 The mitigation hierarchy has been applied, in satisfaction of NPS EN-1.

9.5.6 **ES Volume 1, Chapter 2 - EIA Methodology [EN0110014/APP/ 6.1.2]** sets out the mitigation hierarchy adopted for the EIA. 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 as far as practicable. Such measures are embedded within the various management plans, which are secured via Requirements in Schedule 2 of the **draft DCO [EN0110014/APP/3.1]**. However, residual significant adverse effects that cannot be avoided, reduced or mitigated remain in relation to landscape and visual and BMV quality land, as described above. These are the residual effects that have been assessed as remaining after the consideration of mitigation measures.

Compliance with Other Legal and Regulatory Requirements

9.5.7 As summarised below, the DCO Application has been prepared in compliance with other legal and regulatory requirements, in satisfaction of NPS EN-1.

9.5.8 **Habitats Regulation Assessment**: A Habitat Regulation Assessment has been undertaken as set out in the **Shadow Habitats Regulations Assessment [EN0110014/APP/7.25]** 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.

9.5.9 **Water Framework Directive**: **ES Volume 3, Appendix 9.2 - Water Framework Assessment [EN0110014/APP/6.3.9.2]** concludes that with embedded mitigation, the Scheme will not cause deterioration of the WFD classifications or prevent future work improving the WFD water body classifications. In summary, the Scheme is compliant with the objectives of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.

9.5.10 **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 [EN0110014/APP/5.1]** and associated appendices **[EN0110014/APP/5.2 – 5.12]**.

9.5.11 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017: The Environmental Impact Assessment has been undertaken in accordance with the EIA Regulations, **ES Volume 1, Chapter 2 - EIA Methodology [EN0110014/APP/ 6.1.2]**.

Application of the CNP Presumption

9.5.12 Given the Applicant has demonstrated that the Scheme is in accordance with the NPS, 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.

9.5.13 Paragraph 4.2.28 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 exception to this presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, or irreplaceable habitats. 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*'.

9.5.14 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, offshore navigation or onshore flood and coastal erosion.

9.5.15 As a result, decision-making will be in accordance with NPS EN-1 paragraph 4.2.29 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'.*

9.5.16 As demonstrated in this Planning Statement, the tests that require a clear outweighing of harm have been met. Paragraph 4.2.30 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'*.

9.5.17 The Scheme is not located within the Green Belt nor a nationally designated landscape. Further, no substantial harm to or loss of significance to heritage assets is anticipated. There are no SSSI located within the Order Limits, although SSSI are located in proximity to the Order Limits; the nearest being: Shotesham-Woodton Hornbeam Woods SSSI, Pulham Market Big Wood SSSI, Hedenham Wood SSSI and Fritton Common SSSI. **ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]** concludes with embedded measures in place, no significant residual adverse effects on the SSSI.

9.5.18 The Scheme does not cause substantial harm to or loss of significance to heritage assets. Details of these heritage assets relevant to the Scheme are discussed within this Planning Statement and in **ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10]**.

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 as far as practicable, 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 accompany the DCO Application for the construction, operation, maintenance and decommissioning of the Scheme, known as East Pye Solar.

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 the 60-year lifetime of the Scheme, 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.

10.1.3 As set out in NPS EN-1, nationally significant solar projects, such as the Scheme, have been identified as of critical national priority 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'*.

10.1.4 The mitigation hierarchy has been appropriately applied to avoid, reduce and mitigate, where practicable, any likely significant adverse effects of the Scheme. It is recognised that significant adverse effects remain in relation to landscape and visual during the construction, operational and decommissioning phases of the Scheme. Significant adverse effects have also been identified in relation to BMV quality land during the construction phase. Most significant adverse effects would be temporary and reversible. Furthermore, 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 significant beneficial effects that are anticipated during the construction, operational and decommissioning phases of the Scheme, such as in relation to biodiversity, green infrastructure strategy, employment and training.

10.1.5 Further, the CNP presumption requires that the urgent need outweighs the residual impacts. As a result, the Scheme is in accordance with national energy policy, national planning policy, and the relevant development plan when considered as a whole. None of the exceptions in sections 104(4) to 104(8) of the PA 2008 applies. The overall planning balance is therefore overwhelmingly in favour of the grant of development consent for the Scheme.

Appendix A Sequential and Exception Tests

Introduction

A.1.1 This Sequential Test and Exception Test has been prepared on behalf of East Pye Solar Limited (the 'Applicant') in relation to an application for a Development Consent Order (DCO) (the 'DCO Application') for East Pye Solar (the Scheme), pursuant to the Planning Act 2008 (PA 2008) (Ref 1).

A.1.2 The Scheme comprises the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station with a total capacity exceeding 100 megawatts (MW) and associated development including a Battery Energy Storage System (BESS), up to three 132kV Project Substations and up to three 400kV Project Substations, Grid Connection Infrastructure and a new National Grid Substation. A description of the Scheme can be found in **ES Volume 1, Chapter 4 – The Scheme [EN0110014/APP/6.1.4]**.

A.1.3 The majority of land within the Order Limits is located within Flood Zone 1 'Low Probability' of river/sea flooding, with localised areas of Sub-Site 7B, Site 8 and parts of the CRC within Flood Zones 2 'Medium Probability' and 3 'High Probability' associated with the floodplains of the Hempnall Beck and the River Tas.

A.1.4 Most of the land within the Order Limits have a 'Very Low' risk of surface water flooding, although flow routes with 'Low' to 'High' surface water flood risk run through the Order Limits, notably in Site 9 and Sub-Sites 4B, 7A, 7E, 7F, 7K, 8A and 10A to 10D, together with parts of the CRC. These flow routes are associated with the main rivers and ordinary watercourses, along field lines or localised topographic depressions/crop lines within fields.

A.1.5 Details of the flood and surface water risk are set out in **ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]** and **ES Volume 3, Appendix 9.2 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**.

A.1.6 Given the flood risk identified within the Order Limits, consideration has been given to the policy requirements for the Sequential Test. The purpose of this report is to explain proportionately how the Sequential and Exception Tests have been applied by the Applicant in its assessment of alternative sites for the Scheme and in its design of the Scheme.

Planning Policy and Guidance

Overarching National Policy Statement for Energy – EN1 (2025)

A.1.7 The overall aim of planning policy in respect of development and flood risk is to 'ensure that flood risk from all sources of flooding is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to steer new development to areas with the lowest risk of flooding' (paragraph 5.8.6 of NPS EN-1).

A.1.8 Paragraph 5.8.21 of NPS EN-1 requires 'that a sequential, risk-based approach is 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 with medium risk areas and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas'. Paragraph 5.8.29 of NPS EN-1 explains that a sequential approach should be applied to the layout and design, with vulnerable aspects of the development located on areas of lower risk and residual risk of flooding.

A.1.9 In decision-making, the SoS should be satisfied that the Sequential Test was applied to minimise risk by directing the most vulnerable uses to the areas of lowest flood risk (paragraph 5.8.36). Should it not be possible (taking into account wider sustainable development objectives) for the development to be located in areas of lower flood risk, NPS EN-1 sets out the Exception Test can be applied and states that '*The test provides a method of allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available*' (paragraph 5.8.9 of NPS EN-1). Paragraph 5.8.10 makes it clear that:

'It would only be appropriate to move onto the Exception Test when the Sequential Test has identified reasonably available, lower risk sites appropriate for the proposed development where, accounting for wider sustainable development objectives, application of relevant policies would provide a clear reason for refusing development in any alternative locations identified. Examples could include alternative site(s) that are subject to national designations such as landscape, heritage and nature conservation designations, for example National Landscapes, SSSIs and World Heritage Sites (WHS) which would not usually be considered appropriate'.

A.1.10 Paragraph 5.8.11 provides that to pass the Exception Test, the following must be demonstrated:

- The project would provide wider sustainability benefits to the community that would outweigh flood risk; and
- The project will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere and, where possible will reduce flood risk overall.

National Planning Policy Framework

A.1.11 The NPPF sets out the requirement for the Sequential Test in paragraphs 173 to 177 as follows:

- *'173. A sequential risk-based Approach should also be taken to individual Applications in areas known to be at risk now or in future from any form of flooding, by following the steps set out below.*
- *174. Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites Appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.*
- *175. The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)...*
- *…177. Having applied the sequential test, if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the Order Limits and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.'*

A.1.12 The NPPF sets out the requirement for the Exception Test, where applicable, in paragraphs 178 and 179. These tests are to be applied where appropriate, depending on the flood risk 'vulnerability', the Flood Zone in which it is located and the risk of flooding from other sources.

A.1.13 A draft update to the NPPF was released in December 2025 and is currently under consultation. The main change within the update for flood risk is the wording on the application of the Sequential and Exception Tests, which has been updated to reflect changes to paragraph 027 within the PPG that was

updated in September 2025. This draft NPPF states that the Sequential Test should be used in areas known to be at of any form of flooding, other than for where the FRA demonstrates clearly that '*where the site would be at risk of surface water flooding only, 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 without increasing flood risk elsewhere*'.

Planning Practice Guidance

A.1.14 NPS EN-1 refers to the PPG which provides guidance explaining how the Sequential Test should be applied and states that the sequential approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to other areas of high risk. The PPG reiterates that all forms of flood risk need to be treated consistently with river and tidal flooding in mapping probability and assessing vulnerability, so the Sequential Test is applied across all areas of flood risk (Paragraph: 023 Reference ID: 7-023-20220825).

A.1.15 In applying paragraph 175 of the NPPF, the PPG states '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 Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied.'

A.1.16 In reference to Annex 3 of the NPPF, solar farms are categorised as 'essential infrastructure'. As per Table 2 of PPG (Paragraph: 079 Reference ID: 7-079-20220825), essential infrastructure is appropriate in Flood Zones 1 and 2, as well as in Flood Zones 3a and 3b if the Exception Test is met. In the Notes to Table 2, it is also specified that in Flood Zone 3a *'Essential infrastructure should be designed and constructed to remain and safe in times of flood'. In Flood Zone 3b 'essential infrastructure that has passed the Exception Test, and water-compatible uses, should be designed and constructed to:*

- *Remain operational and safe for operational users in times of flood;*
- *Result in no net loss of floodplain storage;*
- *Not impede water flows and not increase flood risk elsewhere.'*

A.1.17 The PPG also provides non-exhaustive examples of how the Exception Test might be met (Paragraph: 036 Reference ID: 7-036-20220825). This includes the following examples of wider sustainability benefits to the community, reuse of suitable brownfield land as part of a local regeneration scheme, an overall reduction in flood risk to the wider community through flood risk management infrastructure; and/or the provision of sustainable

drainage systems that significantly exceed NPPF policy requirements. Examples given in the PPG of how a development could reduce flood risk overall include: the incorporation of green infrastructure to make additional space for the flow and storage of flood water; providing sustainable drainage systems that manage flood risk beyond the proposed site and above the usual standard; and/or providing or making contributions to flood risk management infrastructure that will provide additional benefits to existing communities.

The Sequential Test for Site Selection

A.1.18 The Applicant's site selection for the Scheme and its consideration of alternative sites in respect of flooding, is set out in the **Site Selection Assessment [EN0110014/APP/7.20]**.

The Sequential Test for Design and Layout

A.1.19 A sequential approach has been adopted for the design and layout of the Scheme to minimise flood risk by directing the most vulnerable aspects of the Scheme to areas of lowest flood risk as far as practicable. In addition, sustainable drainage has been included for the Scheme as set out in **ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**.

A.1.20 As set out in **Table 2.1** above, Design Principle 4.3 is to make sure the Scheme is resilient to flooding and does not increase flooding within the Order Limits or elsewhere. The **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]** also set out design commitments which are summarised below along with embedded measures in the design and layout to minimise flood risk:

- Critical infrastructure such as the BESS, National Grid Substation and Project Substations as well as the Solar PV Arrays would be located outside of Flood Zones 2 and 3 and a minimum distance of 10m of a main river, watercourse or ditch (including IDB drains);
- Standalone Conversion Units, Integrated Conversion Units/33kV Sub-Distribution Switch Rooms and Operational and Maintenance Buildings would be located outside of Flood Zones 2 and 3 and a minimum distance of 10m of a main river, watercourse or ditch (including IDB drains);
- The Project Substations in Sub-Sites 4B, 5A, 7F and 10C would be located within areas of 'very low' surface water flood risk, whilst the National Grid Substation, BESS and the Project Substation in Sub-Site 1B contain isolated areas of surface water flood risk which represent crop lines/topographic lows within the existing fields;

- Standalone Conversion Units and Integrated Conversion Units/33kV Sub-Distribution Switch Rooms would be located away from areas of surface water flooding, as far as practicable;

- The lowest edge of the Solar PV Panels will be set at a minimum of 0.4m above ground level. Where Solar PV Panels are situated in areas of 'low' to 'high' surface water flood risk, the Solar PV Panels will be raised higher where practicable, or the use of Single Axis Tracker panels will be considered;

- All electrical infrastructure associated with the panels (excluding cabling) will be elevated by the Mounting Structures so that it is no less than 300mm above the 1 in 100 (1%) Annual Exceedance Probability (AEP) flood level; or, where this is not possible, as high as practicable;

- Where access tracks are located in areas of Flood Zones 2 or 3 and/or significant 'low' to 'high surface water flow routes/flood risk areas, access tracks to be kept at existing ground level so as to not impeded floodplain storage or flood flow routes; and

- Works within the CRC will not significantly affect ground levels within flood risk areas.

A.1.21 The majority of the areas for Solar PV Arrays would be located within areas of 'very low' surface water flood risk. Where they would located within 'low' to 'high' surface water flood risk areas, there is considered to be negligible impact as the Solar PV Panels would be raised up on narrow pile driven posts (or in some cases concrete feet, where sensitive archaeology has been identified). Whilst the National Grid Substation, BESS and the Project Substation in Sub-Site 1B contain isolated areas of surface water flood risk, this will be managed through a surface water drainage system as set out in **ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]** and secured in the **Outline OEMP [EN0110014/APP/7.2]**. The surface water drainage systems will ensure that the users will remain safe from surface water flood risk for the lifetime of the Scheme and that flood risk will not increase elsewhere.

A.1.22 In summary, the Applicant has considered flooding in the design of the Scheme to minimise the risk of flooding both to and from the Scheme. The most vulnerable elements of infrastructure, being the National Grid Substation, the BESS and Project Substations (along with the Solar PV Arrays) would be sited in areas of Flood Zone 1, at lower risk of flooding. This is secured through the **Works Plan [EN0110014/APP/2.3]**. The Scheme components within Flood Zones 2 and 3 would therefore relate to electrical cabling, fencing, access and maintenance tracks, together with landscape and biodiversity mitigation and enhancement measures. In doing so, the Sequential Test has been appropriately applied.

Exception Test

A.1.23 The Applicant has also applied the Exception Test in accordance with NPS EN-1 and the NPPF, as outlined above.

A.1.24 In paragraph 036 Reference ID: 7-036-20220825, the PPG states that LPA need to set out their own criteria for wider sustainability benefits. As part of the Greater Norwich Level 2 Strategic FRA, this makes reference that applicants should refer to sustainability objectives of the Local Plan Sustainability Appraisals and '*These generally consider matters such as biodiversity, green infrastructure, historic environment, climate change adaptation, flood risk, green energy, pollution, health, transport etc'*.

Wider Sustainability Benefits

A.1.25 Previously developed land (brownfield) has been considered within the site selection process for the Scheme as set out in the **Site Selection Assessment [EN0110014/APP/7.20]**. No previously developed land was identified as suitable for the Scheme.

A.1.26 The provision of all year-round grassland/wildflower meadow beneath the Solar PV Arrays will reduce soil erosion, contribute to greater interception/evapotranspiration of rainfall and increase ground roughness across the fields, thereby slowing the rate of runoff across Sites. This would reduce flooding to villages located at the bottom of drainage catchments.

A.1.27 An assessment of flood risk from all sources of flooding and the outline drainage strategy is set out in **ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]**. As described above a sequential approach to design and layout of the Scheme has been adopted. In addition, the **Outline CEMP [EN0110014/APP/7.1]** and **Outline OEMP [EN0110014/APP/7.2]** secure measures to manage surface water runoff during the construction and operational phases of the Scheme. The latter includes a Preliminary Surface Water Drainage Maintenance Schedule outlining the likely maintenance activities and frequency for the surface water drainage systems.

A.1.28 Whilst the Scheme is low carbon renewable energy generation infrastructure, the substantial wider sustainability benefits of the Scheme are set out in the **Statement of Need [EN0110014/APP/7.11]** and summarised within this Planning Statement in Section 5.6. This wider sustainability benefits are:

- **Green Energy and Climate Change:** the Scheme would make a significant and timely contribution to meeting the Government's targets of Clean Power by 2030 (Ref 4) and net zero by 2050. The Scheme addresses three key requirements of the UK energy market: decarbonisation, the demand for electricity and security of supply. The Scheme will help to address the increase in demand for electricity and

deliver large amounts of low cost, secure, and low carbon electricity in support of Government's energy policy aims;

- **Landscape, Green Infrastructure and Habitat Creation:** the Scheme would strengthen habitat connectivity at a landscape scale and positively contribute to local green infrastructure. This would be through strengthening/reinforcing existing landscape features, such as hedgerows, trees and woodland, together with the restoration of ghost ponds, where practicable, as illustrated in the **Green Infrastructure Strategy** in the **Outline LEMP [EN0110014/APP/7.4]**. Beneficial effects to the soil may also be derived from the cessation of cultivation and chemical treatments;

- **Publicly Accessible Space:** the Scheme would provide publicly accessible space including approximately 850m of newly created permissive paths that would connect to existing PRoW and collectively help to strengthen the network of greenways and active connections within the landscape. In addition, up to 19.8ha of new community accessible spaces for pedestrian use over the lifetime of the Scheme would be created that could provide potential opportunities for archaeological educational interaction and the capacity for interpretation signage boards and amenity use which could include dog walking, for example. This would positively contribute to amenity and recreational opportunities, with secondary benefits on health and wellbeing. The provision of permissive paths and community accessible space is secured in the **draft DCO [EN0110014/APP/3.1]** and the long-term management set out in the **Outline PRoWPPMP [EN0110014/APP/2.7]** and **Outline LEMP [EN0110014/APP/7.4]**.

- **Biodiversity:** the Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement in the **draft DCO [EN0110014/APP/3.1]**. The **BNG Report [EN0110014/APP/7.23]** indicates the Scheme will deliver a potential net gain of 37.42% for habitats, a net gain of 31.35% for hedgerows and 16.08% for watercourses.

- **Jobs and Economy:** as set out in **ES Volume 1, Chapter 14 – Socio-economics [EN0110014/APP/6.1.14]**, it has been estimated that the Scheme would provide a total of 1,044 net additional jobs during the construction phase. Employment opportunities are also anticipated during the operational and decommissioning phases of the Scheme. The Scheme is estimated to generate £137m in GVA over the construction phase.

- **Skills:** the **Outline ESSCS [EN0110014/APP/7.10]** sets out measures to support education, apprenticeships, training and engage in local partnerships. The Scheme is likely to produce a number of education and skills opportunities and the Applicant is committed to maximising benefits to local businesses.

A.1.29 The wider sustainability benefits delivered by the Scheme overwhelmingly outweigh the flood risk and the Scheme is in accordance with the first part of the Exception Test.

A.1.30 While not directly relevant to the weighing of sustainability benefits against flood risk, the Applicant has also committed to 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 taken into account in the decision-making process for determining the DCO Application. However, it will be available to fund local projects.

The Scheme will be Safe for its Lifetime

A.1.31 In summary, **ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1]** demonstrates that the Scheme is safe and will not detrimentally impact on flood risk within the Order Limits or elsewhere, in accordance with the requirements of national and local planning policy.

A.1.32 Embedded flood risk measures of the Scheme are set out in the **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]** which demonstrates the Scheme's compliance with the second part of the Exception Test, in that the Scheme will be safe for its lifetime, taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Conclusion

A.1.33 In line with the relevant national and local planning policy, the Applicant has applied the Sequential and Exception Tests to both site selection and for the design and layout of the Scheme to ensure that the most vulnerable uses are sited in areas of lower flood risk as far as possible.

A.1.34 As well as within the **Site Selection Assessment [EN0110014/APP/7.20]**, the Applicant has also considered the Sequential Test within the design and layout of the Scheme to locate more vulnerable elements of the Scheme within areas of lower flood risk, and to generally safeguard the Sites from flooding both on the Sites and elsewhere.

A.1.35 For the Exception Test, substantial wider sustainability benefits of the Scheme are set out, together with the proposed measures that have been incorporated into the Scheme design to ensure that the Scheme is safe from flooding for its lifetime and will not increase the risk of flooding elsewhere.

A.1.36 Therefore, the Applicant has applied both the Sequential and Exception Tests and demonstrated how the Exception Test is met in line with relevant policy.

References

Ref 1. Planning Act 2008 c 29 (as amended). Available at: https://www.legislation.gov.uk/ukpga/2008/29/contents. Last Accessed 30/01/2026

Ref 2. Department for Energy Security and Net Zero (2025). Overarching National Policy Statement for Energy (EN-1). Available from: https://assets.publishing.service.gov.uk/media/6915ba42bc34c86ce4e6e726/overarching-national-policy-statement-for-energy-en-1-web-accessible.pdf. Last Accessed 30/01/2026

Ref 3. Department for Energy Security and Net Zero (2025). National Policy Statement for renewable energy infrastructure (EN-3). Available from: https://assets.publishing.service.gov.uk/media/695d1368b5c46330350ed9a2/national-policy-statement-for-renewable-energy-infrastructure-en-3-web-accessible.pdf. Last Accessed 30/01/2026

Ref 4. Department for Energy Security and Net Zero (2025). Clean Power 2030 Action Plan. Available from: https://www.gov.uk/government/publications/clean-power-2030-action-plan. Last Accessed 30/01/2026

Ref 5. Department for Energy Security and Net Zero (2025). National Policy Statement for electricity networks infrastructure (EN-5). Available from: https://assets.publishing.service.gov.uk/media/695d12e1b5c46330350ed9a1/national-policy-statement-for-electricity-networks-infrastructure-en-5-web-accessible.pdf. Last Accessed 30/01/2026

Ref 6. Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Available from: https://www.legislation.gov.uk/uksi/2017/572/contents. Last Accessed 30/01/2026

Ref 7. The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. Available from: https://www.legislation.gov.uk/uksi/2009/2264/contents/made. Last Accessed 30/01/2026

Ref 8. Planning Inspectorate (2024). Nationally Significant Infrastructure Projects: Advice on Good Design. Available from: https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-good-design. Last Accessed 30/01/2026

Ref 9. South Norfolk Council (2015). South Norfolk Local Plan Development Management Policies Document. Available from: https://www.southnorfolkandbroadland.gov.uk/asset-library/imported-assets/development-management-policies-document-0.pdf. Last Accessed 30/01/2026

Ref 10. Broadland District Council, Norwich City Council, South Norfolk Council (2024). Greater Norwich Local Plan. Available from: https://www.southnorfolkandbroadland.gov.uk/asset-library/imported-assets/cd-7.1-gnlp.pdf. Last Accessed 30/01/2026

Ref 11. Natural England (2014) National Character Area Profiles. Available at: https://nationalcharacterareas.co.uk. Last Accessed 30/01/2026

Ref 12. Planning, Transportation, Environment, Waste and Economic Development Review Panel 5 December 2002 Environmental Lighting Zones Report by the Director of Planning and Transportation. Available from: https://www.cprenorfolk.org.uk/wp-content/uploads/sites/32/2021/01/NCC-Environmental-Lighting-Zones-Report.pdf. Last Accessed 30/01/2026

Ref 13. Natural England (2011). Agricultural Land Classification map Eastern Region (ALC008). Available from: https://publications.naturalengland.org.uk/publication/127056

Ref 14. Norfolk County Council (2025). Norfolk Minerals and Waste Local Plan 2023-2038. Available from: https://norfolk.oc2.uk/docfiles/71/Adoption%20NM&WLP%20with%20main_add%20mods%20accepted%20-%20V4.pdf.

Ref 15. South Norfolk Council (2024). South Norfolk Village Clusters Housing Allocations Plan. Publication Draft Plan. Available from: https://www.southnorfolkandbroadland.gov.uk/asset-library/submission-version-vchap.pdf

Ref 16. The Climate Change Act 2008 (2050 Target Amendment) Order 2019. Available at: https://www.legislation.gov.uk/ukdsi/2019/9780111187654

Ref 17. The Climate Change Committee (2025). The Seventh Carbon Budget. Available at: https://www.theccc.org.uk/publication/the-seventh-carbon-budget/

Ref 18. Norfolk County Council (2023). Climate Strategy. Available at: https://www.norfolk.gov.uk/article/39033/Climate-strategy

Ref 19. United Nations (2015). Paris Agreement. Available at: https://unfccc.int/sites/default/files/english_paris_agreement.pdf

Ref 20. 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 21. Ofgem. (2025). Average gas and electricity usage. Available from: https://www.ofgem.gov.uk/information-consumers/energy-advice-households/average-gas-and-electricity-use-explained

Ref 22. EMR Delivery Body Capacity Market Auction Guidelines (2025 publication referenced). Available from:

https://emrdeliverybody.nationalenergyso.com/IG/s/article/CM-Auction-Guidelines-and-Parameters

Ref 23. Planning and Infrastructure Act. Available from: https://www.legislation.gov.uk/ukpga/2025/34

Ref 24. The Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025. Available from: https://www.legislation.gov.uk/ukdsi/2025/9780348269765

Ref 25. Department for Communities and Local Government (2013) Planning Act 2008: applications form guidance. Available at: https://assets.publishing.service.gov.uk/media/5a75ac43ed915d6faf2b4ced/Planning_Act_2008_-_application_form_guidance.pdf

Ref 26. Planning Inspectorate (2024). Nationally Significant Infrastructure Projects: Advice for Local Authorities. Available from: https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-for-local-authorities

Ref 27. The Infrastructure Planning (Decisions) Regulations 2010. Available at: https://www.legislation.gov.uk/ukdsi/2010/9780111490266/contents

Ref 28. United Nations (1992). Convention on Biological Diversity Text and Annexes. Available at: https://www.cbd.int/doc/legal/cbd-en.pdf

Ref 29. Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government and Department for Levelling Up, Housing and Communities (2024). National Planning Policy Framework. Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2

Ref 30. Town and Country Planning Act (1990). Available from: https://www.legislation.gov.uk/ukpga/1990/8/contents

Ref 31. 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 Plan-making and national decision-making policies. Draft text for consultation. Available from: https://assets.publishing.service.gov.uk/media/697b71c52ff8d10a830d5d4a/Draft_NPPF_December_2025.pdf

Ref 32. HM Treasury (2020) National Infrastructure Strategy. Available at: https://www.gov.uk/government/publications/national-infrastructure-strategy

Ref 33. 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 from:

https://www.gov.uk/guidance/planning-act-2008-content-of-a-development-consent-order-required-for-nationally-significant-infrastructure-projects

Ref 34. 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 from: https://www.gov.uk/guidance/planning-act-2008-pre-application-stage-for-nationally-significant-infrastructure-projects

Ref 35. 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 from: https://www.gov.uk/guidance/planning-act-2008-pre-examination-stage-for-nationally-significant-infrastructure-projects

Ref 36. 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 from: https://www.gov.uk/guidance/planning-act-2008-examination-stage-for-nationally-significant-infrastructure-projects

Ref 37. Ministry for Housing, Communities and Local Government (2025). Guidance on the compulsory purchase process. Available from: https://www.gov.uk/government/publications/compulsory-purchase-process-guidance/guidance-on-the-compulsory-purchase-process

Ref 38. Ministry for Housing, Communities and Local Government (2013). Planning Act 2008: Associated development applications for major infrastructure projects. Available from: https://www.gov.uk/government/publications/planning-act-2008-associated-development-applications-for-major-infrastructure-projects

Ref 39. Department for Levelling Up, Housing and Communities (2025). Flood risk and coastal change. Available from: https://www.gov.uk/guidance/flood-risk-and-coastal-change

Ref 40. Norfolk County Council (2022). Local Transport Plan 4 Strategy 2021-2036. Available from: https://www.north-norfolk.gov.uk/media/9005/i10-local-transport-plan-4-strategy-implementation-plan-2021-2036.pdf

Ref 41. Long Stratton Neighbourhood Plan 2019 to 2036. Adopted Version October 2021. Available from: https://www.southnorfolkandbroadland.gov.uk/asset-library/imported-assets/long-stratton-neighbourhood-plan-adopted-version-october-2021.pdf

Ref 42. Tasburgh Neighbourhood Plan 2023-2024. Available from: https://www.southnorfolkandbroadland.gov.uk/asset-library/imported-assets/tasburgh-neighbourhood-plan-adopted-version-accessiblity-checked-reduced-size.pdf

Ref 43. The Tivetshall Neighbourhood Plan 2022-2042. Available from: https://www.southnorfolkandbroadland.gov.uk/asset-library/imported-assets/tivetshall-np-adopted-reduced.pdf

Ref 44. South Norfolk Council (n.d.). Shotesham Neighbourhood Plan Designation Documents. Available from: https://www.southnorfolkandbroadland.gov.uk/planning/future-development/local-plans/neighbourhood-plans/emerging-neighbourhood-plans-south-norfolk/shotesham-neighbourhood-plan

Ref 45. Department for Energy Security and Net Zero (2025). Solar Roadmap. Available at: https://www.gov.uk/government/publications/solar-roadmap

Ref 46. Department for Energy Security and Net Zero (2023). Powering Up Britain. Available at: https://www.gov.uk/government/publications/powering-up-britain

Ref 47. 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 48. 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 49. 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 50. Department for Energy Security and Net Zero and Department for Business, Energy & Industrial Strategy (2020). Energy White Paper: Powering our net zero future. Available from: https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future