



**East Pye Solar
Design Approach Document**

**Revision 1
March 2026**

Planning Inspectorate Reference: EN0110014

Document Reference: APP/7.17

APFP Regulation 5(2)(q)

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Executive Summary

This Design Approach Document (DAD) has been prepared on behalf of East Pye Solar Limited to accompany the Development Consent Order Application ('DCO Application') for East Pye Solar ('the Scheme').

East Pye Solar is proposed to help meet the urgent need for home grown, secure, renewable energy that is required by Government policy to address climate change and energy security.

The proposal also offers the opportunity to deliver wide-ranging benefits beyond renewable energy production including recovery of natural environments, economic growth and social benefits such as education and skills opportunities.

The DAD demonstrates how good design has been embedded in the design of the Scheme and how the design of the Scheme has evolved up to the point of the DCO Application within a clear design framework.

This DAD sets out the design framework adopted, which includes an overarching Scheme Vision and design principles, together with the local context to the Order Limits, which the design framework has sought to respond to. The DAD has been prepared with reference to the Planning Inspectorate's guidance 'Nationally Significant Infrastructure Projects: Advice on Good Design'. The DAD describes the key design choices made during the evolution of the Scheme, the reasoning behind these decisions, and the approach to ensuring that the commitment to good design will be secured following consent.

The Scheme design has progressed in response to the findings of environmental surveys, the assessment process and following consultation feedback. As part of the design evolution, strategies for landscape, biodiversity and access were developed to respond to the local context of the Order Limits and to minimise potential effects and enhance opportunities. Design changes have included, for example, reducing the extent of Solar PV Arrays within parts of the Sites, together with evolution of the potential areas for mitigation and enhancement to respond to the landscape character, the historic environment, ecological features and flood risk.

The DAD outlines how good design will be secured post-consent through a suite of management plans and requirements in the **draft Development Consent Order (DCO) [EN0110014/APP/3.1]** and the **Design Principles, Parameters and Commitments** document [EN0110014/APP7.18].

In summary, this DAD outlines how the Scheme design has been 'environmentally led', balancing the need for providing essential renewable energy generation, whilst providing good design outcomes, through the design process.

1 Introduction

1.1 Overview of the Scheme

- 1.1.1 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]**.
- 1.1.2 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]**.
- 1.1.3 The Order Limits are located entirely within the administrative boundary of South Norfolk Council (SNC) and Norfolk County Council (NCC) as shown in **Figure 1.1**. The Order Limits for the Scheme comprise 1,212.3 hectares (ha) of land, of which 1,051.4 ha relate to the Sites. East Pye Solar would be located between the villages of Great Moulton, Long Stratton, Tasburgh, Hempnall, Fritton, Lundy Green, Silver Green, Saxlingham Nethergate, Saxlingham Green, Woodton, Brooke and Seething, encompassing ten land parcels referred to as Site 1 to 10 (with associated Sub-Sites); and the BESS Site, collectively referred to as the 'Sites'. The Sites would be connected by a Cable Route Corridor (CRC).
- 1.1.4 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]**.

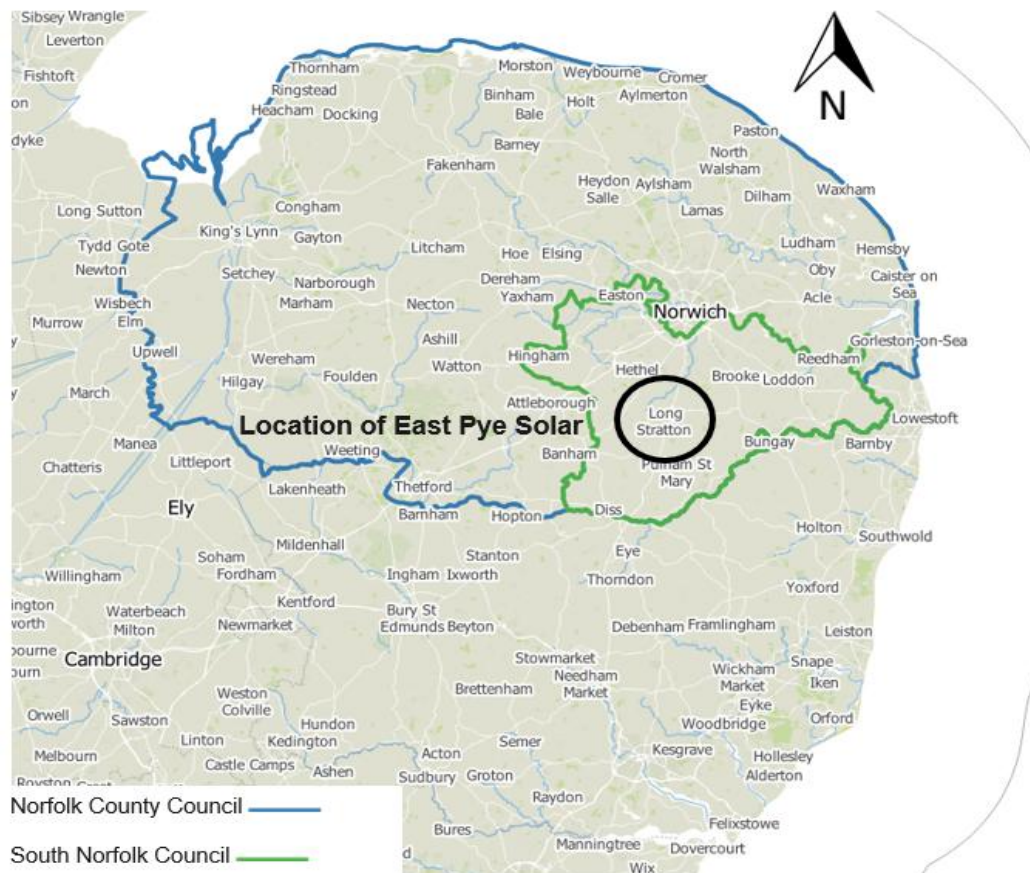


Figure 1.1: Site Location

1.2 Purpose of this Document and Key Design Terminology

- 1.2.1 This Design Approach Document (DAD) has been prepared on behalf of East Pye Solar Limited (the Applicant) to accompany the application for a Development Consent Order (DCO) for the Scheme.
- 1.2.2 The purpose of the DAD is to demonstrate how good design has been embedded in the design process of the Scheme (as illustrated in **ES Volume 2, Figure 4.1 – Indicative Masterplan [EN0110014/APP/6.2.4.1]**), the application of the design principles and mitigation hierarchy, together with how the design of Scheme has evolved. The DAD sets out the key design decisions taken during the design process and the mechanisms by which good design will be secured post-consent.
- 1.2.3 This DAD has been prepared pursuant to Regulation 5(2)(q) of The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (APFP Regulations) (Ref 1) and in accordance with the Planning Inspectorate's (PINS) 'Nationally Significant Infrastructure Projects:

Advice on Good Design’ (Ref 2). Compliance of the Scheme with national and local planning policy is set out in the **Planning Statement [EN0110014/APP/7.14]** and **Policy Compliance Document [EN0110014/APP/7.15]**. Site selection and alternative sites to the Sites is set out in the **ES Volume 1, Chapter 5 - Alternatives and Design Evolution [EN0110014/APP/6.1.5]** and the **Site Selection Assessment [EN0110014/APP/7.20]**.

- 1.2.4 The DAD has been structured around four stages of the design process, as set out in the Planning Inspectorate ‘good design’ guidance (Ref 2). The advice is intended to complement the legislation, regulations and guidance issued by government and is produced under section 51 of the Planning Act 2008.
- 1.2.5 The four stages – *Assemble, Research, Co-ordinate, Secure* – provide evidence, in a structured manner, that the Applicant has engaged in and is committed to a process that can deliver good design outcomes, which are specific and proportionate to the type of infrastructure proposed. These are described in this DAD. Key design terminology of this DAD is set out in **Table 1.1**.

Table 1.1: DAD Design Terminology

Term	Definition
Scheme Vision	An overarching strategic vision for the Scheme. Embedding good design and beneficial outcomes in the Scheme design process requires the adoption of an overarching project level vision for the Scheme, which informs the approach by the Applicant and subsequent project level design principles.
Design Principles	Principles are used to guide decision making throughout the design evolution process in order to deliver the intended outcomes of the Scheme. They should result in tangible outputs that are secured by relevant plans and documents set out in the draft DCO (such as Works Plans, Design Parameters, Design Commitments and relevant management plans). Where these plans and documents allow for flexibility within detailed design, project level design principles may be secured within the outline management plans to inform future design choices (within the consented parameters) post-consent.
Design Parameters	Design parameters secure the size (maximum footprint, width and height above ground level of different elements of the Scheme). Parameters are shown and secured through the Works Plan [EN0110014/APP/2.3] and the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] .
Design Commitments	Design commitments secure specific elements of the detailed design such as appearance, materials, type, colour, surfacing and offsets. Design commitments are set and secured through Design Principles, Parameters and Commitments [EN0110014/APP/7.18] .

2 Policy Context for Good Design

2.1 What is Good Design

- 2.1.1 Good design plays a crucial role in people's quality of life. It goes beyond aesthetics, encompassing processes and behaviours that contribute to sustainable development as much as the final design outcomes.
- 2.1.2 PINS Advice on Good Design (Ref 2) states that '*good design is crucial for achieving excellent functionality, sustainability, positive place-making and resilience in NSIPs*'. The guidance recognises a holistic approach to good design is necessary to respond to place and complex environments. To achieve good design, the guidance states that '*achieving high quality, good design outcomes requires an effective, intentional, transparent, deliverable process to be planned, followed and secured*'.
- 2.1.3 The key policy requirements for Nationally Significant Infrastructure Projects (NSIP) to achieve good design are set out in the following National Policy Statements (NPS):
- Overarching National Policy Statement for Energy (EN-1) (NPS EN-1) (Ref 3);
 - National Policy Statement for Renewable Energy Infrastructure (EN-3) (NPS EN-3) (Ref 4); and
 - National Policy Statement for Electricity Networks Infrastructure (EN-5) (NPS EN-5) (Ref 5).
- 2.1.4 An appraisal of how the Scheme has complied with national and local policy is provided in the **Planning Statement [EN0110014/APP/7.14]** and the **Policy Compliance Document [EN0110014/APP/7.15]**.
- 2.1.5 **Appendix A** of this DAD sets out how the PINS 'Nationally Significant Infrastructure Projects: Advice on Good Design' (Ref 2) has been considered within the DCO Application

2.2 Planning Policy

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

- 2.2.1 NPS EN-1 (Ref 3) sets out criteria for good design. Paragraph 4.7.1 of NPS EN-1 notes that while the visual appearance of infrastructure is sometimes seen as the most important factor in good design, '*high quality and inclusive design goes far beyond aesthetic considerations*', also encompassing functionality, including fitness for purpose and sustainability.

- 2.2.2 Whilst recognising that the nature of energy infrastructure will often limit the contribution to enhancing the quality of the area, paragraph 4.7.2 of NPS EN-1 (Ref 3) states that good design should *‘produce sustainable infrastructure sensitive to place... efficient in the use of natural resources... and matched by an appearance that demonstrates good aesthetic as far as possible’*.
- 2.2.3 Paragraph 4.7.3 of NPS EN-1 (Ref 3) explains that *‘good design is a means by which many policy objectives in the NPSs can be met...and how good design, in terms of siting and use of appropriate technologies...can help mitigate adverse impacts...’*. Given the benefits of good design in mitigating adverse impacts, NPS EN-1 (Ref 3) highlights the need to consider good design from the early stages of the design process (paragraph 4.7.4).
- 2.2.4 Paragraphs 4.7.5 to 4.7.9 of NPS EN-1 (Ref 3) set out how the Applicant could consider implementing good design, including:
- Appoint a project board-level design champion to maximise the value provided by the infrastructure;
 - Establish design principles at the outset to guide design evolution and how design principles can be applied post consent;
 - Consider the siting of infrastructure relative to existing landscape character, landform and vegetation;
 - Design and sensitive use of materials in associated development; and
 - Embed nature inclusive design within the process.
- 2.2.5 Footnote 102 of NPS EN-1 (Ref 3) notes that design principles *‘should take into account any national guidance on infrastructure design,’* including the Design Principles for National Infrastructure (Ref 10), the National Design Guide (Ref 11), the National Model Design Code (Ref 12) and local planning policies.
- 2.2.6 Paragraph 4.7.10 of NPS EN-1 (Ref 3) sets out that the Secretary of State must be satisfied that infrastructure developments are *‘sustainable and, having regard to regulatory and other constraints, are as attractive, durable and adaptable...as they can be’*. The Secretary of State should also be satisfied that the applicant has considered both *‘functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area... any potential amenity benefits, and visual impacts on the landscape...)* as far as possible’ (paragraph 4.7.11 of NPS EN-1 (Ref 3)).
- 2.2.7 Paragraph 4.7.12 of NPS EN-1 (Ref 3) advises that the Secretary of State *‘should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements which the design has to satisfy’* when considering applications.

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

- 2.2.8 NPS EN-3 (Ref 4) further reinforces the expectation that renewable energy infrastructure should demonstrate good design and that the mitigation hierarchy should be followed. Paragraph 2.1.8 of NPS EN-3 (Ref 4) explains that the applicant *‘must show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy.’*
- 2.2.9 Proposals for renewable energy infrastructure should *‘demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage’* (paragraph 2.5.2 of NPS EN-3 (Ref 4)).
- 2.2.10 Paragraph 2.10.9 states *‘Along with associated infrastructure, a solar farm currently requires between 1.6 and 2.25 hectares (4-5.6 acres) for each MW of output. However, this will vary significantly depending on the site, with some being larger and some being smaller. This is also expected to change over time as the technology continues to evolve to become more efficient. Nevertheless, this scale of development will inevitably have impacts, particularly if sited in rural areas.’* (Ref 4)
- 2.2.11 Paragraphs 2.10.51 to 2.10.56 of NPS EN-3 (Ref 4) specifically relates to solar PV generation and achieving good design in relation to site layout, design and appearance. Furthermore, Section 2.10 of NPS EN-3 sets out the influencing factors on the design of solar farms and in paragraph 2.10.51 states *‘Applicants should consider the criteria for good design set out in EN-1 Section 4.7 of EN-1 at an early stage when developing projects’*. Paragraph 2.10.52 of NPS EN-3 (Ref 4) notes that *‘applicants will consider several factors when considering the design and layout of sites, including proximity to available grid capacity... orientation, topography, previous land-use, and ability to mitigate environmental impacts and flood risk.’*
- 2.2.12 Paragraph 2.10.53 of NPS EN-3 (Ref 4) adds that *‘for a solar farm to generate electricity efficiently the panel array spacing should seek to maximise the potential power output of the site. The type, spacing and aspect of panel arrays will depend on the physical characteristics of the site such as site elevation’*.

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

- 2.2.13 Paragraph 2.4.1 of NPS EN-5 (Ref 5) states that the Secretary of State is required to have regard to the desirability of good design and paragraph 2.4.2 (Ref 5) signposts applicants to the criteria for good design set out in

Section 4.7 of NPS EN-1 (Ref 3), together with reference to the Holford and Horlock rules and Electricity Transmission Design Principles.

- 2.2.14 Paragraph 2.4.3 of NPS EN-5 (Ref 5) states that ‘... *the Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant’s ability to influence the aesthetic appearance of that infrastructure*’. Paragraph 2.4.4 of NPS EN-5 (Ref 5) continues with ‘*while the above principles should govern the design of an electricity networks infrastructure application to the fullest possible extent – including in its avoidance and/or mitigation of potential adverse impacts... – the functional performance of the infrastructure in respect of security of supply and public and occupational safety must not thereby be threatened*’.

Greater Norwich Local Plan (2024)

- 2.2.15 The Greater Norwich Local Plan (adopted March 2024) (Ref 5) forms part of the development plan for SNC up to 2038. The Local Plan places emphasis on creating sustainable development and creating environmentally sustainable, resilient and socially inclusive communities. Whilst the policies are not specific to utility-scale renewable infrastructure, the following policies are considered to include themes that are applicable to the Scheme:

- Policy 2 identifies that design is high quality in creating resilient and inclusive communities. Policy 2 also states that ‘*Proposals for free standing decentralised, renewable and/or low carbon energy networks, except for wind energy schemes, will be supported subject to the acceptability of wider impacts*’; and
- Policy 3 seeks development proposals to enhance the built and historic environment, together with the enhancing the natural environment.

SNC Development Management Policies Document (2015)

- 2.2.16 SNC’s Development Management Policies Document (DMPD) (2015) was not superseded following the adoption of the Greater Norwich Local Plan (Ref.6) and has been carried forward. Similar to the Greater Norwich Local Plan, the DMPD seeks sustainable development and environmental quality. Policies are not specific to utility-scale renewable infrastructure, however, Policy DM 3.8 seeks design principles to be applied to all development to achieve high quality design, protect and enhance the environment and existing locally distinctive character and encourage innovation.

SNC draft Landscape Susceptibility in relation to Energy Generation, Storage and Transmission SPD

2.2.17 This consultation Supplementary Planning Document (SPD) defines different levels of susceptibility for the various district landscape character areas for different types of infrastructure which is relevant to the Scheme. The Applicant has reviewed the judgements provided by SNC within the document and reviewed its relevance to the Scheme. The study is not adopted and in any event, is not considered applicable to NSIP scale solar development, given that it considers solar scheme's up to 50MW.

Made Neighbourhood Plans

2.2.18 The Sites are located within the following areas subject to made Neighbourhood Plans. Whilst the policies within these made Neighbourhood Plans are not specific to utility-scale renewable infrastructure, the following made Neighbourhood Plans include themes that are applicable to the Scheme:

- Long Stratton Neighbourhood Plan 2019 - 2036 (made October 2021) (Ref 7). Within this, Policy LSNP – DC7 seeks development to be sympathetic to the landscape character, retain or enhance features of landscape value and historic hedgerow boundaries, and safeguard dark skies, whilst Policy LSNP GI17 seeks the provision of green infrastructure. Policy LSNP – DC10 Long Stratton Design Principles seeks a design led approach guided by design principles;
- Tasburgh Neighbourhood Plan 2023-2038 (made July 2024) (Ref 8). Within this Policy TAS1 seeks to conserve and enhance natural assets. Policy TAS6 seeks that new development reflects the parishes local distinctiveness and character, and that proposals accord to the Tasburgh Design guidance and code. Policy TAS11 seeks to conserve heritage assets in a manner appropriate to their significance; and
- Tivetshall Neighbourhood Plan 2022-2042 (made December 2022) (Ref 9). Within this, Policy TIV3 seeks high quality design that should have regard to local context and seeks development to take account of Tivetshalls Design Guidance and Codes. Policy TIV10 seeks development to respect the landscape setting and identifies important public views, whilst Policy TIV11 seeks conservation and enhancement of natural assets. TIV13 seeks development to take into account dark skies but recognises the need for safety and security.

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

2.3 Guidance and Advice

2.3.1 Alongside policy requirements, regard has been had to the following guidance in the approach to good design:

- NSIPs: Advice on Good Design (PINS, 2025) (Ref 2);
- Design Principles for National Infrastructure (National Infrastructure Commission (NIC) Design Group, 2020) (Ref 10); and
- South Norfolk Place-Making Guide Supplementary Planning Document (South Norfolk Council, 2013) (Ref 1414).

2.3.2 The NIC's 'Design Principles for National Infrastructure' provides further guidance on good design for infrastructure projects and is referred to in NPS EN-1. It highlights the importance of the design process to bring together engineering, environmental and creative expertise to shape and deliver a development project. The document notes that 'design is as much about process as it is product. Imaginative thinking about design should be embedded at every step of planning and delivery. The principles ensure a good process leads to a good design outcome.' The document sets out four thematic design principles for National Infrastructure, which are:

- **Climate:** Mitigate greenhouse gas emissions and adapt to climate change;
- **People:** Reflect what society wants and share benefits widely;
- **Places:** Provide a sense of identity and improve our environment; and
- **Value:** Achieve multiple benefits and solve problems well.

2.3.3 The NIC Design Principles are deliberately high level and intended to provide a framework for more detailed project level design principles to be developed on individual schemes. Further guidance on how to develop and embed project level design principles to major infrastructure projects is provided in the NIC's 'Project Level Design Principles' document. It states that '*Project level design principles should directly address the Design Principles for National Infrastructure of climate, people, places and value, plus any supporting organisational or sectoral principles. There should be a clear logic to the structuring of the design principles, from strategic to project level, within an easy-to understand hierarchy.*' Furthermore, it states that the development of project level design principles is an iterative, ongoing activity throughout the lifecycle of a project and should evolve to reflect '*any significant new information coming to light, a deeper understanding of community and place, and the development of detailed designs.*'

2.3.4 The South Norfolk Place-Making Guide SPD (Ref 14), whilst focussed on buildings rather than NSIP covers the below key themes. In accordance with NPS EN-1 (Ref 3) regard has been given to the SPD, where applicable:

- Responding to local landscape character and context;
- Retaining and integrating natural features, including vegetation and green infrastructure (GI); and
- Being sensitive to heritage assets and the historic environment.

3 Assemble

3.1 Design Team

- 3.1.1 The Applicant is East Pye Solar Limited, which is a 100%-owned subsidiary of Island Green Power UK Projects Limited, which is in turn a 100%-owned subsidiary of Island Green Power's UK group holding company, Island Green Power Group Limited (IGP). The Applicant is part of IGP, who are a leading international developer of utility-scale solar projects and battery storage systems', established in 2013.
- 3.1.2 IGP has successfully delivered nearly 40 solar projects worldwide that have generated more than 3GW of energy capacity. This includes 21 solar projects in the UK. These range in size from below 5MW to Nationally Significant Infrastructure Projects (NSIPs) such as Cottam, currently the UK's largest consented solar project. Cottam will generate 600MW of clean, renewable and secure electricity and includes 600MW of Battery Storage that will store then release energy as needed.
- 3.1.3 Their mission is to deliver renewable energy solutions that create lasting value for the communities they serve, protecting the environment while fostering economic growth and energy independence.
- 3.1.4 Recently, IGP's Cottam and West Burton projects have received DCOs. The Cottam Solar Project was granted development consent by the Secretary of State on 5 September 2024. The West Burton Solar Project was granted development consent by the Secretary of State on 24 January 2025.
- 3.1.5 The Applicant has appointed a Board Level Design Champion to ensure good design is embedded across their portfolio of projects. The Design Champion advocates a good practice design approach and shares lessons learned across the projects. This approach has been taken into consideration in the design process of the Scheme.
- 3.1.6 In addition to the Applicants' Board Level Design Champion, a project level Design Champion led the design process for the Scheme to ensure a multi-disciplinary approach to design. The project's landscape architect was the Design Champion for the Scheme who has prior experience in leading landscape-led environmental design of other NSIP solar projects. The project level Design Champion was also responsible for developing the Indicative Masterplan shown in **ES Volume 2, Figure 4.1 - Indicative Masterplan [EN0110014/APP/6.2.4.1]** and influencing the **Works Plan [EN0110014/APP/2.3]**.
- 3.1.7 A multi-disciplinary team was appointed (see **Figure 3.1**) to inform the design process of the Scheme.

Design Lead and Design Champion
IGP + Stantec

Oversight of the design to ensure that it upholds project design principles, environmental considerations are taken into account and the project delivers good design.
 IGP has experience in the design and delivery of NSIP Solar projects.
 The project level Design Champion is a chartered member of the Landscape Institute with 18 years of experience.

Environmental Disciplines

<p>Landscape, Ecology, Water Environment, Transport, Noise and Vibration, Air Quality, Socio-Economics, Ground Conditions and Arboriculture Stantec</p> <p>Heritage and Archaeology GHC Heritage</p> <p>Glint and Glare and Electromagnetic Field Pager Power</p>	<p>Soils and Agricultural Land Kernon Countryside Consultants</p> <p>Climate Change Bureau Veritas</p> <p>Waste Lanpro</p>
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Collaborative approach to developing the design offset buffers, design principles and making decisions during the design process through multidisciplinary working. Conclusions of environmental surveys and studies fed into an iterative approach to the design. A multidisciplinary team has provided a holistic approach to the design, identifying environmental conditions of the sub-Sites, likely significant effects and mitigation measures.

All EIA topic leads are recognised as competent experts as set out in ES Volume 3, Appendix 1.2 Statement of Expertise [EN0110014/APP/6.3.1.2]

Engineering
IGP + BST&T

Technical engineering design (inc. civils).
 Grid connection and electrical engineering.
 Battery Safety Consultant.

Solar engineers and battery safety consultant with experience in NSIP solar projects.

Communications
Counter Context

Overseeing consultation events, collating feedback and embedding feedback alongside the environmental consultants in the iterative design process.
 Experience in NSIP solar projects

Aviation
Aviatica

Aviation advice specialising in aviation/environmental interactions.

Experience in renewable projects, including solar.

Planning
Stantec

Advise the project team on design relation national and local policy requirements.

Chartered town planners experienced in NSIP solar projects.

Figure 3.1: Project Design Team

3.2 Project Brief for the Scheme

3.2.1 Following the Sites selection process (**Site Selection Assessment [EN0110014/APP/7.20]**), the project brief for the Scheme was to sensitively design:

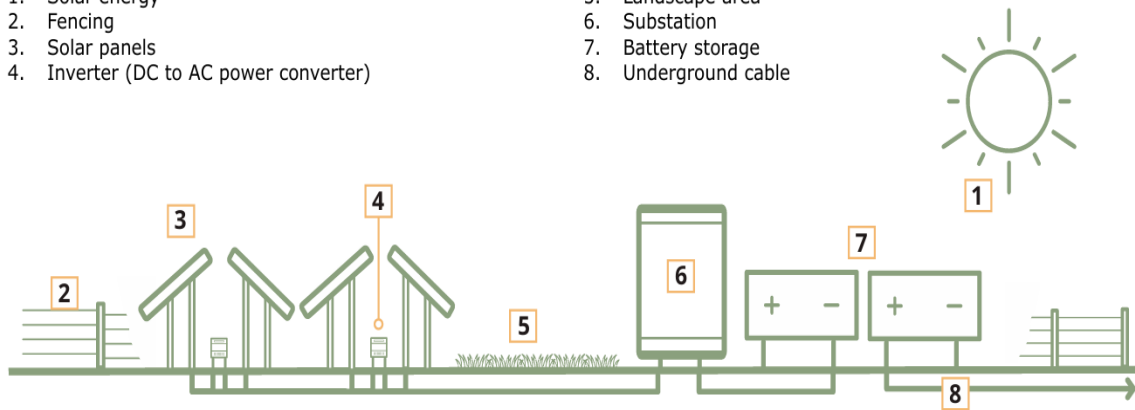
- The construction, operation and maintenance, and decommissioning of a solar PV electricity generating station with a grid connection capacity of approximately 500MW and associated development, including a BESS and Grid Connection Infrastructure; and
- In doing so, the design must take into account the local and surrounding context and apply the mitigation hierarchy to provide renewable and low carbon energy.

3.2.2 To achieve the above project brief, the Scheme would need to include the following key components (and as illustrated in **Figure 3.2**):

- **Solar PV Panels:** captures and converts solar irradiance into electrical energy, comprising fixed and/or tracker panels;
- **Mounting Structures:** structures fixed to the ground and onto which the Solar PV Panels are attached;
- **Security Measures and Fencing:** including perimeter fencing comprising wire mesh and wooden or metal posts, together with pole-mounted, inward-facing closed-circuit television (CCTV) cameras to protect operational areas;
- **Inverters:** equipment (within Conversion Units) that converts direct current (DC) electricity generated by the Solar PV Panels into alternating current (AC) electricity, which allows the electricity generated to be exported to the National Grid;
- **Landscaping:** new planting for landscaping and habitat creation;
- **Substations:** two types of Substations required to export electricity to the National Grid, comprising Project Substations and a National Grid Substation;
- **BESS:** storage capacity enabling the storage, importation and exportation of energy to the National Grid; and
- **Cabling:** cables which transmit electricity between Solar PV Panel to Conversion Units and from there to a Project Substation, BESS and National Grid Substation. These cables consist of 11kV, 33kV, 132kV and 400kV cables, as well as earthing cables and optical fibre cables.

Components of a typical solar project

1. Solar energy
2. Fencing
3. Solar panels
4. Inverter (DC to AC power converter)
5. Landscape area
6. Substation
7. Battery storage
8. Underground cable



*Diagram not to scale

Figure 3.2: Schematic Diagram of Components of a Typical Solar Project

- 3.2.3 A full description of the key components of the Scheme, together with details of how the Scheme would be constructed, operated, maintained and decommissioned, is provided in **ES Volume 1, Chapter 4 – The Scheme [EN0110014/APP/6.1.4]**.

3.3 IGP Global Design Principles

- 3.3.1 IGP has established a set of company-wide ‘global design principles’. These global design principles aim to ensure that all IGP projects deliver direct benefits to communities, enhance biodiversity, control any adverse effects on the local environment throughout the lifecycle of the project, and help tackle climate change by harnessing and storing renewable energy. They align with the core ambitions outlined in the NIC Design Principles for National Infrastructure: Climate, People, Places and Value and are used by IGP at all stages of their projects, from site selection through to delivery. IGP’s global design principles are shown in **Figure 3.3**.



Figure 3.3: IGP's Global Design Principles

3.4 Timeline

3.4.1 The project timeline of key milestones from inception to the submission of the DCO Application is illustrated in **Figure 3.4**, together with the anticipated future programme following the submission of the DCO Application.

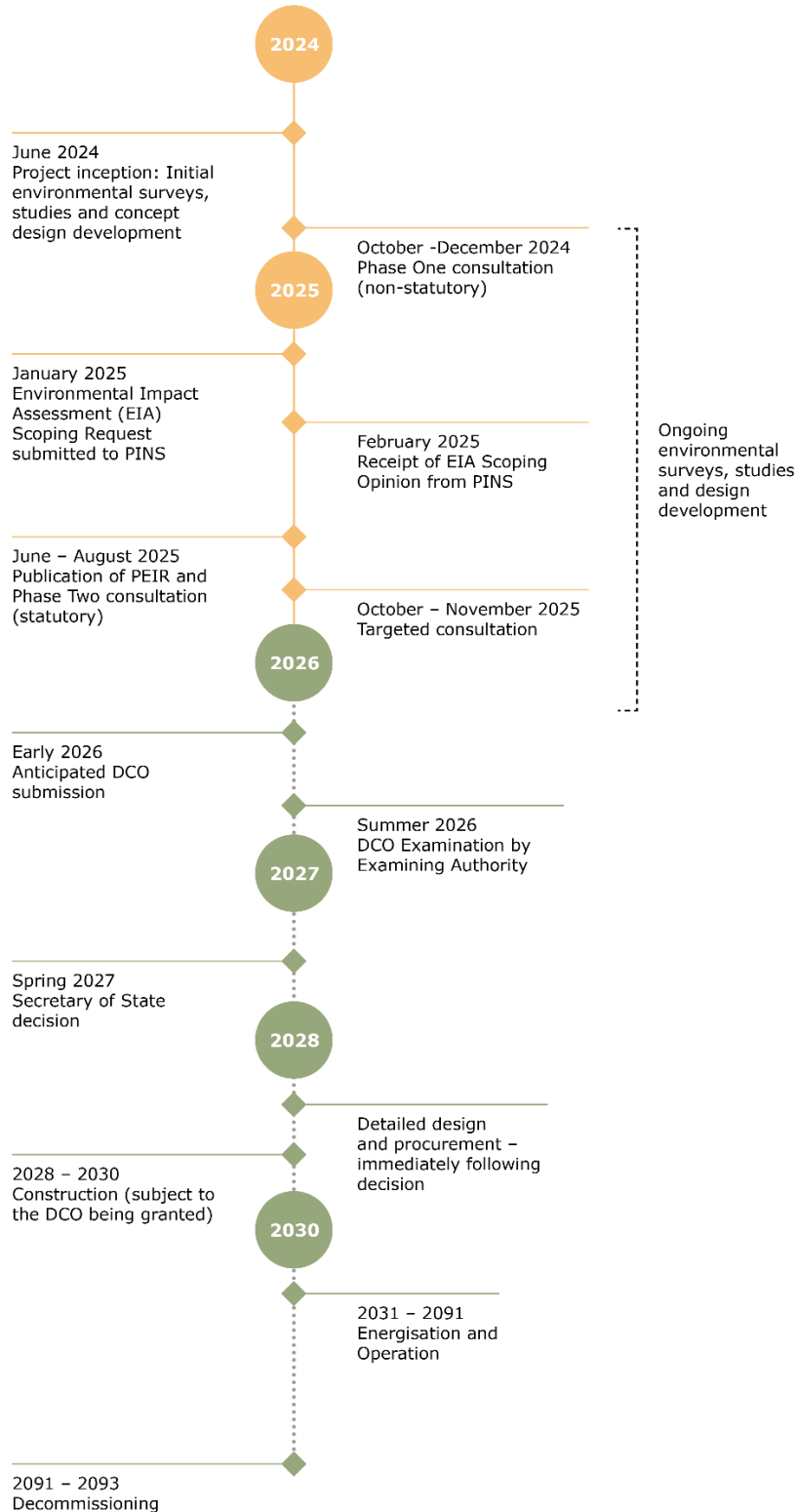


Figure 3.4: Project Timeline

3.5 Context of Sites

- 3.5.1 The land within the Order Limits (see **Figure 3.5**) comprises predominantly agricultural (arable) fields crossed by farm tracks, roads, rural lanes, hedgerows, tree belts, scattered trees, watercourses, ponds and Public Rights of Way (PRoW), including the Boudicca Way and Via Beata recreational routes.
- 3.5.2 An existing 400kV overhead line and associated transmission pylons pass through Site 1. Further existing overhead utilities and existing underground utilities are present within the Order Limits.
- 3.5.3 The Order Limits are bound by agricultural land, blocks of woodland, scattered individual properties and small villages including Great Moulton, Long Stratton, Tasburgh, Hempsall, Fritton, Lundy Green, Silver Green, Saxlingham Nethergate, Saxlingham Green, Woodton, Brooke and Seething.
- 3.5.4 A description of the Sites and their environmental context is provided in the **ES Volume 1, Chapter 3 - The Order Limits [EN0110014/APP/6.1.3]**.

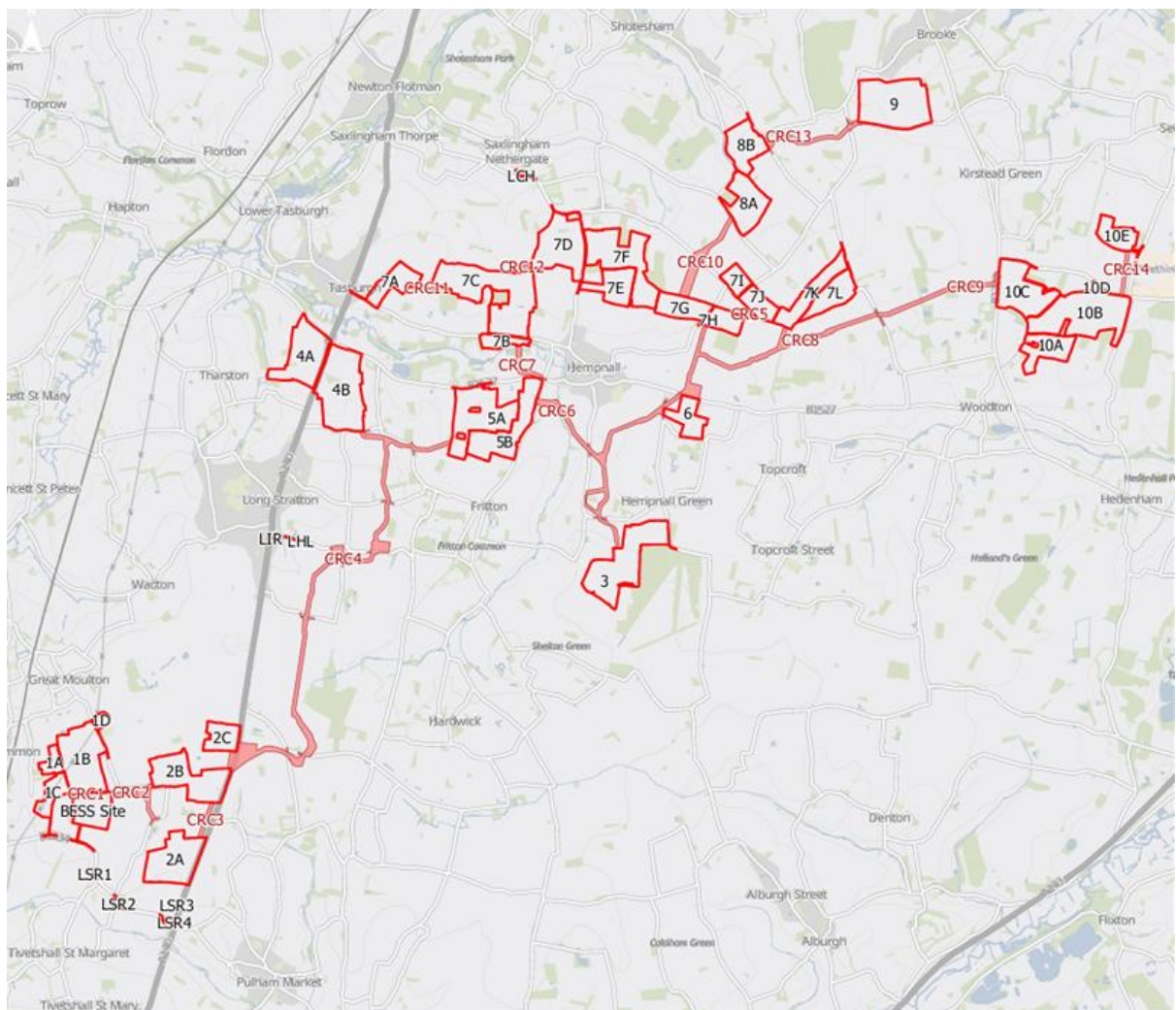


Figure 3.5: Sites and CRC within the Order Limits

Topography

- 3.5.5 The topography of the land within the Order Limits is predominantly flat or gently undulating, as illustrated in **Figure 3.6**. Owing to the general topography, the Sites are particularly suitable for solar energy.
- 3.5.6 The BESS Site, 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. Site 7 ranges from approximately 30m AOD at its lowest to 50m AOD at its highest. 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.

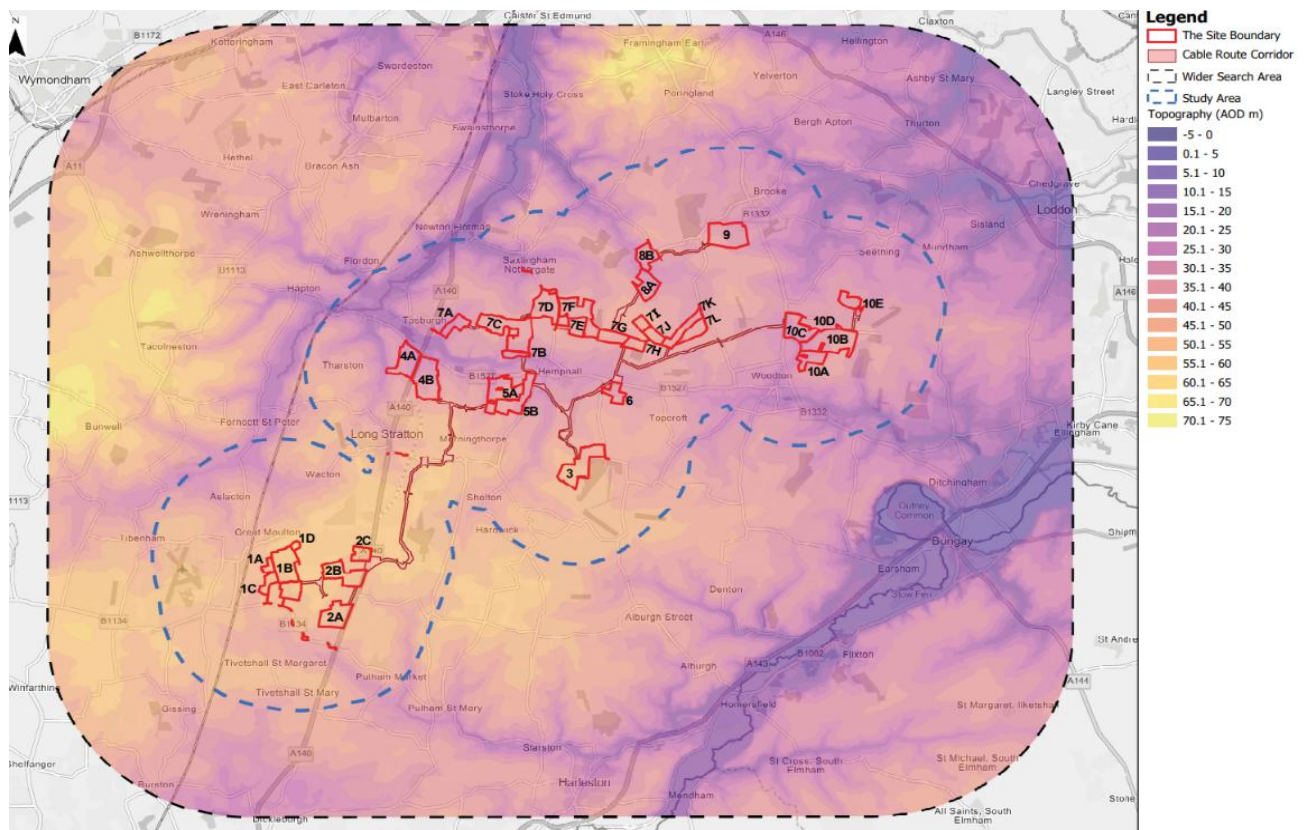


Figure 3.6: Topographical Context

Landscape

Landscape Designations

- 3.5.7 **Figure 3.7** shows the landscape designations around the Order Limits. There are no national landscape designations or local landscape designations within or immediately adjacent to the Order Limits. However, Policy DM 4.5 of the Development Management Policies for South Norfolk (Ref 19), which is retained with adoption of the Greater Norwich Local Plan (Ref 5), places particular regard to protecting the distinctive characteristics, special qualities and geographical extents of Rural River Valleys.

Landscape Character

- 3.5.8 At the national level, the Order Limits are situated within the South Norfolk and High Suffolk Claylands National Character Area (NCA) (Ref 20). 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.
- 3.5.9 South Norfolk is a landscape of arable farmland intersected by rural river valleys to plateau farmland (see photographs at **Figure 3.8** and **Figure 3.9**). Six District Landscape Character Areas (LCA) (**Figure 3.10**) are situated within the Order Limits as follows:
- **A1 Tas Rural River Valley:** key characteristics include valley form with shallow side slopes, with a feeling of exposure and openness, fragmented woodland and network of rural lanes;
 - **B1 Tas Tributary Farmland:** key characteristics include open, gently undulating to flat and sloping landscape, large open arable fields, small blocks of woodland, network of recreational footpaths, villages and transportation corridors;
 - **B4 Waveney Tributary Farmland:** a transitional landscape with key characteristics including large-scale open landscape on the higher ground, watercourses, scattered blocks of woodland, rural lanes, villages and a railway line;
 - **B5 Chet Tributary Farmland:** key characteristics include a flat to gently undulating landscape, with a varied sense of enclosure, watercourses, predominantly arable farmland with sporadic villages;
 - **C2 Thurlton Tributary Farmland with Parkland:** key characteristics include slopes that rise gently up, predominantly arable farmland with woodland and a visible presence of parkland landscapes, distinctive watercourses and sparsely settled villages; and

- **E2 Great Moulton Plateau Farmland:** key characteristics include a flat elevated plateau landform with extensive arable farmland with large-scale fields and expansive skies.
- 3.5.10 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. Site 10 is predominately located within the C2 Thurlton Tributary Farmland with Parkland LCA.

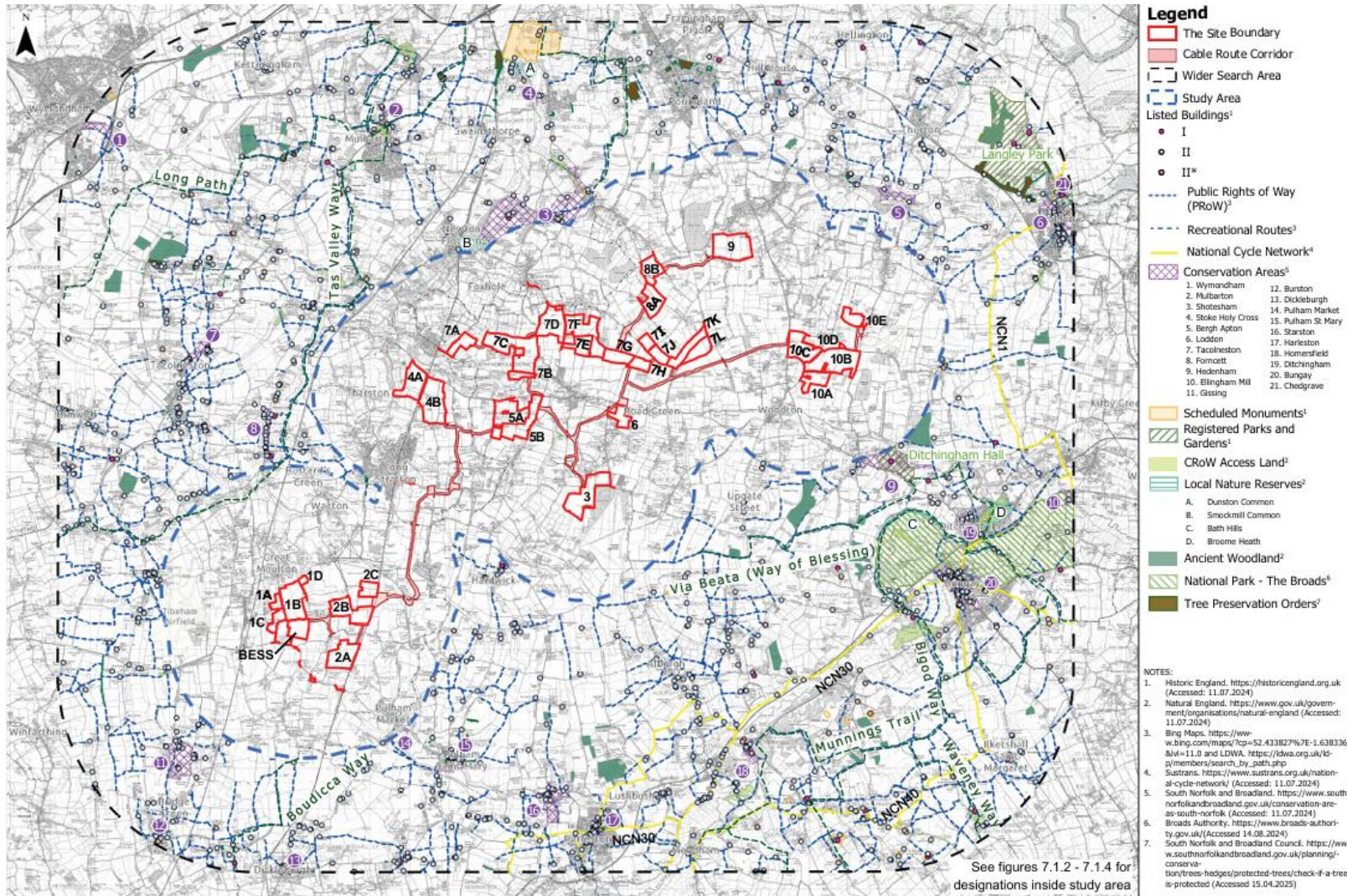


Figure 3.7: Landscape Designations



Figure 3.8: Site 8 – Landscape of the Tas Rural River Valley



Figure 3.9: Sub-Site 1B, Looking North East from Junction of PRow Great Moulton FP15/RB18

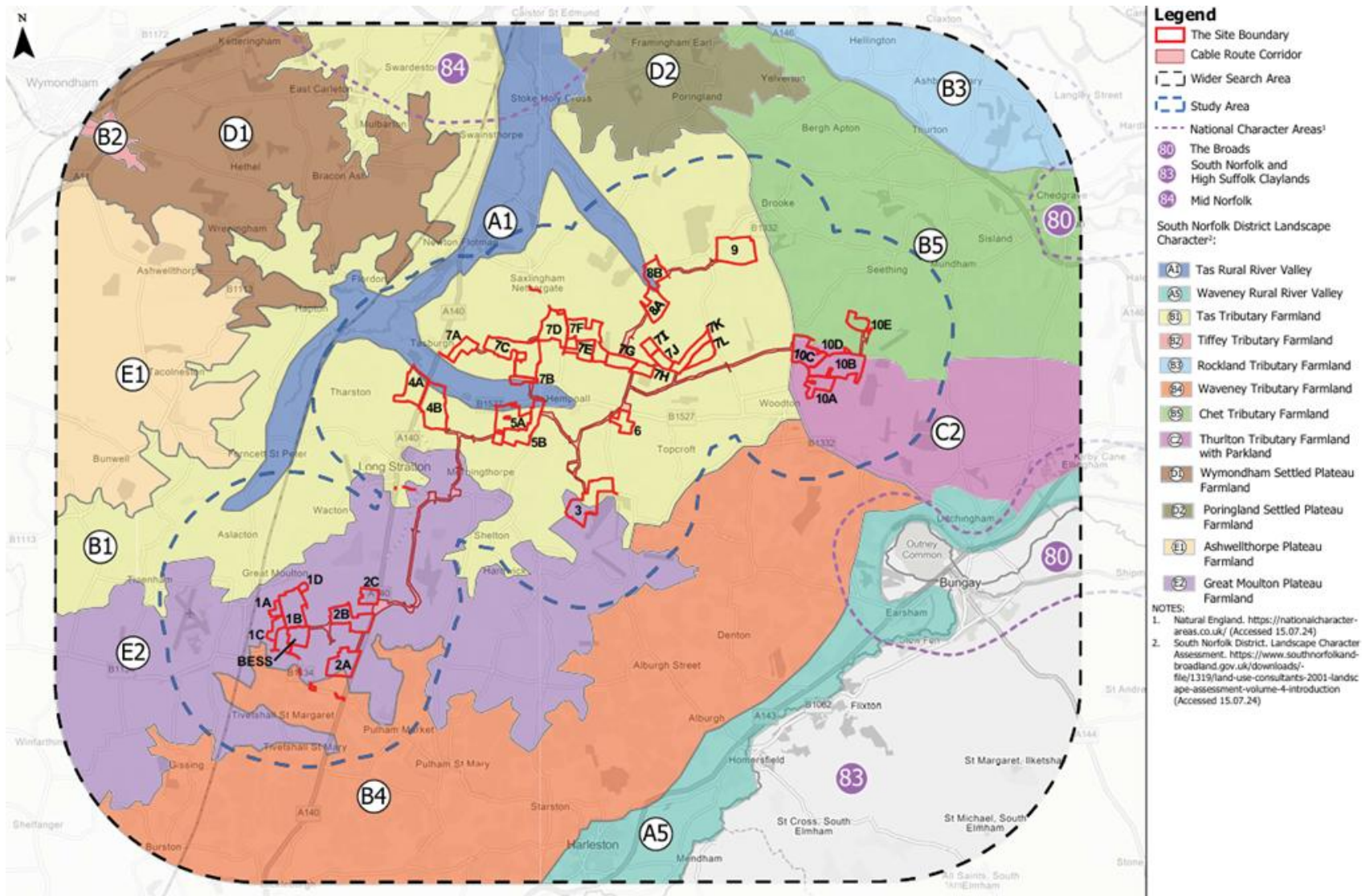


Figure 3.10: District Landscape Character Areas

Dark Skies

- 3.5.11 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 26)(Ref 27).
- 3.5.12 The CPRE England's Light Pollution and Dark Skies (see **ES Volume 2, Figure 4.4 – CPRE England's Light Pollution and Dark Skies Plan [EN0110014/APP/6.2.7.4]**) indicates that the skies classification varies from medium-level light pollution, relatively dim night skies, transitional zones between the darkest night skies and areas of relatively low light pollution and within a transitional zone between relatively dim night skies and areas of the darkest night sky. Some Sites fall within the darkest night sky.

Visual Environment

- 3.5.13 Visibility within the Order Limits varies from one of openness and exposure, encompassing extensive arable farmland and large-scale fields (**Figure 3.9**) with expansive skies and distant views in the south of the Order Limits to areas with a sense of enclosure contained by tree belts and pockets of woodland, which are more common features towards the north. To the south, hedgerows are sparse and hedgerow trees mark the lines of former boundaries, whereas in the north, small blocks of deciduous woodland are more common these of high visual quality creating a series of wooded horizons within the landscape.
- 3.5.14 The visibility includes views from a network of PRow (see **Figure 3.11**) that pass through the Order Limits, together with two recreational routes: Via Beata Way and Boudicca Way (see **Figure 3.12**) and common land adjacent to the Order Limits. The recreational routes are designated as long-distance trails. Boudicca Way has views of Site 7, Site 8 and parts of the CRC, whilst Via Beata has views of Site 1, Site 2, Site 3 and parts of the CRC.



Figure 3.11: Great Moulton PRoW RB19 (Hundred Lane)



Figure 3.12: PRoW Morningthorpe FP33/Boudicca Way

- 3.5.15 The PRoW network within the Order Limits experiences varying degrees of visual containment depending on topography and vegetation, offering a range of views from panoramic views to short distance curtailed views. Views are of predominantly agricultural land and vegetation (such as hedgerows and woodland), with scattered buildings, villages, existing infrastructure (such as roads, electricity pylons and energy infrastructure) and ditches.

Character of the Sites

- 3.5.16 Whilst the Sites are located across six District LCA, there are several similar characteristics, including:
- Flat elevated plateau landform with extensive arable farmland with large-scale fields and expansive skies;

- Predominantly medium to large sized arable fields delineated by hedgerows (gappy and remnant in places), linear tree belts and small woodland blocks including Ancient Woodland and veteran trees;
- A diverse network of rural lanes and the strategic A140 Norwich Road;
- A network of ditches and watercourses, including the River Tas, Hempnall Beck and tributaries of the Hempnall Beck, together with scattered ponds. The River Tas is an important river valley of value and former designation;
- A well-defined network of PRow.

Cultural Heritage

3.5.17 The Site has been subject to baseline surveys which include historic environment record searches, geophysical survey, walkover survey, assessment of airborne remote sensing and satellite imagery data and archaeological desk-based assessment.

Designated Heritage Assets

3.5.18 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 are 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.
- 3.5.19 The historic character of the area is defined by a combination of ecclesiastical landmarks, nucleated village cores focussed around greens and commons, and a dispersed pattern of historic farmsteads and rural dwellings within the surrounding agricultural hinterland. Ecclesiastical (meaning relating to the Christian Church) built heritage provides an important focal point within this landscape, exemplified by assets such as the Church of St Catherine and the Church of St Michael.
- 3.5.20 Historic settlement patterns are generally characterised by a mixture of nucleated villages and more dispersed farmsteads within the surrounding area. The latter is reflected in the numerous 16th to 19th century listed farmhouses, barns and agricultural workers cottages.



Figure 3.13: Church of St Michael South of Sub-Site 4B



Figure 3.14: Fritton Conservation Area South of Sub-Site 5B

Historic Landscape

- 3.5.21 The fields within the Order Limits largely comprise 20th century agricultural fields with boundary loss and 20th century agriculture. Exceptions include 18th and 19th century piecemeal enclosure by agreement, inland managed wetland represented by an enclosed meadow, coaxial enclosure dating to pre-18th century and 18th-19th century agriculture.

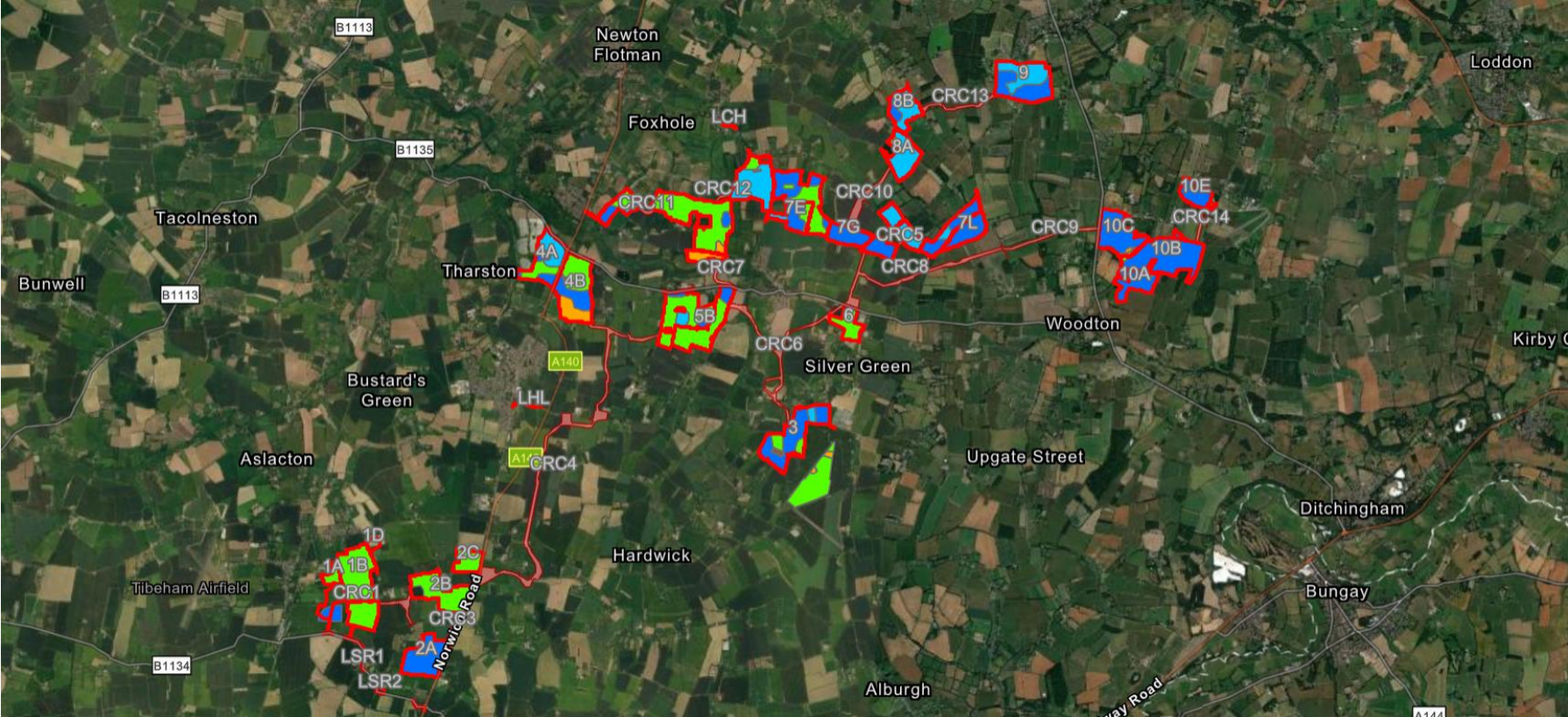
Archaeology

- 3.5.22 The Norfolk Historic Environment Record (HER) contains records within the Order Limits including: a recorded location of All Saints Church (demolished in 1570) (Sub-Site 1B); part of a World War II airfield and potential medieval deer park (Site 3); a possible site of a medieval building (Sub-Site 7D); a medieval moated site (Sub-Site 7C); and the southern tip of Boyland deserted medieval village and hall (Sub-Site 5B), together with various medieval earthworks. The HER also contains multi-period findspots spanning the prehistoric to post-medieval periods.
- 3.5.23 The Pye Road, between Scole and the Roman town of Venta Icenorum at Caistor St Edmund, near Norwich, transects the Order Limits (now the A140 Norwich Road which originated as a Roman road).
- 3.5.24 The geophysical survey and trial trenching on the Sites did not provide any substantial evidence for the location of All Saints Church nor for the possible medieval moated site. A medieval/early post-medieval settlement and/or stock enclosures (Sub-Site 5B) were largely confirmed by the trial trench evaluation. The medieval remains included a potential occupational layer, a cobbled surface, post-holes and pits along with the ditched enclosures identified by the geophysical survey.
- 3.5.25 As well as multi-period findspots, trial trenching also identified prehistoric watering holes (Sub-Sites 7K and 7F), a prehistoric pit filled with burnt stone (Sub-Site 10C), a ditch preliminarily dated to the Neolithic/Bronze Age period, a series of Iron Age settlement remains including a potential roundhouse (Site 9), a series of medieval remains including ditches, pits, cobbled surfaces and several pottery kilns, together with the remains of a flint wall footings of a square building of putative Roman date (Sub-Site 4B).

Agricultural Land Classification

- 3.5.26 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.
- 3.5.27 An Agricultural Land Classification (ALC) survey has been carried out for the Scheme. This identified that the Order Limits includes 32.8% Grade 2 and 35.7% Grade 3 BMV land. The wider area within which the Order Limits is located largely consists of Grade 3 agricultural land with pockets of Grade 2 and 4 according to the Natural England Agricultural Land Classification map

Eastern Region (ALC008). The ALC survey results are presented on **ES Volume 2, Figure 15.1 ALC Results [EN0110014/APP/6.2.15.1]**. **Figure 3.15** below shows the survey results, but also shows surveyed areas which have now been excluded from the order Limits (namely around Sites 1A and 3A, as discussed later in the DAD).



- Classification
- Grade 2
 - Grade 3a
 - Grade 3b
 - Grade 4
 - Non-Agricultural

Figure 3.15: Agricultural Land Classification of the Sites

Water Environment

- 3.5.28 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) between Site 7 and Sites 4 to 6 and through CRC7. Tributaries of the Hempnall Beck flow through CRC4, CRC6 and CRC8; and
 - The **River Tas** (main river and chalk stream) between Sub-Sites 8A and 8B. A tributary of the River Tas flows close to the western boundary of Sub-Site 4A.
- 3.5.29 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' (see **Figure 3.16**) associated with the floodplains of the Hempnall Beck and the River Tas.
- 3.5.30 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, 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.
- 3.5.31 The south western area of the Order Limits is located within a Drinking Water Safeguard Zone for surface water.

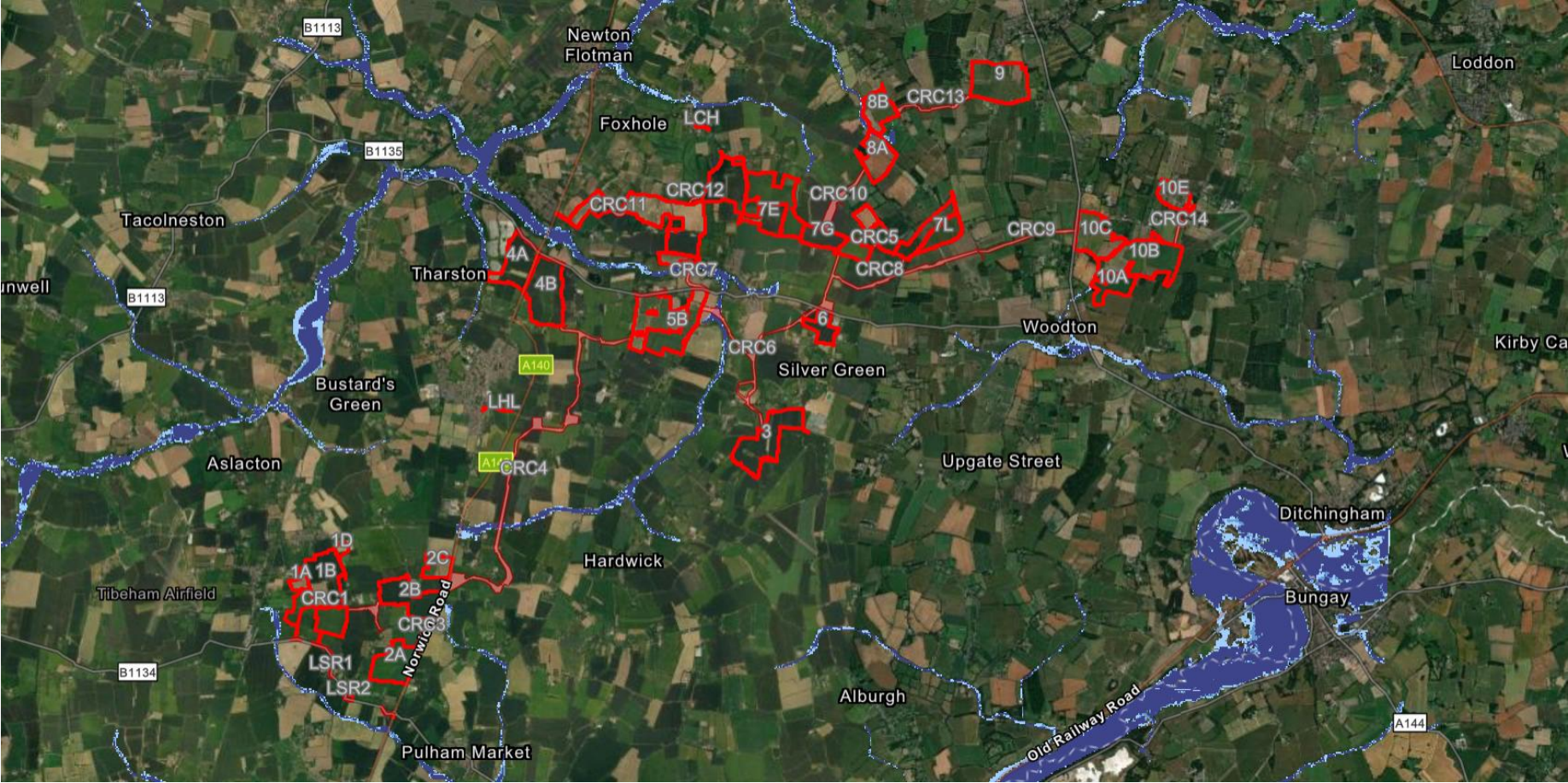


Figure 3.16: Environment Agency’s Flood Map for Planning (Zones 2 and 3)

Ecology, Biodiversity and Green Infrastructure

Statutory Designations

- 3.5.32 As shown in **Figure 3.17**, 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.

Non-Statutory Designations

- 3.5.33 Non-statutory ecological designations within and adjoining the Order Limits, as shown on **Figure 3.18**, 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 (Area 1 and Area 2), Bussey's Loke RNR and Parkers Lane RNR are also located within the Order Limits.

Irreplaceable Habitats

- 3.5.34 Ancient Woodlands are present adjoining and 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.

Habitats

- 3.5.35 The predominant habitat within the Order Limits is intensively managed arable farmland. This includes combinable crops such as wheat, barley, oilseed rape and a wide range of arable break crops, as well as some sugar beet. Arable fields contain hedgerows and field boundaries. Some fields are subject to the Countryside Stewardship Scheme.
- 3.5.36 Priority habitats identified within the Order Limits include arable field margins, native hedgerows (of varying species richness and condition), ponds, grassland, blocks of lowland deciduous woodland, together with a small area of lowland fen (irreplaceable habitat) in CRC7.

Protected and Priority Species

- 3.5.37 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.

- 3.5.38 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.
- 3.5.39 Trees within the Order Limits have the potential to support roosting bats. Surrounding woodlands are known to sustain bat roosts including barbastelle bat maternity colonies.

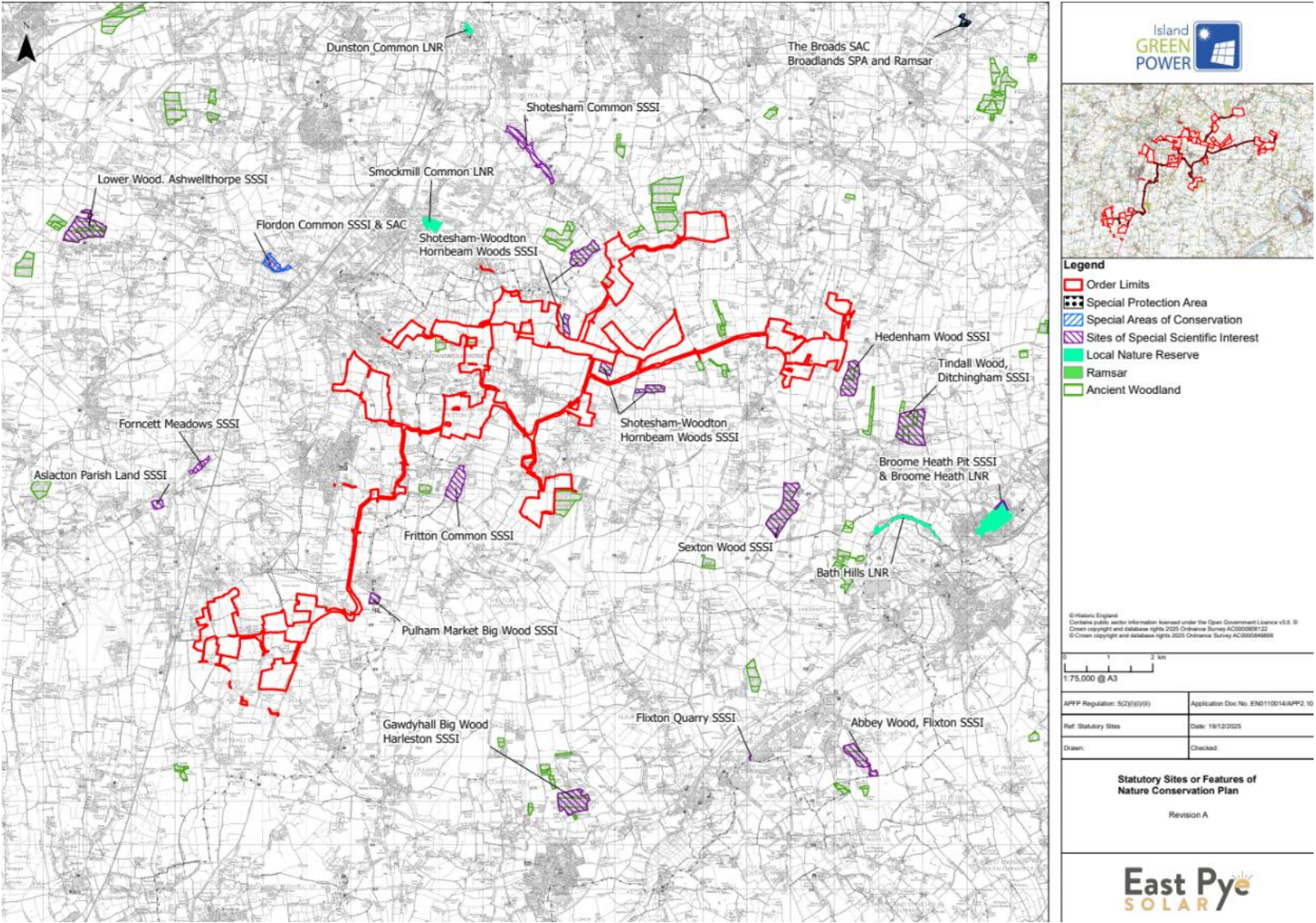


Figure 3.17: Statutory Designated Sites

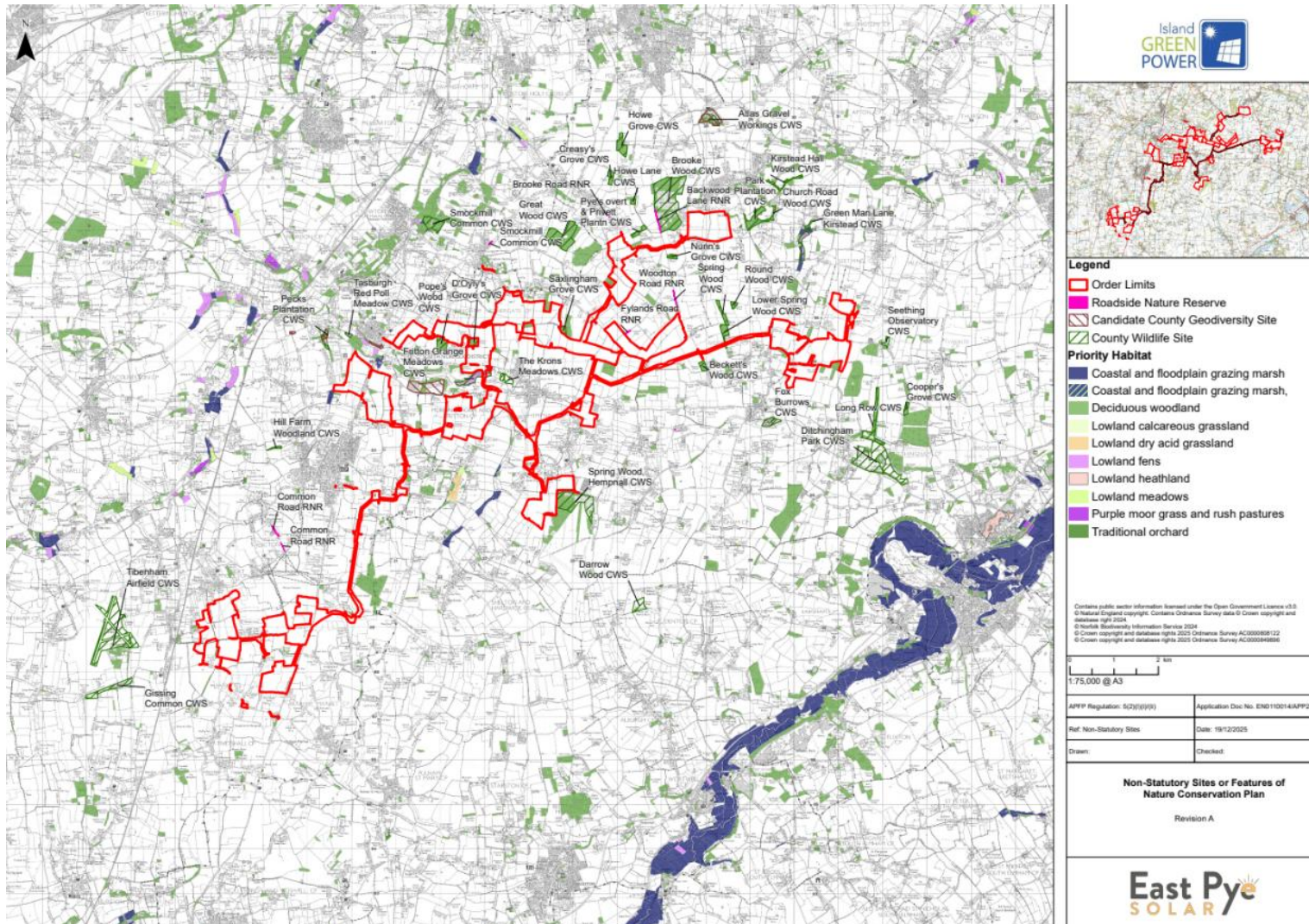
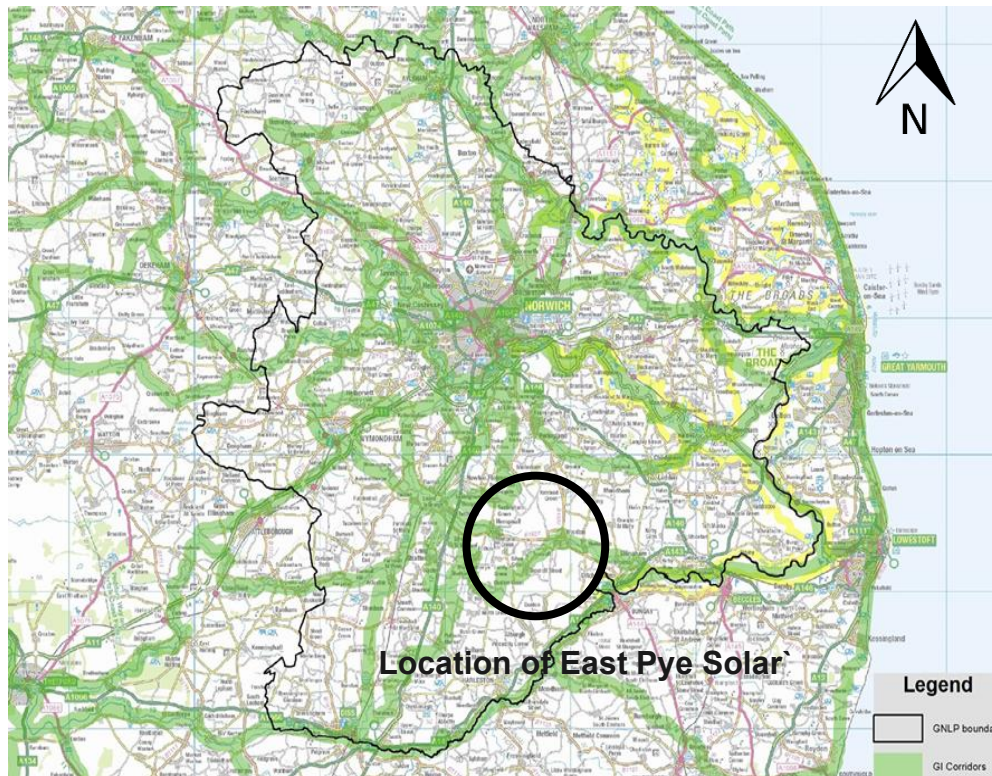


Figure 3.18: Non-Statutory Designated Sites

Green Infrastructure

- 3.5.40 The Greater Norwich Local Plan (Ref 5) acknowledges green infrastructure within the vision for Greater Norwich and refers to ongoing long-term work to improve and expand the green infrastructure network throughout the Greater Norwich area.
- 3.5.41 Green infrastructure is defined as *'a network of multi-functional green space and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity'*.
- 3.5.42 Norwich County Council and local partners have developed the Greater Norwich Green Infrastructure Strategy (Ref 21) which adopts a strategic approach to delivering green infrastructure at a Greater Norwich level shaped by the Natural England Green Infrastructure Framework's principles (Ref 25).
- 3.5.43 The Greater Norwich Green Infrastructure Strategy (Ref 21) sets out a roadmap seeking greener, healthier and more resilient places in support of the Greater Norwich Local Plan (Ref 6). The strategy provides strategic initiatives for protecting, enhancing and expanding green infrastructure delivery over the next five years, with a focus on nature recovery and enhancing access to nature. The objectives are:
- *'Enabling access to nature and healthy lifestyles;*
 - *Harnessing productive landscapes;*
 - *Strengthening distinctive places;*
 - *Supporting nature recovery;*
 - *Promoting urban greening; and*
 - *Strengthening blue-green infrastructure'*.
- 3.5.44 Within the strategy the green infrastructure corridors in Greater Norwich, as shown in **Figure 3.19**, provide a focus for strategic green infrastructure investment to enhance the connectivity of urban and rural communities, wildlife habitats and countryside destinations. **Figure 3.17** shows green corridors crossing parts of the Order Limits with Sub-Sites 2C, 4B, 7A, 7B, 7C, 7D, 7F, 8B and Site 3 interacting with these green corridors.
- 3.5.45 Green infrastructure is acknowledged in Section 3 of the Greater Norwich Local Plan (Ref 5) to ... *'help our communities mitigate and adapt to the effects of climate change, by providing for biodiversity gain through improved and linked habitats, reducing flood risk and improving opportunities for active travel and leisure'*.



Source: Greater Norwich Local Plan (page 76).

Figure 3.19: Greater Norwich Local Plan Green Infrastructure Corridor

3.5.46 The Implementation of the Greater Norwich Green Infrastructure Strategy Supplementary Planning Document (SPD) Draft for Consultation (Ref 21) identifies that the Order Limits is located within Area 3 – Waveney Farmland and Area 4 – Yare Farmland. Relevant Strategic Green Infrastructure Priorities from these areas include:

- *‘Address deficiencies in accessible greenspace provision at a range of scales within the identified priority areas*
- *Strengthening the network of greenways within and between settlements to support active travel*
- *Urban greening to increase green cover in the built environment, strengthen habitat connectivity and support urban nature recovery, and*
- *Embed GI into new development sites’.*

Local Nature Recovery Strategy

3.5.47 The Norfolk Local Nature Recovery Strategy (Ref 22) aims to provide an approach to restoring and protecting nature, including identifying opportunities for where and how habitats can be created and enhanced for maximum benefit for both nature and people. The nature recovery principles set out in the Norfolk Local Nature Recovery Strategy (Ref 22) are as follows:

- **Recover** ‘aims to actively restore degraded habitats to their full ecological potential. This could involve enhancing soil health, rewetting drained peatlands, or removing invasive species to allow ecosystems to function naturally again. The actions also aim to support the recovery of existing species’;
- **Reintroduce or translocate** ‘is about bringing species back to areas where they have been lost or establishing populations in new locations to help them thrive. This can help rebuild balanced ecosystems and restore missing links in food webs’; and
- **Control** ‘involves managing factors that threaten biodiversity, such as invasive species, grazing pressure, or pollution. Effective measures ensure restored and existing habitats’.

3.5.48 The Norfolk Local Nature Recovery Strategy (Ref 22) also identifies key opportunities for various habitat types. For farmland habitat, opportunities identified include:

- Connect, expand and enhance areas of arable field margins;
- Enhance and restore hedgerows and hedgerow trees;
- Promote effective management techniques and controlled grazing regimes;
- Incorporate mosaic features within habitats; and
- Restore farmland ponds and improve riparian habitats.

South Norfolk Claylands

3.5.49 Whilst the Claylands Wilder Connection Project by Norfolk Wildlife Trust ran until 2023 (Ref 23), the initiative sought to improve the connectivity of wildlife habitats in South Norfolk. This included the restoration and creation of ponds, new hedgerow and woodland planting, and diverse buffers, margins and meadows.

3.5.50 Norfolk Wildlife Trust is now developing a 25-year vision for the area’s wildlife and wild spaces (Ref 24).

Access and Recreation

Highway Network

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

Public Rights of Way and Recreational Routes

- 3.5.52 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. Boudicca Way follows a mix of PRoW, quiet country lanes and waymarked footpaths.
- 3.5.53 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.

3.6 Design Framework

Overview

- 3.6.1 This section provides an overview of the design framework and demonstrates how good design aspirations and intentions have permeated through the Scheme and will be secured as good design outcomes within the detailed design of the Scheme.
- 3.6.2 If DCO consent is given, the detailed design for the Scheme would be submitted for approval by the relevant planning authorities post-consent. Securing the detailed design post-consent gives scope for the adoption of the latest and most sustainable technologies during the procurement and construction phase, positively contribute to delivering the UK to net zero by 2050.
- 3.6.3 Good design outcomes will be secured in the detailed design of the Scheme, in accordance with the control documents contained within the draft **DCO [EN0110014/APP/3.1]**. Adherence to the control documents will secure good design outcomes, uphold the conclusions of the ES and provide for flexibility. A full list of control documents is set out in the Guide to the Application **[EN0110014/APP/1.3]**.

Scheme Vision

- 3.6.4 An overarching high-level vision for the Scheme was adopted. The purpose of the vision was to make sure the overall design process for the Scheme was subject to a clear goal.

Scheme Vision

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

Project Level Design Principles

- 3.6.5 In line with paragraphs 4.7.5 to 4.7.9 of NPS EN-1 (Ref 3) in how an applicant could consider implementing good design, a set of project level design principles for the Scheme were developed (see **Table 3.1**). The aim of these project level design principles is to design a Scheme that responds to the Applicant’s brief and to the local context of the Order Limits.
- 3.6.6 Alongside the design buffers (offsets) adopted for the Scheme (see **Table 3.2** and illustration in **Figure 3.20**), 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.
- 3.6.7 The design principles were informed by work undertaken at Stage 1 (which enabled the Applicant to gain an understanding of the Site context and its environmental, socio economic and local community issues). These were further developed throughout Stage 2 and consulted on at statutory consultation. Responses to the statutory consultation are set out in the **Consultation Report [EN0110014/APP/5.1]**.
- 3.6.8 Since the statutory consultation and, as acknowledged in the NIC guidance (Ref 10) the project level design principles are an iterative, ongoing process throughout the project, there has been an evolution of the project level design principles (in comparison to those presented at statutory consultation). These amendments include the additional reference to the Natural England’s National Character Area Profiles, reference to a mixture of natural regeneration/planting and opportunities for peoples’ connection to nature, which were points raised by Norfolk Wildlife Trust, along with reference to the reinstatement of ghost ponds, as raised by South Norfolk Council.

Table 3.1: 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 Sites, 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 Sites 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.

Design Principle Reference	Design Principle
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, 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, 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.
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).

Design Principle Reference	Design Principle
5.4	Seek to route construction vehicles away from local villages, as far as practicable.
5.5	Improve connectivity and accessibility through the Sites, 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.

Design Buffers

- 3.6.9 A series of design buffers have been embedded into the Scheme (as set out in **Table 3.2**) and are secured in the **Design Principles, Parameters and Commitment** document [EN0110014/APP/7.18]. Design buffers provide offsets for Solar PV Arrays, the National Grid Substation and Project Substations, from sensitive features such as existing landscape and ecological features, to provide protection as well as the opportunity for enhancement. Examples are the potential for populations of barbastelle bat immediately surrounding the Order Limits to be impacted; or opportunities for enhancements of habitat for great crested newts and turtle doves). The design buffers were consulted upon during the statutory consultation for the Scheme.
- 3.6.10 The design buffers have evolved following feedback from the statutory consultation. In response to feedback from South Norfolk Council, Natural England, the Forestry Commission and Norfolk Wildlife Trust, the design buffer to Ancient Woodland has been increased to 30m (from 15m). The design buffer to Internal Drainage Board (IDB) drains increased to 10m (from 9m) given the feedback from the Environment Agency. The updated design buffers adopted for the Scheme are set out in **Table 3.2**.

Table 3.2: Minimum Offsets/Buffers from Existing Features

Criteria Where Buffer Applied	Buffer Size
Main river, watercourse or ditch (including IDB drains)	10m
All Badger Setts	30m
Hedgerows	10m
Individual trees, groups of trees and non-Ancient Woodland	15m
Veteran and Ancient Trees	15x width of tree stem diameter or 5m from the edge of the tree's canopy, whichever is greater
Ancient Woodland	30m
Ponds (no Great Crested Newts)	30m
Ponds (with Great Crested Newts)	50m
Sites of Special Scientific Interest	30m
County Wildlife Site	30m
Public Rights of Way	15m
Curtilage of Residential Properties	Minimum of 50m but case by case for residential properties.

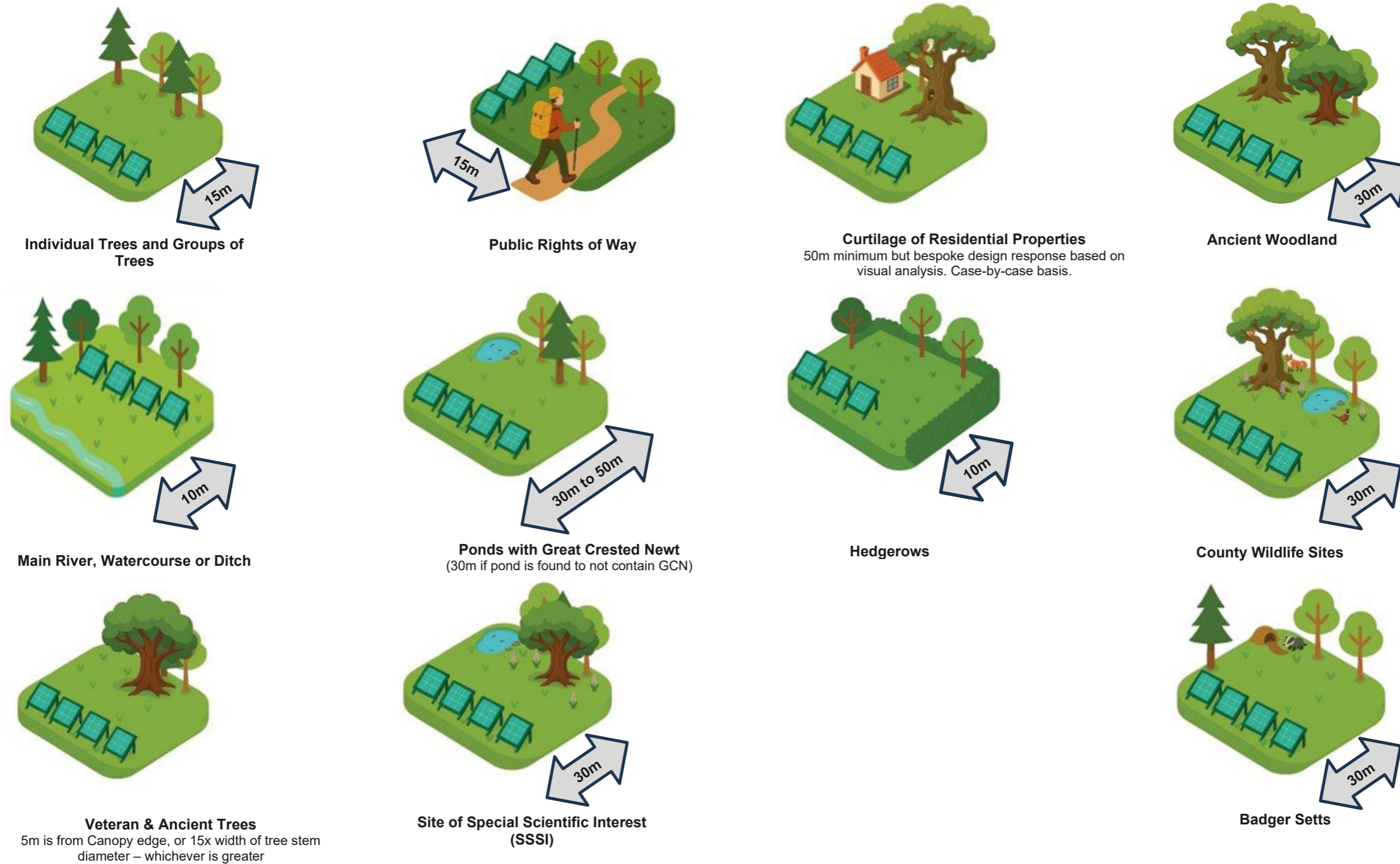


Figure 3.20: Design Buffers

4 Research

4.1 Design Evolution

- 4.1.1 As stated previously in the DAD, a site selection process was undertaken in relation to the Sites for the Solar PV Arrays and also for the location of the National Grid Substation and its proposed point of connection into the 400kV Norwich Main to Bramford overhead line (OHL). This included an initial Sites evaluation where consideration was given to the key factors outlined in Section 2.10 of NPS EN-3 (Ref 4), together with local environmental constraints and planning considerations. Details of the sites selection process is set out in the **Site Selection Assessment [EN0110014/APP/7.20]**, which describes the Applicants consideration of appropriate locations for the siting of the National Grid Substation and connection into the overhead line; sets out the approach used to identify the proposed location for the Scheme and evaluates the proposed location for the Scheme against other potential areas for solar development to establish whether the Scheme is in a suitable location.
- 4.1.2 This section of the DAD explains the design evolution of the Scheme and how the extent of Site and area proposed for development has evolved through the design process. It explains how the spatial layout of the Scheme has been shaped by the project team brief, vision and design principles and has responded to the environmental assessment process, consultation feedback and engagement with stakeholders via an iterative design process. The design evolution described specifically relates to the operational phase of the Scheme, culminating in the production of the **Indicative Masterplan (ES Volume 2, Figure 4.1 [EN0110014/APP/6.2.4.1])**.
- 4.1.3 The iterative design process was informed by environmental surveys, the environmental assessment process and consultation feedback. The design evolution of the Scheme is described below for the following stages:
- Stage 1: Project inception up to non-statutory consultation (June 2024 – Dec 2024);
 - Stage 2: Non-statutory consultation up to statutory consultation (December 2024 – June 2025); and
 - Stage 3: Post-statutory consultation, including targeted consultation, up to DCO submission (August 2025 – March 2026).
- 4.1.4 Stage 3 describes the design changes based on feedback from statutory consultation.

4.2 Stage 1: Evolution from Project Inception up to Non-Statutory Consultation (June 2024 – Dec 2024)

Initial Design Development

- 4.2.1 At Stage 1, initial visits and environmental surveys of the Sites commenced, together with a review of published material and environmental designations. The intention was to develop an initial understanding of the local context and environmental sensitivities of the Sites, develop a maximum area for the Order Limits and also an initial masterplan concept based on engineering requirements and environmental considerations identified at the time.
- 4.2.2 Through early discussions with the landowners and engineering requirements, land under consideration for potential development areas for Solar PV Arrays, the BESS and National Grid Substation were identified. This included Solar PV Arrays across Site 1 to Site 10, the identification of the BESS Site and a National Grid Substation Site.
- 4.2.3 Good design requires a holistic approach with input from all disciplines to result in an integrated solution. In taking an environmentally led approach, a key tool in the design process was therefore design workshops, bringing together the multi-disciplinary team to enable constraints and opportunities to be explored collectively.
- 4.2.4 In November 2024, the project's specialists for air quality, heritage, ground conditions, ecology and landscape met with relevant officers at South Norfolk Council to discuss survey methodologies and, in principle, potential design considerations for the Scheme. Concerns raised included the concentration of heritage assets to the north of Long Stratton near Site 4, together with potential opportunities for biodiversity net gain (BNG) and the reinstatement/rejuvenation of trees and hedgerows on agricultural land. In addition, a meeting was also held at this time with Norfolk Wildlife Trust where concerns raised related to, but were not limited to, impacts on woodland, CWS, Barbestelle bats. Potential opportunities raised related to the Claylands priority area where there was a vision to improve ecological connectivity and manage relict habitats.
- 4.2.5 At this stage of the design process, flexibility in the potential development areas was included in the initial masterplan concept to enable future response to consultation feedback and refinement following further environmental surveys. Some initial potential environmental buffers, mitigation and enhancement areas were identified at high-level. This included, for example, an initial 50m buffer from residential properties and offset from identified hedgerows.

4.2.6 An initial desk-based study was also undertaken to develop the CRC. A wide CRC was initially identified based on:

- Keeping the route as short and direct as possible;
- Keeping the number of crossings of features (roads and watercourses) to a minimum; and
- Avoiding environmental constraints such as heritage features and ecologically sensitive areas such as Ancient Woodland, SSSI and CWS as far as possible.

Initial Concept Masterplan

4.2.7 Following the initial design development, the Applicant held a non-statutory consultation (also referred to as 'Phase One Consultation') from 23 October 2024 to 6 December 2024. The initial concept masterplan presented at the non-statutory consultation is illustrated in **Figure 4.1**.

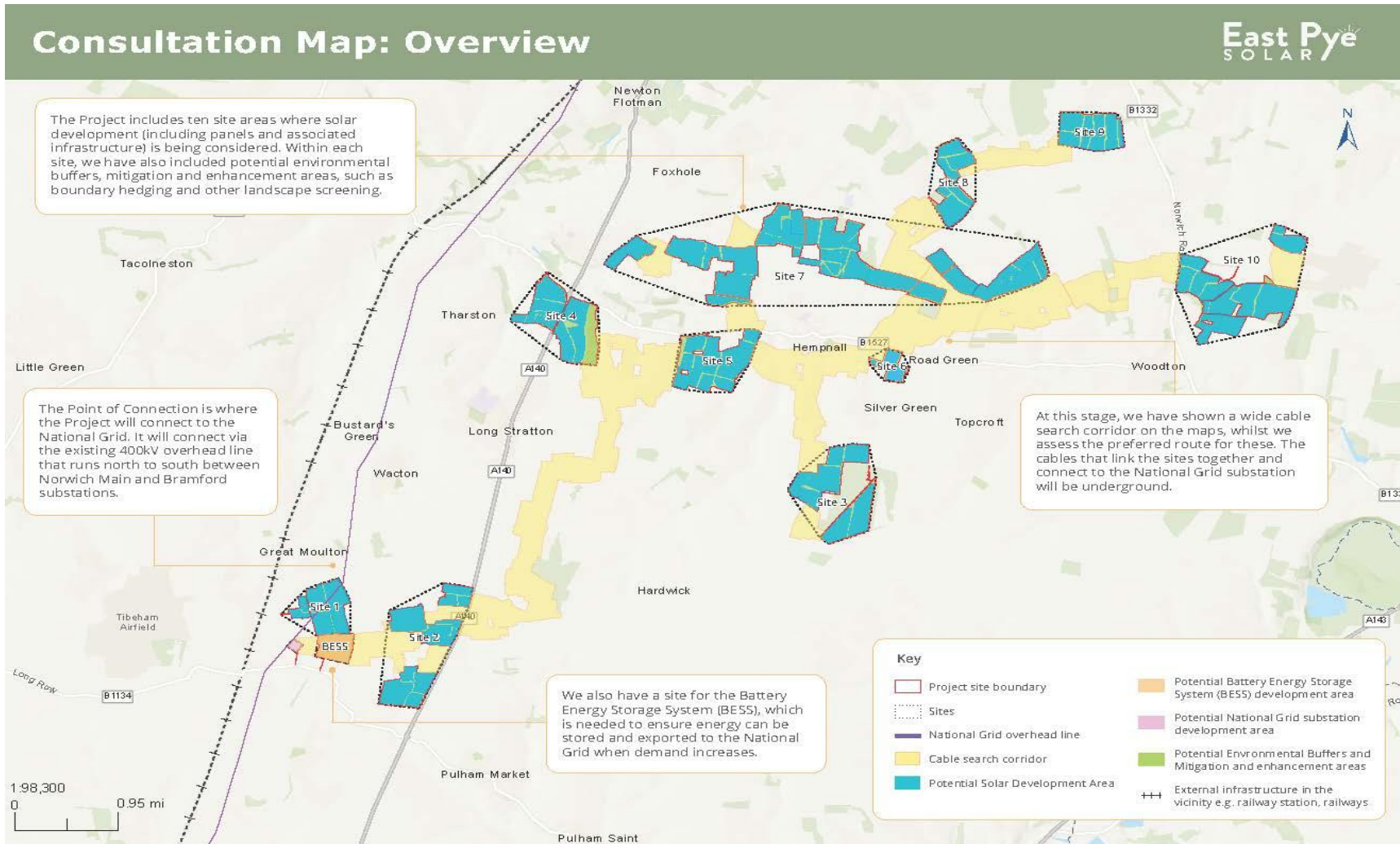


Figure 4.1: Concept Masterplan – Non-Statutory Consultation

4.3 Design Evolution from Non-Statutory Consultation up to Statutory Consultation (December 2024 – June 2025)

Non-Statutory Consultation Feedback

- 4.3.1 Following non-statutory consultation, concerns were raised in relation to the scale of the Scheme, together with a range of other topics, predominantly in relation to landscape and visual, biodiversity, agricultural land and soils and traffic. The Applicant's responses to the comments raised at the non-statutory consultation are set out in the **Consultation Report [EN0110014/APP/5.1]** and associated appendices.

Design Review

- 4.3.2 Environmental surveys, desk-based research and design workshops continued into Stage 2 to further develop an understanding of environmental and technical constraints and opportunities, as well as considering feedback from non-statutory consultation. The development of environmental strategies and the design review of the initial concept masterplan included consideration of the extent of the Solar PV Arrays across the Sites and the siting of the National Grid Substation.

Siting of the National Grid Substation

- 4.3.3 At Stage 2, an alternative location for the National Grid Substation was explored in Sub-Site 1B ('National Grid Substation Option 2 Site'). This was in response to the planning application for a solar project (ref. 2024/3817) that overlapped with the same area as Option 1. Both Option 1 and Option 2 were taken forward for further design and environmental consideration at Stage 3 and were presented within the Environmental Impact Assessment Scoping Report, as illustrated in **Figure 4.2** and within the Preliminary Environmental Information Report.

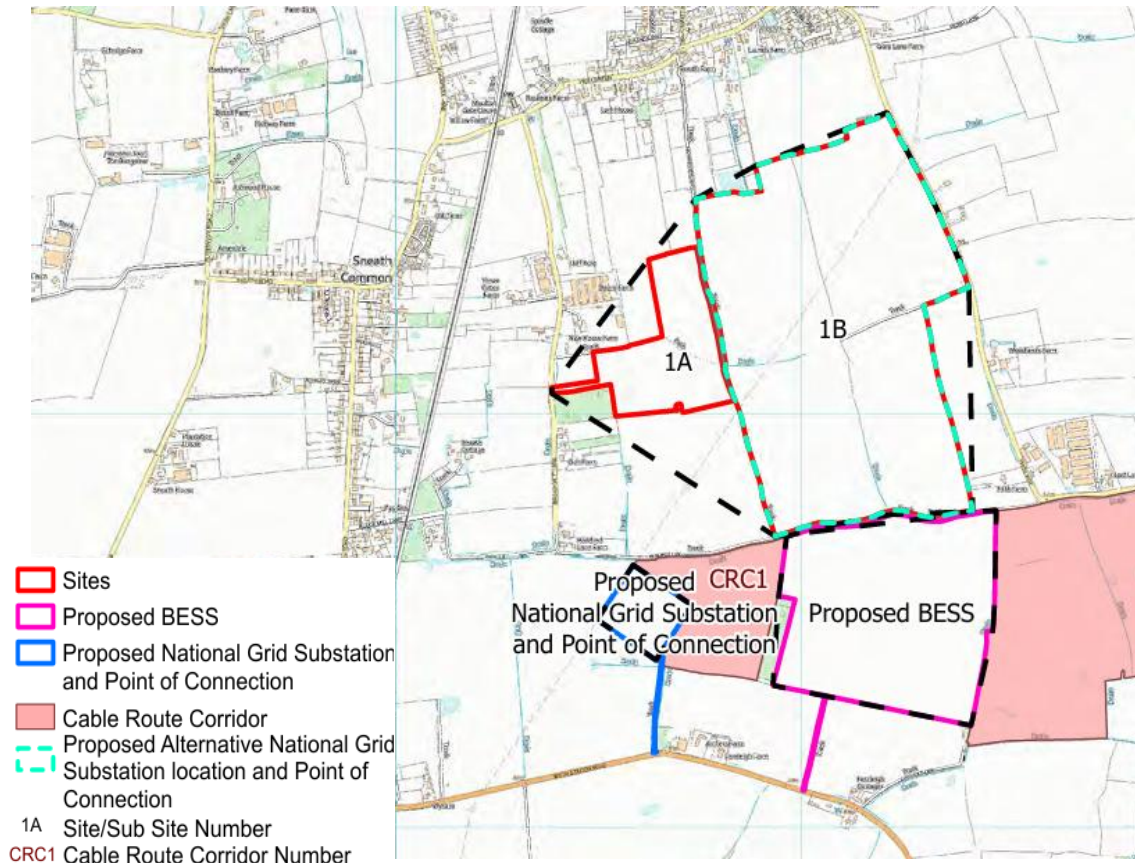


Figure 4.2: Location of Option 1 and Option 2 for the National Grid Substation

Refinement of the Order Limits

4.3.4 Through ongoing engagement with landowners and design evolution during this stage, the Order Limits were refined to respond to the following:

- Accommodating highway visibility splays and potential traffic management measures (Design Principle 5.3, 5.4);
- Avoidance of the proposed landscaping associated with the Long Stratton bypass;
- Avoidance of the Hempnall Fritton Road Water Recycling Centre;
- Avoidance of land used for horse grazing by Redwings horse sanctuary; and
- Accommodating (including flexibility) for the potential for Grid Connection Infrastructure, including overhead lines which could include new/replacement pylons between the National Grid Substation and the Point of Connection (design principles 4.2, 6.1, 7.3).

Design Evolution Around Landscape Character and Green Infrastructure

- 4.3.5 Initial landscape and visual studies were undertaken to inform the development of the Indicative Masterplan. This was informed by desk-based research of the national and district character areas, landscape surveys and initial visibility analysis. It was established that the Order Limits were located in the Claylands initiative/priority area, which supported a strategic landscape scale approach to support connectivity across the landscape.
- 4.3.6 At this stage, the emerging landscape strategy was to:
- Restrict development within areas of landscape which were more visually open (i.e. rising ground or where there is an absence of vegetation) (design principles 2.1, 2.8);
 - Retain features of value such as existing woodland blocks (including Ancient Woodland) applying buffers and introducing new features to strengthen ecological connectivity, improve resilience of these landscape features and as a visual screening function (design principles 2.2, 2.4, 2.8, 3.2);
 - As some parts of the Sites have a more open landscape character, the aim was to balance the provision of new vegetation with maintaining open views, where possible (design principles 2.1, 2.2);
 - Retention and restoration of existing hedgerows through infill planting and enhancement measures (such as hedge laying and coppicing) (Design Principles 2.2, 2.5);
 - Retention of priority habitats including field margins and grassland where possible (design principles 2.2, 3.2);
 - Retention of irreplaceable habitats (Ancient Woodland, veteran/ancient trees and fenland habitats) and refinement of offset buffers from these features (design principles 2.2, 3.2);
 - Retention of ponds and refinement of offset buffers from these features;
 - New landscape measures which positively respond to their setting and the prevailing landscape character. At this stage, proposed measures included new hedgerow and hedgerow tree planting. These measures positively respond to the Greater Norwich Green Infrastructure Strategy (design principles 2.3, 2.3, 2.8, 2.9); and
 - Retention of agricultural land for ecological mitigation including skylark mitigation and enhancement of arable field margins (design principles 2.2, 3.2).

Design Evolution of Access and Recreation

4.3.7 Consideration was also given to the access strategy and PRow. At this stage, this included:

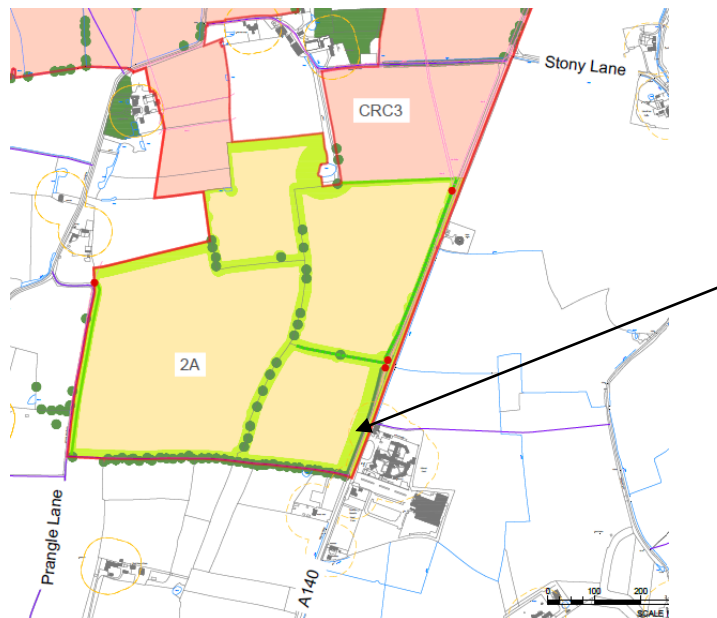
- Routing construction vehicles along the A140, B1527 and B1332, away from local villages, wherever practicable. This included local villages such as Hempnall, Saxlingham Nethergate, Woodton and Brooke (design principle 5.4);
- Potential for internalisation of construction vehicle routes through and between Sub-Sites through internal haul routes (design principle 5.4);
- Retention and protection of the PRow and recreational routes through provision of buffers (see illustration in **Figure 4.3** of a typical buffer) and measures to protect and/or minimise harm to visual amenity. To respond to the Greater Norwich Green Infrastructure Strategy (design principles 2.2, 2.3, 2.8, 2.9). Consideration was given to visibility from the Boudicca Way (Site 5), via Beata Way (Site 3 and Site 2) and from Wash Lane (Site 10);
- Utilising existing field access to the Sites and Sub-Sites, wherever possible, to minimise vegetation loss; and
- Minimise the extent of visibility splays using observed traffic flow and speed data to reduce the potential for vegetation removal.



Figure 4.3: Buffer between Footpath and Solar PV Arrays (Illustrative)

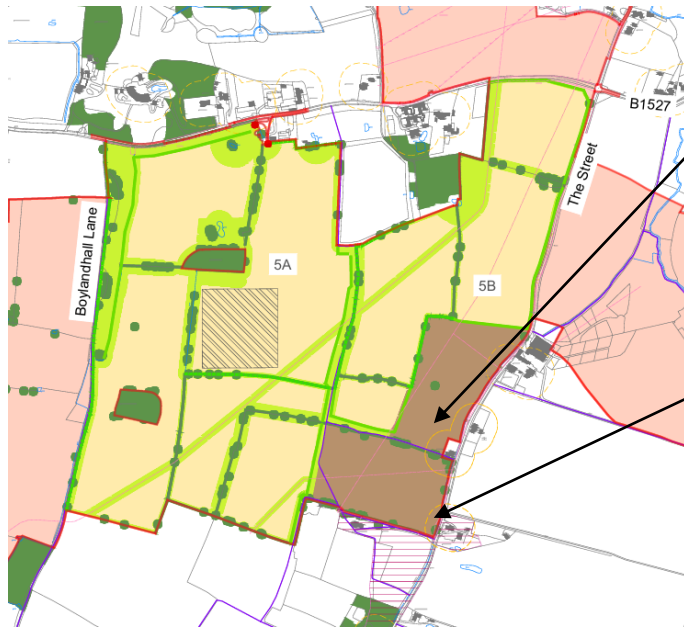
Design Evolution Around Residential Properties and Villages

- 4.3.8 As well as responding to the landscape character, **place** is a key theme of good design, as set out in NIC guidance (Ref 10Ref 10). For the Scheme, this included consideration of minimising the impact on surrounding villages and views from residential properties, as far as possible (design principles 2.8, 5.3).
- 4.3.9 Initially a minimum of 50m design buffer was considered around individual residential dwellings. However, following feedback from the non-statutory consultation along with initial landscape and visual studies, a bespoke approach was adopted in relation to design buffers and offsets from individual residential dwellings, based on the visibility taking into account existing landscape screening and topography. As a result, areas of Solar PV Arrays were reduced to accommodate larger offsets. Some examples (but not limited to) of these design changes in Stage 2 is illustrated in **Figure 4.4** to **Figure 4.6** (design principles 2.8, 5.3).



A landscape buffer increased along part of the eastern boundary of Sub-Site 2A to provide an offset and opportunity for screening to adjacent residential properties (also Grade II listed Hill House) (Design Principles 2.7 and 2.8).

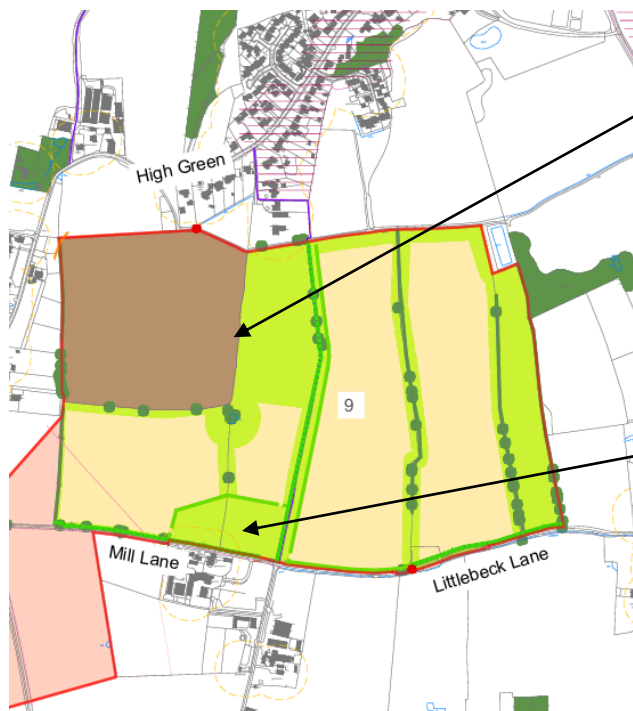
Figure 4.4: Offsets Developed for Residential Properties on the A140 Norwich Road



Solar infrastructure removed from eastern part of Sub-Site 5B to provide an offset to residential properties on The Street (Design Principles 2.8, 5.3).

Setback from the southern Order Limits of Sub-Site 5B removes and/or reduces visibility from the Grade I listed Church of St Catherine, Fritton Conservation Area and two Grade II listed buildings (Design Principle 2.7).

Figure 4.5: Offsets Developed for Residential Properties on ‘The Street’, Listed Buildings and Fritton Conservation Area



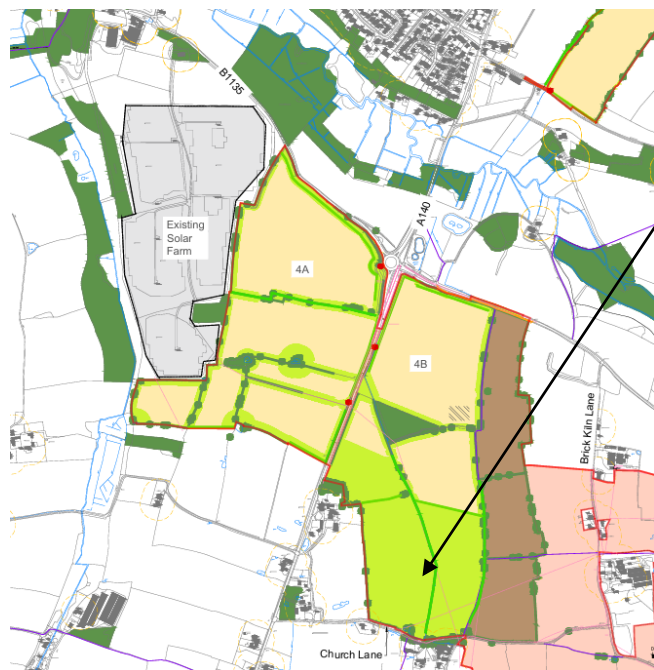
Solar infrastructure removed from the north western part of Site 9 to provide an offset from Brooke and Brooke Conservation Area (Design Principle 2.7).

Offset introduced on the southern Order Limits of Site 9 to provide a buffer and landscaping opportunities adjacent to residential properties on Mill Lane (Design Principles 2.8, 5.3).

Figure 4.6: Offsets Developed for Residential Properties on Mill Lane and from the Village of Brooke

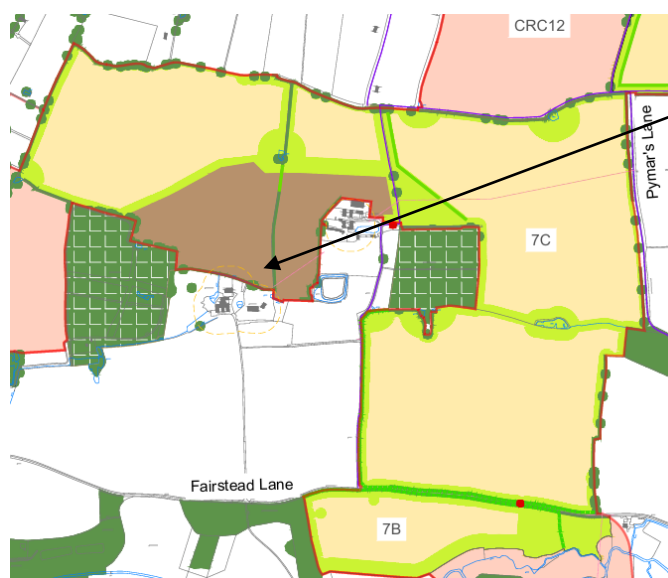
Design Evolution Around Heritage Assets

4.3.10 The approach adopted in relation to heritage assets was to mitigate impact by design, where practicable (Design Principle 2.7). Following feedback from stakeholders during Stage 2 engagement, further visits of the Sites, desk-based analysis and geophysical surveys, the areas and extent of solar infrastructure evolved. This included reducing the extent of Solar PV Arrays in response to designated heritage assets, with some examples of these design changes at Stage 2 illustrated in **Figure 4.7** to **Figure 4.9**.



Setback from the southern Order Limits of Sub-Site 4B. Setback introduced to reduce/remove visibility from the Grade I listed Church of St Michael and other listed buildings in the locality (Design Principle 2.7).

Figure 4.7: Setback Introduced to Sub-Site 4B from Listed Buildings



Setbacks from the southern boundary of Sub-Site 7C to reduce visibility from two Grade II listed buildings: Wood Farmhouse and Grove Farmhouse (Design Principle 2.7).

Figure 4.8: Setback Introduced to Sub-Site 7C from Listed Buildings

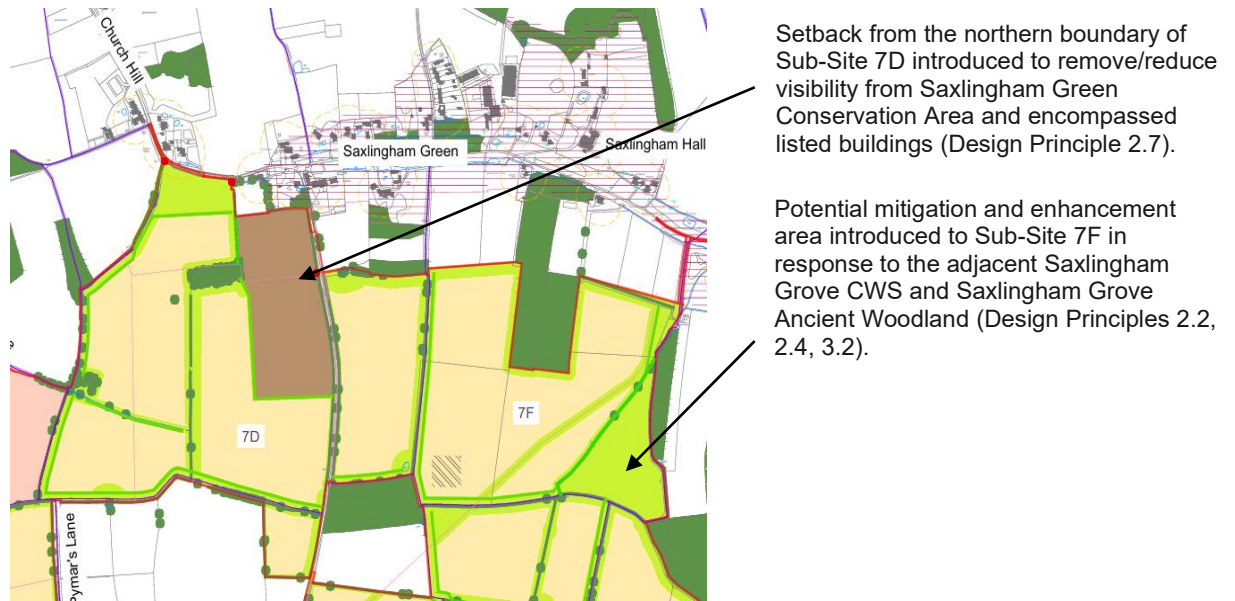
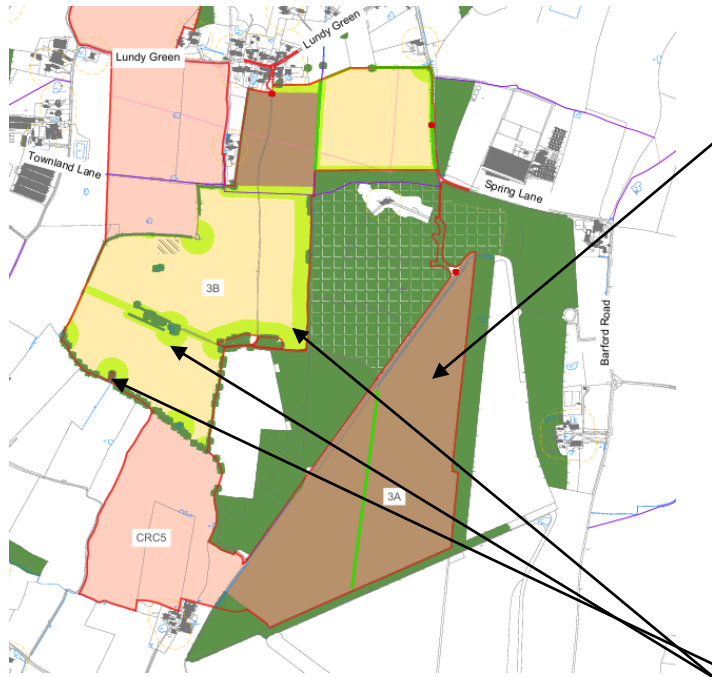


Figure 4.9: Setback Introduced to Sub-Site 7D from Saxlingham Green Conservation Area and Listed Buildings

Design Evolution of Mitigation and Enhancement Areas

- 4.3.11 As the design progressed and, in accordance with the mitigation hierarchy, the design focused primarily on avoiding environmental constraints as far as practicable.
- 4.3.12 With the evolution of the design following further surveys and analysis of environmental disciplines, taking a holistic approach balancing various environmental considerations, buffers and potential mitigation and enhancement areas were further developed. This included developing buffers (offsets) from existing landscape and ecological features, such as the identification of trees of veteran status (design principles 2.2, 3.5). Where appropriate land of suitable size with known environmental constraints or layered/multiple constraints (for example, BMV quality agricultural land and potential archaeological assets) were identified. These were considered for potential mitigation areas (design principles 2.3, 2.6, 2.7, 2.8) and potential for land to be retained in agricultural use. Retention as agricultural land offered opportunity for identification of these areas as skylark mitigation and/or enhancement to arable field margins (design principles 2.2, 3.4, 7.3).
- 4.3.13 The combination of buffers and potential mitigation and enhancement areas were aimed at providing opportunities for developing landscape mitigation proposals (design principles 2.1, 2.2, 2.4, 2.5) and green infrastructure strategy (design principles 2.3, 2.9), together with delivering BNG and contributing towards local conservation priorities (design principles 3.1, 3.3).
- 4.3.14 Some examples (but not limited to) of these design changes at Stage 2 are illustrated in **Figure 4.9** above and **Figure 4.10** to **Figure 4.13**.

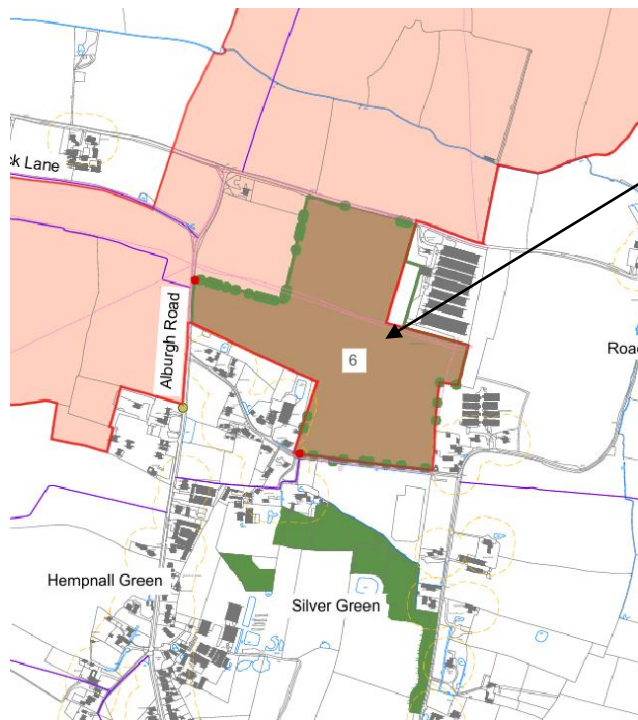


Solar infrastructure removed entirely from Sub-Site 3A owing to a combination of factors, including limited highway access, Spring Wood Ancient Replanted Woodland (with bat roosts), part of the Spring Wood, Hempnall CWS within the northern section of Sub-Site 3A, a high unexploded ordnance risk and evidence of the land having previously formed part of a deer park. Sub-Site 3A was also largely classified as BMV quality land (Grade 2) (Design Principle 2.2, 2.7, 2.8, 3.2, 5.3, 7.2).

Sub-Site 3A was identified as a potential area for ecological mitigation and enhancement, compatible with continued agricultural use. This would remove approximately 3.2ha of Grade 2 BMV quality land from the Scheme.

Various buffers (offsets) introduced around existing landscape and ecology features including Ancient Woodland and ponds.

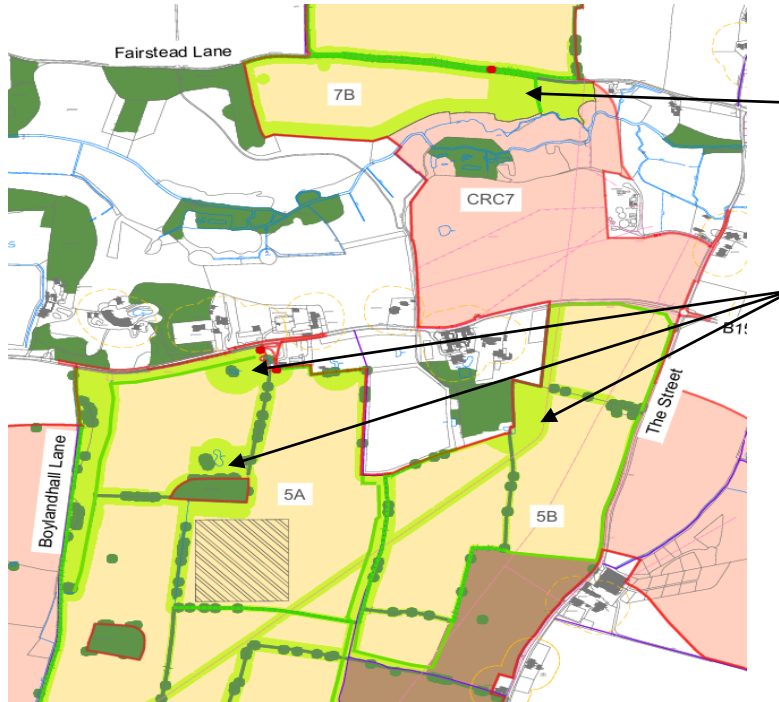
Figure 4.10: Offsets and Potential Mitigation Areas Introduced to Site 3



Solar infrastructure removed entirely from Site 6 owing to a combination of factors, including proximity to listed buildings and Site 6 classified as entirely BMV quality land (Grade 2) (Design Principle 2.2, 2.6, 2.7, 7.3).

At this stage, Site 6 was therefore identified as a potential area for ecological mitigation and enhancement, compatible with continued agricultural use. This would remove 18ha of Grade 2 BMV quality land from the potential development area.

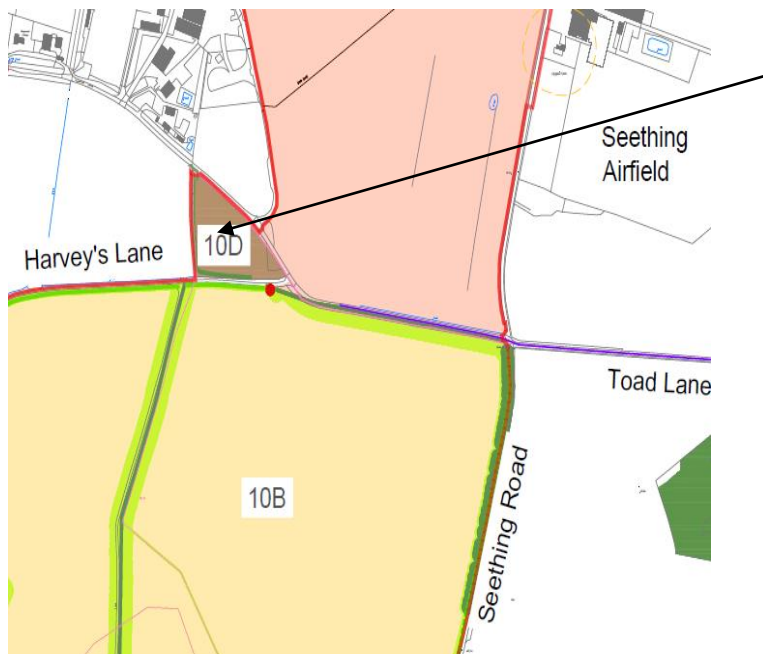
Figure 4.11: Potential Mitigation Area Introduced to Site 6



The area for mitigation in the eastern part of Sub-Site 7B increased owing to the proximity to Fritton Grange Meadows CWS and floodplain grassland (Design Principles 2.4, 2.5, 2.8, 3.2).

Examples of various buffers (offsets) introduced around existing landscape and ecology features including hedgerows, ponds, woodland and trees (including to trees of attainable to veteran status) (Design Principles 2.4, 2.5, 2.8, 3.2, 3.5).

Figure 4.12: Offsets Introduced to Site 5



Solar infrastructure removed from Sub-Site 10D and identified as a potential mitigation area. Sub-Site 10D is dominated by 'other neutral grassland habitat' along with areas of modified grassland. Also identified as BMV (Grade 3a) quality land. (Design Principles 2.2, 2.6).

Figure 4.13: Potential Mitigation Area Introduced to Sub-Site 10D

Indicative Masterplan

- 4.3.15 Following design development, the Applicant held statutory consultation (also referred to as 'Phase Two Consultation') from 18 June 2025 to 6 August 2025. The Indicative Masterplan presented at the statutory consultation is illustrated in **Figure 4.14**.

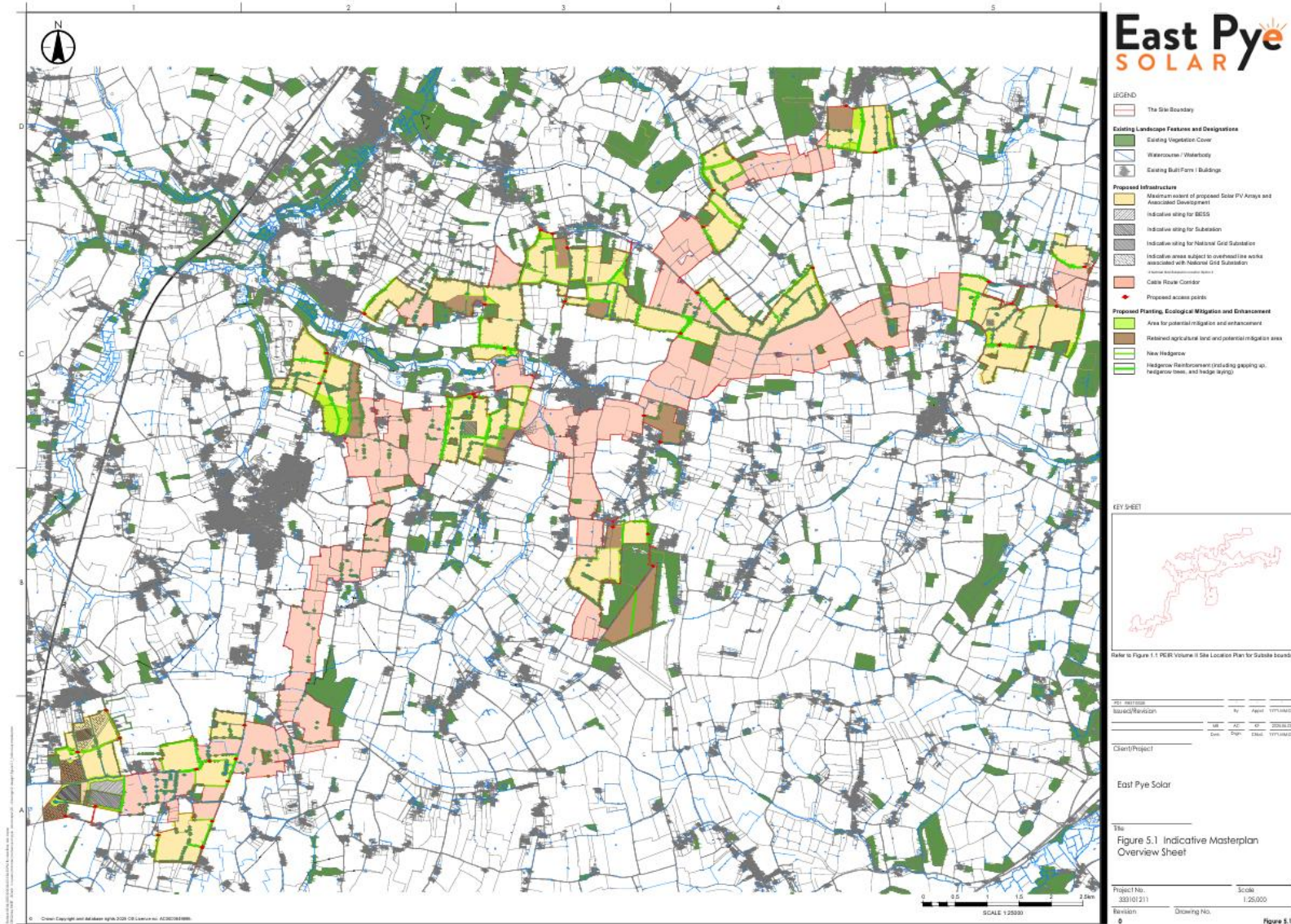


Figure 4.14: Indicative Masterplan at Statutory Consultation

5 Co-ordinate

5.1 Design Evolution Post Statutory Consultation up to Submission (August 2025 – March 2026)

Statutory Consultation Feedback

- 5.1.1 This chapter summarises the design evolution of the Scheme shaped by the coordination of Statutory Consultation feedback and updated information provided as part of the environmental assessment process and technical testing. During this stage, the Indicative Concept Masterplan went through refinement to ensure design principles and comments made by consultees and the local community were considered and met, where practicable.
- 5.1.2 Additional information influencing the evolution of the design at this stage included but was not limited to: updated ecology surveys, refinement of the ecological mitigation strategy; noise modelling; technical studies relating to the grid connection infrastructure; and refinement of the access strategy.
- 5.1.3 Feedback from statutory consultation, raised concerns in relation to the overall size of the Scheme and design buffers, together with a range of topics including landscape and visual, ecology and biodiversity, soils and agriculture, transport and access and human health. The Applicant's responses to the comments raised at the non-statutory consultation are set out in the **Consultation Report [EN0110014/APP/5.1]** and associated appendices.
- 5.1.4 Technical meetings during this stage were held with stakeholders, for example, the Highways Authority, the Environment Agency, the Lead Local Flood Authority, Historic England, Norfolk Fire and Rescue Service, Norfolk County Council, South Norfolk Council, National Grid, Seething Airfield and Tibbenham Airfield to discuss various aspects of the design of the Scheme.

Design Review

- 5.1.5 Environmental surveys, design workshops and the environmental assessment process continued into Stage 3, along with engagement with statutory consultees. This led, along with consideration of feedback at statutory consultation, to further design reviews, refinement of the design and Order Limits to culminate in a final Indicative Masterplan (**ES Volume 2, Figure 4.1 Indicative Masterplan [EN0110014/APP/6.2.4.1]**) and parameters secured by the **Works Plan [EN0110014/APP/2.3]**.
- 5.1.6 Whilst a targeted consultation on design changes and a Scheme update was held between 22 October 2025 to Wednesday 26 November 2025 no further design amendments were made in response to the targeted consultation feedback.

Siting of the National Grid Substation, Connection to the 400kV Overhead Line and Project Substations

National Grid Substation

- 5.1.7 An environmental appraisal (RAG rating exercise) was undertaken for the two options for the location of the National Grid Substation. Primarily, owing to the solar farm (planning application ref. 2024/3817) approved during the period of the statutory consultation (the site of which overlapped with Option 1), Option 2 located in Sub-Site 1B was taken forward as the location of the National Grid Substation (as presented at the targeted consultation). Option 2 was also considered preferable from a flood risk and landscape and visual perspective owing to the proximity of Option 1 to the Starston Brook floodplain and the requirement for PRow diversion associated with Option 1 (design principles 2.9, 4.3). Whilst Option 2 is located closer to Great Moulton compared to Option 1, there is an opportunity for screening in Sub-Site 1B owing to the existing boundary vegetation in the north western part of Sub-Site 1B (design principles 2.4, 2.8).
- 5.1.8 At the statutory consultation stage, the National Grid Substation in site 1B was initially orientated east – west (see **Figure 5.1**).



Figure 5.1: Orientation of National Grid Substation at Statutory Consultation

- 5.1.9 However, as part of the design evolution, the National Grid Substation was reorientated north - south to enable greater opportunities of screening from existing vegetation to the north to reduce the visibility from Great Moulton and provide a greater offset from Narrowgate Way PRow (design principles 2.4, 2.8, 2.9) (see **Figure 5.2**).

Project Substations

- 5.1.10 The siting of the Project Substations in Sub-Site 5A, Sub-Site 7F and Sub-Site 10C has remained largely unchanged. As presented at the targeted consultation, the Project Substation in Sub-Site 1B was increased in size from 132kV to 400kV and moved to the east to allow for adequate space for the National Grid Substation (see **Figure 5.2**). This upgrade removed the need for an additional transformer at the BESS Site, thereby reducing the

requirement for Abnormal Indivisible Loads (AIL) within the locality. This change simplified the overall infrastructure requirements (design principles 4.2, 6.1).

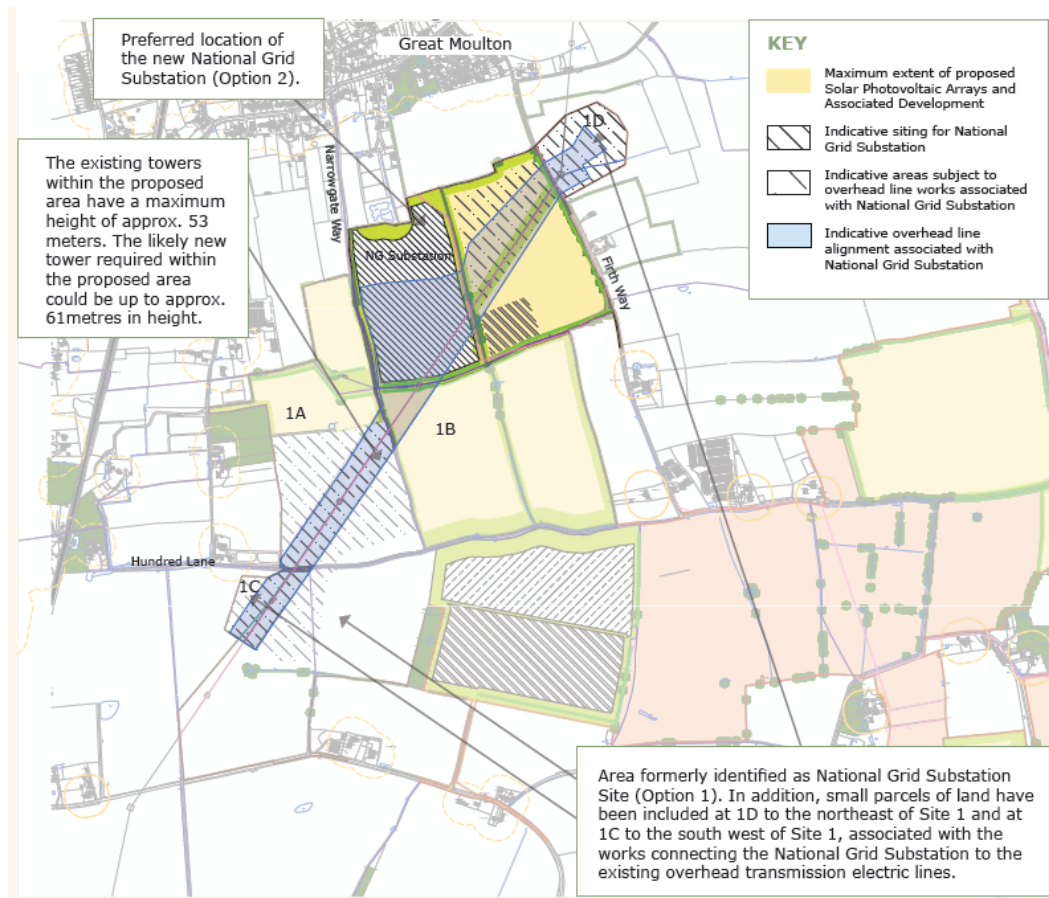


Figure 5.2: Design Changes around National Grid Substation Post Statutory Consultation

Refinement of the Order Limits

Sites

5.1.11 The Order Limits of the Sites were further refined during this stage (including those noted above around Site 1), with key changes made:

- To remove Sub-Site 3A entirely from the Order Limits, given the numerous constraints relating to it including its agricultural land quality (largely Grade 2), and ecological constraints; and it was considered that BNG, skylark plots and arable field margins could be delivered elsewhere within the Order Limits. In addition, removal of Sub-Site 3A was preferable given it removed highway access through Spring Wood Ancient Replanted Woodland (design principles 2.2, 2.4, 3.1, 3.2, 3.4, 7.2);
- To accommodate additional highway visibility splays as the access strategy was developed. This also included the removal of strips of land

owing to the removal of access points, including from Broadgate Lane to Sub-Site 1A, from Lundy Green to Site 3, from The Green to Sub-Site 7F and from one proposed access from Harvey's Lane to Sub-Site 10C (Design Principle 2.4, 2.8);

- To include small areas of land associated with highways (as presented at the targeted consultation) owing to further appraisal of the routes for the AIL that could result in highway works, removal of street furniture and/or vegetation removal, together with a review of highway visibility splays to the Sites (design principles 5.3, 5.4);
- To include some existing field boundaries across various Sites to facilitate the strengthening of field boundaries and enable the long-term management by the Applicant (design principle 3.4, 7.2); and
- To include additional land to the north east and south west of Sub-Site 1B owing to the development of the concept design to accommodate Grid Connection Infrastructure, as presented at the targeted consultation (Design Principle 6.1).

Cable Route Corridor

- 5.1.12 At Stage 1 and Stage 2, a broad CRC was identified which was refined throughout Stage 3. Through a series of design workshops with the multi-disciplinary team, the CRC was refined to an approximate width of 50m, with variations (widening and narrowing) in the width having regard to technical and environmental considerations, such as owing to the presence of veteran trees, ponds, access requirements and the need for flexibility associated with trenchless crossing solutions (Design Principle 3.2, 3.5, 5.4, 5.5). The reduction in extent of the CRC between Statutory Consultation and submission, can be seen on **Figures 4.13** and **5.10**.
- 5.1.13 Together with the technical requirements (including consideration of the underground utilities) and owing to parts of the CRC to accommodate the internalisation construction traffic away from the local roads, namely around Site 7 (and associated Sub-Sites) in response to comments from the Highway Authority, consideration was given to:
- Keeping the route as short and direct as possible;
 - Avoiding existing landscape and ecological features such as woodland, trees, ponds, watercourses/ditches as far as practicable;
 - Utilising existing gaps in the hedgerows as far as possible to minimise temporary hedgerow loss (design principle 2.2);
 - Directing the route away from HER finds relating to archaeology as far as possible (Design Principle 2.7);
 - Directing the route away from designated ecological sites as far as possible, including moving away from Roadside Nature Reserves,

Ancient Woodland, County Wildlife Sites, and Sites of Special Scientific Interest (Design Principle 2.2, 3.2);

- Providing a buffer to residential properties (design principles 2.8, 5.3); and
- Access requirements to the CRC, including the internalisation of construction traffic to remove from the local roads as far as practicable (Design Principle 5.4, 5.5).

Design Evolution Around Landscape Character and Green Infrastructure

- 5.1.14 Following statutory consultation, the landscape measures were further refined to respond to their setting and the prevailing landscape character. The approach utilised the emerging habitat survey data and arboricultural surveys; and a greater understanding of the local landscape and views within, such as at Sub-Site 8B), the Local Nature Recovery Strategy mapping tool, was further informed by responses received during statutory consultation. Collectively, this information was used to shape the landscape proposals for the mitigation and enhancement areas responding to the prevailing landscape character and green infrastructure network (Design Principle 2.1, 2.2, 2.3).
- 5.1.15 The Scheme design approach has sought to positively respond to these priorities and the existing green infrastructure assets, informed by an understanding of the local environment in which the Scheme is located.
- 5.1.16 The Scheme design applied appropriate buffers to existing green infrastructure assets to retain and protect key landscape features. In addition, where appropriate in local context of the Order Limits, the Scheme includes provision of new community accessible spaces for pedestrian use to providing accessible greenspace in Sub-Site 4B and Sub-Site 7F.
- 5.1.17 PRow within the Sites have been protected and retained with new permissive paths provided in Sub-Sites 7F, 8B, and 10B, which collectively help to strengthen the network of greenways and active connections within the landscape.
- 5.1.18 The Scheme has included the provision for new landscape measures and enhancement of existing features, including the restoration of ghost ponds and key hedgerows, embedding green infrastructure into the Scheme and collectively seeking to strengthen habitat connectivity at a landscape scale. These measures will increase habitats provision and support ecological connectivity, visual screening and glint and glare mitigation throughout the landscape.
- 5.1.19 Additional areas for mitigation were identified to provide space for suitable landscape measures to mitigate effects. Effects such as those on visual amenity from the PRow or from residential properties through introduction of

tree and/or hedgerow planting. This also included measures to reinforce existing landscape features and support habitat connectivity for example at Sub-Sites 7F, 7G and 7H to provide increased connectivity between SSSI and Ancient Woodland (design principles 2.4, 2.5, 2.8, 2.9).

Design Evolution of Access and Recreation

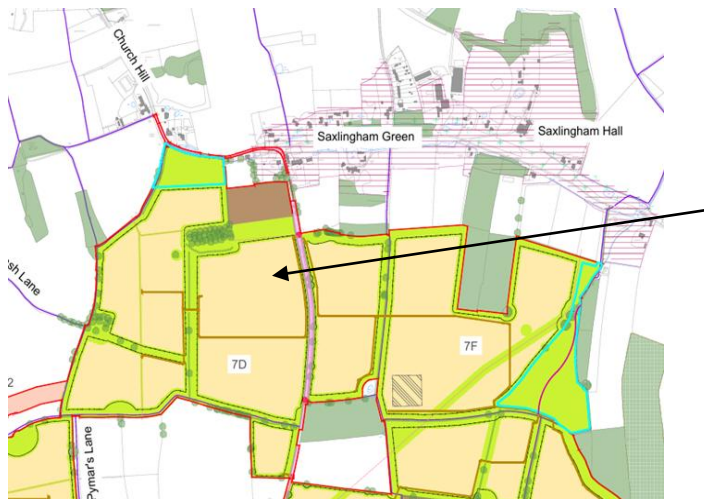
- 5.1.20 In response to feedback throughout the consultation process regarding community benefits, consideration was given to the provision of permissive paths and community accessible spaces with pedestrian access.
- 5.1.21 All existing PRow were identified for retention throughout the lifetime of the Scheme, with a minimum 15m buffer embedded into the design from an early stage. Connecting to existing PRow to provide continuous routes, permissive paths have been proposed within areas of retained open space in Sub-Site 7F, Sub-Site 8B and Sub-Site 10B (design principle 2.9, 5.5).
- 5.1.22 Community accessible spaces with pedestrian access have also been introduced to the Scheme in Sub-Site 4B and Sub-Site 7F (Design Principle 5.2).

Further Design Evolution Around Residential Properties and Villages (including Heritage Assets)

- 5.1.23 In response to feedback from statutory consultation from residents and Historic England, several design changes were made to the extent of Solar PV Arrays in Site 5, Sub-Site 7D, Site 8 and Site 9. Some of these design changes post-statutory consultation are illustrated in **Figure 5.3** to **Figure 5.6**.



Figure 5.3: Further Setbacks Introduced to Site 5



As previously proposed, the design and layout of the Scheme in this area would have led to the severance of an existing field. It was considered a more efficient design solution to move the landscaping screening belt further to the north to tie in with existing field boundaries (and which will make reinstatement of the field, at the decommissioning stage more efficient), with solar panels to be provided in the area where the mitigation has been removed (Design Principle 6.1).

Figure 5.4: Additional Area of Solar PV Array in Sub-Site 7D



Historic England and other stakeholders raised concerns regarding the impact on the setting of listed buildings to the north of Sub-Site 8B. As a result, Solar PV Arrays were removed from the northern part of Sub-Site 8B owing to the elevated topography and the prominence of the landscape on the setting of listed buildings. This change would make sure that there is no infringement on the setting of the Grade II listed Upgate Green Farmhouse to the north (Design Principle 2.7). This has also removed some BMV land from the scheme.

Similarly, Solar PV Arrays removed were from the western part of Sub-Site 8B owing to the rising topography and visibility from a residential property on Market Lane (Design Principle 2.8).

Solar PV Arrays removed from Flood Zones 2 and 3 (Design Principle 4.3).

Solar PV Arrays removed from a field adjacent to Ringers Grove Ancient Woodland and owing to a discrete parcel of Grade 2 BMV quality and identified (Design Principle 2.6).

Figure 5.5: Removal of Areas of Solar PV Array in Site 8



Following statutory consultation feedback, Solar PV Arrays were removed entirely from the western part of Site 9 owing Brooke Conservation Area to the north and residential properties bordering the southern Order Limits on Mill Lane (Design Principle 2.7, 2.8).

It also removed some Grade 3a BMV quality land (Design Principle 2.6).

Figure 5.6: Further Removal of Areas of Solar PV Array in Site 9

Design Evolution in respect of Other Environmental Considerations

- 5.1.24 As part of the design evolution, further updates were made in relation to the extent of Solar PV Arrays, primarily in relation to flood risk, BMV quality land and Seething Airfield (design principles 4.3, 2.6, 5.3).
- 5.1.25 As illustrated in **Figure 5.5**, further consideration was given to flood risk and the sequential approach to locating infrastructure within areas of Flood Zone 1 and the lowest flood risk from other sources as far as possible. As a result, Solar PV Arrays were removed from Flood Zones 2 and 3 in Sub-Site 8A associated with the River Tas (design principles 2.10, 4.3).
- 5.1.26 Seething Airfield is situated in proximity to the Order Limits (north east of Site 10). Following dialogue with Seething design changes were made to Sub-Site 10B as illustrated in **Figure 5.7**, in respect of issues relating to Engine Failure after Take-off (EFATO). An area of solar panels was removed from Site 10B to provide space in the very unlikely event, of an engine failure after take-off.



Following discussions with Seething Airfield and the projects' aviation specialists, Solar PV Arrays were removed from part of Sub-Site 10B to take into account the potential for engine failure from aircraft using Seething Airfield (Design Principle 5.3, 7.3).

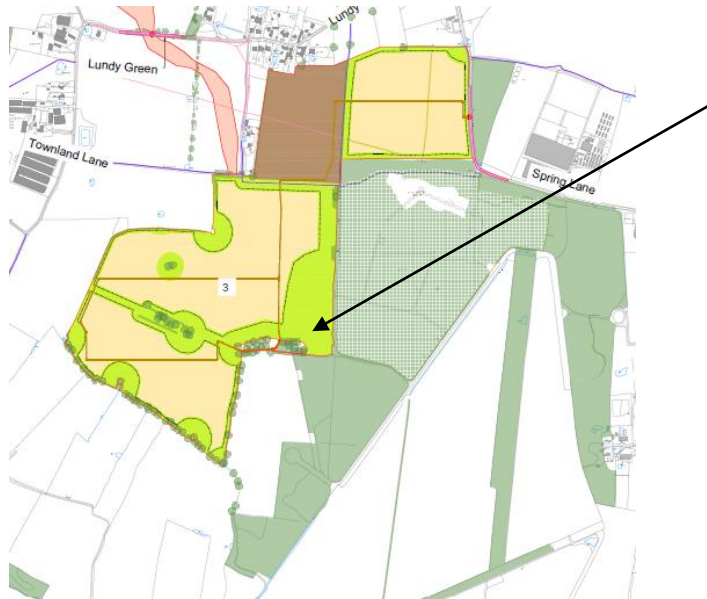
Figure 5.7: Removal of Area of Solar PV Arrays from Sub-Site 10B

Design Evolution of Access

- 5.1.27 Sub-Site access and construction vehicle routeing has evolved following feedback to internalise haul routes through and between Sub-Sites where practicable to help minimise construction vehicle traffic on the local road network. Internal haul routes are now proposed to connect Sub-Sites 7A-F, 7G-L and 8A-B.

Design Evolution of Mitigation and Enhancement Areas

- 5.1.28 As a result of the design changes, as illustrated above, owing to the reduced extent of the Solar PV Arrays, additional areas were identified for mitigation and enhancement within the Order Limits. The main additional areas included at this stage related to Sub-Site 5B, Sub-Site 8A, Sub-Site 8B, Site 9 and Sub-Site 10B where Solar PV Arrays have been removed. In addition, the design buffers (offsets) were updated following statutory consultation feedback (see Section 3.6) and the offset within Site 3 as illustrated in **Figure 5.8**. These areas were identified for a combination of land retained for agricultural use and mitigation and enhancement areas (Design Principle 2.6, 2.8, 7.3).



Solar PV Arrays removed and buffer increased. This was in response to a combination of factors, including the adjacent Spring Wood Ancient Replanted Woodland, discrete parcel of Grade 2 BMV quality land and high unexploded ordnance risk (Design Principle 2.2, 2.6, 3.2).

Figure 5.8: Mitigation and Enhancement Buffer Increased in Site 3

5.1.29 Following statutory consultation, the landscape mitigation measures for the Scheme were further refined and developed. At this stage proposed measures included further refinement and identification of existing hedgerows for reinforcement, alongside the identification of new hedgerow and hedgerow trees, tree planting, including tree belts and woodland (design principles 2.1, 2.2, 2.4, 2.5, 3.2, 7.2). Furthermore, the habitat surveys provided guidance on the definition of appropriate grassland typologies throughout the Order Limits, including areas of modified, neutral, tussocky, and flower rich species mixes.

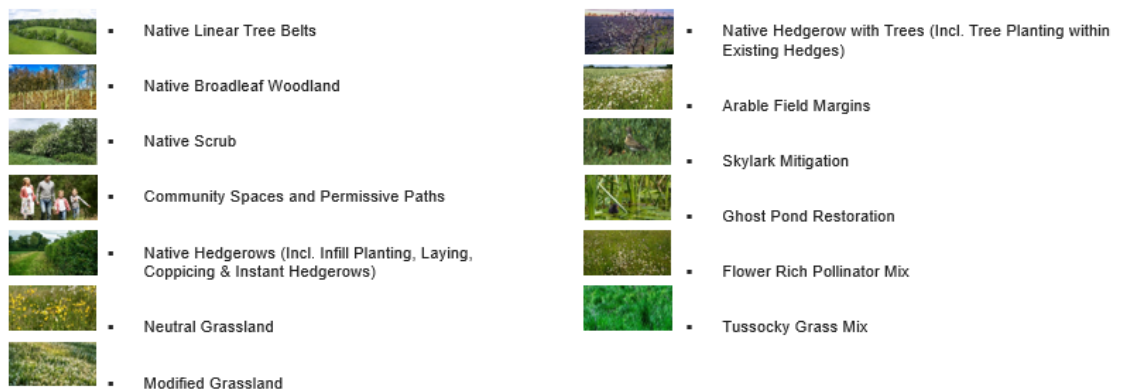


Figure 5.9: Mosaic of Landscape Planting Proposed

5.1.30 The landscaping mitigation proposals were also refined in response to the outcomes of environmental assessment process, design evolution and landscape discussions with landowners to enable continued farming practices. The development of the landscaping mitigation proposals included opportunities for the restoration of ghost ponds (such as in locations identified in Sub-Site 7C, Sub-Site 7D) (design principles 2.6, 3.5, 7.3).

Indicative Masterplan

- 5.1.31 Following further design development as discussed above, the Applicant updated the Indicative Masterplan and the final Indicative Masterplan is illustrated in **Figure 5.10** below and also **ES Volume 2, Figure 4.1 Indicative Masterplan [EN0110014/APP/6.2.4.1]** with the final landscaping mitigation illustrated in Outline Landscape and Ecology Management Plan [EN0110014/APP/7.4] **Appendix B, Green Infrastructure Strategy.**

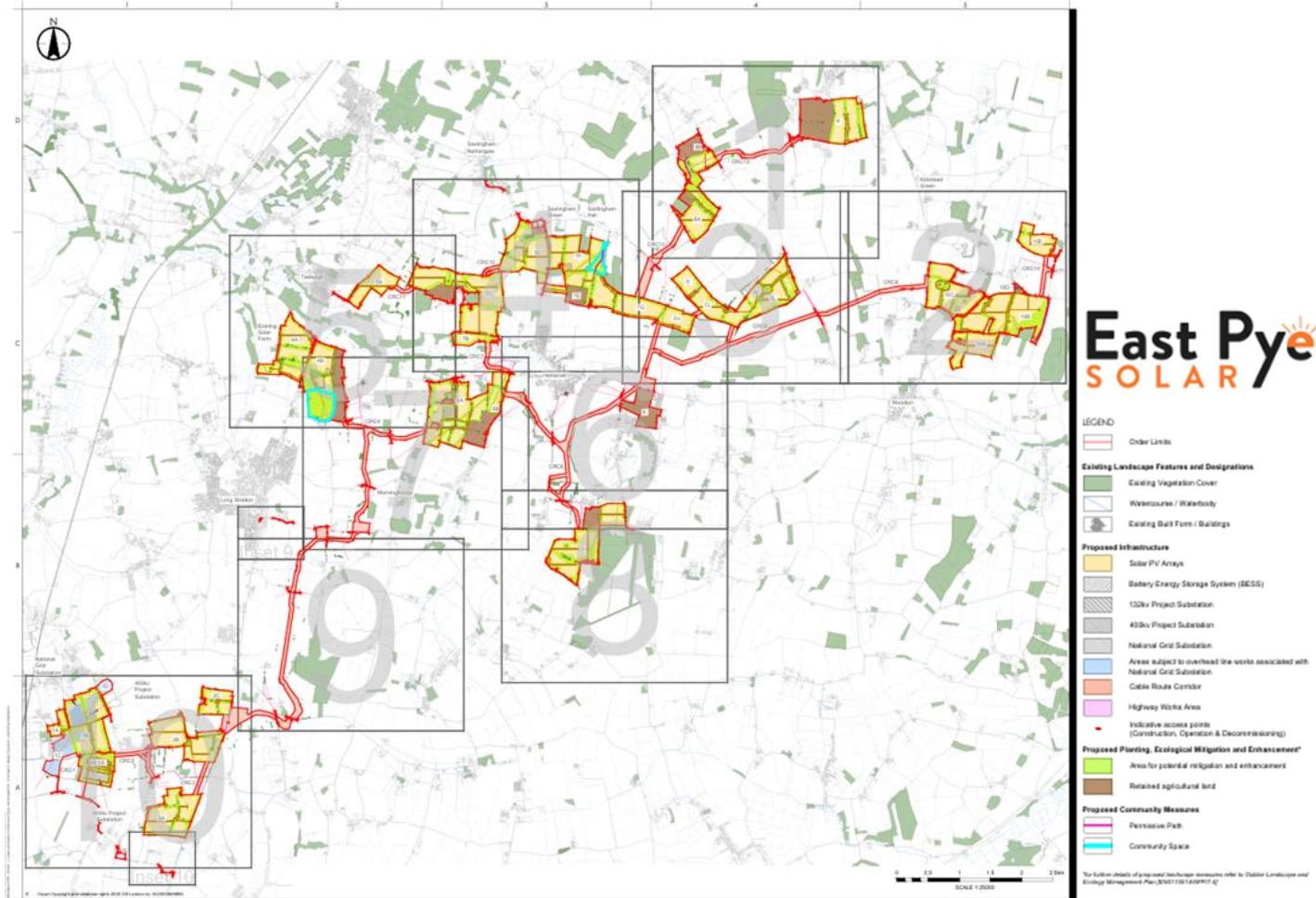


Figure 5.10: Indicative Masterplan for DCO Submission

6 Securing Good Design

6.1 How the Scheme will Secure Good Design

- 6.1.1 The DCO Application includes a **draft DCO [EN0110014/APP/3.1]** that will secure the design of the Scheme through various mechanisms which are described below.
- 6.1.2 Schedule 1 of the **draft DCO [EN0110014/APP/3.1]** describes the authorised development as a set of numbered works. Article 3(2) of the **draft DCO [EN0110014/APP/3.1]** requires that the numbered works authorised by the made Order are located in the corresponding areas shown on the **Works Plan [EN0110014/APP/2.3]**. This secures the maximum spatial parameters of the components of the Scheme, taking into account flexibility needed for detailed design.
- 6.1.3 Schedule 2 of the **draft DCO [EN0110014/APP/3.1]** sets out the Requirements that the Scheme must comply with. Article 3(1) of the **draft DCO [EN0110014/APP/3.1]** states that consent for the Scheme is only given subject to compliance with these Requirements. Each Requirement sets out the details and documents that the Scheme must legally comply with.
- 6.1.4 With respect to detailed design, Requirement 5 of the **draft DCO [EN0110014/APP/3.1]** sets out that the development must be carried out in accordance with the **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]**. This approach is taken to ensure suitable flexibility in the design of the Scheme so that the latest technology can be used, while ensuring that good design will be embedded in the final design and that the impacts of the Scheme will not materially differ from those set out in the Environmental Statement.
- 6.1.5 The documents and management plans that set out the Scheme's design commitments at this stage, and which will inform detailed management plans secured by the Requirements in the **draft DCO [EN0110014/APP/3.1]** are:
- **Design Principles, Parameters and Commitments [EN0110014/APP7.18]** sets out the design parameters and commitments for the Scheme;
 - **Outline Battery Safety Management Plan (Outline BSMP) [EN0110014/APP/7.5]** sets out the key fire safety provisions for the BESS proposed to be installed as part of the Scheme, including measures to reduce BESS failure risks and mitigate credible failure incident scenarios;
 - **Outline Landscape and Ecology Management Plan (Outline LEMP) [EN0110014/APP/7.4]** provides a framework for the proposed implementation, management and monitoring of the landscape

and ecological measures and areas of habitat creation within the Scheme;

- **Outline Construction Environmental Management Plan** (Outline CEMP) [EN0110014/APP/7.1] sets out mitigation measures, management and monitoring that will be in place to minimise the environmental impacts of the Scheme during construction;
 - **Outline Operational Environmental Management Plan** (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;
 - **Outline Construction Traffic Management Plan** (Outline CTMP) [EN0110014/APP/7.6] provides a framework for the management of construction vehicle movements to and from the Scheme during the construction to reduce, as far as practicable, the impacts of the Scheme on the Local Road Network;
 - **Outline Operational Traffic Management Plan** (Outline OTMP) [EN0110014/APP/7.7] outlines the traffic management measures that will be implemented to ensure safety and minimise disruption from traffic during the operation of the Scheme;
 - **Outline Public Rights of Way and Permissive Paths Management Plan** (Outline PProWPPMP) [EN0110014/APP/7.8] provides a framework for the management of PProW and recreational/walking routes within the Scheme during the construction, operational and decommissioning phases;
 - **Outline Soil Resource and Management Plan** (Outline SRMP) [EN0110014/APP/7.15] sets out the principles for handling soil during the construction, operation and decommissioning phases;
 - **Outline Employment, Skills and Supply Chain Strategy** [EN0110014/APP/7.10] describes the opportunities created by the Scheme for employment, skills, supply chain and the economy; and
 - **Outline Decommissioning Environmental Management Plan** (Outline DEMP) [EN0110014/APP/7.3] details the measures that will be in place to minimise the environmental impacts of the Scheme during decommissioning.
- 6.1.6 The management plans have been submitted with the DCO Application as 'outline'. Detailed management plans will be prepared substantially in accordance with the outline management plans and submitted to and approved by the relevant local authority in accordance with the DCO Requirements.
- 6.1.7 The environmental mitigation measures that would be adopted during the construction, operation and maintenance, and decommissioning phases of

the Scheme are provided in the **Commitments Register [EN0110014/APP/7.27]**. This sets out where those mitigation measures are to be secured, for example through the inherently limited scope of the Works Plan or through the provisions of the various management plans.

6.2 Community Liaison Group

- 6.2.1 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.
- 6.2.2 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.
- 6.2.3 Details of the CLG are set out in the **Outline CEMP [EN0110014/APP/7.1]** and its delivery is secured via a Requirement in Schedule 2 to the **draft DCO [EN0110014/APP/3.1]**. 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.

6.3 Delivery of Positive Outcomes

- 6.3.1 The following section provides a summary of the operational design of the Scheme and demonstrates how it has responded to each of the project level design principles presented in Section 5 (Design Framework).

Decarbonisation and Energy Security

Principle 1.1: Reduce carbon emissions during all phases of the Scheme

- 6.3.2 The minimisation of carbon emissions throughout the Scheme lifecycle will be achieved through adherence to best practice guidelines in-place throughout the lifespan of the Scheme for all applicable aspects of construction (including maintenance and replacement), operation, and decommissioning. This includes:

- Implementing measures to decrease fuel use by maximising energy efficiencies, for example, to ensure all vehicles switch off engines when stationary and ensure vehicles are well maintained and conform to current emissions standards;
- Promoting the use of sustainable fuels in construction vehicles, and where possible making use of electric or battery powered equipment where practicable;
- Liaising with construction staff to minimise GHG emissions associated with their commute to the Site, including encouraging travel to the site via lower carbon modes of transport and sustainable travel, where practicable. Measures may include the provision of a shuttle bus and a car sharing scheme, identifying and communicating local bus connections and pedestrian and cycle access routes to/ from the Scheme to all construction staff, and providing appropriate facilities for the safe storage of cycles;
- Using locally sourced and/or produced materials. The use of recycled materials where practicable;
- Promoting the recycling of materials by segregating construction waste to be re-used and recycled where practical; and
- Regular planned maintenance of the Scheme will be conducted to optimise the efficiency of the Scheme infrastructure.

Environmentally-Led Design

Principle 2.1: Respond to the character of the Sites, 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.

- 6.3.3 The Scheme has avoided placing infrastructure within the River Valley landscapes as far as possible, recognising their higher sensitivity and more varied topography. This approach helps reduce visual intrusion and maintains the character of these areas.
- 6.3.4 The Scheme has also been informed by Natural England's Statements of Environmental Opportunity (SEOs), with the design responding to each relevant objectives as follows:
- SEO 1 – The design supports the creation and restoration of field-edge habitats through new grassland, enhanced and newly planted hedgerows, linear tree planting, scrub and woodland creation, and the reinstatement of former pond features. These measures help deliver stronger ecological networks across the farmed landscape. The Scheme has also been arranged to minimise visibility from nearby recreational routes, supporting the conservation of local tranquillity.

- SEO 2 - The Scheme enhances opportunities for access and understanding of the landscape through the provision of new permissive routes and community-facing environmental improvements. The siting of infrastructure has been carefully considered to limit effects on nearby settlements and to respect traditional settlement patterns.
- SEO 3 – The Scheme maintains and enhances the River Tas Valley by introducing new areas of woodland and grassland within the lower-lying parts of the valley, contributing to landscape character and habitat diversity.
- SEO 4 - The design protects and reinforces ancient semi-natural woodland, hedgerows and hedgerow trees through targeted management and the introduction of new woodland and hedgerow planting. These measures strengthen biodiversity, improve habitat connectivity and support visual screening. Extending and linking existing woodland and linear features forms a key part of the landscape strategy, providing both green infrastructure benefits and appropriate separation between the development and its surroundings.

Principle 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.

6.3.5 **ES Volume 2 Figure 7.11 Landscape Mitigation**

[EN0110014/APP.6.2.7.11] identifies over 40 opportunities to reinforce existing hedgerows through infill planting or complementary tree planting. In addition, it sets out more than 200 locations suitable for linear planting, new woodland and scrub, new hedgerows, arable field margins, skylark mitigation areas, reinstated ghost ponds and further native scrub planting.

- 6.3.6 This approach directly reflects Principle 2.2, which seeks to retain and enhance existing vegetation and features that define the Site's fabric and contribute to its rural character. Strengthening hedgerows across the Site helps maintain the traditional field structure, softens the appearance of new infrastructure, and supports the Scheme's integration within the surrounding landscape. The **Outline LEMP [EN0110014/APP/7.4]** provides for the long-term management of these areas, ensuring that reinforced hedgerows establish successfully and continue to contribute to the character and coherence of the landscape throughout the operational life of the Scheme.

Principle 2.3: Support the objectives of Norfolk's Green Infrastructure Strategy, creating green infrastructure for climate change resilience and enhancing biodiversity.

- 6.3.7 The Scheme has been developed to positively support the aims of the Greater Norwich Green Infrastructure Strategy by delivering a multifunctional landscape that strengthens habitat networks, improves climate resilience and enhances the wider green infrastructure resource. Through nature-rich

grassland creation, reinforced hedgerow corridors and the integration of SuDS, the Scheme contributes to the Strategy's objectives for nature recovery and climate-adaptive places. The layout responds to local landscape character and the existing pattern of fields, watercourses and public rights of way, reflecting the Strategy's emphasis on supporting distinctive places and improving connectivity within the wider GI network. The land beneath and around the solar arrays is managed for ecological enhancement and compatible low-impact uses, ensuring the Site continues to function as a green and natural space while generating renewable energy. This dual use of land helps optimise the benefits of green infrastructure and supports the Strategy's wider ambition to deliver multiple functions from the same land. The Scheme integrates climate mitigation, habitat creation and long-term land management in a way that supports the Strategy's vision for a high-quality, connected and resilient green infrastructure network across Greater Norwich.

Principle 2.4: Create new woodland belts and native tree planting to provide screening to the Scheme, improve biodiversity and green infrastructure connectivity.

6.3.8 ES Volume 2, Figure 7.11 Landscape Mitigation

[EN0110014/APP.6.2.7.11] identifies numerous locations where new woodland belts, native tree groups and linear planting will be delivered to help screen the Scheme and strengthen the existing landscape pattern. These planting areas have been designed to connect with existing vegetation, reinforce field boundaries and contribute to wider habitat networks.

6.3.9 The Outline LEMP [EN0110014/APP/7.4] sets out how new woodland and tree planting will be established and managed to support long-term biodiversity and landscape benefits.

Principle 2.5: Restore key hedgerows to improve biodiversity and reinforce a sense of landscape character.

6.3.10 ES Volume 2, Figure 7.11 Landscape Mitigation

[EN0110014/APP.6.2.7.11] identifies more than 40 opportunities to reinforce hedgerows, either alone or with supplementary tree planting. In sub-Site 2A, for instance, over 600 metres of strengthened hedgerow will not only reinforce the existing field boundary but also improve connectivity between surrounding habitats.

6.3.11 This approach is repeated across the Site, creating a more continuous and resilient hedgerow network that supports species movement and enhances foraging and nesting opportunities. Ongoing management set out in the Outline LEMP [EN0110014/APP/7.4] will ensure these reinforced hedgerows establish well and continue to deliver strong biodiversity benefits throughout the lifetime of the Scheme.

Principle 2.6: Improve soil health during the lifetime of the Scheme.

- 6.3.12 Potential improvements to soil health and quality across the Site are outlined in **ES Volume 1, Chapter 15 - Soils and Agriculture [EN0110014/APP/6.1.15]**.
- 6.3.13 The British Society of Soil Science identify that ‘significant long-term land use change (e.g. conversion of arable land to grassland or woodland) has by far the biggest impact on soil organic carbon (SOC)’ (Ref 16), and that soils with a higher rate of SOC are less prone to runoff and erosion, have greater water infiltration and retention, increased biological activity and improved nutrient supply.
- 6.3.14 The majority of the Site is expected to be sown to grassland and managed, this includes the potential for sheep grazing during the operational phase. This would have a significant benefit on the health of the soil during this time. Methods on how the soil will be managed are set out in the **Outline SRMP [EN0110014/APP/7.9]**.

Principle 2.7: Consider the setting of heritage assets and mitigate any impact by design, where practicable.

- 6.3.15 The Scheme has been developed to respond to the setting of heritage assets by avoiding sensitive areas, increasing buffer distances and introducing landscape mitigation where potential effects were identified. Solar PV Arrays were removed or reduced in several locations to maintain the character and legibility of historic features. For example, land in the north-eastern part of sub-Site 7D was excluded to protect the setting of the Saxlingham Green Conservation Area, and the southern area of sub-Site 7E was taken out of the developable area to retain the open context of the moated site recorded on the Historic Environment Record.
- 6.3.16 In sub-Site 4B, the layout was refined to avoid enclosure features and a potential ring ditch identified through the geophysical survey. Large areas of woodland are proposed in this sub-Site to screen views from the Cedars listed building and create a buffer between the solar arrays and the proposed community area. In sub-Site 5B arrays were moved further north and west to prevent impacts on enclosure features located at the eastern edge of the Site.
- 6.3.17 Where appropriate, new planting such as hedgerow reinforcement, tree belts and native scrub has been introduced to soften views and help maintain the rural setting of heritage features. This planting and the management of it would be secured by Requirement in the Landscape and Ecological Management Plan, which will be produced in line with the **Outline LEMP [EN0110014/APP/7.4]**.

Principle 2.8: Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.

- 6.3.18 The design of the Scheme has been shaped to minimise potential effects on residential receptors and users of Public Rights of Way by applying generous buffers, removing Solar PV Arrays from sensitive locations and introducing targeted landscape mitigation. Across the Site, minimum offsets such as the 15m buffer to PRow and bespoke setbacks to residential properties have informed the layout, as set out in **Table 3.6** of this DAD.
- 6.3.19 Refinements made during design evolution include removing Solar PV Arrays from the southern boundary of sub-Site 9 to reduce effects on properties along Mill Lane, reducing development along the west of the same sub-Site to protect views from High Green and the Brooke Conservation Area, and scaling back Arrays in sub-Sites 7E and 7F to retain openness along key PRow routes.
- 6.3.20 The **Design Principles, Parameters and Commitments** document **[EN0110014/APP/7.18]** secures this approach by embedding Principle 2.8 across all relevant components of the Scheme, including Solar PV Arrays, internal access tracks, fencing, BESS Containers and all Substations. It sets out the minimum offsets and commitments that ensure sensitive siting and appropriate landscape buffers, including mitigating noise within 30m of PRow and 200m of residential properties where required, and the careful routing of infrastructure to reduce visibility and disturbance.

Principle 2.9: Consider the opportunities for peoples' connection to nature, experience and access using quiet lanes, PRow and recreational routes namely the Boudicca Way and Via Beata Way.

- 6.3.21 The Scheme has adopted mitigation measures that ensure the level of change for uses of the PRow network are kept to a minimum. This includes the following:
- Minimum 15m offset to Solar PV Arrays (including security fencing) from all PRow;
 - A general strategy for the strengthening and gapping up of hedgerows along PRow such as planting required to maintain amenity of PRow: Great Moulton RB18, FP14, FP13 & FP15; and
 - Limiting crossings of all PRow to reduce disruption of their use during construction and operation.
- 6.3.22 The **Outline OEMP [EN0110014/APP/7.2]** and the **Outline PRowPMP [EN0110014/APP/7.8]** require the Applicant, at detailed design stage, to give further consideration to the experience of people using the Public Rights of Way, including:
- The layout of the PV Arrays within individual fields;
 - The siting of Standalone Conversion Units and Integrated Conversion Units / 33kv Sub-distribution Switch Rooms;

- The alignment and treatment of fencing;
 - The final location and layout of the BESS Compound and BESS Containers;
 - The final location and layout of the 400kv Substations; and
 - The final location and layout of the National Grid Substation.
- 6.3.23 The Scheme has been designed to respect and enhance the experience of people using quiet lanes, PRow and key recreational routes, including the Boudicca Way and Via Beata Way. The layout manages and improves access where appropriate by maintaining the tranquillity of the rural landscape, strengthening the setting of nearby footpaths, bridleways and watercourses, and ensuring these routes remain enjoyable and easy to navigate. The Scheme also supports opportunities to promote awareness and understanding of lesser-known local features, while reinforcing access to well-established long-distance paths such as the Boudicca Way, Angles Way and the wider network of quiet lanes and village routes.

Principle 2.10: Prevent deterioration to the local water quality environment, such as the River Tas.

- 6.3.24 The proposed surface water drainage systems for the BESS and Substations will be lined to manage risk of pollution and contaminated firewater discharging to hydrogeological receptors.
- 6.3.25 A penstock/self-actuating valve will be installed downstream of the BESS surface water drainage system and will be linked to the fire alarm system, so in the event that the alarm goes off, the valve will close to prevent contaminated firewater from discharging to hydrological receptors in the unlikely event of a fire.

Principle 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.

- 6.3.26 Lighting will only be used where required for safety or operational needs and will be designed to be directional, low-intensity and controlled through appropriate timing and sensor systems. **ES Volume 3, Appendix 7.11 Lighting Strategy [EN0110014/APP/6.3.7.11]** will guide the final design and will set out the measures that ensure lighting remains sensitive to surrounding receptors.

Principle 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.

- 6.3.27 The **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]** document secures the key parameters that control

the location, separation distances and arrangement of BESS infrastructure, ensuring that safety considerations are embedded in the design from the outset. Further detail is provided in the **Outline BSMP [EN0110014/APP/7.5]**, which sets out the measures that will guide the detailed design, installation and operation of the BESS to ensure safe performance and appropriate emergency management. Together, these secured documents ensure that the BESS is designed with due regard to fire safety, risk mitigation and site-wide resilience.

Biodiversity Net Gain and Nature Recovery

Principle 3.1: Deliver a quantifiable Biodiversity Net Gain of at least 10%

- 6.3.28 The measures set out in the **Outline LEMP [EN0110014/APP/7.4]** enable the Scheme to achieve biodiversity net gains of at least 10% in both habitat and hedgerow units. This outcome has been evidenced through the **Biodiversity Net Gain Report [EN0110014/APP/7.23]**, which uses the Department for Environment, Food and Rural Affairs (DEFRA) Biodiversity Metric. The BNG calculations will be updated during detailed design and through the LEMP(s) to confirm that a minimum 10% net gain is secured.

Principle 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.

- 6.3.29 The design integrates the Scheme into the surrounding natural environment by reinforcing and expanding existing habitat corridors across the farmed landscape. This is achieved through the protection and management of ancient semi-natural woodland, hedgerows and hedgerow trees, alongside new woodland, scrub and hedgerow planting that strengthens ecological networks and creates continuous linear connections. These measures enhance biodiversity, support the movement of wildlife through and around the Site, and form a key part of a landscape strategy that both embeds the Scheme within its setting and improves green infrastructure across the area.

Principle 3.3: Incorporate initiatives set out in the Local Nature Recovery Strategy and Norfolk Clayland Initiative, where practicable.

- 6.3.30 The Wilder Claylands initiative seeks to protect and enhance the South Norfolk Claylands landscape, which is characterised by an ancient field pattern of high hedgerows, pollarded trees, open fields and commons, underlain by a belt of chalky boulder clay with scattered areas of woodland.
- 6.3.31 This Principle seeks to restore ghost ponds where possible, establish new hedgerows and tree planting, and enhance and create areas of woodland and meadowland, thereby contributing to nature recovery. It will be applied in tandem with other relevant Principles, including 3.1, 3.2 and 3.4, to help deliver a biodiverse Scheme that supports wildlife and enhances the character of the Claylands landscape.

Principle 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.

- 6.3.32 The Scheme supports the creation and enhancement of field-edge and field-corner habitats by introducing new grass margins, hedgerows, scrub and tree planting, alongside the restoration and management of existing boundary features. These measures provide improved foraging and nesting opportunities for farmland birds and rare arable species. In addition to these enhancements, approximately 40 hectares of land have been identified for targeted arable management to deliver skylark mitigation, further strengthening habitat provision across the farmed landscape. The integration and management of these areas would be secured through the **Outline LEMP [EN0110014/APP/7.4]**.

Principle 3.5: Maintain isolated ponds and, 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.

- 6.3.33 The Scheme design prioritises the retention of existing ponds and, where appropriate, the reinstatement of historic 'ghost ponds', especially within areas identified for landscape and ecological mitigation. Environmental DNA (eDNA) surveys have been undertaken to establish the presence or likely presence of great crested newts, enabling informed decisions to be made on appropriate buffer zones around each pond. In addition, new native planting is proposed around selected retained and reinstated ponds to reinforce habitat connectivity, improve refuge and foraging opportunities, and strengthen the overall ecological function of these features.

Design Flexibility

Principle 4.1: Flexibility for resilience and adaptation to climate change.

- 6.3.34 The Scheme has incorporated measures to ensure it remains resilient under future climate conditions by locating key infrastructure in low flood-risk areas and integrating drainage solutions that respond to projected increases in rainfall intensity. Examples include a sustainable drainage network being incorporated into the BESS Compound, designed to accommodate the 1% annual exceedance probability event plus a 45% climate change allowance, ensuring the facility remains robust during extreme rainfall events as set out in **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]**.
- 6.3.35 The wider establishment of grassland across the Solar PV Sites will support natural infiltration and reduce runoff compared to the existing arable baseline, and further drainage measures will be refined at detailed design in accordance with the commitments set out in **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]**. Collectively, these

measures ensure the Scheme can adapt to future climate change while avoiding an increased flood risk on-site or elsewhere.

Principle 4.2: Flexibility for design and technological advancement to maximise energy production.

- 6.3.36 The DCO seeks consent for the spatial extents, design parameters, management measures and commitments for the Scheme, which have been informed by good design, consultation and environmental assessments. This approach has set the design envelope for the detailed design. The final selection of the component parts of the Scheme will be made at the detailed design stage, the details of which will be submitted to the relevant authorities in accordance with Requirement 5 of the **draft DCO [EN0110014/APP/3.1]**. This approach allows for technological advancement between the point of DCO application and construction to be incorporated within the Scheme which will optimize generation and export capacity of the Scheme.

Principle 4.3: Make sure the Scheme is resilient to flooding and does not increase flooding at the Site or elsewhere.

- 6.3.37 The Scheme's approach to flood risk follows the measures set out under Principle 4.1, including the siting of key infrastructure in low flood-risk area. These measures, together with the drainage commitments secured through the **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]**, ensure the Scheme does not increase flood risk on-site or elsewhere.

Social Value and Community Benefits

Principle 5.1: Provide opportunities to boost the local and regional economy

- 6.3.38 The Applicant has an established record of adding legacy value through supply chains and has committed to promoting the delivery of economic benefits generated by the Scheme to residents and business. This includes opening up opportunities for enhanced business growth and productivity through winning contracts on the Scheme and catalysing increased capabilities and specialisms in green construction and manufacturing across Norfolk.
- 6.3.39 The Scheme will make a meaningful contribution to the local and regional economy by creating employment, supporting supply chains and strengthening skills within Norfolk's growing clean-energy sector. Construction will generate a substantial peak workforce and a significant number of net direct, indirect and induced jobs, with opportunities for local contractors and suppliers embedded into the delivery approach. The Applicant is committed to maximising the use of local labour where possible and will secure a Skills, Supply Chain and Employment Plan in line with the **Outline Skills Supply Chain and Employment Plan [EN0110014/APP/7.10]** to support training, apprenticeships and

partnerships with local businesses. This has been developed in consultation with both Norfolk County Council and South Norfolk Council. The construction workforce will also bring increased expenditure to local accommodation and services. During operation, the Scheme will continue to sustain technical, landscape management and maintenance roles, as well as longer-term service contracts.

- 6.3.40 Apprenticeships will be used as a tool to both address skill shortages and provide local residents with pathways into meaningful employment, representing an opportunity to build on existing apprenticeship strength while helping address local gaps. The Applicant will work with local further and higher education providers, as well as established initiatives. Apprenticeship opportunities will be promoted throughout construction and operation, aligned with the Scheme's skills needs.
- 6.3.41 The Applicant will also consider other partnerships to support the training of employees and workers on the Scheme. Promotion of transferable skillsets shall be explored by the Applicant where practicable to aid workers displaced by the Scheme to transition to adjacent or similar careers, this may include helping agricultural workers transition to land management and site maintenance on the Scheme.
- 6.3.42 the Applicant will explore collaboration with FE colleges (e.g. College of West Anglia, City College Norwich, East Coast College, UEA) to expand capacity in green skills, including potential short courses in solar installation and renewable energy construction. This would upskill individuals, enhance career prospects and employment opportunities
- 6.3.43 The Applicant will explore opportunities to work with schools, colleges and local authorities to deliver outreach programmes on renewable energy and STEM careers, potential partners being Long Stratton High School, College of West Anglia, City College Norwich, East Coast College, UEA, Norfolk & Suffolk Careers Hub.

Principle 5.2: Support opportunities for delivery of wider community benefits and contributing to local community initiatives (in consultation with local stakeholders).

- 6.3.44 In line with this Design Principle, community accessible space with accessible access will be provided in Sub-Site 4B. The Applicant is committed to maximising the use of local labour where possible and will secure a Skills, Supply Chain and Employment Plan in line with the **Outline Skills Supply Chain and Employment Plan [EN0110014/APP/7.10]** to support training, apprenticeships and partnerships with local businesses. The Scheme will also provide new permissive paths to increase connectivity in and around the Site.
- 6.3.45 The Applicant will look to collaborate with other development projects where possible, in the locality and the wider region, such as the Drovers Solar DCO project which it also progressing, to seek to derive wider community benefits.

Principle 5.3: Behave as a considerate neighbour during the whole project lifecycle (all phases).

- 6.3.46 Measures that seek to control the impact and reduce impacts on those located near to the Site are set out in the, **Outline CEMP [EN0110014/APP/7.1]**, **Outline OEMP [EN0110014/APP/7.2]**, **Outline CTMP [EN0110014/APP/7.6]**, **Outline OTMP [EN0110014/APP/7.7]** and **Outline DEMP [EN0110014/APP/7.3]**.

Principle 5.4: Seek to route construction vehicles away from local villages, as far as practicable.

- 6.3.47 The Applicant has sought to route construction vehicles away from local villages wherever practicable. This includes local villages such as Hempnall, Saxlingham Nethergate, Woodton and Brooke. Further detail confirming construction vehicle routes and measures to manage these vehicle movements are set out in the **ES Volume 2, Appendix 11.1 Transport Assessment [EN0110014/APP/6.3.11.1]** and the **Outline CTMP [EN0110014/APP/7.6]**.

Principle 5.5: Improve connectivity and accessibility through the Site, where practicable.

- 6.3.48 As part of the operation of the Scheme, none of the existing PRoWs will be closed. It is proposed that multiple permissive paths be provided as per the **ES Volume 2, Figure 4.1 - Indicative Masterplan [EN0110014/APP/6.2.4.1]**. These permissive paths seek to link together existing routes, reduce the requirement to walk directly on the road and steer users away from directly impacting designated sites. This includes Site 7F where the permissive path is routed away from a designated ecological site. These routes will be secured through a Public Rights of Way and Permissive Paths Management Plan which will be substantially in accordance with the **Outline PRoWPPMP [EN0110014/APP/7.8]**.

Efficient Infrastructure and Ethical Supply Chain

Principle 6.1: Efficient use of land and maximising grid connection capacity

- 6.3.49 The Applicant has refined the design of the Scheme to maximise its generation and export capacity while working within the constraints of the Site. This optimisation is essential in order to help meet the national requirement for secure, home grown renewable energy, which is identified by Government policy as a key response to climate change and energy security. Further detail on the need for the Scheme is set out within the **Statement of Need [EN0110014/APP/7.11]**, which forms part of the DCO Application. The design process has included careful siting of infrastructure to make use of existing and available grid capacity, the integration of BESS technology to support grid stability, and provisions within the **draft DCO**

[EN0110014/APP/3.1] that enable future technological improvements to be incorporated as they emerge.

6.4 Sustainability, Durability and Reversibility

Principle 7.1: Prioritise sustainable resource management and techniques through the Scheme's lifecycle (all phases).

- 6.4.1 Sustainable resource management including following of the mitigation hierarchy, are set out in the appropriate management plans which are secured by requirement. These are the, **Outline CEMP [EN0110014/APP/7.1]**, **Outline OEMP [EN0110014/APP/7.2]**, **Outline CTMP [EN0110014/APP/7.6]**, **Outline OTMP [EN0110014/APP/7.7]** and **Outline DEMP [EN0110014/APP/7.3]**.

Principle 7.2: Sustainable management of woodland and hedgerows, along with meadows and other natural habitats

- 6.4.2 The long-term management of woodland, hedgerows, meadows and other natural habitats across the Site is secured through the **Outline LEMP [EN0110014/APP/7.4]**, which sets out the prescriptions for establishment, enhancement and ongoing maintenance during the Operational Phase. This includes the creation of new woodland and scrub planting, reinforced hedgerows, species-rich grassland, arable field margins and restored habitats such as ghost ponds and skylark plots. The **Outline LEMP [EN0110014/APP/7.4]** requires management practices that promote structural diversity, ecological resilience and habitat connectivity, ensuring that new and existing vegetation develops in a sustainable way and continues to reflect the rural character of the surrounding landscape. These measures are supported by the design choices made during Scheme evolution, where buffers were widened, planting increased and sensitive areas avoided to allow habitats to be protected and enhanced.

Principle 7.3: Allow for dual use of land, where practicable

- 6.4.3 Dual use of land beneath Solar PV Arrays can be achieved through low-intensity, year-round grazing, consistent with the ecological aims of the Scheme. Areas of the Site designated for ecological mitigation, as well as new planted grassland habitats will benefit birds and invertebrates.
- 6.4.4 The **Outline LEMP [EN0110014/APP/7.4]** sets out practical management measures that explain how these areas will be looked after throughout the lifetime of the Scheme.

Our Commitment to Mitigation

Principle 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.

- 6.4.5 Our commitment to mitigation is set out above through the various management plans, design principles and parameters commitments, and through the Requirements we have included within the **draft DCO [EN0110014/APP/3.1]** submitted with the application.

7 Conclusion

- 7.1.1 This DAD sets out how the Scheme has been shaped by, and will be taken forward in line with, the following matters:
- The principles of good design outlined in the NSIPs Advice on Good Design, as described in Section 2.1 and **Appendix A**, of this DAD.
 - The requirements of NPS EN-1, EN-3 and EN-5, together with relevant local planning policy and design guidance, summarised in Section 2.2 of this DAD.
 - The project brief in Section 3.1, which identifies the need to plan the construction, operation and maintenance, and decommissioning of a solar PV electricity generating station with a grid connection capacity of approximately 500MW and associated development, including a BESS and Grid Connection Infrastructure; and
 - The Scheme vision and design principles in Section 3.6, which set out both the Scheme-specific design direction and the IGP-wide design approach that applies across the project.
- 7.1.2 This DAD also explains how the design has evolved through engagement with stakeholders, responses to consultation, and the findings of technical work. The Design Vision and design principles have provided a consistent framework for making decisions, reducing potential impacts, making use of opportunities, and striking an appropriate balance between design flexibility and certainty for the DCO submission.
- 7.1.3 Through carefully developing the design in response to the constraints and opportunities identified within the locality, the Applicant has achieved a design that responds positively to place, minimises impacts on heritage, delivers ecological and social benefits, avoids or minimises negative impacts as far as possible and makes valuable enhancements to the local area.
- 7.1.4 The DAD identifies the securing mechanisms that will ensure the design principles that have informed the evolution of the Scheme are carried through into delivery.
- 7.1.5 The **Planning Statement [EN0110014/APP/7.14]** and the **Policy Compliance Document [EN0110014/APP/7.15]** set out how the Applicant has met the requirement for good design in line with NPS EN-1, EN-3 and EN-5.

Glossary

Abbreviation/Term	Definition
Abnormal Indivisible Load (AIL)	A vehicle which typically exceeds 44 tonnes gross vehicle weight and/or is a width of more than 2.9m and length of more than 18.65m. Further details are set out in the Road Vehicles (Construction and Use) Regulations 1986 and the Road Vehicles (Authorisation of Special Types) (General) Order 2003.
Agricultural Land Classification (ALC)	The measurement of agricultural land quality.
Battery Energy Storage System (BESS)	The battery storage installation to allow for the storage, importation and exportation of energy to the National Grid.
Best and Most Versatile Agricultural Land (BMV)	Agricultural land of Grades 1, 2 and 3a.
Biodiversity Net Gain (BNG)	An approach to development that makes sure habitats for wildlife are left in a measurably better state than they were before the development.
Cable Route Corridor (CRC)	An area of land identified for the proposed underground cables between the Sites, Sub-Sites and the BESS.
Construction Environmental Management Plan (CEMP)	A specific plan developed to ensure that appropriate environmental management practices are followed during the construction phase of the Scheme.
Construction Traffic Management Plan (CTMP)	A specific plan developed for the management of construction vehicles and worker travel associated with the construction period of the Scheme.
Decommissioning Environmental Management Plan (DEMP)	A specific plan will ensure that appropriate environmental management practices are followed during the decommissioning phase of the Scheme.
Development Consent Order (DCO)	Development consent is required pursuant to the Planning Act 2008 for Nationally Significant Infrastructure Projects. A DCO is a statutory instrument containing powers that enable the applicant to carry out the construction, operation (and maintenance) and decommissioning of the Nationally Significant Infrastructure Project. Applications for DCOs are made to, and decided by, the relevant Secretary of State.
Design Commitments	Design commitments secure specific elements of the detailed design such as appearance, materials, type, colour, surfacing and offsets. Design commitments are set and secured through the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] .

Abbreviation/Term	Definition
Design Parameters	<p>Design parameters secure the size (maximum footprint, width and height above ground level of different elements of the Scheme).</p> <p>Parameters are shown and secured through the Works Plan [EN0110014/APP/2.3] and the Design Principles, Parameters and Commitments [EN0110014/APP/7.18].</p>
Design Principles	<p>Design principles have been used to guide design-based decisions.</p> <p>Island Green Power (IGP) has developed a set of corporate level design principles. Project level design principles have been developed in line with IGP's corporate design principles, reflecting the local context of the Sites.</p> <p>Where Works Plan [EN0110014/APP/2.3] and management plans allow for flexibility for detailed design, project level design principles may be secured through the management plans to inform future design choices (within the consented parameters) post consent.</p>
Greater Norwich Local Plan (GNLP)	<p>Local planning policy as adopted by South Norfolk Council in March 2024.</p>
Ground mounted photovoltaic (PV) modules	<p>Solar photovoltaic (PV) modules attached to structures that are fixed to the ground which include Single Axis Tracker PV Panels or Fixed PV Panels.</p>
Heavy Goods Vehicle (HGV)	<p>Large lorries for materials/component deliveries e.g. PV panels with a gross vehicle weight equal or greater than 3.5 tonnes.</p>
Landscape and Ecological Management Plan (LEMP)	<p>A specific plan developed to provide details of planting and enhancements and will set out how these measures will be implemented and maintained.</p>
Local Planning Authority (LPA)	<p>The planning department of the district or county council (South Norfolk Council and Norfolk County Council) of the area in which the Scheme resides.</p>
National Character Area (NCA)	<p>Large-scale landscapes in England as defined by their natural, cultural and geographic features.</p>
National Policy Statements (NPS)	<p>Policy documents produced by government in accordance with Part 2 of the Planning Act 2008. They comprise the Government's central policy documents for Nationally Significant Infrastructure Projects.</p>
Nationally Significant Infrastructure Project (NSIP)	<p>A large-scale development (as defined in Sections 14-30A of the Planning Act 2008) such as certain new harbours, power generating stations (including wind farms), highways developments and electricity transmission lines, which require a type of consent known as 'development consent' which is governed by the Planning Act 2008.</p>

Abbreviation/Term	Definition
Operational Environmental Management Plan (OEMP)	A specific plan to be developed to manage the activities during the operational and maintenance phase of the Scheme.
Order Limits	The maximum extent of land anticipated to be acquired and/or used for the construction, operation and maintenance and decommissioning phases of the Scheme.
Planning Act (PA) 2008	The Planning Act 2008 establishes a process for obtaining planning permission for Nationally Significant Infrastructure Projects.
Planning Inspectorate (PINS)	The Planning Inspectorate is an executive agency of the Ministry of Housing, Communities and Local Government of the Government with responsibility for making decisions and providing recommendations and advice on a range of land use planning-related issues across England and Wales.
Point of Connection (POC)	The National Grid Substation and associated connection into the Norwich to Bramford 400 kV overhead lines, with which the Scheme will connect, to transfer the energy generated to the national energy transmission system pursuant to a grid connection offer provided by NESO to the Applicant in December 2022.
Public Right of Way (PRoW)	PRoW comprise Footpaths, Bridleways and Byways as set out on the definitive map for each locality.
The Scheme	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 132 kV Project Substations and up to three 400 kV 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] .
Scheme Vision	An overarching strategic vision for the Scheme. Embedding good design and beneficial outcomes in the Scheme design process requires the adoption of an overarching project level vision for the Scheme, which informs the approach by the Applicant and subsequent project level design principles.
Site	The Site comprises land located to the east and south of Long Stratton in Norfolk. The Site includes 10 Sites, which are further sub-divided into Sub-Sites (which host the generating stations; including solar PV and other Associated Development, Project Substations, Mitigation and Enhancement Areas, Highway

Abbreviation/Term	Definition
	Works and Ancillary Infrastructure); the National Grid Substation proposals which sit within Sub-Site 1B (including Grid Connection Infrastructure); Battery Energy Storage System; and Cable Route Corridor (CRC).
Soil Resource and Management Plan (SRMP)	A management plan detailing the survey work required for the CRC and subsequent measures required for the construction phase relating to the CRC. An outline version of this plan will be submitted with the DCO Application and will be secured by DCO requirement.
Sub-Sites	The Scheme includes a number of Sites, numbered 1 -10 which host the generating stations; including Ground Mounted PV Modules and other Associated Development, Conversion Units Substations (where necessary), Mitigation and Enhancement Areas, Highway Works and Ancillary Infrastructure. Within these Sites, there are a number of separate 'Sub-Sites' which have been sub-numbered e.g. 2A, 2B, 2C.

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Appendix A Consideration of the Planning Inspectorates guidance ‘Nationally Significant Infrastructure Projects: Advice on Good Design’

A.1.1 In 2024, PINS published guidance on ‘good design’ for NSIP. This advice explains why good design in NSIP is important and how it might be delivered in applications for development consent. Annex A of PINS Advice Page on Good Design sets out ‘good design issues to consider’. PINS advises that applicants should consider the content of Annex A before submitting a DCO application for an NSIP. The content of Annex A has been provided below along with project considerations, as set out in **Table A.1**.

Table A.1: Consideration of the Planning Inspectorate’s Advice Page on Good Design

Issue	Considerations	Project Consideration of Issue
Design Approach Document (DAD)	Is a DAD provided?	Yes (this document)
	Does the DAD address the brief, the design process, the design principles, and beneficial outcomes?	Yes. This DAD is structured to address these points.
	If a DAD is not provided, where are the design process and design principles set out?	N/A
Analysis, Research	How has the development site been analysed to inform a good design approach?	Section 3 ‘Assemble’ of this DAD details the environmental context of the Order Limits. The environmental baseline has been established by desk-based research, surveys and the environmental assessment process which has informed good design.
	What are the main conclusions from this analysis that inform the design at this stage and as it develops?	Section 3 ‘Assemble’ of this DAD provides a summary of the environmental context of the Order Limits. The environmental context of the Order Limits has informed the design, along with the environmental assessment process and consultation feedback.
Response	What are the main significant adverse effects of the proposed development and how are they addressed to enable good design?	Section 4 ‘Research’ and Section 5 ‘Coordinate’ of this DAD describes the design evolution of the Scheme and illustrates key design changes in response to the environmental assessment process and consultation feedback. The Environmental Statement [EN0110014APP/6.1.1 to APP/6.1.20] identifies the likely significant adverse effects of the Scheme.
Vision	What is the vision for the completed development and its surroundings?	Section 3 ‘Assemble’ of this DAD sets out the vision for the Scheme. The

Issue	Considerations	Project Consideration of Issue
	Where is it set out?	Scheme vision 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. The accompanying commentary on sustainability is described in Section 6 'Securing Good Design' of this DAD.
	Set out the narrative, how the vision will achieve sustainability, create a new place and hold the design together.	
Skills	What professional disciplines and skill sets are being and will be working on the design of the project?	Section 3 'Assemble' of this DAD sets out the professional disciplines involved in the design process and their skill set.
	Is there a design champion designated for this project, and if so, who is it and what are their skills?	Section 3 'Assemble' sets out commentary regarding the Design Champion for the project during the design process.
Developing the design	Describe the approach to good design and explain how the design has (and will continue) to evolve.	Section 4 'Research', Section 5 'Co-ordinate' and Section 6 'Securing Good Design' of this DAD describes the approach to good design and how the design has and will continue to evolve.
	How is any required flexibility being addressed?	Section 6 'Securing Good Design' of this DAD explains how flexibility is being addressed. The Environmental Statement [EN0110014/APP/6.1.1 to APP/6.1.20] describes how the flexibility has been assessed.
	What design choices have (and will be) made?	Section 4 'Research' and Section 5 'Co-ordinate' of this DAD sets out the key design choices that have been made in the design evolution of the Scheme. Section 6 'Securing Good Design' sets out how design choices will be made in the future.
	What are the emerging design principles and how have the principles directly informed decision making?	Section 3.6 'Design Framework' of this DAD sets out the project level design principles for the Scheme. Section 4 'Research' and Section 5 'Co-ordinate' illustrate how the design principles have informed decision making.
	Is there a hierarchical approach to elements of the proposal (for example in designing major and less important bridges in a highways scheme)?	No, due to the technical requirements of a solar scheme and the interrelationship of the infrastructure.
	Have digital techniques, including algorithms and AI been used in design development? If so, explain the tools and data used.	AI has not been used in the design development of the Scheme. The only digital tools used in the design development have included desk-based assessment of constraints using best available online data, and Geographic Information System (GIS) data.
	Is there a coherent narrative of how the approach to design has evolved?	This DAD sets out a coherent narrative of how the approach to design has evolved from project inception to DCO submission
	Where are design outcomes set out?	Section 4 'Research', Section 5 'Co-ordinate' and Section 6 'Securing Good Design' of this DAD sets out how the

Issue	Considerations	Project Consideration of Issue
		Scheme has achieved good design outcomes. Section 6.3 explains the delivery of positive design outcomes of the Scheme.
	Will additional value beyond the site boundary be incorporated?	Section 6.3 explains the delivery of positive outcomes of the Scheme. The Applicant is committed to providing social value and community benefits and is a project level design principle, as described in this DAD.
Independent design review	Has the design development been the subject of an independent design review?	The Scheme has not been subject of an independent design review. The multi-disciplinary design team is experienced in developing solar projects so an independent review was not considered necessary.
	If so, what were the main comments and how has the design responded to them?	N/A
	Is it the intention to include design reviews post-consent? If so, how are these secured?	N/A
Delivery	How will the final design be delivered? Will there be a design management plan, a design guide or a design code? If not, why are they not required?	Section 6 'Securing Good Design' of this DAD sets out how the Scheme will be secured and delivered, through Requirements in the made DCO. The Requirements will secure various documents and management plans, including a Design Principles, Parameters and Commitments [[EN0110014/APP/7.18] . Therefore, a separate design management plan, design guide or design code is not considered necessary.
	Is there a design consultation plan to engage the community following consent of the DCO?	As set in Section 6.2 'Community Liaison Group' of this DAD, following the grant of the DCO, a community liaison group would be in place to facilitate liaison with the local community.
	Is there an agreed process for post consent decisions with local planning authorities and others, where required?	The relevant local planning authorities will be the discharging authorities for the Requirements in the DCO.
Place	How is placemaking being addressed?	Section 3 'Assemble' sets out the local context to the Order Limits. Section 4 'Research' and Section 5 'Co-ordinate' provides commentary about how the design evolution of the Scheme has considered 'place' and responded to the local context. Section 6.3 'Delivery of Positive Outcomes' of this DAD sets out how good design outcomes have resulted in a Scheme that is sustainable that responds to place and provides positive outcomes for the local area.
	How will this be a distinctive place and how will the community benefit from it?	Section 3 'Assemble' describes the local context to the Order Limits, including key features of the landscape.

Issue	Considerations	Project Consideration of Issue
		<p>The local context has shaped the design of the Scheme.</p> <p>The Scheme will provide community benefits through ecological and landscape enhancements, the introduction of new permissive routes and community accessible spaces with pedestrian access, as outlined in Section 6.3 'Delivery of Positive Outcomes' of this DAD.</p>
	Describe what the quality of place outcome will be, how this relates to the vision and how it will be secured?	Section 6 'Securing Good Design' of this DAD explains how the design outcomes will be secured.
People	What consultation has taken place with statutory and local authorities, communities and people with an interest in the land?	The Consultation Report [EN0110014/APP/5.1] sets out detail on what consultation has been undertaken for the DCO Application.
	How will their views be incorporated in the design evolution and where will this be set out?	<p>The Consultation Report [EN0110014/APP/5.1] sets out what views have been raised by consultees and the Applicant's response.</p> <p>Section 4 'Research' and Section 5 'Coordinate' of this DAD provides examples of how the design has responded to consultation feedback.</p>
Integrated design approach	Explain how an integrated, holistic approach to the project's design will be achieved.	This DAD demonstrates a multi-disciplinary team has been involved in the design of the Scheme and explains the integrated holistic approach to the Scheme design.
	Where is it shown in the documentation? Is there a masterplan?	The outcome of an integrated, holistic approach to the Scheme considering different disciplines is illustrated through the development of the Indicative Masterplan, as shown in ES Volume 2, Figure 4.1 Indicative Masterplan [EN0110014/APP/6.2.4.1] .
	How will this be secured?	Section 6 'Securing Good Design' of this DAD explains how the design of the Scheme will be secured, including through management plans of the construction, operation and decommissioning phases of the Scheme. The design of the Scheme is also secured through the Works Plan [EN0110014/APP/2.3] and the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] .
National Policy Statements (NPS)	How have the requirements for good design in the relevant NPS (or NPSs) been met?	Section 2 Policy Context for Good Design of this DAD sets out how the requirements for good design in the relevant NPSs have been considered. The Planning Statement [EN0110014/APP/7.14] and the Policy Compliance Document [EN0110014/APP/7.15] sets of how the Scheme complies with NPS.

Issue	Considerations	Project Consideration of Issue
Design Principles	Set out the good design principles being applied to the project.	Section 3.6 Design Framework of this DAD sets out the project level design principles that have been applied to the Scheme.
	Are the design principles structured or grouped logically?	Yes, the design principles have been developed in line with IGP's corporate level, key themes identified within national, and the local context of the Sites.
	How will they be developed prior to consent?	The project level design principles, as set out within this DAD, were developed from the IGP's corporate level design principles and in response to the local context of the Sites. The project level design principles were consulted upon as part of the statutory consultation process. This DAD highlights the changes to the project level principles following the statutory consultation.
	How will they be illustrated and secured?	Section 6 'Securing Good Design' of this DAD sets out how the design of the Scheme, which has been informed by the design principles, will be secured.
National Infrastructure Commission (NIC) 'principles'	Is there a response to the NIC's four principles of good design?	Yes, the project level design principles have been developed considering NIC's four themes of good design.
	If not, what design principles have been adopted?	N/A
	What process has been used to develop and embed project level design principles?	The Applicant sought to establish good design at an early stage of the Scheme development process, as demonstrated within the DAD.