



**East Pye Solar
Environmental Statement
Volume 1: Chapter 5 – Reasonable Alternatives and
Design Evolution**

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5 Reasonable Alternatives and Design Evolution

5.1 Introduction

5.1.1 This chapter of the Environmental Statement (ES) provides a summary of the reasonable alternative options that the Applicant has considered for the Scheme, including the initial selection of the Order Limits and throughout the development of the design.

5.1.2 This chapter also details how the assessment of sites and design alternatives has been undertaken, detailing the factors that have been considered and the main reasons for discounting alternative design options. Further details can be found in the **Design Approach Document [EN0110014/APP/7.17]** and the **Site Selection Assessment [EN0110014/APP/7.20]**.

5.1.3 The **Statement of Need [EN0110014/APP/7.11]** and **Planning Statement [EN0110014/APP/7.14]**, both submitted in support of the Development Consent Order (DCO) Application, set out a detailed and compelling case as to why the Scheme is urgently required and at the proposed scale. This assessment of alternatives is set in the context of the clear and urgent need for the Scheme.

5.1.4 This chapter is supported by the following figures:

- **Figure 5.1 Environmental Constraints and Key Features [EN0110014/APP/6.2.5.1]**
- **Figure 5.2 Provisional Agricultural Land Classification [EN0110014/APP/6.2.5.2]**
- **Figure 5.3 Alterations to the Site Boundary Between Scoping and PEIR [EN0110014/APP/6.2.5.3]**
- **Figure 5.4 Alterations to the Site Boundary Between PEIR and Submission [EN0110014/APP/6.2.5.4]**

5.2 Legislation, Policy, and Advice Notes

5.2.1 National Policy Statement (NPS) 'Overarching National Policy Statement for Energy' EN-1 (**Error! Reference source not found.**) paragraph 4.3.9 confirms that, from a policy perspective, there is no general requirement to consider alternatives or to establish whether a development represents the best option. Although there are specific requirements in relation to compulsory acquisition and habitats sites, the NPS does not change these requirements.

5.2.2 However, paragraphs 4.3.15 to 4.3.17 of NPS EN-1 go on to set out the circumstances where there is a requirement to consider alternatives, as noted:

- Applicants are obliged in their ES to include information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the Applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility;
 - In some circumstances, the NPSs may impose a policy requirement to consider alternatives; and
 - Where there is a policy or legal requirement to consider alternatives, the Applicant should describe the alternatives considered in compliance with these requirements.
- 5.2.3 Paragraph 4.3.27 of EN-1 states, *'Alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision'*.
- 5.2.4 Although there is no general planning policy requirement to consider alternatives and show the proposals represent the best option, the requirement to include information on alternatives is imposed by other legislation and in specific circumstances, as set out in NPS EN-1. In particular:
- Paragraph 2 of Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Ref 5-2) requires *'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects'*;
 - There is a requirement under the Habitats Directive, as transposed into UK law by the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) (**Error! Reference source not found.**) to consider alternative solutions where a derogation is required under stage 3 of a Habitats Regulations Assessment (HRA) for projects where the Habitats Regulations apply;
 - NPS EN-1 includes specific requirements to consider alternatives in relation to biodiversity and geological interests, flood risk and development within nationally designated landscapes, which are set out in sections 5.4, 5.8, and 5.10 of NPS EN-1 respectively; and
 - NPS EN-1 paragraph 4.3.17 provides that where there is a policy or legal requirement to consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements.
- 5.2.5 A description of the alternatives has been provided within this chapter of the ES.

- 5.2.6 NPS EN-3 (0) paragraphs 2.10.10 - 2.10.40 set out the key considerations involved in the siting of a solar farm and factors influencing site design, including:
- Irradiance and site topography;
 - Network connection;
 - Proximity of a site to dwellings;
 - Agricultural land classification and land type;
 - Accessibility;
 - Public rights of ways; and
 - Security and lighting.
- 5.2.7 NPS EN-5 (Ref 5-5) sets out, in paragraphs 2.2.7 to 2.2.9, which factors influence site selection and design for electricity network infrastructure:
- *'The connection between the initiating and terminating points of a proposed new electricity line will often not be via the most direct route. Siting constraints, such as engineering, environmental or community considerations will be important in determining a feasible route'* (paragraph 2.2.7); and
 - *'There will usually be a degree of flexibility in the location of the development's associated substations, and applicants should consider carefully their location, as well as their design'* (paragraph 2.2.8).
- 5.2.8 The Planning Inspectorate's Advice Note Seven (Ref 5-60) sets out that a good ES is one that, amongst numerous things, *'explains the reasonable alternatives considered and the reasons for the chosen option taking into account the effects of the Proposed Development on the environment'*

5.3 Alternatives Considered

- 5.3.1 Taking into consideration the policy and legal requirements as well as the iterative approach to the design, the following alternatives have been considered for the Scheme and are discussed in this chapter:
- Alternative Generation Technologies;
 - Site selection for the Point of Connection (PoC) and location for the National Grid Substation;
 - Solar Site Selection; and
 - Design evolution including the BESS, Cable Route Corridor, Green Infrastructure, Access etc.
- 5.3.2 A 'no development' scenario as an alternative to the Scheme has not been considered further in line with EN-1 paragraph 4.3.23. This is because 'no development' is not considered to be a reasonable alternative to the Scheme as it would have no prospect, realistic or otherwise, of delivering the additional

electricity generation and energy storage proposed. A smaller development in terms of energy-generating capacity has not been considered further as an alternative to the Scheme, in the context of both EN-1 paragraph 4.3.23 and 4.3.27.

- 5.3.3 The overarching need for the Scheme is set out in brief in the **Statement of Need [EN0110014/APP/7.11]** addressing the need for large-scale solar assets.

5.4 Alternative Generation Technologies

- 5.4.1 The Applicant is a solar PV and energy storage developer. On that basis, alternative types of low carbon electricity generation have not been considered by the Applicant in the development of the Scheme. Crucially, NPS EN-1 confirms that the need for all of the types of infrastructure in that NPS – including solar – is established by this NPS and a combination of many or all of them is urgently required for the Clean Power 2030 Mission, energy security, and Net Zero. However, it is considered that the Order Limits would not be suitable for other forms of renewable electricity generation at the same scale as the Scheme and the relevant technologies are considered below. Further details on various alternative generation technologies, and the role they play in the UK's wider energy portfolio, is contained within the **Statement of Need [EN0110014/APP/7.11]**.
- 5.4.2 Due to the Scheme's location away from the coast, tidal power and offshore wind are deemed unviable. Further, there are no local opportunities to source hydroelectric power from rivers that would provide a generating capacity equivalent to the electricity generated by the Scheme, and therefore hydroelectric power was not considered.
- 5.4.3 Nuclear power is not considered a suitable alternative for the Scheme given the high cost of electricity and the length of time it would take to plan and build a nuclear plant. For example, as referred to in the **Statement of Need [EN0110014/APP/7.11]**, the development of Hinkley Point C started in the late 2000s and is scheduled for completion between 2029 and 2031. In contrast, the Scheme, if consented, is expected to be built and operational by 2031.
- 5.4.4 Onshore wind is not considered to be a suitable alternative because the flat topography of the Order Limits would likely give rise to greater adverse visual effects due to the height of the wind turbines, and the proximity to residential dwellings may give rise to adverse effects associated with shadow flicker and turbine noise.
- 5.4.5 To utilise opportunities to 'co-locate' different renewable generation technologies, the Scheme includes the BESS, which can store electricity at times of lower demand and therefore enhances grid resilience and stability. The BESS allows for energy to be released 'on demand' at time of greater need, in a way that cannot be provided by wind turbines at this time. Therefore,

it is considered that Solar PV Panels, co-located with the BESS, is the preferred and suitable energy generating solution for the Order Limits.

5.5 National Grid Substation Site Selection Assessment

- 5.5.1 The National Grid Substation Site Selection methodology adopted is set out in further detail in the **Site Selection Assessment [EN0110014/APP/7.20]**.
- 5.5.2 The Applicant engaged with National Grid Company (National Grid Electricity Transmission (NGET), the Transmission Operator) in 2022 to discuss available capacity within its transmission network within the Norfolk area for integrating a 500MW solar utility-scale solar generating project.
- 5.5.3 The Applicant initially considered a Point of Connection (PoC) at the existing Norwich Main Substation; and commenced their search for solar sites in parallel. It was established that there were landowners willing to lease their land for solar development in the area. However, subsequently, NGET advised that there was neither sufficient existing capacity at the Norwich Main Substation nor an opportunity to expand this existing substation to accommodate a 500MW solar project. Given this, the Norwich Main Substation was discounted as a viable PoC.
- 5.5.4 NGET confirmed that a new substation would be required in order to connect the Scheme to the grid. Through these discussions, available capacity along the Bramford to Norwich 400kV line was identified in Norfolk between Norwich and Diss. As per the **Grid Connection Statement [EN0110014/APP/7.12]**, the Applicant submitted a grid application to the National Energy System Operator (NESO), the system operator of the National Electricity Transmission System (NETS) to connect the Scheme into the NETS existing transmission line via a new National Grid Substation. A grid connection offer was subsequently received which contracted the Applicant to provide the land and gain consent for the proposed new National Grid Substation.
- 5.5.5 In light of the discussions with National Grid, the Applicant focused its search along the Bramford to Norwich 400kV line between Diss and Norwich to identify a site that was appropriate and available for a new National Grid Substation. Proximity to the overhead line is important to minimise effects from routing grid connection infrastructure and reduce the length of any potential diversion of the existing overhead line into a new National Grid Substation, thereby minimising construction impacts and capital costs associated with new infrastructure.
- 5.5.6 An important consideration for the location of the National Grid Substation is the capacity of transport infrastructure and accessibility to the PoC for Abnormal Indivisible Loads (AIL) for the delivery of transformers and other equipment associated with a substation. Proximity to A roads such as the A140 and B roads were considered to be preferable for access into the

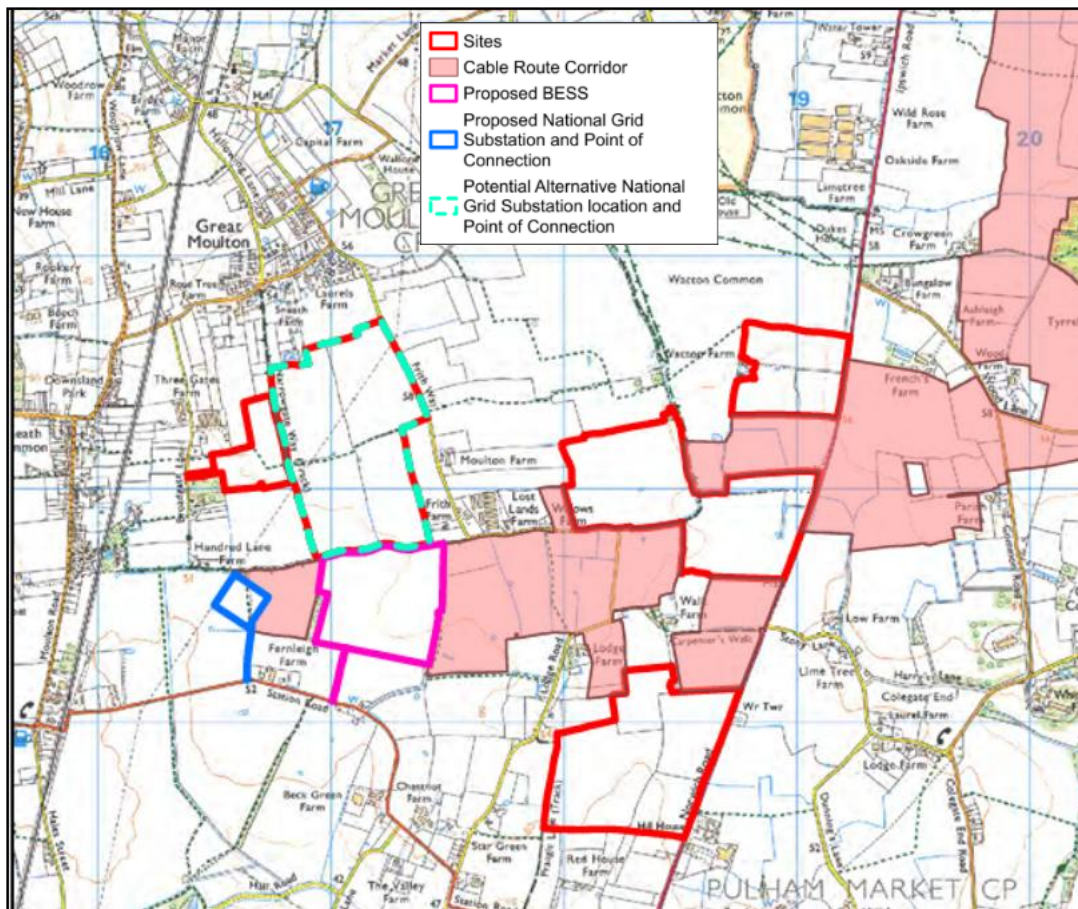
- Strategic Road Network (SRN). Access, and the proximity to A and B roads were important considerations to reduce the extent of highway upgrades and/or the need to lengthen new permanent access tracks to a new National Grid Substation from the public highway, thereby minimising construction impacts and capital costs associated with new infrastructure.
- 5.5.7 An initial desk-based transport feasibility study, which included site visits and swept path analysis, was undertaken to explore locations close to the Bramford to Norwich 400kV line and the A140 that were potentially appropriate for accommodating a new National Grid Substation; and HGVs associated with construction. This initially included studying three locations (and route options) at: Newton Flotman, Tasburgh and Long Stratton, that were accessible from the A140.
- 5.5.8 Following the identification of potential siting zones from desktop analysis of routing options, a desk-based review of planning and environmental constraints was undertaken against the guidelines within Section III of the Horlock Rules (Ref 5-7), which set out National Grid Company plc's guidelines on designing and locating substations, and which NPS EN-5 Paragraph 2.4.2 establishes should be considered at an early stage by applicants when developing proposals. In summary:
- To avoid internationally and nationally designated areas of highest amenity, cultural or scientific value, e.g. Ramsar sites, Site of Special Scientific Interest (SSSI), and National Landscapes.
 - Care should be taken in relation to all historic sites with statutory protection, e.g. Ancient Monuments, Battlefields and Listed Buildings.
 - Account should be taken of the Government Planning Policy Guidance and established codes of practice.
 - Account should be taken of any development plan policies relevant to the siting or design of substations.
 - Areas of local amenity value, important existing habitats and landscape features, such as ancient woodland, historic hedgerows, surface and ground water sources and nature conservation areas, should be protected as far as reasonably practicable.
 - The siting of substations, extensions and associated proposals should take advantage of the screening provided by land form and existing features and the potential use of site layout and levels to keep intrusion into surrounding areas to a reasonably practicable minimum; and
 - The proposals should keep the visual, noise and other environmental effects to a reasonably practicable minimum. The land use effects of the proposal should be considered when planning the siting of substations or extensions.
- 5.5.9 As set out in Paragraphs 2.9.16-2.9.17 of NPS EN-5, the Holford Rules (Ref 5-8) set out National Grid's guidelines for the routing of new high voltage overhead lines. By locating the PoC in proximity to the existing transmission

line, the Applicant has sought to limit the extent of overhead line diversion, thereby reducing the potential environmental and landscape impacts in proximity to areas of amenity value and settlements and avoiding areas of scientific interest, in line with the Holford Rules.

- 5.5.10 From a transport perspective, taking into account the physical characteristics of the roads, the sites near Newton Flotman and Long Stratton were initially considered feasible options. The routing options for access to Tasburgh were physically constrained by narrow country lanes, and insufficient land within the highway boundary to enable widening meant it was therefore the least preferable option, due to highway and land constraints.
- 5.5.11 The preferred route for Long Stratton was via the A140 and Swan Lane, which would avoid crossing the railway and the use of lower standard, narrow roads west of the railway. Although there were sections of the road where two HGVs would not be able to pass each other, good forward visibility meant that HGVs could slow to allow each other to pass at wider sections, and it was considered that the HGVs could be safely managed through a Construction Traffic Management Plan. However, this route passes through Long Stratton which includes sensitive receptors such as a primary and secondary school, emergency fire station, as well as roads with tight bends. The location was also adjacent to the east of sensitive visual receptors comprising residential dwellings at Hunts Mead. Alternative routing options via the B1113 would pass through the residential areas associated with Forncett St Peter and Forncett End and would therefore potentially impact local amenity.
- 5.5.12 The preferred routing for Newton Flotman was via the A140 and then Flordon Road which would involve passing through the residential area of Newton Flotman which has on-street parking and is narrow along stretches, and crossed by overhead wires. Long Stratton had better ability for HGVs to pass each other, compared to the location at Newton Flotman, where mitigation measures would need to be explored along the relatively long sections of narrow road. While no designated heritage receptors are located within the area considered, the Rainthorpe Hall Grade II Registered Park and Garden is located adjacent to the east, as well as Grade I Listed Rainthorpe Hall and Grade II Listed Hall Farmhouse and located approximately 350m to the east. and would potentially need to be consideration in the design of landscape screening. Residences along Flordon Road adjacent to the east, Greenways adjacent to the west, and Newton Flotman to the north would further require consideration from a visual impact perspective, although areas of woodland and hedgerows / trees along field boundaries provide some natural screening.
- 5.5.13 Based on the above, while the sites at Newton Flotman and Long Stratton were initially considered feasible options, accessibility constraints, proximity to, and routing through residential areas, and proximity to heritage assets, meant they were dismissed.
- 5.5.14 The search was expanded, and a new location for a National Grid Substation was considered to the south of Great Moulton, north of Station Road (B1134)

and beneath the Bramford to Norwich 400kV line. A desktop review was undertaken to assess the potential vehicular routes from this location to determine the key physical and environmental constraints, and a RAG review against the Horlock / Holford rules.

- 5.5.15 It was concluded that the location presented a viable option because of proximity to the 400kV overhead line and to the A140, together with highway visibility and the ability for the roads to accommodate Abnormal Indivisible Loads. Station Road (B1134) leading from the A140 to the site has clear markings and caters for two-way traffic, with good forward visibility. While several individual dwellings are located along the route, the routing would not pass through any residential settlements, minimising the possibility of effects from construction traffic. No statutory ecological, landscape, or heritage designations were located within the broad area under consideration south of Great Moulton. The National Grid Substation and overhead lines would therefore avoid areas of high amenity, cultural, and scientific value in line with the Holford / Horlock Rules and NPS EN-5.
- 5.5.16 As detailed in the EIA Scoping Report (ES Volume III Appendix 2.1) [EN0110014/APP/6.3.2.1] as the 'Proposed National Grid Substation and Point of Connection', outlined in dark blue in **Insert 1** below. Owing to the planning application for a solar project (ref. 2024/3817) at 'Land to the North of Station Road Tivetshall St Margaret Norfolk' (which was approved in June 2025), overlapping with the previously proposed National Grid Substation Site, an alternative location immediately to the north, beneath the 400kV overhead line, within Sub-Site 1B was put forward at EIA Scoping as outlined in light blue dashed lines on the insert below ('Potential Alternative National Grid Substation location and Point of Connection'), which can still be adequately accessed from Station Road, via the BESS site.

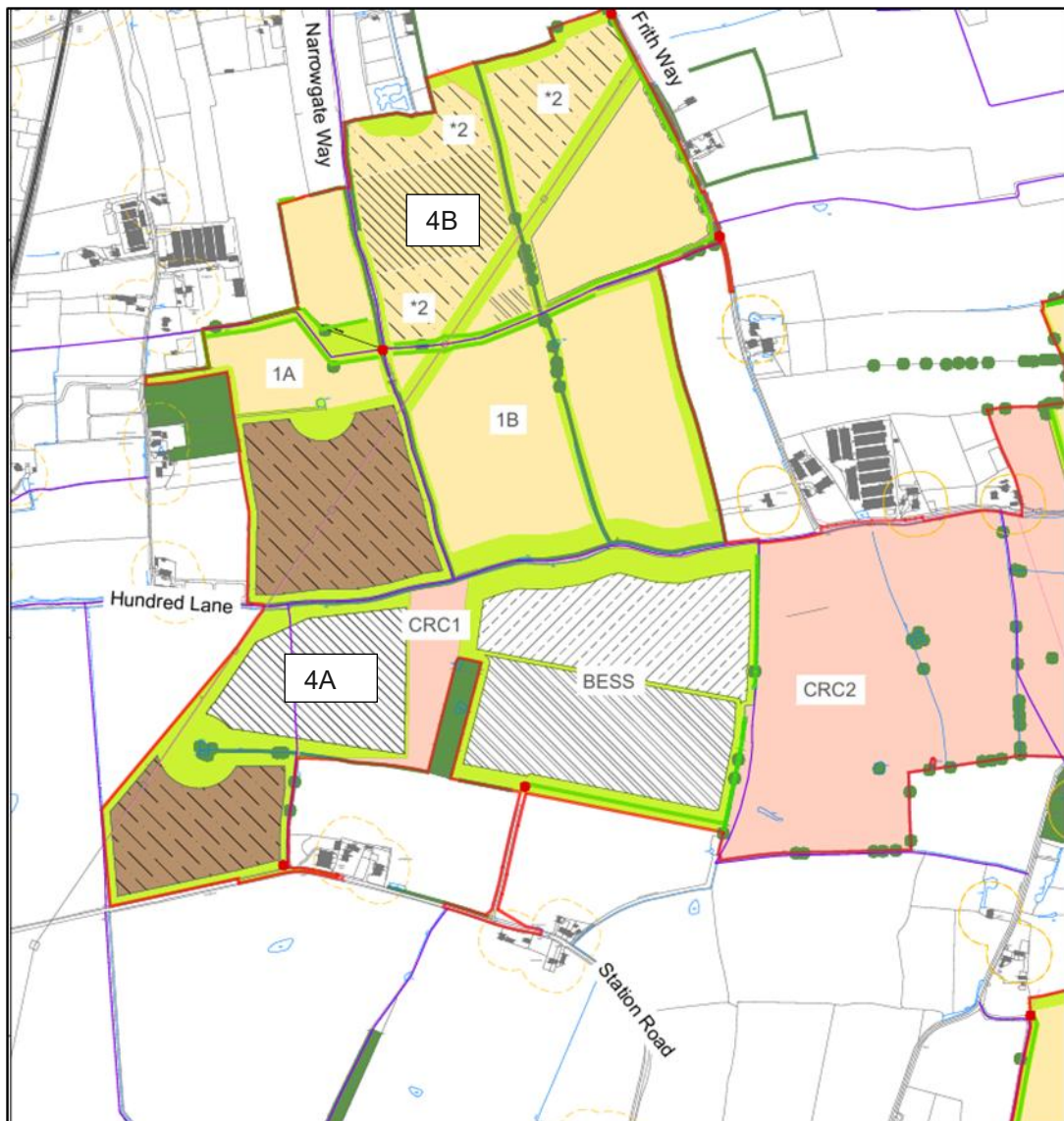


Insert 1: Extract of Figure 1.1 Scoping Boundary from the EIA Scoping Report

5.5.17 The locations of both options are described as follows:

- Option 1 ('Proposed National Grid Substation and Point of Connection') – a square shaped parcel part of a large field to the south of sub-Site 1A and 1B, south of Hundred Lane and east of the 400kV overhead line, and west of the proposed BESS site; and
- Option 2 ('Potential Alternative National Grid Substation location') and PoC – within sub-Site 1B immediately to the north-east of Option 1 and north of Hundred Lane, crossed by the 400kV overhead line.

5.5.18 These two options were refined and presented within the Preliminary Environmental Information Report ('PEIR') at the Statutory Consultation Stage in Figure 5.1 Indicative Masterplan Sheet 1 (see extract in Insert 2 below).



Insert 2: Extract from Figure 5.1 Indicative Masterplan Sheet 1 of PEIR, showing Substation options to the south of Great Moulton

- 5.5.19 The potential National Grid Substation site to the south of Hundred Lane is referred to in the **Site Selection Assessment [EN0110014/APP/7.20]** as Option 4A, and the site within sub-Site 1B is referred to as Option 4B (as annotated on the insert above).
- 5.5.20 In line with the Holford and Horlock rules, works in connection with the existing 400kV overhead line and the National Grid Substation would not be located within internationally or nationally designated areas of the highest amenity. The National Grid Substation and the works in connection of the existing 400kV overhead line would be located outside the extent of the Rural River Valley policy area defined in SNC's Development Management Policies Document (Policy DM4.5) (Ref 5-9).

- 5.5.21 As per NPS EN-5 Paragraphs 2.9.16-2.9.19, the grid connection infrastructure connecting the National Grid Substation to the 400kV overhead line would not be routed through any residential settlement. Based on an initial desk-based assessment of the topography and natural screening from hedgerows and trees within the surrounding area, it was considered that the visual impact of the grid connection infrastructure could be reduced for both options, and the existing boundary vegetation in the north western part of Sub-Site 1B would provide a level of screening from residential dwellings associated with Great Moulton.
- 5.5.22 As per Paragraph 2.9.19 of NPS EN-5 / the Horlock Rules, applicants should use space effectively and minimise the adverse effects on existing land use and rights of way. Option 4A would require a diversion of the PRoW ('Tivetshall St Margaret FP2') which crosses through the centre of the site, whereas the PRoW which crosses Sub-Site 1B between Narrowgate Way and Frith Way would not be within the Sub-Station site and could be incorporated into the Scheme.
- 5.5.23 Further, Option 4A is located within an area of Flood Zones 2 and 3, whereas 4B in Sub-Site 1B is entirely located within Flood Zone 1, and therefore is preferred from a flood risk perspective.
- 5.5.24 Option 4B within Sub-Site 1B beneath the Bramford to Norwich 400kV line was considered to be favourable in terms of flood constraints, and conflict with the PRoW and given the overlap of 4A with the solar application (ref. 2024/3817), 4A was discounted and 4B taken forward in the DCO application.

Alternative National Grid Substation Site Search Assessment

- 5.5.25 The Applicant has undertaken a desktop assessment to identify whether there are any other reasonable alternative locations to the proposed National Grid Substation along the Bramford to Norwich 400kV line.
- 5.5.26 The stretch of transmission line that was considered was limited to north of Diss, as the Applicant preferred a location in proximity to the solar sites that had already been identified as suitable against the criteria of NPS EN-3, and for which a willing landowner had been established.
- 5.5.27 Given the importance of the accessibility of the National Grid Substation from the SRN and the need for a location in proximity to the Bramford to Norwich 400kV line, the Applicant applied the following guidelines as a starting point to identify potential siting zones for the substation:
- 1km search area either side of the existing 400kV overhead line; and
 - 500m search area, either side of a main road (A and B roads) for accessibility.
- 5.5.28 The application of these criteria identified three potential 'siting zones' for the National Grid Substation. Following the identification of potential siting zones, each siting zone was reviewed and RAG-rated against the guidelines within

Section III of the Horlock Rules (Ref 5-7). The locations of each siting zone, and the environmental and technical constraints identified are summarised below:

- Siting Zone 1: Land along the A140 around Swainsthorpe and Newton Flotman. Constraints include operational challenge of routing the grid connection infrastructure around the railway line which runs parallel to the east of the overhead line and west of the A140; a large number of proposed and consented infrastructure around Norwich Main Substation would restrict the land available; high number of heritage assets, including a Scheduled Monument, Conservation Area, and multiple Listed Buildings; and proximity to residential areas.
 - Siting Zone 2: Land to the south of Great Moulton, split north and south of the B1134 and east and west of the railway line. Much of the land within the north east of this area falls under the consented solar farm application (ref. 2024/3817). Small areas of deciduous woodland priority habitat and areas of Flood Zone 2 and 3 would limit the developable area. Other environmental constraints were minimal.
 - Siting Zone 3: Land along the A140 south east of Diss, land between the A1066 and A143, and land north of the A1066. Much of this area is occupied by built development associated with Diss and Scole, and golf courses. Land around Yaxley substation to the south is included within consented and proposed applications for energy infrastructure. Other constraints include areas of deciduous woodland priority habitat and multiple Grade II Listed Buildings.
- 5.5.29 Siting Zone 2 overlaps with the land initially considered for the siting of the National Grid Substation (Option 1) and now comprises part of Sub-Site 1C and the proposed location for the BESS. The review concludes that Siting Zone 2 is accessible from A/B roads, performs well against key environmental and technical criteria, and is a suitable location to consider for the location of a National Grid Substation. Notwithstanding, and for the reasons given in above, the proposed location of the National Grid substation needed to move to Site 1B to the north, particularly given the conflict with the consented solar farm. Land in Siting Zone 2, to the south of Station Road, and to the west of the railway line was not selected as a willing landowner was not forthcoming. Land to the east of the railway line is preferable as it negates the need for a crossing of this infrastructure.
- 5.5.30 A review of alternative locations of the selected PoC, based on accessibility, proximity to the 400kV Bramford to Norwich line, and environmental / technical criteria revealed that these sites either present similar or more constraints. Siting Zone 1 was relatively constrained by existing infrastructure, other potential development schemes in the area, and environmental designations. While areas within Siting Zone 3 could present a reasonable alternative, the distance from the initially identified solar sites meant that this site is less preferable.

- 5.5.31 Further detail on the alternative sites considered in respect of the PoC and National Grid Substation, is provided within the **Site Selection Assessment [EN0110014/APP/7.20]**.

5.6 Solar Development: Site Selection Assessment

- 5.6.1 The Solar Development Site Selection methodology adopted is set out in further detail in the **Site Selection Assessment [EN0110014/APP/7.20]**.
- 5.6.2 As stated in PEIR, concurrently with the discussions with National Grid in respect of connecting into the Norwich Main Substation, the Applicant identified an initial 20km search radius from the Norwich Main Substation for sites to be included in the Scheme. The Applicant conducted a search exercise within this radius for landowners who wished to participate in the Scheme.
- 5.6.3 According to paragraph 2.10.9 in NPS EN-3, *“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.”* Based on this, to meet the 500MW of the Grid Connection Agreement, an area of approximately between 500ha to 810ha was a starting point to accommodate the panels itself. The Applicant searched for an area of approximately 1,100ha to accommodate the Solar PV Array, along with associated infrastructure such as substations, Battery Energy Storage System (BESS), access, landscaping and biodiversity measures, together with a Cable Route Corridor (CRC). The Applicant’s search for sites yielded the requisite amount of land needed and voluntary agreements were secured with those landowners, to include their land in the Scheme. This land, referred to as the Sites, is the subject of the DCO application.
- 5.6.4 The **Site Selection Assessment [EN0110014/APP/7.20]** sets out the staged approach to solar site selection and consideration of other reasonable alternative sites, which may be potentially suitable to accommodate the Scheme against environmental, planning, and operational factors. This staged approach is explained below:
- 5.6.5 As a result of NGET confirming that there was no available capacity at Norwich Main Substation, the Applicant undertook a search for a suitable PoC, moving south from Norwich Main Substation, and ultimately selected the site for the PoC to the South of Great Moulton within Sub-Site 1B. The sites which had already been identified from Stage 4 above all lie within 20km from the PoC location south of Great Moulton, and were therefore considered to still be viable, and the Applicant had established that landowners were willing to voluntarily enter into land agreements for these sites. At Stage 5 of the stages set out below, the Applicant considered potential alternative unconstrained sites within 20km of the National Grid Substation.

5.6.6 The methodology and results of is presented in the **Site Selection Assessment [EN0110014/APP/7.20]** and adopts a staged approach, as follows:

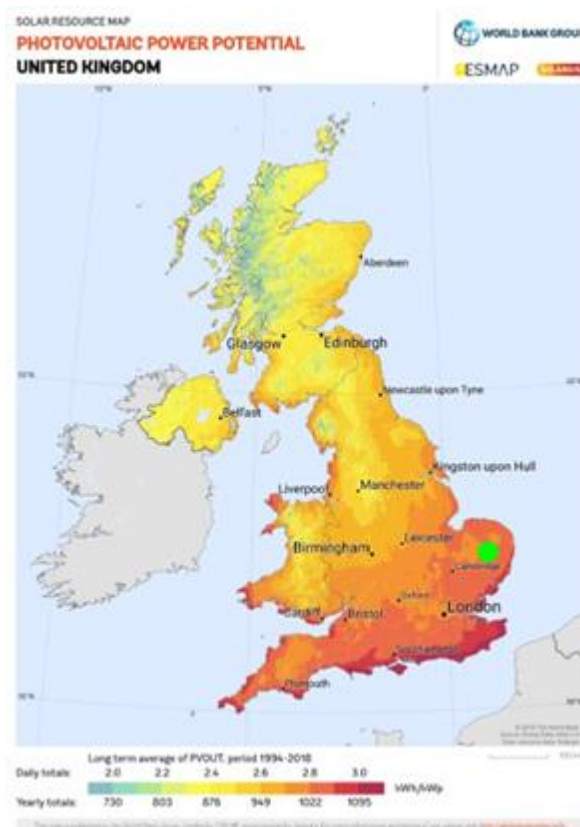
- **Stage 1:** An initial PoC was considered at the Norwich Main Substation. Concurrently with the discussions with National Grid with respect of the PoC, the Applicant identified an initial 20km search radius from the Norwich Main Substation for sites to be included in the project. A 20 km radius is considered by the Applicant to be a viable cable connection distance for a solar project of this scale. Limiting the distance of solar development from the PoC is consistent with Paragraph 2.10.16, NPS EN-3 which states '*...the connection voltage, availability of network capacity, and the distance from the solar farm to the existing network can have a significant effect on the commercial feasibility of a development proposal*'. Paragraph 2.10.17 further states: '*to maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce overall costs, applicants may choose a site based on nearby available grid export capacity*'.
- **Stage 2:** Exclusion of various planning, environmental and spatial constraints, in accordance with policy considerations (such as a preference not to site on best and most versatile agricultural land), to identify the most unconstrained land.
- **Stage 3:** Application of considerations around site size and land assembly, use of previously developed land and topography to identify potential suitable development areas on the remaining land.
- **Stage 4:** Evaluation of the potential development areas identified with the help of land agents against environmental assessment indicators such as ecology and biodiversity, land use, landscape and visual, flood risk, as well as planning and operational considerations, as set out in NPS EN-3.
- **Stage 5:** The Applicant considered other potential alternative unconstrained sites within a 20km search radius of the chosen location for the National Grid Substation by applying the same criteria (site size, land assembly, topography, and environmental constraints including a preference for non-BMV land). This search led to the identification of five 'Potential Development Areas' that were further evaluated with regard to national and local policy. Ultimately, none of the PDAs were considered to be suitable based on the constraints that were identified.
- **Stage 6:** Having not been able to identify suitable and available sites within the criteria defined for Stage 5, the Applicant proceeded to consider Grade 3 agricultural land within the 20km search area. This introduced a significant amount of land within the 20km search area which could potentially accommodate solar development. These were divided around operational constraints, such as the Great Eastern Main Line and A roads into four potential 'Alternative Development Zones', were considered at a high-level, as land in closer proximity to the grid connection may be advantageous in minimising environmental effects associated with cable

corridors. However, without alternative land sufficient to accommodate the Scheme within these ADZs being made available to the Applicant, the land was not considered further as a reasonable alternative.

- 5.6.7 Section 2.10 of NPS EN-3 (Ref 5-4) relates specifically to Solar Photovoltaic generation, and paragraphs 2.10.10 to 2.10.40 list factors influencing site selection. The Order Limits' initial evaluation was in accordance with these key site selection factors outlined in section 2.10 of NPS EN-3. The site evaluation involved a balance of these factors, as set out under the following headings:

Irradiance and Site Topography

- 5.6.8 As noted in Paragraph 2.10.11-12 of NPS EN-3, irradiance is a key consideration in identifying a potential site as the amount of electricity generated on site is directly affected by irradiance levels. Irradiance levels are in turn affected by surrounding topography, with an uncovered or exposed site of good elevation and favourable south facing aspect more likely to increase year-round irradiance levels.
- 5.6.9 Norfolk represents a good location within the UK to construct a solar farm as the area benefits from higher levels of irradiance compared to other parts of the UK.
- 5.6.10 Figure 6.2 from the **Statement of Need [EN0110014/APP/7.11]** (at **Insert 3** below), shows a map of PV power potential in the UK (from The World Bank: Global Solar Atlas 2.0, Solar resource data: Solargis) Areas of higher irradiance are identified by colours towards the red end of the spectrum, while areas of lower irradiance are towards the blue end of the colour spectrum. The approximate location of the Scheme is shown by the green point.



Insert 3: PV power potential in the UK

- 5.6.11 Flat or gently south-facing slopes are most suitable and beneficial for solar energy generation. A generally flat or gently undulating topography is most suitable for solar energy from both a constructability and operational perspective, ensuring that the Order Limits can produce a large amount of electricity.
- 5.6.12 These factors have influenced the focus on the Norfolk area as the preferred location of the Scheme. The general topography surrounding the Order Limits is flat or has limited gradients, making it particularly suitable for solar energy. In addition, Norfolk benefits from large areas of land characterised by a generally sparse settlement pattern. Such characteristics provide the opportunity for utility-scale solar development, which can contribute to delivering net zero.

Connection to the Grid

- 5.6.13 The Scheme benefits from a grid connection agreement which requires land suitable for a new National Grid Substation to connect into the 400kV overhead line. As established by NPS EN-3 paragraphs 2.10.13-2.10.18, the availability of network capacity and distance from the Scheme to the existing network was the most important factor in site selection. The Sites were initially selected within a 20km radius of Norwich Main Substation. However, as identified in Section 5.5, proximity to existing electricity transmission

infrastructure, accessibility via A/B roads, and a review of environmental considerations and the Horlock / Holford rules led to the identification of a suitable site for the National Grid Substation. The Sites remain within a 20km radius from the National Grid Substation and were therefore considered to still be viable.

- 5.6.14 At Stage 6 of the **Site Selection Assessment [EN0110014/APP/7.20]**, the Applicant has considered other potentially suitable areas in proximity to the PoC, which may be more preferable in principle due to the benefits of a shorter cable route, which include ease and timeliness of key infrastructure delivery, minimisation of disruption to residents and businesses along the route, and reduced environmental disturbance and cost. However, whilst land within these areas may be suitable for solar development, they were not considered to be reasonable alternatives to the Scheme, given that the land within them has not been made available to the Applicant. Without willing landowners, acquiring land through compulsory acquisition powers would be necessary, which the Applicant has sought to avoid as far as practicable.

Proximity of the Site to Dwellings

- 5.6.15 NPS EN-3 (Ref 5-4) paragraph 2.10.19, sets out the need for the Applicant to consider the proximity of a site to dwellings. The two main impact issues that determine the necessary distances to sensitive receptors are, therefore, likely to be visual amenity and glint and glare. In line with this, consideration was given to avoiding close proximity to nearby sensitive human receptors, including residential dwellings and workplaces where it would not be possible to mitigate visual amenity, glint and glare appropriately, to minimise potential impacts. Large urban areas such as Norwich and Wymondham were excluded from the search area.
- 5.6.16 As the immediate surrounds of the Order Limits are characterised by a network of villages, together with individual dwellings and businesses, the design process has had regard to the proximity and effects on dwellings and their occupants (together with other surrounding sensitive land uses). The consideration of alternative designs and layouts in respect of proximity to dwellings is set out in **Section 5.7** of this Chapter.

Environmental Considerations

- 5.6.17 A key principle in selecting a site is to avoid areas of particular environmental and landscape sensitivity to minimise potential impacts. For example, paragraph 4.7.12 of NPS EN-1 identifies that many of the wider impacts of a development, such as landscape and environmental impacts, will be important factors in the design process. This is true from a natural and built environment perspective, including ecology and biodiversity, landscape, water resources, and cultural heritage. The environmental constraints and key features surrounding the Site are shown in **Figure 5.1 Environmental Constraints and Key Features [EN0110014/APP/6.2.5.1]**.

Landscape and Visual

- 5.6.18 From a landscape perspective, paragraph 5.10.5 NPS EN-1 recognises that virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape. Paragraph 5.10.6 identifies that projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.
- 5.6.19 National Landscapes and National Parks have the highest status of protection in relation to landscape and natural beauty. From the earliest consideration of site selection, the Applicant was aware of the significance of sensitive landscapes in the local area because of the presence of the Broads National Park, which was excluded from the area of search.
- 5.6.20 There are no statutory designated landscapes covering the Site, the closest being the Broads National Park 3.9km south of Sub-Site 10A.

Ecology and Biodiversity

- 5.6.21 Internationally and nationally designated biodiversity sites are afforded high protection in national and local planning policy, NPS EN-1 and NPS EN-3. Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar Sites, Sites of Specific Scientific Importance (SSSI) and National Nature Reserves (NNR) were therefore identified and avoided. This notably includes the Norfolk Valley Fens SAC, The Broads SAC, Broadland Ramsar, Broadland SPA, and SSSIs including Shotesham-Woodton Hornbeam Woods, Hedenham Wood, Fritton Common, as well as areas of ancient woodland such as Big Wood Ancient Woodland, Little Wood Ancient Woodland and SSSI, and Winters Grove Ancient Woodland and SSSI.
- 5.6.22 There are no international, national, or local statutory designated sites within the Sites.

Flood Risk

- 5.6.23 Paragraphs 5.8.6 to 5.8.12 of NPS EN-1 confirm the need to steer new development to areas at the lowest risk of flooding. Where this cannot be avoided, and there are no reasonable available sites in areas of lower risk, the Sequential Test must be applied to site selection. This test requires a detailed process to consider alternative sites that pose a lower flood risk than the selected site.
- 5.6.24 Areas of land in Flood Zones 2 and 3 were excluded from the initial search for potential sites, with land at lower risk of flooding prioritised. The majority of the Site is located within Flood Zone 1, with localised areas of Flood Zones 2 and 3 associated with the floodplains of Hempnall Beck and the River Tas. Most of the land within the Order Limits has a 'very low' risk of surface water flooding.

- 5.6.25 Land chosen for the Scheme has taken into account planning policy in respect of flood risk and sought to direct development to land at least risk of flooding. Most of the land within the Order Limits is at low risk of flooding. It is recognised that parts of the Order Limits overlap with areas of Flood Zone 2 and 3. However, a sequential approach to the design process has been adopted and critical infrastructure has been located outside of Flood Zones 2 and 3.

Cultural Heritage

- 5.6.26 Paragraph 5.9.28 of NPS EN-1 places great weight on the conservation of designated heritage assets. The more important the asset, the greater the weight should be. The Applicant identified and avoided designated heritage assets, namely Scheduled Monuments, World Heritage Sites, Registered Battlefields, Registered Parks and Gardens, Conservation Areas, and dense concentrations of Listed Buildings.
- 5.6.27 The Site is not subject to statutory historic designations, although Listed Buildings are in the vicinity of the Site.

Agricultural Land Classification (ALC)

- 5.6.28 NPS EN-3 (Ref 5-4) indicates that Agricultural Land Classification (ALC) should not be a *'predominating factor in determining the suitability of the site location'* (paragraph 2.10.21). However, paragraph 2.10.21 also states that where *'the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of 'Best and Most Versatile' agricultural land where possible.'* Paragraph 2.10.22 of NPS EN-3 does not prohibit the use of BMV agricultural land, and paragraph 2.10.23 recognises that agricultural land is likely to be used and where this occurs, the applicant should explain their choice. The presence of BMV, however, needs to be balanced with other factors
- 5.6.29 Agricultural Land Classification (ALC) is therefore an important factor for the Applicant when evaluating the site. Available desk-based mapping was used at the time to inform the initial site evaluation.
- 5.6.30 Natural England's provisional mapping of ALC shows the area of the Order Limits is predominantly undifferentiated Grade 3, with scattered pockets of Grade 2 and Grade 4 land. The ALC map does not differentiate between Grades 3a and 3b. Based on this provisional mapping used for the initial Site selection, the Order Limits is predominantly undifferentiated Grade 3 as shown on **ES: Figure 5.2 Provisional Agricultural Land Classification [EN0110014/APP/6.2.5.2]**.
- 5.6.31 In 2017, Natural England published a series of maps, showing the likelihood of BMV land. These maps show three categories: low (60% area BMV); moderate (20%-60% area BMV) and high (>60% area BMV). The Site and surrounding area is predominantly shown as moderate likelihood of BMV. As

identified in **ES: Chapter 15 Soils and Agricultural Land [EN0110014/APP/6.1.15]**, the Order Limits mostly falls within the lowest category for the likelihood of BMV land in the wider area.

- 5.6.32 As the design of the Scheme progressed, the Applicant's understanding of the Order Limits in terms of the land classification and productivity has developed through ALC surveys and discussions with the landowners over the quality and viability of agricultural land. Where possible, the Applicant has sought to minimise the use of BMV land through its exclusion, as part of the design evolution. Further detail on the results of the ALC surveys and impacts of the Scheme on BMV land is provided in **ES: Chapter 15 Soils and Agricultural Land [EN0110014/APP/6.1.15]**.
- 5.6.33 Consideration of the availability of non-BMV land is set out within the Site Selection Assessment. Where practicable, as part of the design evolution, the Applicant has sought to minimise the use of BMV land through either its exclusion from the Order Limits; or as retained land within the Order Limits, used for mitigation, which is compatible with continued agricultural use.

Land Type

- 5.6.34 NPS EN-3 (Ref 5-4) states that previously developed, brownfield, contaminated, and industrial land should be preferred for solar projects. Opportunities to locate Solar PV Panels on previously developed land / brownfield land, contaminated land, industrial land, and commercial rooftops were explored.
- 5.6.35 The use of previously developed (brownfield) land within 20km of the proposed National Grid Substation site was considered. The Applicant conducted a review of the brownfield registers (prepared by South Norfolk and Broadland District Council, Breckland Council, Mid Suffolk District Council, and East Suffolk Council) and found no suitable previously developed sites that covered a sufficient area to accommodate a 500MW utility-scale solar project. Previously developed land is therefore not considered a reasonable alternative.
- 5.6.36 Consideration was given to commercial rooftops within the 20km search area. However, no commercial rooftops or combined premises of an adequate area to facilitate a 500MW utility-scale solar project or provide a viable network of sites in proximity to the PoC were identified. Achieving this capacity would require securing agreements with a large number of land ownerships over an extensive geographic area, making the Scheme unviable. In accordance with paragraph 4.3.27 of NPS EN1, commercial rooftops are therefore not considered a reasonable alternative to the Site.
- 5.6.37 There is a clear urgent and enduring need for further renewable energy capacity. While this will likely include more generation connecting across the electricity distribution network, the Scheme presents a single, large-scale generating asset connected to the electricity transmission network. This

addresses the project aims of delivering clean and secure electricity to consumers nationally as well as locally whilst making a significant contribution to the fulfilment of the UK's legally binding climate change commitments. More, smaller-scale solar PV developments will also be required in order to achieve these commitments, however they do not represent a realistic alternative to the Scheme and are required in addition to large scale solar projects. The bulk generation potential of large-scale schemes and their connection to the electricity transmission network enables their significant benefits to be felt more widely than those achieved by smaller scale projects.

Land Ownership

- 5.6.38 The Applicant regularly engages with land agents regarding potentially willing landowners for solar developments. The availability of willing landowners is an important consideration because it is preferable that land is leased rather than permanently acquired due to solar farms consisting of temporary structures (therefore, land ownership is preserved for original use post-decommissioning). Without willing landowners, acquiring land through compulsory acquisition powers would be necessary, which the Applicant has sought to avoid as far as practicable while still delivering a suitable site. Compiling a site with as few land ownerships as possible is desirable to minimise project complexities (including engineering, design, and mitigation measures), all of which were considered in evaluating the site. Sites 1-10 and the BESS site, are all secured through voluntary landowner agreements.

Accessibility

- 5.6.39 Paragraphs 2.10.27 - 2.10.40 of EN-3 require the Applicant to consider the accessibility of sites during construction and operation, Public Rights of Way (PRoW), security, and lighting. Accessibility and ability to accommodate Abnormal Indivisible Loads (AIL) and Heavy Good Vehicles (HGV) is an important factor when considering the site selection process and identifying potential effects. The road network surrounding the Sites currently consists of three main roads: the B1332, B1527 and A140, the remaining roads surrounding the Site are more rural in nature. The Scheme Sites are accessible for construction traffic from the SRN via the A140.
- 5.6.40 The design evolution with respect to access and recreation is summarised within **Section 5.7** and detailed within the **Design Approach Document [EN0110014/APP/7.17]**.

Site Selection Summary

- 5.6.41 Paragraph 4.39 of NPS EN-1 (Ref 5-1) makes it expressly clear that there is no general requirement to consider alternatives or to establish whether the proposed project represents the 'best option' from a policy perspective. However, the **Site Selection Assessment [EN0110014/APP/7.20]** concludes that there are no locations within the search area that are more

suitable and available than the proposed location for the Scheme, based on the criteria identified. Full results of the alternative sites assessment and alternative sites which were considered and excluded are provided within the **Site Selection Assessment [EN0110014/APP/7.20]**.

5.7 Design Evolution

Introduction

- 5.7.1 Following the site selection process, an initial masterplan concept of the Scheme was developed, which has evolved over the course of the design and consultation process.
- 5.7.2 The iterative design process has been informed by environmental surveys, the environmental assessment process, and consultation feedback.
- 5.7.3 A set of project level design principles for the Scheme were developed, as detailed within the **Design Approach Document [EN0110014/APP/7.17]**. The aim of these project level design principles is to design a Scheme that achieves the applicant's required levels of energy generation and storage and responds to the local context of the Order Limits.
- 5.7.4 The project level design principles have and will continue to be used, where relevant, to inform decision-making, including at detailed design, further refine the design.
- 5.7.5 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.
- 5.7.6 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).
- 5.7.7 Stage 3 describes the design changes based on feedback from statutory consultation.

- 5.7.8 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. The key considerations relating to site layout iterations are set out below and summarised in **Table 5.1**. Whilst all of the design principles have been considered as part of the evolving design of the Scheme, the table below highlights the particular design principles relating to that key consideration. For Stage 1 the initial design was informed based on the information available and in recognition of the key policy tests in respect of site selection and design and the emerging understanding of the site and specific Scheme context.
- 5.7.9 Further information on the design evolution is set out within the **Design Approach Document [EN0110014/APP/7.17]** and secured in the **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]**. See **ES: Figure 1.1 Site Location Plan [EN0110014/APP/6.2.1.1]** for the exact locations for Sites and Sub-Sites referenced in the table below.

Table 5.1: Summary of Key Design Changes through the Evolution of the Scheme

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
National Grid Substation	Stage 1	Following discussions with NGET, the Applicant was informed that there was available capacity along the Bramford to Norwich 400kV line in Norfolk, and confirmed that a new substation would be required in order to connect the Scheme to the grid. Initially a potential location at Norwich Main was identified; and others to the south of this, but were dismissed, and a further location was considered south of Great Moulton.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context. Guidelines within Section III of NGC Substation and the Environment: Guidelines on Siting and Design
	Stage 2	Further consideration was given to the requirements for Grid Connection Infrastructure to the Point of Connection. Alternative locations at Great Moulton were considered (see 4A and 4B described above).	4.2 Flexibility for design and technological advancement to maximise energy production. 6.1 Efficient use of land and maximising grid connection capacity.
	Stage 3	Option 4B location for the National Grid Substation taken forwards primarily owing to the approval of planning permission for a solar farm (ref. 2024/3817), which impacted 4A. 4B was also preferable from a flood risk and PRoW perspective. Development of the concept design for the Grid Connection Infrastructure, including additional land required in the Order Limits.	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. 2.8 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.

¹ Design Principle numbers are given in this table. The Design Principles are set out in the **Design Approach Document [EN0110014/APP/7.17]**

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
		Refinement of the offset buffers from existing landscape and ecological features.	<p>4.3 Make sure the Scheme is resilient to flooding and does not increase flooding at the Order Limits or elsewhere.</p> <p>5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).</p>
BESS Site	Stage 1	A general location of the BESS Site and co-location of 400kV Project Substation were identified, in order to be in close proximity to the PoC.	<p>Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.</p> <p>Paragraph 2.10.24 of NPS EN-3 recommends consideration be given to co-location of solar PV panels where they are sited on agricultural land.</p>
	Stage 2	<p>Owing to surface water flooding risk identified, the maximum BESS area was setback from the boundary to reduce the area identified within a surface water risk.</p> <p>Setbacks and buffer zones were also introduced along parts of the western and southern boundary of the BESS Site to allow for potential landscape screening of nearby residential properties and to extend woodland connectivity.</p>	<p>2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.</p> <p>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.</p> <p>4.3 Make sure the Scheme is resilient to flooding and does not increase flooding at the Site or elsewhere.</p> <p>5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).</p>
	Stage 3	BESS area setback further in the north east of the BESS Site to provide a minimum buffer of 200m to the nearest residential property owing to fire safety best practice; and in consideration of noise impacts.	<p>2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.</p> <p>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.</p>

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
			5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).
1A	Stage 1	Maximum extent of the Solar PV Arrays within Sub-Site 1A, with the provision of a buffer along the PRow that extends through Sub-Site 1A.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	Following initial landscape analysis, consideration was given to realigning part of the PRow within Sub-Site 1A along the desire line to maintain open views to the south. Areas of Solar PV Arrays were setback from the existing alignment of the PRow to enable for partial realignment of the PRow.	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.
	Stage 3	Refinement of the offset buffers from existing landscape and ecological features.	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.
1B	Stage 1	Maximum extent of the Solar PV Arrays considered for Sub-Site 1B.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	The maximum extent of the Solar PV Arrays was reduced along the southern boundary of Sub-Site 1B to accommodate a setback along Hundred Lane, increasing the buffer zone. This was in response to views from the PRow and to include the potential for landscape/ecological mitigation. The maximum extent of the Solar PV Arrays was also reduced to accommodate existing hedgerows, trees and field margins. In the north-west corner of Sub-Site 1B, a setback was increased owing to the presence of hedgerows, trees and a pond.	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. 2.8 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.

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
			<p>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.</p> <p>5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).</p>
	Stage 3	The 132kV project substation was moved to the east of its original location and uprated to 400kV.	<p>6.1 Efficient use of land and maximising grid connection capacity.</p> <p>5.4 Seek to route construction vehicles away from local villages, as far as practicable.</p>
2A	Stage 1	Maximum extent of the Solar PV Arrays considered for Sub-Site 2A, with a buffer zone included adjacent to the Grade II Hill House listed building.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	The maximum extent of the Solar PV Arrays was reduced to accommodate setbacks to hedgerows and field margins, together with provision of potential areas for landscape/ecological mitigation and owing to the presence of a PRoW.	<p>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.</p> <p>2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.</p> <p>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.</p> <p>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.</p>

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
			5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).
	Stage 3	Refinement of the offset buffers from existing landscape and ecological features.	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.
2B	Stage 1	Maximum extent of the Solar PV Arrays considered for Sub-Site 2B.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	The maximum extent of the Solar PV Arrays was reduced to accommodate setbacks to hedgerows and field margins, together with the provision for potential areas for landscape/ecological mitigation. The Solar PV Arrays was also scaled back to reflect an area identified at a high risk of surface water flooding.	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. 4.3 Make sure the Scheme is resilient to flooding and does not increase flooding at the Site or elsewhere.
	Stage 3	Refinement of the offset buffers from existing landscape and ecological features.	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.
2C	Stage 1	Maximum extent of the Solar PV Arrays considered for Sub-Site 2C with setbacks along the western boundary for the provision of potential mitigation area.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	Setbacks were increased along the western boundary owing to the presence of water features and accommodate offset buffers to existing hedgerows, trees and field margins.	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. 4.3 Make sure the Scheme is resilient to flooding and does not increase flooding at the Site or elsewhere.

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
	Stage 3	Refinement of the offset buffers from existing landscape and ecological features.	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.
3A	Stage 1	Sub-Site 3A was initially identified for Solar PV Arrays, with offset buffers.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	Sub-Site 3A designated as an area for continued agricultural use and landscape/ecological mitigation 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).	<p>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.</p> <p>2.7 Consider the setting of heritage assets and mitigate any impact by design, where practicable.</p> <p>2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.</p> <p>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.</p> <p>5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).</p> <p>7.2 Sustainable management of woodland and hedgerows, along with meadows and other natural habitats.</p> <p>7.3 Allow for dual use of land, where practicable.</p>
	Stage 3	Sub-Site 3A removed from the Order Limits. It was considered that BNG, skylark plots and arable field margins could be delivered elsewhere within	6.1 Efficient use of land and maximising grid connection capacity.

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
		the Order Limits. Removal of Sub-Site 3A was preferable given it removed highway access through Spring Wood Ancient Replanted Woodland.	
3B (now Site 3)	Stage 1	Maximum extent of the Solar PV Arrays considered for Sub-Site 3B.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	<p>Parcel of land adjacent to Workhouse Lane and south of Lundy Green identified as an area of retained agricultural land and potential mitigation area owing to potential effects on Lundy Green in relation to noise and visual amenity (also a number of listed buildings in Lundy Green).</p> <p>Setbacks were introduced around the field margins, hedgerows and trees, which included increasing the buffer along the edge of Spring Wood Ancient Replanted Woodland, increasing the separation distance and providing opportunities for connectivity and enhancement.</p>	<p>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.</p> <p>2.7 Consider the setting of heritage assets and mitigate any impact by design, where practicable.</p> <p>2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.</p> <p>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.</p> <p>5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).</p>
	Stage 3	<p>Project Substation removed from Sub-Site 3B.</p> <p>Refinement of the offset buffers from existing landscape and ecological features. Buffer to Spring Wood Ancient Replanted Woodland extended, partially increasing the offset. This was in response to a combination of factors, including the adjacent Spring Wood Ancient Replanted Woodland, discrete parcel of</p>	<p>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.</p> <p>3.2 Integrate the Scheme into the natural environment and strengthen habitat corridors through the farmed landscape;</p>

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
		Grade 2 BMV quality land and high unexploded ordnance risk.	allowing the movement of wildlife and enhancement of biodiversity.
4A	Stage 1	Maximum extent of the Solar PV Arrays considered in Sub-Site 4A with setbacks and buffer zones along field margins and to accommodate potential mitigation.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	No significant change to the above.	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. 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.
	Stage 3	Refinement of the offset areas from existing landscape and ecological features.	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. 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.
4B	Stage 1	The eastern part of Sub-Site 4B was identified as retained for agricultural land and potential mitigation area responding to landscape and visual concerns from properties on Brick Kiln Lane, the PRoW and areas of surface water flood risk.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	The south-western part of Sub-Site 4B was not identified for Solar PV Arrays owing to heritage assets, notably the Grade I Church of St Michael.	2.7 Consider the setting of heritage assets and mitigate any impact by design, where practicable.

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
		In Sub-Site 4B, the geophysical survey has identified enclosures within the southern and western part and a potential ring ditch in the north-eastern part. The Solar PV Arrays would not be placed in the majority of these areas.	2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable. 5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases). 7.3 Allow for dual use of land, where practicable.
	Stage 3	Refinement of the offset areas from existing landscape and ecological features, including removal of Solar PV Arrays from an area on the northern boundary that has been identified as a historical landfill.	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. 5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases). 7.3 Allow for dual use of land, where practicable.
5A	Stage 1	Maximum extent of the Solar PV Arrays within Sub-Site 5A with setbacks from the field margins, hedgerows and trees. Consideration was given to a 400kV substation in Site 5; location not defined.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	Refinement to increasing the buffer zones around trees. Site 5 contains potential archaeological remains as indicated by the HER data and the geophysical survey. In the northern part of Sub-Site 5A, the Solar PV Arrays were set back to avoid the enclosures that may have once formed part of a medieval village.	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. 2.4 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.

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
		Location for 400kV Project Substation identified in Sub-Site 5A. Refinement of buffers to take account of High Pressure Gas Main within the site.	2.5 Restore key hedgerows to improve biodiversity and reinforce a sense of landscape character. 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. 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. 3.5 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.
	Stage 3	Refinement of the offset areas from existing landscape and ecological features. Removal of Solar PV Arrays between two blocks of woodland within proximity to each other to maintain/enhance ecological connectivity between the woodland blocks.	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. 6.1 Efficient use of land and maximising grid connection capacity.
5B	Stage 1	Maximum extent of the Solar PV Arrays within Sub-Site 5B with setbacks from the field margins, hedgerows and trees. Consideration was given to a 400kV Project Substation in Site 5; location not defined.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	The south-eastern part of Sub-Site 5B was excluded from the Solar PV Arrays area due to the	2.7 Consider the setting of heritage assets and mitigate any impact by design, where practicable.

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
		<p>proximity to the Grade I Church of St Catherine, Fritton Conservation Area and Grade II listed buildings, together with the potential effects on residential properties along 'The Street'.</p> <p>At the eastern edge of Sub-Site 5B, enclosures are avoided by the placement of Solar PV Arrays further to the north and west. These enclosures and associated features were identified during geo-physical surveys and are likely to represent medieval/early post-medieval and/or stock enclosures.</p> <p>Refinement of buffers to take account of High Pressure Gas Main within the site.</p>	<p>2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.</p> <p>5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).</p>
	Stage 3	<p>Removal of Solar PV Arrays from an additional field in the eastern part of Sub-Site 5B to provide a greater offset to residential properties on The Street owing to the landscape and visual analysis outcomes and consultation feedback.</p> <p>Refinement of the offset areas from existing landscape and ecological features.</p>	<p>2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.</p> <p>7.3 Allow for dual use of land, where practicable.</p>
6	Stage 1	Maximum extent of the Solar PV Arrays within Site 6.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	<p>Site 6 was considered unsuitable for Solar PV Arrays owing to a combination of factors, including proximity to listed buildings and Site 6 classified as entirely BMV quality land (Grade 2). Identified as a potential area for ecological mitigation and enhancement, compatible with continued agricultural use.</p>	<p>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.</p> <p>2.7 Consider the setting of heritage assets and mitigate any impact by design, where practicable.</p> <p>7.3 Allow for dual use of land, where practicable.</p>
	Stage 3	No significant change to the above.	As above.

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
7A	Stage 1	Maximum extent of the Solar PV Arrays within Sub-Site 7A.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	No significant change to the above.	6.1 Efficient use of land and maximising grid connection capacity.
	Stage 3	Refinement of the offset areas from existing landscape and ecological features.	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.
7B	Stage 1	Maximum extent of the Solar PV Arrays within Sub-Site 7B, with a buffer in the eastern part of sub-Site 7B owing to proximity to Fritton Grange Meadows CWS.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	Area of potential mitigation and enhancement increased in the eastern part of Sub-Site 7B in response to the Fritton Grange Meadows CWS and floodplain grassland habitat.	<p>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.</p> <p>2.5 Restore key hedgerows to improve biodiversity and reinforce a sense of landscape character.</p> <p>2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.</p> <p>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.</p> <p>3.5 Maintain isolated ponds and, reinstate ghost ponds, which are a characteristic feature of the clay plateau for their</p>

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
	Stage 3	Refinement of the offset areas from existing landscape and ecological features.	<p>landscape and biodiversity value, particularly their populations of great crested newt.</p> <p>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.</p> <p>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.</p>
7C	Stage 1	Maximum extent of the Solar PV Arrays within Sub-Site 7C5A with setbacks from the field margins/hedgerows.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	<p>Solar PV Arrays were removed from the western part of sub-Site 7C owing to the presence of listed buildings; potential for landscape and ecology mitigation and connectivity to Ancient Woodland (Pope's Wood CWS); and to provide a buffer to adjacent residential properties to the south and the PRow that extends through sub-Site 7C.</p> <p>Part of a moated site may have extended into sub-Site 7C and this area has been excluded from Solar PV Arrays.</p>	<p>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.</p> <p>2.7 Consider the setting of heritage assets and mitigate any impact by design, where practicable.</p> <p>2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.</p> <p>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.</p> <p>5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).</p>

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
	Stage 3	Refinement of the offset areas from existing landscape and ecological features e.g. to reflect updated buffers to ancient woodland.	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.
7D	Stage 1	During Stage 1, the north-eastern part of sub-Site 7D was excluded from the Solar PV Arrays owing to the proximity to the Saxlingham Green Conservation Area. This was identified for a potential area for landscape/ecological mitigation or an area of exclusion.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	<p>The buffer zone along the north-western boundary of sub-Site 7D was increased to allow for greater buffering between residential properties and heritage assets in Saxlingham Green.</p> <p>A former house is recorded on the HER and enclosures have been detected in the geophysical survey in the northern part of sub-Site 7D, which is avoided by the Solar PV Arrays.</p>	<p>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.</p> <p>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.</p> <p>2.7 Consider the setting of heritage assets and mitigate any impact by design, where practicable.</p> <p>2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.</p> <p>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.</p> <p>5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).</p>

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
			7.3 Allow for dual use of land, where practicable.
	Stage 3	Following further consideration of the design, it was considered that as set out at Stage 2, the large buffer zone along the north-western boundary of sub-Site 7D 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.	6.1 Efficient use of land and maximising grid connection capacity.
7E	Stage 1	Maximum extent of the Solar PV Arrays within Sub-Site 7E with setbacks from the field margins/hedgerows; having regard to the existence of the PRowS in the area,	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	The southern section of the sub-Site has been excluded from Solar PV Arrays to preserve the openness of the PRowS that run through the area. At the southern boundary of sub-Sites 7E and 7F, a moated site has been recorded on the HER and that has been accommodated. The scale of Solar PV Arrays in the western portion of the sub-Site has been reduced to allow for greater flexibility for potential landscape/ecological mitigation.	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. 5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).
	Stage 3	No change	As above.
7F	Stage 1	The northern edge of the sub-Site identified for potential ecological mitigation to strengthen connectivity between the identified woodland features south of Saxlingham Green.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
	Stage 2	Solar PV Arrays removed from the south-eastern corner of sub-Site 7F owing to aid the openness of the PRow. This is identified for a potential area for landscape/ecological mitigation. Buffers introduced close to Shotesham Woodton Hornbeam Woods SSSI.	<p>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.</p> <p>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.</p> <p>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.</p>
	Stage 3	New permissive path provided at sub-Site 7F which helps to strengthen the network of greenways, and active connections within the landscape. The permissive path is routed away from a designated ecological site.	5.5 Improve connectivity and accessibility through the Sites, where practicable.
7G / 7H	Stage 1	The southern edge of the sub-Sites has included a proposed mitigation buffer.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	Solar PV Arrays has been scaled back from the northern boundary of the sub-Sites to accommodate buffers along the edge.	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.
	Stage 3	No significant change	As above.
7I / 7J / 7K	Stage 1	The initial design of the sub-Sites considered the maximum extent of the Solar PV Arrays.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	No significant change to the above, other than buffers introduced for field margins and trees.	2.2 Retain and enhance existing vegetation, where possible, and features of value to retain the fabric of the Sites and aid

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
			the integration of the Scheme within the environment and the characteristics of the surroundings, as far as practicable.
	Stage 3	Refinement of the offset areas from existing landscape and ecological features e.g. following ecology survey results	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.
7L	Stage 1	The eastern boundary of the sub-Site 7L included a proposed mitigation buffer along Woodton Road between the sub-Site, a residential property and the Grade II* Oaks Farmhouse.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	No significant change to the above.	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. 2.7 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. 5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).
	Stage 3	Refinement of the offset areas from existing landscape and ecological features e.g. following ecology survey results Buffer to the residential dwelling on the corner of Woodton Road /Springwood increased with Solar PV Arrays set further back to allow greater landscape screening opportunities.	2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable. 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.

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
			5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).
8A	Stage 1	The initial design of the sub-Site 8A considered the maximum extent of the Solar PV Arrays with buffers along the PRow, field margins, hedgerows and along the edge of Flood Zones 2 and 3.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	No significant change to the above.	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. 4.3 Make sure the Scheme is resilient to flooding and does not increase flooding at the Site or elsewhere.
	Stage 3	Solar PV Arrays removed from Flood Zones 2 and 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.	4.3 Make sure the Scheme is resilient to flooding and does not increase flooding at the Site or elsewhere.
8B	Stage 1	The initial design of the sub-Site 8B considered the maximum extent of the Solar PV Arrays with buffers along the PRow, field margins, hedgerows with a proposed mitigation buffer along the northern boundary.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	No significant change to the above, other than buffers to trees introduced.	2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable. 3.2 Integrate the Scheme into the natural environment and strengthen habitat corridors through the farmed landscape;

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
			<p>allowing the movement of wildlife and enhancement of biodiversity.</p> <p>5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).</p>
	Stage 3	<p>New permissive route provided at sub-Sites 8B which strengthens the network of greenways, and active connections within the landscape.</p> <p>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 Uppgate Green Farmhouse to the north. This has also removed some BMV land from the scheme</p>	<p>2.7 Consider the setting of heritage assets and mitigate any impact by design, where practicable.</p> <p>2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.</p> <p>5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).</p> <p>5.5 Improve connectivity and accessibility through the Sites, where practicable.</p>
9	Stage 1	<p>The initial design considered Solar PV Arrays across much of the sub-Site with a proposed mitigation buffer along the northern boundary and along hedgerows.</p>	<p>Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.</p>
	Stage 2	<p>Solar PV Array area across the sub-Site reduced and, in particular, an area on the southern boundary has been excluded owing to the potential effects on residential properties on Mill Lane. The north-western corner of the sub-Site was also removed to reduce potential effects on nearby residential properties on High Green and the Brooke Conservation Area.</p>	<p>2.7 Consider the setting of heritage assets and mitigate any impact by design, where practicable.</p> <p>2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.</p> <p>3.2 Integrate the Scheme into the natural environment and strengthen habitat corridors through the farmed landscape;</p>

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
			<p>allowing the movement of wildlife and enhancement of biodiversity.</p> <p>5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).</p>
	Stage 3	<p>Following statutory consultation feedback, Solar PV Arrays were removed entirely from the western part of Site 9 owing to the presence of Brooke Conservation Area to the north and residential properties bordering the southern Order Limits on Mill Lane (Design Principle 2.7, 2.8).</p> <p>This change also removed some Grade 3a BMV quality land from the Scheme.</p>	<p>2.7 Consider the setting of heritage assets and mitigate any impact by design, where practicable.</p> <p>2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.</p> <p>5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).</p>
10A	Stage 1	The initial design of the sub-Site 10A considered the maximum extent of the Solar PV Arrays with a proposed mitigation buffer along Pound Lane.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	Further buffer introduced along the northern boundary and around woodland.	<p>2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.</p> <p>5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).</p>
	Stage 3	No significant change to the above.	As above.
10B	Stage 1	The initial design of Site 10B considered the maximum extent of the Solar PV Arrays with buffers along field margins and hedgerows.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	Solar PV Arrays area removed from south-west corner and eastern part of the sub-Site to allow for potential mitigation, setting back the Solar PV Arrays from Pound Lane.	2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
			5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).
	Stage 3	<p>Following discussions with Seething Airfield and the projects' aviation specialists, Solar PV Arrays were removed from the south and eastern part of Sub-Site 10B to take into account the potential for engine failure from aircraft using Seething Airfield. It is proposed to provide a Tussocky Grass Mix in this location.</p> <p>A permissive path is proposed within Sub-Site 10B and in parallel to Seething Road.</p>	<p>2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.</p> <p>5.3 Behave as a considerate neighbour during the whole project lifecycle (all phases).</p> <p>5.5 Improve connectivity and accessibility through the Sites, where practicable.</p> <p>7.3 Allow for dual use of land, where practicable.</p>
10C	Stage 1	The initial design of Site 10C considered the maximum extent of the Solar PV Arrays with buffers along field margins and hedgerows.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	No significant change to the above, other than buffers introduced around trees.	<p>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.</p> <p>2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.</p>
	Stage 3	No significant change to the above. Refinement of the offset areas from existing landscape and ecological features e.g. following ecology survey results.	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.
10D	Stage 1	Sub-Site 10D was initially identified for Solar PV Arrays.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.

Sub-Site	Design Stage	Design Choice / Considerations	Relevant Policy / Design Principle ¹
	Stage 2	Sub-Site 10D is now designated as an area for landscape/ecological mitigation.	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.
	Stage 3	No significant change to the above.	As above.
10E	Stage 1	The initial design of Site 10E considered the maximum extent of the Solar PV Arrays with buffers along field margins, hedgerows and mitigation area.	Initial considerations relating to key policy tests, environmental and community constraints and early understanding of the site context.
	Stage 2	No significant change to the above.	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. 2.8 Careful siting of infrastructure and landscape buffers to minimise impact on recreational and residential amenity, where practicable.
	Stage 3	Refinement of the offset areas from existing landscape and ecological features	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.

Design Buffers

- 5.7.10 A series of design buffers have been embedded into the Scheme. These were developed based on precautionary principles and specific environmental sensitivities of the Sites, together with opportunities for enhancements. The design buffers therefore provide consideration for offsets for solar infrastructure to a range of features including landscape, ecological and water courses; as well as residential properties.
- 5.7.11 Following feedback from the statutory consultation, there has been evolution of the design buffers in response to clarification sought from stakeholders on the buffers. In addition, 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.

Alterations to the Site Extents

- 5.7.12 Alterations to the Sites extents are identified on **Figure 5.3 Alterations to the Site Boundary Between Scoping and PEIR [EN0110014/APP/6.2.5.3]** and **Figure 5.4 Alterations to the Site Boundary Between PEIR and Submission [EN0110014/APP/6.2.5.4]**.

Stage 1

- 5.7.13 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.
- 5.7.14 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.

Stage 2

- 5.7.15 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.

5.7.16 Through ongoing engagement with landowners and statutory consultees, design evolution during this stage, allowed for the Order Limits to be refined to respond to the following:

- Accommodating highway visibility splays and potential traffic management measures;
- 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.

Stage 3

5.7.17 The Order Limits of the Sites were further refined during this stage, 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;
- 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;
- To include small areas of land associated with highways (as presented at the targeted consultation) owing to further appraisal of the routes for the Abnormal Indivisible Loads 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;
- 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; and

- To include additional land to the northeast and southwest of Sub-Site 1B owing to the development of the concept design to accommodate Grid Connection Infrastructure, as presented at the targeted consultation.

Cable Route Corridor

5.7.18 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. 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 possible;
- Utilising existing gaps in the hedgerows as far as possible to minimise temporary hedgerow loss;
- Directing the route away from HER finds relating to archaeology as far as possible;
- Directing the route away from designated ecological sites as far as possible, including moving away from Roadside Nature Reserves, Big Wood Ancient Woodland, Tyrel's Wood and New Plantation CWS, Wood Green CWS, Little Wood Ancient Woodland (and SSSI) and Winters Grove Ancient Woodland (and SSSI);
- Providing a buffer to residential properties; and
- Access requirements to the CRC, including the internalisation of construction traffic to remove from the local roads as far as practicable.

Green Infrastructure

Stage 2

5.7.19 Following initial baseline data gathering, site visits and initial discussions with consultees in Stage 1, during Stage 2, further 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.

Stage 3

5.7.20 During Stage 3, following statutory consultation, the landscape measures were further refined to respond positively to their setting and the prevailing landscape character. The approach utilised the emerging habitat survey data,

arboricultural surveys and a greater understanding of the local landscape and views.

- 5.7.21 The Scheme design applied appropriate buffers to existing Green Infrastructure assets to retain and protect features. In addition, where appropriate and in context of the proposals themselves the Scheme includes provision of new community spaces (responding to providing accessible greenspace) and areas where development is excluded.
- 5.7.22 PRoW within the Sites were protected and retained with new permissive routes provided at Sub-Sites 7F, 8B, and 10B.
- 5.7.23 The Scheme included provision for new landscape measures and enhancement of existing features, including the restoration of ghost ponds and existing hedgerows, embedding Green Infrastructure into the development, and collectively seeking to strengthen habitat connectivity at a landscape scale.
- 5.7.24 Where total avoidance of an environmental effect was not possible, additional areas for mitigation were identified to provide space for suitable landscape measures to mitigate these effects. Effects such as those on visual amenity from the PRoW network 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 where providing increased connectivity between the SSSI and Ancient Woodland features across the landscape was a key requirement.

Access and Recreation

Stage 2

- 5.7.25 Following initial baseline data gathering, site visits and initial discussions with consultees in Stage 1, at Stage 2, consideration was given to the access strategy and PRoW. 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;
 - Potential for internalisation of construction vehicle routes through and between Sub-Sites through internal haul routes;
 - Retention and protection of the PRoW and recreational routes through provision of buffer and measures to protect and/or minimise harm to visual amenity;
 - Utilising existing field access to the Sites and Sub-Sites, wherever possible, to minimise vegetation loss;

- Minimise the extent of visibility splays using observed traffic flow and speed data to reduce the potential for vegetation removal.

Stage 3

- 5.7.26 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.
- 5.7.27 All existing PRow were identified for retention throughout the lifetime of the Scheme, with a minimum 15m buffer. Connecting to existing PRow to provide continuous routes, permissive paths have been proposed within areas of retained open space.
- 5.7.28 Community accessible spaces with pedestrian access have also been introduced to the Scheme.
- 5.7.29 Sub-Site access and construction vehicle routing 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.

Residential Properties and Heritage Assets

Stage 2

- 5.7.30 Following initial baseline data gathering, site visits and initial discussions with consultees in Stage 1, consideration was given to minimising the impact on surrounding villages and views from residential properties, to seek to avoid any impacts, or minimise impacts as far as possible.
- 5.7.31 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.
- 5.7.32 The approach adopted in relation to heritage assets was to mitigate impact by design, where practicable. 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.

Stage 3

- 5.7.33 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.

Mitigation and Enhancement Areas

Stage 2

- 5.7.34 Following initial baseline data gathering, site visits and initial discussions with consultees in Stage 1, as the design progressed it focused primarily on avoiding environmental constraints as far as practicable in accordance with the mitigation hierarchy. 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.
- 5.7.35 For example, Solar infrastructure was 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).

Stage 3

- 5.7.36 As a result of the design changes, 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.
- 5.7.37 Following statutory consultation, the landscape mitigation measures for the Scheme were further refined and developed. 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.

National Grid Substation

- 5.7.38 At the statutory consultation stage, the National Grid Substation in site 1B was initially orientated east – west. 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.

5.8 Summary and Conclusions

- 5.8.1 In summary, the Applicant has considered alternatives in line with the requirements of the EIA Regulations and the specific provisions of NPS EN-1, NPS EN-3 and NPS EN-5. The Applicant has also demonstrated through the information set out in this chapter, the **Design Approach Document [EN0110014/APP/7.17]**, and the **Design Principles, Parameters and Commitments [EN0110014/APP/7.18]** how 'good design' is being delivered throughout the course of the Scheme and how the Design Principles have informed the design evolution of the Scheme.

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