Response to the Applicant's response to Shotesham Action Group Relevant Representation.

DESIGN PRINCIPLES, LANDSCAPE AND VISUAL Shotesham Action Group refers this matter to our Written Representation where we disagree with the applicant's response. In brief, the applicant has evidently failed to properly consider EN-1 5.10 (Landscape and Visual) when developing the design. Furthermore, the applicant hasn't followed their own IGP Design Principles : Environmentally Led Design, vis. item 2.1 – Respond to the character of the site informed by Natural England National Character Area (NCA) Profiles, South Norfolk Local Character Landscape assessment and Place Making Guide SPD, including the character of the River Valleys. National England name the NCA area South Norfolk and High Suffolk Claylands described as high and predominantly flat incised by numerous small-scale wooded river valleys with complex slopes. In February 2026 South Norfolk Council adopted a SPD on Landscape and Susceptibility in Relation to Energy Generation, Storage and Transmission. The SPD identifies the Tas Rural River Valleys as high susceptibility and least likely to accommodate PV arrays.

Site 8 is in a Tas Rural River Valley and its landscape character is highly sensitive and the applicant acknowledges that the development would leave residual adverse landscape and visual effects following mitigation. The applicant states the landscape and visual assessment has been undertaken in accordance with recognised professional guidance, however, a report by Classic Landscape Architecture Ltd disagrees with the applicant's professional adviser. Furthermore, Historic England comment as follows, particularly referring to Site 8.

Written Representation: Historic England

Chapter 7: Landscape and Visual

3.20 **Role of the LVIA in the heritage assessment.** Historic England notes that Chapter 7 assesses landscape and visual effects, while Conservation Areas and other designated heritage assets are assessed as receptors in Chapter 10. We consider this distinction reasonable in principle and recognise that the LVIA provides useful evidence for understanding changes within the settings of designated heritage assets, including through its study areas, ZTV, viewpoints and assessment of changes to landscape character and perceptual qualities.

3.21 However, LVIA conclusions do not determine effects upon heritage significance. A landscape or visual effect which is not significant in LVIA terms may nevertheless affect the significance of a heritage asset, and setting is not limited to visibility. Relevant considerations may include historic landscape character, openness, land use, spatial relationships between historic places and the experience of moving through the landscape. The adequacy of the study area and visual evidence for heritage purposes, and the significance of any resulting changes, should therefore be established through the Cultural Heritage assessment in Chapter 10.

3.22 **Section 7.7 – Embedded mitigation.** Historic England welcomes Design Principle 2.7 at paragraph 7.7.12, which requires the Scheme to: *'Consider the setting of heritage assets and mitigate any impact by design, where practicable'.*

3.23 We also note the wider principles requiring the Scheme to respond to landscape character, retain and enhance existing vegetation, create woodland belts and native tree planting, restore hedgerows and carefully site infrastructure and landscape buffers

3.24 These measures have the potential to reduce effects upon the settings of designated heritage assets. However, screening should not in itself be equated with mitigation of effects upon heritage significance. Where openness, agricultural character,

historic land-use patterns, designed or incidental views, or relationships between historic places contribute to significance, new woodland, hedgerow or other planting could itself alter that contribution even where it reduces visibility of Scheme infrastructure.
3.25 We will therefore consider in reviewing Chapter 10 whether landscape mitigation relied upon to reduce effects upon designated heritage assets has been designed in response to the contribution made by their settings to their significance, rather than principally to screen the Scheme from view. Any measures relied upon in reaching the heritage conclusions should also be adequately secured through the Design Principles, Parameters and Commitments and/or other relevant DCO controls.
3.26 **Section 7.8 – Assessment of likely effects.** Historic England notes that the assessment identifies significant adverse landscape and visual effects across a number of parts of the Scheme, including an increased urbanising influence from infrastructure with industrial characteristics within a rural and relatively open landscape. These findings provide relevant evidence for Chapter 10 where rural or agricultural character contributes to the significance of designated heritage assets through their setting. Effects upon heritage significance should not be discounted solely because intervening vegetation limits direct visibility of Scheme infrastructure.
3.27 **Site 8 – Shotesham** Historic England notes that the Applicant's own LVIA identifies appreciable landscape and visual change associated with Site 8. Chapter 7 concludes that Site 8 would experience significant adverse landscape effects during operation, which remain Moderate and Significant at Year 15 despite maturation of landscape mitigation. The overall conclusions similarly identify Site 8 as one of the locations at which significant adverse residual landscape and visual effects are concentrated.
3.28 The visual assessment also identifies significant effects at viewpoints in and around Shotesham. Site 8-VL2, at the origin of Shotesham FP18 on Wash Lane, is of particular relevance. The associated visualisation is a winter view at 32.6m AOD across the rural landscape towards Sites 8A and 8B. The detailed visual assessment describes a direct view towards solar arrays within Site 8B occupying elevated land across the valley, with planting subsequently relied upon to screen those arrays.
3.29 Historic England notes, however, that no viewpoint appears to have been specifically selected to illustrate the setting of the Grade II* Church of St Mary, Shotesham, including relevant views to or from the church and its relationship with the surrounding historic settlement and landscape. The absence of a dedicated viewpoint does not necessarily constitute an assessment deficiency in itself: the question is whether the available visual evidence is sufficient to understand the contribution made by setting to the significance of the church and the change to that contribution arising from Site 8.
3.30 The same issue arises in relation to the Shotesham Conservation Area. Given the Applicant's own identification of significant landscape and visual change within the surrounding Shotesham landscape, Chapter 10 should demonstrate that it has considered whether the rural valley, surrounding agricultural landscape and relevant spatial and visual relationships contribute to the significance of the Conservation Area, rather than limiting the assessment to visibility of Scheme infrastructure from within its boundary.
3.31 This is particularly important because the LVIA relies upon woodland and hedgerow planting to reduce some visual effects over time. Where such planting is relied upon in Chapter 10 as heritage mitigation, consideration should also be given to whether the resulting alteration to landscape character, openness or historic relationships would itself affect those aspects of setting which contribute to heritage significance. Reduced visibility of solar development should not automatically be taken to represent an equivalent reduction in effects upon heritage significance.

3.32 **Section 7.11 – Cumulative effects.** Historic England notes the conclusion that no significant cumulative landscape or visual effects would arise. However, this does not necessarily establish the absence of cumulative effects upon heritage significance. Chapter 10 should therefore demonstrate that relevant developments have been considered where they have the potential to affect the same designated heritage asset or the same aspects of its setting.3.15
3.33 **Section 7.12 – Conclusion.** Historic England notes that Chapter 7 identifies long-term change to the rural landscape and significant adverse effects remaining at a number of locations after mitigation, including at Site 8 at Year 15. It also confirms that the National Grid Substation and established mitigation planting would remain following decommissioning. These findings should be appropriately reflected in Chapter 10, including in relation to the duration and reversibility of effects upon the settings of designated heritage assets.

In light of the aforementioned information, Shotesham Action Group requests that the ExA asks the applicant to independently review the Landscape and Visual aspects of Site 8 in relation to the provision of proposed solar development.

PUBLIC RIGHTS OF WAY The applicant is incorrect saying the PV arrays proposed on Site 8b are only intermittently visible from Boudica's Way. Boudica's Way runs directly alongside the south east side of Little Wood (SSSI). The PV arrays will be highly visible on top of 8b sloping land and within 250m distance.

Whether the effect on footpaths 19 and 22 is acceptable is not merely objective, it depends on landform and the footpath users' experience. Footpath 22 runs along the top of the sloping land of site 8b and offers outstanding views north, south and west. On the south side close by solar panels will block the view, on the north side the view will be blocked by proposed tree planting which the applicant failed to mention in their response.

The applicant is justifying their decision to blight footpaths in Shotesham including Boudica's Way on the basis of the urgent need to deploy renewable energy. The applicant has proved no other justification. As previously mentioned, the applicant has failed to properly consider EN1-1 5.10 when developing the design. Nor did they refine the design process in accordance with their own design process, otherwise Site 8 would have been excluded from the Scheme due to its topography, river valley location, Valued Landscape, Flood Zone 3, close proximity to Little Wood (SSSI) with a confirmed barbastelle bat maternity colony, numerous public footpaths and proximity of dwellings.

FLOODING IN SHOTESHAM The applicant is misguided if they think the regular occurrence of flooding in Market Lane and Shotesham village will not intensify if solar panels are placed on the sloping land of Sites 8a and 8b.The applicant satates the provision of grass cover will improve run-off concerns over and above agricultural use. The applicant has failed to take into account two factors. Firstly grass cover is very unlikely to be provided, evidenced by the lack of grass on active solar fields. The nearby Bloy's Grove solar farm has no grass cover. Secondly solar panels can significantly increase run-off volumes due to soil type (clay on Site 8 can become saturated in the winter months and baked dry in the summer months), ground slope and panel angle drip lines. Shotesham Action Group has little doubt that flooding on Market Lane and in Shotesham Village will occur more regularly if solar panels are provided on Site 8.

Shotesham Beck runs though the village and Shotesham Common (SSSI). Shotesham Common has abundant flora and fauna (records appended) and this could upset the balance if there are more flood events. Contaminants and increased run-off silt will also potentially damage this precious ecosystem. Shotesham Beck is not dredged as Natural England policy for wetland sites is to hold water as much as possible. Accordingly increased surface water run-off from the solar fields will lead to a greater risk of flooding in the village and potential damage to The Common ecosystem.

WATER ENVIRONMENT As mentioned above, Shotesham Action Group believes flooding on Market Lane, in Shotesham village including The Common (SSSI) will exacerbated if solar panels are placed on Site 8a and 8b. The applicant has offered no evidence that this will not be the case.

PRIVATE WATER SUPPLIES The applicants assessment of private water supplies (PWSs) within the 250m study area is not accurate. The applicant has identified three boreholes in the area, in fact there are ten boreholes. The applicant has not addressed PWSs as required under regulation 24 0f WFD. The applicant has failed to adhere to the available guidance on assessing PWSs (SEPA 202488).

BARBASTELLE BATS In ES Volume 1 Chapter 8 the applicant lists habitat degradation as a potential effect for construction, operation and decommissioning phases. Barbastelle bats prefer ancient woodland and local wet meadows, both provide perfect habitat for barbastelle bats. Most ancient woods in the area are SSSIs and the known presence of barbastelle bats in these woods reinforces the importance of the SSSI woods. Sites 7, 8 and 9 are all within the Impact Risk Zones of the SSSIs containing barbastelle bats. There is mounting evidence confirming harm may occur to bats living near solar farms. Barbastelle bats are rare legally protected Annex II species and should not be put at any risk.

The applicant's current position on their requirement for a protected species license for barbastelle bats is that they don't consider there to be a requirement for a license. Natural England has responded in their Relevant Representations raising amber fundamental concerns about Wildlife licences as follows.

1. **Protected species**

1.2.10 Natural England made the following comments on the DCO project at PIER stage:

Applicants should refer to the guidance at Wildlife licences: when you need to apply to check to see if a mitigation licence is required. Via our discretionary advice service (DAS), Natural England can review a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued

Shotesham Action Group has noted that the applicant has revised the Commitments Register (AS-039) to omit part of a previous commitment (CLV10) concerning landscape and Visual as below. Omitted text shown in red.

The **Outline LEMP** sets out specific landscape and ecological prescriptions for implementation of the measures. Such opportunities and prescriptions would be put in place to create and enhance habitats, protect and enhance existing landscape/ ecological features, strengthen Green Infrastructure across the Order limits and provide visual screening whilst aligning with local conservation priorities.

The management and maintenance of existing and new vegetation is an embedded mitigation measure which ensures vegetation would be actively managed in the long term. The **Outline LEMP** defines the measures to ensure successful implementation and establishment management measures.

The omitted part removes the applicant's commitment to protect and enhance the environment. The omission includes the applicant's commitment to maintain new and existing vegetation i.e. grass and hedges etc. The reason given by the applicant is removing superfluous text. Shotesham Action Group strongly objects to the removal of the text and requests that the ExA requires the applicant to reinstate the text. Furthermore, Shotesham Action Group asks the ExA to request that the applicant includes the omitted commitment in the draft DCO. This is due to the fact that maintenance of the solar panel sites will be important to help minimise the proposed industrialisation of the countryside. Furthermore, the omission when reinstated will help protect and enhance the existing landscape /ecological features such as the barbastelle bat colonies.

TRANSPORT AND ACCESS Shotesham Action Group notes Norfolk County Council (NCC) has stated in their Local Impact Report the following.

12. 8.14 The County Council cannot support the present strategy for sites 7 to 9. The Krons is unacceptable for HGV movements, and Fairstead Lane west of its junction with the A140 remains within the Order Limits despite the previous understanding that it would not be used for general construction access. The applicant should make greater use of CRC8, CRC9, CRC10 and CRC13. Construction sequencing is not accepted as justification for routing traffic onto unsuitable roads; the programme should be adjusted so that the relevant haul routes and sites can be developed in a coordinated manner.

Shotesham Action Group concurs with NCC stance concerning this matter.

CULTURAL HERITAGE Shotesham Action Group disagrees with the applicant concerning their view of no potential impact on Shotesham Conservation Area. As mentioned in our Relevant Representation, Shotesham Action Group strongly believes Shotesham Conversation Area would experience material harm to the wider landscape where surrounding fields are incorporated into the development.

The applicant states that potential impacts were assessed to Brooke, Fritton and Seething Conservation Areas. However, the applicant has not mentioned Saxlingham Green Conservation Area which would be significantly impacted. Also Seething Conservation Area has little potential impact due to its considerable distance from the solar fields. It appears the assessment carried out by the applicant was not thorough or accurate.

Historic England comment in their Written Representation (praras 3.27 - 3.31) questions whether the applicant has properly assessed effects on the setting of Shotesham Conservation Area and Grade II* Church of St Mary.

GLINT AND GLARE Shotesham Action Group has little faith in the applicant's assessment. The whole of Site 8 occupies open rolling landscape and the panels will be seen from many directions both close up and from a distance. Inevitably sun reflections will occur.

NOISE AND VIBRATION Shotesham Action Group is not convinced that the sound pressure levels from inverter units will not be audible at Golden Owl Barn and Kings Farm on Baxter's Lane and Market Lane Farm on Market Lane. The existing background noise surrounding Site 8 is very low. Footpath users on footpaths 19 and 22 will hear the nearby inverter units in constant use and the solar tracking motors intermittently. The existing tranquillity of the area will be significantly affected. Shotesham Action Group requests that the ExA gives little weight to the applicant's present conclusion that the noise effects on site 8 are acceptable.

.