APPENDIX 1

SHOTESHAM PARISH COUNCIL DEADLINE 2 WRITTEN REPRESENTATION

APPENDIX 1

MARK UP OF APPLICANT's RESPONSE BY LISA FINCH CMLI

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East Pye Solar

Applicant's Further Response to Shotesham Parish Council Relevant Representation, not Submitted at Deadline A

October 2026

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Appendix A Site Selection Process

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1 Introduction

1.1 Purpose of the Document

1.1.1 An application (the Application) was made to the Secretary of State for Energy Security and Net Zero for a Development Consent Order (DCO) under section 37 of the Planning Act 2008 (PA 2008) for East Pye Solar (the Scheme). The Application was submitted by East Pye Solar Limited (the Applicant) on 5 March 2026 and was accepted for Examination on 2 April 2026.

1.1.2 This document provides the Applicant's response to the document "East Pye Solar – Site 8, Shotesham – Landscape & Visual Matters" (hereafter referred to as the 'Site 8 LVM Report') produced by Classic Landscape Architecture and submitted as part of Shotesham Parish Council's Relevant Representation **[RR-1771]**.

1.1.3 This report provides a technical review of the Site 8 LVM Report and the Applicant's **Environmental Statement Volume 1: Chapter 7 - Landscape & Visual [APP-043]**. It examines the principal areas of disagreement between the two assessments, including the assessment of landscape value, the identification of a Valued Landscape, the treatment of mitigation, receptor sensitivity and the significance of effects. The report also considers whether methodological differences and differing interpretations of the Scheme have contributed to the contrasting conclusions reached by the Applicant and Classic Landscape Architecture.

1.1.4 **Appendix A – Site Selection Process** addresses the comments raised throughout the Site 8 LVM Report in relation to the site selection process and the selection of Site 8.

1.2 Structure of the Report

1.2.1 This document provides the Applicant's response to the matters raised in the Site 8 LVM Report and is structured as follows:

- Planning Policy;
- Methodology;
- Differences in Professional Judgement; and
- Conclusion.

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2 Applicant's Technical Review of the Site 8 LVM Report

2.1 Planning Policy

2.1.1 National Policy Statements are the primary policy basis for the Scheme in accordance with section 104 of the Planning Act 2008. The relevant National Policy Statements (NPS) in relation to the Scheme are the Overarching National Policy Statement for Energy (NPS EN-1)(1), the National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) (2) and the National Policy Statement for Electricity Networks Infrastructure (NPS EN-5) (3).

2.1.2 EN-1 recognises that: *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape"* and that "*All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites*". Therefore, impact must be judged case-by-case using planning balance.

2.1.3 In addition, the following national and local policy also forms the policy basis:

- National Planning Policy Framework (NPPF) (4);
- Planning Practice Guidance (PPG) for the Natural Environment (5);
- Greater Norwich Local Plan (GNLP) (6); and
- South Norfolk Development Management Policies Document (DMPD) (7).

2.1.4 The Site 8 LVM Report is also based on this national and local policy framework, including NPS EN-1, NPS EN-3, the NPPF, GNLP and the South Norfolk DMPD, together with landscape-specific guidance such as Guidelines for Landscape and Visual Impact Assessment (GLVIA3) (8) and local Landscape Character Assessments.

2.1.5 Site 8 is not a designated landscape at the national and regional level, however the Applicant has acknowledged the sensitivity of Site 8. Site 8 is located within the 'B1 Tas Tributary Farmland LCA'(9), which falls under the saved policy on Rural River Valleys (Policy 4.5) of the DMPD for South Norfolk. Policy DM4.5 'Landscape Character and River Valleys' states that all development should respect, conserve and, where possible, enhance landscape character. In particular, the policy states that regard will be had to protecting the distinctive characteristics, special qualities and geographical extents of the identified Rural River Valleys.

Much of the Site is located with LCA A1 Tas Rural River Valleys, a highly sensitive landscape.

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Valued Landscape

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2.1.6 The Site 8 LVM Report argues that Site 8 should be removed from the Order Limits on the basis that it is one of the most environmentally, visually, and landscape-sensitive parts of the Scheme. The LVM Report concludes that Site 8 comprises a Valued Landscape. Paragraph 4.10.42 states: "*… At all levels of the assessment set out above, the Site satisfies the criteria for high value attributes, and, when seen as a whole, it is concluded that the Site and the context in which it sits should be considered a 'Valued Landscape' and should be afforded enhanced protection in line with National and local policy*."

2.1.7 Whilst the Applicant agrees that Site 8 is a sensitive landscape and has some valuable attributes, the Applicant does not consider Site 8 to be a Valued Landscape.

2.1.8 'Valued Landscape' was a term used in the National Planning Policy Framework (NPPF) in England in 2012 and most recently until the December 2024 version, which required the planning system to 'protect and enhance valued landscapes', offering some protection to undesignated landscapes. However, the NPPF published in August 2026 no longer includes the term "valued landscapes". While landscape character, local distinctiveness and designated landscapes remain important planning considerations, the specific policy reference to valued landscapes has been removed from national planning policy.

2.1.9 Therefore, even if Site 8 were considered to exhibit characteristics associated with a valued landscape, this would not in itself establish a policy basis for excluding the Site from the Order Limits.

2.1.10 The relevance of landscape value is whether the landscape and visual effects identified in the ES, together with the proposed mitigation, are acceptable in the planning balance. Section 5.10 of NPS EN-1 deals with Landscape and Visual. For example, this explains that "*National Parks, the Broads and National Landscapes have been confirmed by the government as having the highest status of protection*" (para 5.10.7). In addition, whilst paragraph 5.10.12 acknowledges that there are landscapes that may be highly valued locally (for example, where a local development document in England has policies based on landscape or waterscape character assessment), the national policy position is that "*locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development*". There is no other reference to value landscapes in national policy.

2.1.11 However, as the term Valued Landscape was used in the Site 8 LVM Report, the following text sets out a brief precis of the Applicant's view as to what extent Site 8 would constitute a Valued Landscape with reference to the Landscape Institute Technical Guidance Note 02/21 *Assessing Landscape Value Outside National Designations* (10). This guidance explains that landscape value is not solely dependent on statutory or non-statutory designations and that undesignated landscapes can be valued

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where they exhibit attributes that are demonstrably important. The following factors contribute to a landscape's value:

- natural heritage;
- cultural heritage;
- landscape condition;
- distinctiveness;
- scenic qualities;
- recreational value;
- perceptual qualities;
- associations; and
- functional roles.

2.1.12 The presence of one or more of these characteristics does not automatically result in a landscape being considered a Valued Landscape, professional judgement is required to determine the relative importance of the landscape within its wider context.

2.1.13 The Site 8 LVM Report concludes that "Site 8 and its context" should be considered a 'Valued Landscape'. However, the assessment does not define the spatial extent or boundaries of the "context" being assessed. Several of the characteristics relied upon in the valuation appear to relate not only to Site 8 and its immediate surroundings, but also to the wider Shotesham area and the River Tas Valley. For example, the assessment refers to associations with Venta Icenorum (paragraph 4.1.35), located approximately 4.5 km from the Site, and attributes a medium-high level of association to this feature. It is therefore unclear which features are considered part of the assessed landscape resource, and which relate to the wider surrounding area. This creates uncertainty as to the extent of the landscape being assessed and raises questions regarding the consistency of the assessment methodology applied to the identification of a 'Valued Landscape'.

2.1.14 Furthermore, whilst the assessment refers to the Landscape Institute Technical Guidance Note 02/21: Assessing Landscape Value Outside National Designations, it does not clearly demonstrate how the examples and criteria set out in that guidance have been applied to define the extent of the landscape being valued.

2.1.15 The following table is the Applicant's Valued Landscape Assessment and its associated visual envelope, as defined in **Figure 7.5.4 Site 8 Zone of Theoretical Visibility [APP-073]**, against the LI TGN 02/21 Valued Landscape criteria:

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Table 2.1 Site 8 Valued Landscape Assessment

Factors and Definition	Indicators of Landscape Value and Evidence
Natural Heritage Landscape with clear evidence of ecological, geological, geomorphological or physiographic interest which contribute positively to the landscape.	A few Ancient Woodlands are present within the valley floor, include Ringer's Grove and Little Wood. However, the majority of Site 8 and its associated visual envelope are used for intensive arable farming. Therefore, the defined Site is not considered to be of ecological interest although the wider landscape is. The site itself is not with in a SSSI. A small part of the Site is within a Roadside Nature Reserves along Wash Lane. In planning and Landscape and Visual Impact Assessment (LVIA) terms, a site's immediate context is the area directly surrounding it that influences, and is influenced by, its character, appearance, setting and relationship with neighbouring land uses and landscape features. Importantly, **the immediate context is not necessarily defined by a fixed distance from the site boundary**. It should be determined by the landscape's characteristics, topography, visual relationships and the extent to which the site forms part of a wider, recognisable landscape unit **Site**The land within the proposed development boundary.**Immediate landscape context**The adjoining and closely related landscape within which the site is experienced and understood.**Local landscape context**The wider landscape character unit or area containing the site.**Wider study area**The geographical area considered in assessing potentially significant landscape and visual effects.
Cultural Heritage Landscape with clear evidence of archaeological, historical or cultural interest which contribute positively to the landscape.	There are no historic landmarks within the site or its visual envelope. There are no archaeological findings on the Site based on Historic Environment Record Data. Boudica Way
Landscape condition Landscape which is in a good physical state both with regard to individual elements and overall landscape structure.	The Site's landform is varied located within an enclosed valley with open views. Within the Site hedgerows are sparse and gappy with occasional scattered large trees. The landscape condition of the Site has an average physical condition and intactness. Clearly part of an intact local context.

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Association Landscape which is connected with notable people, events and the arts.	The landscape is not connected with notable people, events or art. Boudica Way is visible from the Site
Distinctiveness Landscape that has a strong sense of identity	The landscape's sense of place is defined by its location within an enclosed valley floor, but this does not present any rare or unusual features that makes it an important contribution of the character. Part of the sensitive Tas Rural River Valley landscape, distinctively and unusually undulating for South Norfolk. Open views across the valley floor with large areas of ancient woodland as a backdrop
Recreational Landscape offering recreational opportunities where experience of landscape is important.	The presence of PRoW with good accessibility for outdoor recreational experience. A section of Boudicca way will have view of Site 8. 8 a and 8b both have PRoW running through them, they are very closely linked to a particularly strong network of PRoW and rural lanes and linked to the Boudica Way.
Perceptual (Scenic)	The Site is within a moderately wide simple valley with presence of the river corridor. However, there are no protected views or views being published in literature. Totally underplaying the scenic value which is very clearly evident.

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Factors and Definition	Indicators of Landscape Value and Evidence
Landscape that appeals to the senses, primarily the visual sense	The Conservation Area Appraisal exclude the site from its assessment. The Appraisal does not describe individual fields and therefore the Site is NOT excluded from the assessment. Furthermore, key characteristics are described as [inter alia] • A unusually undulating landscape with numerous changes in level allowing extensive views and enhancing the prominence and settings of key buildings • Attractive valley setting of main village. In addition, An Inspector at Appeal Ref: APP/L2630/W/18/3217160 Adjacent Green Hill, The Common, Shotesham Road, Shotesham All Saints, Norwich NR15 1YD noted "*11. The significance of the CA in my view relates partly to Shotesham being a small, historic village nestling in this mainly open river valley landscape. The incursion of further development beyond the village limits would detract from this largely undeveloped landscape setting and harm the significance of the CA. Whilst less than substantial I must attach significant weigh to this harm which would not be outweighed by any discernible public benefit which paragraph 196 of the Framework requires I should consider. Consequently, the proposal further conflicts with JCS Policy 1 and Policy DM 4.8 insofar as these seek to protect the historic environment.*"
Perceptual (Wildness and tranquillity) Landscape with a strong perceptual value notably wildness, tranquillity and/or dark skies	Arable farming is the predominant land use and therefore the Site and immediate area (within 1km) does not have a strong wildness perception. The Site is tranquil with only rural lanes connecting the Site and is identified as so in the CPRE tranquillity map. The Site is undoubtedly perceived as tranquil, in part due to the quiet and rural network of lanes and also is acknowledged for its dark skies
Functional Landscape which performs a clearly identifiable and valuable function, particularly in the healthy functioning of the landscape	Site 8 does not have contribute to green infrastructure strategy or local Plan, but part of it is within the saved policy on Rural River Valleys Policy 4.5 of the DMPD. A landscape may perform several valuable landscape functions: **Ecological connectivity:** Hedgerows, woodland, field margins and watercourses connect habitats and allow wildlife to move through the countryside – the Site and its immediate context contribute to this connectivity. **Water management:** Valleys, floodplains, soils and vegetation regulate drainage, retain water and reduce surface runoff.

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	Landscape connectivity: Fields, woodland and valleys form a coherent, interconnected landscape rather than isolated fragments. **Historic landscape continuity:** Historic routes preserve the landscape's historic structure and identity. **Settlement setting:** Undeveloped countryside provides a distinctive rural setting for villages and prevents the erosion of their landscape character. **Tranquillity and recreation:** Quiet countryside and public rights of way provide opportunities for recreation and experiencing a relatively undisturbed landscape. **Soil and agricultural functions:** Productive soils support agriculture, soil health and wider environmental processes. **Habitat and biodiversity support:** Woodland, grassland, hedgerows and other habitats support ecological diversity and resilience.

See LVM 4.10 for a more detailed and considered Valued Landscape Assessment.

2.1.16 Taking these factors together, Site 8 exhibits some locally valued characteristics but does not meet the threshold of a Valued Landscape when assessed against the criteria set out in LI TGN 02/21. Consequently, while the Site should be recognised as a rural landscape with certain positive attributes, there is insufficient evidence to conclude that it constitutes a Valued Landscape.

In Environmental Statement Appendix 7.2, paragraph 5.10.9, the applicant expressly identifies the landscape character and features of Site 8 as being of **High value.**

By their definition of 1KM

As described in the LVM report importantly, the characteristics set out are mutually reinforcing characteristics, rather than isolated features.

Site 8 is not merely as an attractive agricultural landscape. It forms part of a distinctive, coherent and relatively intact river-valley landscape with demonstrable scenic, recreational, historic, perceptual and natural heritage value as reiterated below:

- **Distinctive topography:** An unusually undulating river-valley landscape in the context of South Norfolk.

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- **Landscape integrity:** A relatively intact agricultural landscape, notwithstanding some field amalgamation, with substantial interconnected woodland blocks.
- **Scenic quality:** Extensive views across the valley, framed by substantial woodland and pronounced local changes in landform.
- **Absence of detracting features:** No significant intrusive development affecting the landscape's rural character.
- **Historic setting:** The contribution of the agricultural landscape to the setting of Shotesham Conservation Area.
- **Recreational value:** Well-used public rights of way connecting with an extensive network of quiet rural lanes and routes towards Saxlingham.
- **Natural heritage and connectivity:** Hedgerows linking woodland areas and the Tas Beck corridor, together with nearby woodland supporting barbastelle bats.
- **Perceptual qualities:** Recognised tranquillity and exceptionally dark skies.

2.2 Methodology

2.2.1 The Applicant's Landscape and Visual Impact Assessment (LVIA) presented in **ES Volume 1, Chapter 7 – Landscape & Visual [APP-043]** was carried out in accordance with the industry standard and follows the Guidance of Landscape and Visual Impact Assessment (GLVIA3) and its associated clarifications that provide guidelines for consideration of effects on landscape and visual amenity.

2.2.2 In South Norfolk Council's Relevant Representation [RR-1795], the council confirms the Applicants LVIA "*provides a comprehensive assessment of potential landscape and visual effects*", and Norfolk County Council's Relevant Representation [RR-1451] also agrees that the "*LVIA follows industry standard guidance, including GLVIA3 (Guidelines for Landscape and Visual Impact Assessment) and relevant technical notes*". This position is evidenced in the draft SoCG with both parties submitted at Deadline 1.

2.2.3 The Site 8 LVM Report also follows the GLVIA methodology and subsequent guidance and clarifications. However, there are differences in both the methodological approach applied and Classic Landscape Architect's

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understanding of the Scheme. These have led to differences in the assessment results.

2.2.4 The following methodological differences have led to variations in the assessment of effects:

- Temporal scope;
- Visualisation Methodology;
- Study Area;
- Subdividing of landscape receptors and double counting of non-landscape factors;
- Misrepresentation of the Scheme and East Pye's **LVIA [APP-043]** result; and
- Cumulative effects.

Temporal Scope

2.2.5 The Site 8 LVM Report's temporal scope is different to the Applicant's **LVIA [APP-043]**. Paragraph 8.1.3 of the Site 8 LVM Report refers to the Scheme as having a duration of 40 years, stating that: "*40 years appears a short time span and therefore is considered 'reversible' in landscape and visual terms, this time span affects a whole generation of those receptors currently living within the area.*" What the LVM actually said was "It should be noted however that, although 40 years appears……

2.2.6 However, the operational lifespan of the Proposed Development presented within the Applicant's documentation is 60 years. As a result, the Site 8 LVM Report appears to have relied on an incorrect scheme duration when discussing reversibility and the temporal extent of effects.

40 years was the initial span when preparing our comments. A 60 year span infact strengthens the case that the scheme can barely be described as 'short term', particularly for those generations experiencing the scheme.

2.2.7 The Applicant's **LVIA [APP-043]** scenarios are based on the following temporal scope:

- Construction Phase Effects: 2028 – 2030. The Scheme assumes commencement of construction in 2028 and that the Scheme is built out over a 24-month period.
- Operation: 2031 – Year 1. This is the assumed date that the Scheme will be fully built out and operational.
- A future year of 2046 – Year 15 (i.e. 15 years post first operation of the Scheme) is considered for this LVIA chapter and supporting appendices i.e., 15 years after commissioning, which is the typical period for the

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establishment of landscape planting.

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- Decommissioning 2091. This is the assumed date of decommissioning based on the anticipated 60-year design life of the Scheme. Decommissioning is expected to take between 12 and 24 months and would be undertaken in phases. A 24-month decommissioning phase has been assumed for the purposes of the realistic worst-case assessment in the LVIA.

2.2.8 The Site 8 LVM Report did not assess mitigation using the same structured and comprehensive temporal framework as the Applicant's **LVIA [APP-043]**. Whilst the methodology refers to assessment at Construction, Year 1 and Year 15, the landscape assessment tables primarily compare Year 1 and Year 15 effects, whereas the visual assessment tables generally present Construction, Year 1 and Year 15 assessments. Consequently, the consideration of mitigation effectiveness is not consistently presented across all receptor groups.

This does not detract from the overall effects at Year 1 and Year 15, since it is generally acknowledged that Construction Phase effects are more severe and mitigation has little to no effect at this time. The Landscape Effects at Year 1 and Year 15 are still applicable and the conclusions of the LVM still stand.

2.2.9 Although the visual assessment tables identify effects at Construction, Year 1 and Year 15, the summary landscape effects tables and overall conclusions generally present a single residual judgement for each receptor. In several instances it is not immediately clear whether the summary conclusions relate to Year 1 effects, Year 15 residual effects, or an overall professional judgement combining both stages. This reduces transparency when comparing the assessment with the Applicant's **LVIA [APP-043]**, which clearly distinguishes effects at different stages of the Scheme's lifecycle.

Visualisation Methodology

2.2.10 The Applicant's **LVIA [APP-043]** uses representative view locations due to a large volume of receptors, whilst the Site 8 LVM Report assessed effects on individual receptors. Consequently, the assessments are not directly comparable. This difference is down to different assessment methodology rather than a fundamental disagreement regarding the nature of the Scheme's effects.

2.2.11 Whilst the Site 8 LVM Report relies heavily on photographic panels and illustrated viewpoints, the report does not appear to include a dedicated visualisation methodology equivalent to that provided within **ES Volume 3, Appendix 7.1 - Landscape and Visual Methodology [APP-118]**. It is unclear whether the visual representations have been produced in accordance with the principles set out in the LI *TGN 06/19: Visual Representation of Development Proposals* (Ref 11).

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2.2.12 Consequently, it is unclear how the extent of development, mitigation planting and visual effects shown within the images has been derived, which limits the transparency and evidential weight that can be attributed to the visual material.

It should be noted that due the last minute publiciaton of the revised application documents, additional photographs had to be quickly taken and assessed in order to meet the deadline, having previously prepared a document based on the scheme that we were presented with. Whereas the Applicant has had ample time throughout to the scheme to prepare and respond to consultation, despite the concerns brought up by Shotesham Parish and other interested parties, no forewarning of the altered design was given.

Where minor errors on the visual pages exclude the results for the lower sensitivity receptors, it is the higher sensitivity receptors and particularly the pedestrians and residents that are the important matter here and the results clearly show the effects at Year 1 and Year 15. The LVM is primarily set out to highlight any potential significant effects.

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2.2.13 The photographic panels are annotated with the statement that *"coloured blocks represent ground level areas with potential to have panels and will include mitigation which at present is indicative only"*. However, the annotations do not distinguish between areas representing potential development and areas representing mitigation. Furthermore, the mark-ups do not appear to consistently account for the filtering and screening effects of existing foreground vegetation.

2.2.14 Where the annotations are intended to represent the maximum extent of potential development, they do not appear to reflect proposed offsets from Public Rights of Way, landscape features and ecological constraints. In addition, the depiction of height is not applied consistently throughout the assessment. In some figures height is illustrated, whilst in others only the extent on the ground level is shown, and the basis upon which height has been represented is not explained. Consequently, it is difficult to determine how the annotated images relate to the Order Limits, parameters and proposed mitigation strategy, reducing their reliability as visual evidence.

2.2.15 Furthermore, the position that the mitigation shown is only indicative and is incorrect. The **Green Infrastructure Strategy [AS-005]** presents the range of environmental mitigation and enhancement areas which has been influenced by the environmental baseline. That Strategy is secured through the **Outline LEMP [APP-199]** and Requirement 7 of the **Draft DCO [AS-032]**. Areas for mitigation and enhancement on which the Environmental Statement relies are shown on **ES Volume 2, Figure 4.1 - Indicative Masterplan [APP-059]** and secured by Work No 7 on the **Works Plans [AS-002 and AS-03]** and as defined in the **Design Principles, Parameters and Commitment Document [APP-213]**.

I'm sure that their plans say that its indicative only..

2.2.16 The Applicant considers that the annotated visual material provides limited assistance in understanding the likely appearance of the Scheme and raises questions as to whether the respondent has consistently interpreted and applied the Scheme design parameters throughout the assessment.

The visuals provide a much more realistic interpretation of the scheme than any visuals provided by the applicant which clearly seek to draw the best conclusions.

2.2.17 The basis for viewpoint selection is also unclear. Whilst the assessment contains a large number of viewpoints, several appear to be closely related spatially and assess substantially the same route section. In the absence of a clearly defined viewpoint selection methodology, it is not possible to determine whether the viewpoints provide a balanced and representative sample of receptor experiences across Site 8.

The viewpoints are clearly selected from a walkover of the local area as set out in the methodology. Closely related photographs show the nature of the route where the Proposed Development can be seen along much of the scenic walk.

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2.2.18 For example, Viewpoints 7 and 14 appear to have been taken from the same location; Viewpoints 8 and 16 appear to be taken from almost the same location; and Viewpoints 9, 10, 11 and 17 appear to be taken from locations that are very closely related. As a result, the effects experienced by the same receptor may be recorded multiple times within the assessment, potentially giving disproportionate weight to particular views or route sections.

VP 7 shows views from the start of FP 19 where views of 8b are also visible and only a section of 8a is visible. VP14 shows the view up the PRoW showing the extent of Site 8a.

VP8 shows summer views and VP 16 shows winter views.

VP 9, 10 and 11 are required to show the full extent of the Site from the south of FP 19.

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2.2.19 In addition, whilst Viewpoint 15 is identified on the respondent's plan as representing PRoW 19, the viewpoint does not appear to be located on the Public Right of Way itself, but on the other side of the hedge. Nevertheless, it has been assessed as representative of the experience of users of PRoW 19. The Applicant does not consider this viewpoint to be representative of views available from the route or effects from this location.

VP 15 is described as 'This viewpoint is looking southeast-south across Parcel 8A from the corner in Market Lane at the small ford showing part of the northern section and part of the southern section beyond.'

Study Area

2.2.20 The Site 8 LVM Report does not appear to define a clear study area or explain the geographical extent over which landscape value and sensitivity have been assessed. Whilst the methodology refers generally to identifying a study area, no clear rationale is provided for the extent of the assessment or for the inclusion of landscape characteristics beyond the immediate site and its host Landscape Character Area.

In assessing the landscape value of Site 8, it is not standard or appropriate to confine the assessment to the agricultural field boundaries that define the proposed development site. These boundaries are not landscape character boundaries, and the site does not exist as an isolated landscape unit. Rather, it forms an integral and visually connected part of the wider Tas Valley landscape.

The site's immediate landscape context is defined by its physical, visual and character relationships with the surrounding landscape, rather than by an arbitrary distance from the site boundary. Site 8 occupies a prominent position on the sloping valley side, where its landform, agricultural character and openness contribute directly to the character and experience of the wider valley.

Within a few hundred metres of the site are significant landscape features, including the Tas Beck, substantial blocks of woodland, Ancient Woodland and the historic settlement of Shotesham and its Conservation Area. These are not simply features located near the site; they form part of the same recognisable landscape setting and contribute to its distinctive character, scenic quality, historic associations and sense of place.

The relationship between these features is particularly important. The valley landform, wooded slopes, agricultural fields, hedgerows and historic settlement collectively create a coherent and relatively intact rural landscape. Site 8 forms part of this landscape composition, rather than being a separate or self-contained area defined by its field boundaries.

This relationship is also experienced through the network of public rights of way, particularly Footpath 22, which crosses Site 8B and affords extensive views across the valley towards the wooded landscape to the west.

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Accordingly, my assessment of landscape value considers the site as part of the identifiable valley-side landscape to which it contributes, including those surrounding features that are physically, visually and perceptually connected to it.

This approach is consistent with the principles of GLVIA3 and Landscape Institute Technical Guidance Note 02/21, which recognise the importance of assessing landscape character and value at an appropriate geographical scale.

To restrict the assessment to the development field boundaries would artificially separate Site 8 from the wider landscape that gives it much of its character and value, and would risk understating both its landscape significance and its susceptibility to change.

2.2.21 As a consequence, the assessment frequently draws upon features and attributes from the wider landscape, including ecological, historic, recreational and settlement-related characteristics, when determining the value and sensitivity of Site 8. However, it is not always clear whether these attributes relate directly to the site itself, its immediate setting, or the wider study area. This makes it difficult to understand the extent to which the conclusions are derived from the characteristics of Site 8 as opposed to the wider landscape context.

2.2.22 The absence of a clearly defined study area reduces the transparency of the assessment process and makes it difficult to verify whether the value and sensitivity judgements have been applied consistently across the landscape receptors considered.

The Study area is shown within the Figures, the Site and its immediate context are as set out above in line with standard practice.

2.2.23 The Site 8 LVM Report states that the extent of visual impact and viewpoint selection was established through a Zone of Theoretical Visibility (ZTV) informed by desk study and field survey. However, the assessment does not appear to include a mapped Zone of Visual Influence (ZVI) / ZTV or a transparent explanation of how the extent of potential visibility was determined. Consequently, it is not possible for the reader to verify the basis upon which viewpoints were selected or whether the assessment provides a representative coverage of receptors within the wider landscape.

The Site walkover and local knowledge provided sufficient viewpoint information and was proportionate. I am not sure why EPS would want us to find further views. This is therefore irrelevant.

2.2.24 The absence of a presented ZVI / ZTV is particularly important given that the assessment relies heavily on a series of close-range viewpoints from within, or immediately adjacent to, Site 8. Whilst the methodology states that some viewpoints were discarded due to vegetation and topography, no visibility mapping is provided to demonstrate why certain viewpoints were selected

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and others omitted.

The ZVI was undertaken by EPS, the viewpoints shown are representative of the views and are proportionate to the assessment.

2.2.25 Whilst the methodology refers generally to a study area, the assessment does not clearly define the extent of the landscape study area used to assess landscape value, sensitivity and effects.

Explained above.

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2.2.26 In conclusion, the absence of a clearly defined study area and the lack of a presented ZVI / ZTV make it difficult to verify whether the viewpoint selection process and assessment framework have been applied systematically and consistently across the study area.

The study area is set out, the site and its immediate context explained and the lack of a formal ZVI does not affect the level or significance of the viewpoints shown. The assessment is proportionate and based on a response to EPS LVIA.

Subdividing of landscape receptors and double counting of non-landscape factors

2.2.27 The Site 8 LVM Report adopts a more granular assessment approach than the Applicant's **LVIA [APP-043]**, subdividing the landscape resource into a wider range of component parts and site-specific characteristics, including landscape character, natural heritage, ecology, Public Rights of Way, topography and drainage, built heritage, designation, land use, existing vegetation, Boudica Way and Shotesham Conservation Area. This approach provides a detailed understanding of the local environment. However, the use of a greater number of landscape receptors means that individual landscape attributes are assessed separately and as a result, the assessment identifies a larger number of significant adverse effects than the Applicant's **LVIA [APP-043]**, not necessarily because the impacts are fundamentally different, but because the assessment framework itself considers a wider range of individual receptors and effects. The Applicant's approach considered individual landscape attributes and component features as part of the overall assessment of the landscape character and features of the Site within the Order Limits, and assessed collectively as part of the landscape resource as a whole, instead of separate landscape receptors.

2.2.28 Furthermore, the assessment incorporates a number of matters that would ordinarily be assessed within separate technical chapter within an ES, including ecology, drainage and hydrology, heritage and agricultural land. Whilst these factors may contribute to an understanding of landscape value and context, they are not typically considered landscape receptors in their own right.

The LVM is NOT an ES chapter, it is a response to the EPS LVIA which they have had months to prepare.

2.2.29 The Site 8 LVM Report's conclusions on ecology, drainage and heritage rely on professional judgements outside their primary landscape qualification and specialism. Care is therefore required to ensure that such matters are used to inform landscape value where appropriate, rather than being effectively counted as separate landscape effects in addition to the conclusions reached by the relevant technical assessments. To the extent that these factors have influenced both the assessment of landscape value and the

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assessment of individual landscape receptors, there is a potential risk of double counting sensitivities and consequently elevating the overall significance of effects.

The applicant's own assessment confirms its high value and sensitivity and identifies major adverse effects. There appears to be common ground on these aspects.

Furthermore, Shotesham Action Group do not have the benefit of the team of experts. Having said that, the setting of heritage assets is a fundamental aspect of Landscape Architecture and the author is also an ecological assessor which sufficiently covers the aspects set out in the LVM.

2.2.30 Whilst the more detailed subdivision of receptors provides a useful alternative perspective on Site 8, the apparent increase in the number and significance of effects identified by the Site 8 LVM Report should be viewed

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in the context of its differing assessment methodology and the broader range of factors incorporated into the assessment framework.

See above.

Misrepresentation of the Scheme and East Pye's LVIA [APP-043] Results

2.2.31 The Site 8 LVM Report in some cases seems to have misrepresented the Applicant's position. Further to the previously discussed time span of the Scheme (section 2.2.5-2.2.7), and the inconsistency in representation of the Scheme in the illustrated viewpoints (section 2.2.12-2.2.14), the Site 8 LVM Report also misrepresents the Applicant's assessment results in its assessment. For example:

- Site 8 LVM Report has incorrectly combined the construction and operational Year 1 effects into a single assessment when presenting the Applicant's assessment result. These represent different stages of the Proposed Development and should be assessed separately. A single column cannot accurately present the distinct assessment outcomes for both phases.
- Site 8 LVM Report does not provide an accurate or like-for-like account of the Applicant's **LVIA [APP-043]** conclusions in Table A: Landscape Matters (Page 50-51 in the Site 8 LVM Report), the misrepresentation is detailed in Table 2.

Table 2.2 Misrepresentation of Applicant's Landscape Effects within the Site 8 LVM Report

Receptor	What Site 8 LVM Report presents as the Applicant's result	East Pye LVIA [APP-043] result	Misrepresentation
NCA 83	**Construction/ Year 1:** Moderate – Significant **Year 15:** Minor Adverse	**Construction:** Moderate, Significant. **Year 1:** Minor, Not Significant. **Year 15:** Minor, Not Significant	The combined heading obscures the fact that the significant finding applies only to construction.

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LCA A1 Tas Rural River Valley	**Construction/ Year 1:** Minor Adverse **Year 15:** Minor Adverse, *followed by an*	**Construction:** Moderate, Significant. **Year 1:** Minor, Not Significant.	Construction is misreported as Minor. The supposed discrepancy is created by comparing the construction summary with an operational

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Receptor	What Site 8 LVM Report presents as the Applicant's result	East Pye LVIA [APP-043] result	Misrepresentation
	asterisk alleging an inconsistency	**Year 15:** Minor, Not Significant	result. These are different assessment stages, not contradictory Applicant findings.
LCA B1 Tas Tributary Farmland	**Construction/ Year 1:** Moderate Significant **Year 15:** Major Adverse	**Construction:** Major, Significant. **Year 1:** Moderate, Significant. **Year 15:** Moderate, Significant	Table A appears to shift the Year 1 result into the combined column and the construction result into Year 15. The Applicant does not report a Major Year-15 effect.
Site 8 landscape character and features	Cell shown simply as "High" for Year 15	**Construction:** Major, Significant. **Year 1:** Major, Significant. **Year 15:** Moderate, Significant; the Applicant's sensitivity is High	"High" is the Applicant's sensitivity, not its reported level of effect.
Ecology	Year 15: Moderate beneficial	This is not assessed as a separate item in the Applicant's Assessment.	This is not assessed as a separate item in the Applicant's Assessment.
Topography and drainage	Year 15: Moderate beneficial	This is not assessed as a separate item in the Applicant's Assessment.	This is not assessed as a separate item in the Applicant's Assessment.
Boudicca Way	**Construction/ Year 1:** Minor Adverse **Year 15:** Minor Adverse	**Construction:** Minor, Not Significant. **Year 1:** Minor, Not Significant. **Year 15:** Minor, Not Significant	The combined heading obscures the fact that the significant finding applies only to construction.

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2.2.32 The Site 8 LVM Report overstates inconsistencies in the Applicant's evidence and is not a reliable transcription of the Applicant's assessment results. The correct assessment result is presented in Table 3: Landscape effect comparison between Site 8 LVM Report and the Applicant's **LVIA [APP-043]**.

Cumulative Effects

2.2.33 The Applicant's cumulative assessment follows established LVIA practice by identifying consented and committed developments in accordance with PINS guidance and then assessing cumulative effects on identified landscape and visual receptors.

2.2.34 Whilst the Site 8 LVM Report concludes that cumulative effects have been understated, it does not clearly identify the specific projects that are contributing to the alleged cumulative effects, nor does it provide a transparent receptor-based assessment of cumulative change. The conclusions are largely qualitative and do not consistently explain the magnitude of cumulative change or how significance has been derived. Consequently, whilst the assessment raises a legitimate concern regarding cumulative landscape change, the cumulative effects conclusions are difficult to verify and remain largely speculative.

This is not an ES chapter and as stated there are a large number of energy projects within the planning system across the whole of NCA 83. The cumulative effects on the NCA are therefore very tangible and must be a material consideration, since the overarching aims are to protect and enhance the NCA as a whole. It was for BEPS to fully address the cumulative effects. Effects on the PRoW were discussed within the LVM.

2.3 Differences in Professional Judgement

2.3.1 Site 8 LVM critiques the Applicant's **LVIA [APP-043]** as having to "*brushed over, ignored, understated or underestimated either value or effects*". This highlights the Applicant and Classic Landscape Architecture's differences in professional opinion.

2.3.2 However, it is important to note that the Site 8 LVM's assertion that the Applicant has understated the value of Site 8 is not wholly reflected in the Applicant's published baseline assessment. The Applicant assesses LCA A1 Tas Rural River Valley and Site 8's Landscape Character as having High value, High susceptibility and therefore High sensitivity, which represents the highest sensitivity category within the Applicant's methodology. Consequently, there does not appear to be a fundamental disagreement regarding the sensitivity of this particular landscape receptor.

There does not. The LVM purely points out where the Applicant has tried to understate the potential effects. **Furthermore, considering the HIGH VALUE, HIGH SUSCEPTIBILITY, AND THE HIGHEST SENSITIVITY CATEGORY WITHIN THE APPLICANTS METHODOLOGY, it brings us**

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back to the Site selection Process and the lack of a suitable Alternative Site Selection Process.

Assessment of Valued Landscape

2.3.3 As discussed in section 2.1.8 to 2.1.16, the Applicant does not consider Site 8 to be within a Valued Landscape, notwithstanding that the policy basis for Valued landscapes has been revoked with changes to the NPPF 2026 and the only reference to 'valued landscapes' in NPS EN-1 is to confirm that they "*should not be used in themselves to refuse consent, as this may unduly restrict acceptable development*" (paragraph 5.10.12).

See above comments on Valued Landscape. We absolutely disagree with this and stand myour assertion that the assessment of landscape value considers the site as part of the identifiable valley-side landscape to which it contributes, including those surrounding features that are physically, visually and perceptually connected to it.

This approach is consistent with the principles of GLVIA3 and Landscape Institute Technical Guidance Note 02/21, which recognise the importance of assessing landscape character and value at an appropriate geographical scale.

To restrict the assessment to the development field boundaries would artificially separate Site 8 from the wider landscape that gives it much of its character and value, and would risk understating both its landscape significance and its susceptibility to change.

Site 8 and its immediate context therefore possess demonstrable landscape value, this value has been recognised in the LVIA as well as the fact that the proposed development would cause significant harm to the qualities that make the landscape distinctive.

The removal of the specific "valued landscapes" wording from the revised National Planning Policy Framework does not mean that previously identified landscape qualities have disappeared or that the evidence establishing their value has become irrelevant.

Therefore:

1. **The previous landscape assessment remains material evidence.** A change in national policy does not invalidate the underlying assessment of landscape character, scenic quality, tranquillity or historic landscape features.

2. **The current national policy still requires landscape character and natural beauty to be considered.**

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3. **EN-1 provides an independent basis for challenging unacceptable landscape harm.** The national need for renewable energy does not automatically outweigh every adverse landscape effect.

There is also an important distinction between accepting that solar infrastructure will be visible and accepting that it should occupy a particularly sensitive landscape.

That distinction is central to our objection for the inclusion of Site 8.

EN-1 Paragraph 5.10.12 states:

'*Outside nationally designated areas, there are landscapes that may be highly valued locally*.'

It goes on to require particular attention to local planning policies founded on landscape character assessments. It is noted that locally valued status should not, by itself, be used to refuse consent. However,

Paragraph 5.10.6 of EN1 states that Projects should be carefully designed to minimise landscape harm. **This does not relate just to each parcel, it relates to the DCO as a whole and therefore there is indeed a requirement to provide the most appropriate scheme, and therefore to remove parcels from the Site where their character would be significantly adversely affected and where this was acknowledged by the Applicant at the outset.**

Paragraph 5.10.19 of EN1 states that Landscape and visual considerations should influence site selection and design from an early stage. **An important factor that has clearly not been taken into consideration through the whole Site design process with regard to Site 8.**

Paragraph 5.10.26 states that reducing a project's scale may be appropriate to mitigate visual and landscape effects. **We consider and respectfully request that Site 8 should be removed to mitigate visual and landscape effects.**

Paragraph 5.10.37 states that decision-makers should consider whether the project has been carefully designed to minimise landscape harm. We refer to the flawed Site selection process and the lack of suitable alternative site selection procedures.

The existence of a national need for renewable energy infrastructure does not, therefore, remove the requirement to assess the severity of local environmental harm.

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2.3.4 Site 8 LVM Report places emphasis on the conclusion that the Site and its surroundings comprise a Valued Landscape. This judgement influenced both the assessment of landscape sensitivity and the treatment of visual receptors. As a consequence, some receptors are considered within the context of experiencing a Valued Landscape rather than solely as users of a Public Right of Way. This results in a higher sensitivity judgement and, in turn, contributes to a greater number of significant adverse effects being identified, particularly within the visual assessment. This has the effect of increasing the significance of visual effects when compared with the Applicant's assessment.

Pedestrians are considered high sensitivity receptors. The value that is attached to their view is also in this case considered to be high regardless of whether the Site is or is not a Valued Landscape. The conclusion of the significance therefore remains the same and we stand by our results.

Mitigation

2.3.5 The Applicant's **LVIA [APP-043]** considers the effect from embedded mitigation measures, including the retention of existing vegetation, application of landscape buffers and exclusion of development, hedgerow restoration, woodland planting, ecological enhancement and the progressive establishment of mitigation planting over the operational life of the Scheme.

2.3.6 In contrast, the Site 8 LVM Report generally concludes that mitigation would be insufficient to address adverse effects, particularly in relation to landscape openness and the experience of Public Rights of Way users. Whilst this is a legitimate professional judgement, the assessment does not consistently provide a detailed comparative analysis of how mitigation effectiveness is expected to evolve between Year 1, intermediate operational stages and maturity. Consequently, the basis upon which the Applicant's mitigation assumptions have been discounted is not always fully evidenced, and some conclusions appear to rely primarily on professional opinion rather than a structured evaluation of mitigation performance over time.

The point made throughout the LVM is that the mitigation in itself would be harmful to the character and the experience of the PRoW with removal of open views. The reality which was not explained is that users of PRoW would either have views of the panels across the landscape or no views at all at Year 15 where these have been closed down by proposed mitigation. The need to discuss heights and species is therefore irrelevant with regard to the PRoW.

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3 Conclusion

3.1.1 The Applicant's **LVIA [APP-043]** identifies both Site 8 and its host Landscape Character Area B1 Tas Tributary Farmland LCA as being of high sensitivity and the design has responded to the constraints. The mitigation hierarchy for landscape and visual amenity has been applied throughout the design of the Scheme, and the landscape and visual impacts have been minimised as far as practicable. The design evolution of the Scheme in respect of landscape and visual context is set out in the **Design Approach Document [APP-212]**. During the design process, in addition to the standard offsets applied to features such as woodland and PRoW, the Applicant has:

- Excluded solar development near residential properties on Market Lane and Wash Lane.
- Excluded development near Ancient Woodland.

Much of Site 8 is within the LCA A1: Tas Rural River Valley - not just LCA B1 a material consideration.

Site design should not be restricted to each parcel but the overall Site selection process.

Site 8 should have been removed from the DCO at an early stage and certainly following an alternative site selection assessment.

3.1.2 In addition, the Applicant has proposed a range of mitigation measures, including hedgerow planting, hedgerow enhancement, and woodland planting as detailed in the **Green Infrastructure Strategy [AS-005]**. The Applicant will also provide a permissive route. As a result of the design evolution process, the developed area within Site 8 has been significantly reduced from the original proposal.

The proposed mitigation including hedgerow planting will adversely affect the open character of Site 8 and the open and panoramic views associated with it from the adjacent PRoW. Mitigation should, in itself not be detrimental to the character of the area.

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3.1.3 Although the effect on the landscape character of Site 8 remains significant, the overall significance of effect reduces from Major to Moderate in Year 15. Site 8 is sensitive in terms of its landscape characteristics, but the sensitivity has been considered through the design evolution and mitigation approach. The Applicant considers that the residual adverse landscape and visual effects on Site 8 have been minimised as far as practicable. The proposed implementation, management and monitoring of the landscape during construction and operation of the Scheme is secured in the **Outline LEMP [APP-199]** through a Requirement in the **Draft DCO [AS-032]**. Further mitigation measures relating to construction and decommissioning are secured in the **Outline CEMP [APP-196]** and **Outline DEMP [APP-198]**, respectively via the **Draft DCO [AS-032]**.

This shows that mitigation measures are not acceptable and that Site 8 should not and should never have been within the DCO Limits as it was recognized at a very early stage that the effects could not be mitigated.

3.1.4 The Applicant acknowledges that Site 8 is a sensitive landscape and that the Scheme would result in adverse landscape and visual effects, some of which remain significant following mitigation. These effects have been identified transparently within the Applicant's **LVIA [APP-043]** and have informed the iterative design process. The Applicant considers that the residual landscape and visual effects have been minimised as far as practicable.

Again, this shows that mitigation measures are not acceptable and that Site 8 should not and should never have been within the DCO Limits.

The Applicant acknowledges the highly sensitive Site but fails to look for alternative sites.

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3.1.5 The Applicant recognises that the Site 8 LVM Report provides a detailed review of Site 8 and raises a number of legitimate matters regarding local landscape sensitivity, Public Rights of Way and the experience of receptors

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within the Tas Beck Valley. However, the Applicant considers that many of the differences between the two assessments arise from differences in assessment methodology, assumptions regarding mitigation effectiveness and professional judgement, rather than any fundamental error in the Applicant's LVIA methodology (presented in **ES Volume 3, Appendix 7.1 – Landscape and Visual Methodology [APP-118]**). Both assessments are founded on the principles of GLVIA3 but apply those in different ways and at different scales. Tables 3 and 4 below presents the Landscape Effect and Visual Effect comparison of the two reports.

We disagree, we believe the Applicant is well aware of the constraints that the Site has but is refusing to remove Site 8 since the fundamental results remain the same for each assessment. The Applicant's failure to recognise the Site and its immediate setting as a Valued Landscape are fundamental to its insistence on retaining the Site within the DCO Limits and, although this is no longer covered by NPPF policy, the Applicant appears well aware of this important designation within policy NE-1. We assert and stand by our conclusions that the LVIA has understated its results to serve its own purposes and that further inspection of this matter would conclude this to be the case.

3.1.6 The Applicant and the Site 8 LVM Report fundamentally differ in their assessment of whether Site 8 and its surrounding landscape should be regarded as a Valued Landscape. The Site 8 LVM Report concludes that Site 8 and its wider context satisfy the criteria for a Valued Landscape and uses this conclusion to inform both landscape sensitivity and the assessment of effects. By contrast, whilst the Applicant acknowledges that Site 8 is a sensitive rural landscape with a number of positive attributes when assessed against the factors identified within Landscape Institute Technical Guidance Note 02/21, however it does not consider that the available evidence demonstrates that Site 8 meets the threshold of a Valued Landscape. Furthermore, as set out in section 2.1, the definition of a Valued Landscape under the NPPF policy has now been removed. As a result, the Applicant and the Site 8 LVM reach different conclusions regarding the value of the landscape resource and the sensitivity of receptors experiencing it. This distinction is important because the Site 8 LVM's conclusion that the Site forms part of a Valued Landscape influences a number of subsequent judgements within the assessment, including landscape and visual receptor's value, sensitivity and significance of effect.

As above, high sensitivity receptors and high sensitivity landscapes reach the same level of harm, whether or not the landscape is a Valued one. The value that walkers attach to the view on both PRoW 22 and PRoW cannot be disputed. We however stand by our determination that the Site is a Valued Landscape as above and set out clearly within LVM 4.10.

3.1.7 Furthermore, the Applicant considers that aspects of the Site 8 LVM Report introduce uncertainty regarding the interpretation of the Scheme, including the stated operational lifespan of the development, the presentation of visual material, the absence of a clearly defined study area and visibility mapping, and the manner in which the Applicant's assessment findings are

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reproduced within the Site 8 LVM report. The Applicant also notes that the Site 8 LVM Report adopts a more granular receptor framework and incorporates a number of matters that are assessed separately within other technical disciplines of the **Environmental Statement [APP-036 to 056]**, which contributes to a greater number of significant effects being identified.

The operational lifespan does not change the results of the LVM, indeed if anything, the level of harm is extended since the residual effects are considered at Yea 15 only within the LVM. The visuals provide a much clearer understanding of the effects of the Proposed Development than the limited LVIA visuals. The assessment was not an ES Chapter but a response. The study area was clearly defined in the figures, and visibility was assessed during several site visits and a fundamental understanding and knowledge of the local landscape.

The Applicant does not agree with the conclusion that Site 8 should be removed from the Order Limits. Whilst Site 8 forms part of a sensitive rural landscape, the Applicant's assessment identifies the landscape sensitivity, assesses the likely effects in accordance with established guidance and incorporates mitigation measures designed to avoid, reduce and offset effects wherever practicable. The Applicant's position is that the Applicant's **LVIA [APP-043]** provides a robust and proportionate assessment of the likely landscape and visual effects of the Scheme.

Again, the Site is highly sensitive, and adverse effects remain significant and cannot be mitigated. Due to these factors; which were ascertained at a very early stage of the design process, alternative Sites should have been sought.

Contrary to Policy EN-1, Site design (DCO Limits) has not been adequately undertaken. Should the scheme be approved, we therefore respectfully request that a robust and transparent Alternative Site Selection Process be carried out if further land is required and that Site 8 be removed from the DCO.

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3.1.8 Importantly, national policy recognises that the retention of land as part of a Scheme is important to protect functionality even if visual and landscape effects are predicted. Paragraph 5.10.26 of NPS EN-1 sets out that "*Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, electricity generation output*". The Applicant does not consider there to be 'exceptional circumstances' (as required by the policy test) to justify the removal of Site 8. This would not have a very significant benefit (recognising the lack of Value Landscape) and would represent more than a small loss in function.

As above.

3.1.9 The Applicant considers that the Site 8 LVM Report represents an alternative interpretation of landscape and visual effects rather than evidence that the Applicant's assessment is fundamentally deficient. The principal areas of disagreement relate to the interpretation of landscape value, susceptibility, mitigation effectiveness and significance of effect. These matters are ultimately questions of professional judgement. For the reasons set out within the **Environmental Statement [APP-036 to 056]**, the **Planning Statement [APP-209]** and this response, the Applicant considers that the residual adverse landscape and visual effects associated with Site 8 are acceptable in the planning balance and do not justify the removal of Site 8 from the Scheme.

We would respectfully request that a Site visit is undertaken to acknowledge the enhanced value of Site 8 and this, taken together with the associations, designated features and important elements within the immediate context which all combine to create the distinctive character of the Site can be understood.

We also respectfully request that the fundamental issues with the alternative site selection be addressed.

comments

Table 3.1 Landscape effect comparison between Site 8 LVM Report and the Applicant's LVIA [APP-043]

Landscape receptors (Based on Site 8's LVM)	Applicant LVIA [APP-043]					Site 8 LVM Report		
	Sensitivity	Construction Phase	Operation Year 1	Operation Year 15	Decommission	Sensitivity	Construction/ Year 1	Year 15
Boudicca Way	High	Minor, Not Significant	Minor, Not Significant	Minor, Not Significant	Minor, Not Significant	High	**Major Moderate-Adverse Significant**	**Moderate Adverse Significant**
NCA 83 South Norfolk and High Suffolk Claylands	Medium	**Moderate Significant**	Minor, Not Significant	Minor, Not Significant	**Moderate Significant**	Medium	**Moderate Adverse Significant**	Moderate Minor Adverse
LCA A1 Tas Rural River Valley	Medium	**Moderate Significant**	Minor, Not Significant	Minor, Not Significant	Minor, Not Significant	High	**Major Adverse Significant**	**Major Adverse Significant**

LCA B1 Tas Tributary Farmland	High	**Major Significant**	**Moderate Significant**	**Moderate Significant**	**Moderate Significant**	High-Medium	**Major Moderate-Adverse Significant**	**Major Moderate-Adverse Significant**
Site 8 landscape character and features	High	**Major Significant**	**Major Significant**	**Moderate Significant**	**Major Significant**	High	**Major Adverse Significant**	**Major Adverse Significant**
Ecology	Matters assessed in **ES Chapter 8 Ecology and Biodiversity [APP-044]**, effect on landscape concluded as part of Site 8 landscape character and features					High	**Major Moderate-Adverse Significant**	**Major Moderate-Adverse Significant**
Natural Heritage	Matters assessed in **ES Chapter 10 Cultural Heritage [APP-046]**					High	**Major Adverse Significant**	**Major Adverse Significant**
Built Heritage	Matters assessed in **ES Chapter 10 Cultural Heritage [APP-046]**					High	Minor Adverse	Minor Adverse Negligible
Public Rights of Way Site 8	Effect on PRoW is assessed individually in **Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP-149]**, effect on landscape concluded as part of Site 8 landscape character and features					High	**Major Adverse Significant**	**Major Adverse Significant**

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Landscape receptors (Based on Site 8's LVM)	Applicant LVIA [APP-043]					Site 8 LVM Report		
	Sensitivity	Construction Phase	Operation Year 1	Operation Year 15	Decommission	Sensitivity	Construction/ Year 1	Year 15
Topography and drainage	Matters assessed in **ES Chapter 15 Soils and Agricultural Land [APP-051]** and **Chapter 15 Ground Conditions [APP-052]**, effect on landscape concluded as part of Site 8 landscape character and features					High	**Major Moderate-Adverse Significant**	**Major Moderate-Adverse Significant**
Designations	No landscape designation falls within Site 8 as the Applicant does not consider Site 8 as Valued Landscape					High	**Major Moderate-Adverse Significant**	**Major Moderate-Adverse Significant**
Land use	Matters assessed in **ES Chapter 15 Soils and Agricultural Land [APP-051]**, effect on landscape concluded as part of Site 8 landscape character and features					High	**Major Adverse Significant**	**Major Adverse Significant**
Existing vegetation	Impact recorded in **Appendix 7.10 - Preliminary Arboriculture Impact Assessment [APP-150]**, effect on landscape concluded as part of Site 8 landscape character and features					High	Moderate Minor Adverse	Potentially Moderate Adverse Significant
Shotesham Conservation Area	Matters assessed in **ES Chapter 10 Cultural Heritage [APP-046]**					High	**Moderate Adverse Significant**	**Moderate Adverse Significant**

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Table 3.2 Visual effect comparison between Site 8 LVM and the Applicant's LVIA [APP-043]

Visual Receptor (Based on Site 8's LVM)	East Pye LVIA result (The Applicant's LVIA assesses effects from representative viewpoints rather than individual receptors. The receptor-level effects shown below have therefore been inferred from the representative viewpoint assessment and are provided for comparison purposes only. They should not be interpreted as direct LVIA assessment results)					Site 8 LVM result	
	Representative View Location	Construction	Operation Year 1	Operation Year 15	Decommission	Representative View Location	Residual Effect *(The Site 8 LVM reports a single overall residual effect for each receptor, despite separately assessing Construction, Year 1 and Year 15 effects within the visual assessment tables. The basis upon which the residual effect has been derived is not always clear.)*
PRoW 22	VL6	**Major Significant**	**Major Significant**	**Moderate Significant**	**Moderate Significant**	VP4, VP12, VP19, VP20, VP22	**Moderate Adverse to Major Adverse, Significant**
PRoW 19	VL7	Minor Not Significant	Minor Not Significant	Negligible Not Significant	Minor Not Significant	VP7–VP11, VP14–VP17	**Major Adverse, Significant**
PRoW 16	VL3, VL5	VL3: Minor Significant VL5: **Major Significant**	VL3: Minor Not Significant VL5: **Moderate Significant**	VL3: Negligible Not Significant VL5: Minor Not Significant	VL3: Negligible Not Significant VL5: Minor Not Significant	VP2, VP3, VP5, VP6	**Moderate Adverse to Major–Moderate Adverse, Significant**
PRoW 17/Boudicca Way	VL1, VL5 and VL9	VL1: No Change VL5: **Major Significant** VL9: Minor Significant	VL1: No Change VL5: **Moderate Significant** VL9: Minor Not Significant	VL1: No Change VL5: Minor Not Significant VL9: No Change	VL1: No Change VL5: Minor Not Significant VL9: No Change	VP1	**Major–Moderate Adverse, Significant**
PRoW 18	VL2	**Moderate Significant**	**Moderate Significant**	**Moderate Significant**	**Moderate Significant**	VP23	**Moderate Adverse, Significant**
Baxters Lane	VL11	**Major to Substantial Significant**	**Major Significant**	**Moderate Significant**	**Moderate Significant**	VP18, VP19	**Moderate Adverse to Major Adverse, Significant**
Market Lane	VL3, VL4	VL3: Minor, not significant VL4: **Major Significant**	VL3: Minor, not significant VL4: **Major Significant**	VL3: Negligible Not Significant VL4: Negligible Not Significant	VL3: Negligible, not significant VL4: Negligible, not significant	VP4, VP14, VP15	**Major Adverse, Significant**

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Visual Receptor (Based on Site 8's LVM)	East Pye LVIA result (The Applicant's LVIA assesses effects from representative viewpoints rather than individual receptors. The receptor-level effects shown below have therefore been inferred from the representative viewpoint assessment and are provided for comparison purposes only. They should not be interpreted as direct LVIA assessment results)					Site 8 LVM result	
	Representative View Location	Construction	Operation Year 1	Operation Year 15	Decommission	Representative View Location	Residual Effect *(The Site 8 LVM reports a single overall residual effect for each receptor, despite separately assessing Construction, Year 1 and Year 15 effects within the visual assessment tables. The basis upon which the residual effect has been derived is not always clear.)*
Fylands Road (resident)	No representative view location selected as this falls out of the ZTV visibility using DSM.					VP24	Moderate–Minor Adverse, Not Significant
Residents / pedestrians near Kings Farm	VL11	**Major to Substantial Significant**	**Major Significant**	**Moderate Significant**	**Moderate Significant**	VP21	**Major Adverse, Significant**

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Appendix A Site Selection Process

A.1 Introduction

A.1.1 This Appendix A – Site Selection Process, has been prepared in response to Section 7 of the "East Pye Solar – Site 8, Shotesham – Landscape & Visual Matters" (hereafter referred to as the 'Site 8 LVM Report'), which relates to the Applicant's site selection process, specifically in relation to Site 8.

A.1.2 This Appendix makes reference to the **Site Selection Assessment [APP-215]** which details the Applicant's approach to site selection and consideration of relevant alternatives.

A.1.3 Section 2.3 of NPS EN-3 sets out the factors influencing site selection and design for renewable energy generation stations. Section 2.10 of NPS EN-3 sets out, at paragraphs 2.10.10 – 2.10.64, the factors that are likely to influence the key considerations involved in the siting for solar photovoltaic generation. It is noted that these paragraphs do not include reference to landscape and visual matters beyond consideration of the proximity to dwellings. As set out at Paragraph 5.1.7 of the **Site Selection Assessment [AP-215]**, the factors influencing site selection directly informed the environmental, planning, and operational considerations that were applied in the site selection.

A.1.4 Site 8 is considered to be suitable against these factors, as summarised below:

- Irradiance and Topography: 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. The land use of Site 8 means that it is relatively uncovered, with limited overshadowing. Solar PV panels have been excluded from areas of steeper topography within Site 8 (see section A.6);
- Network connection; Site 8 is located within 20km of the Point of Connection;
- Proximity to dwellings; Residential properties are located along Brooke Road, with the closest located approximately 220m north. Shotesham is located further along Brooke Road approximately 1km north-west. There is an isolated dwelling along the boundary of Sub Site 8B, along Market Lane and further dwellings 150m south of Sub-Site 8B. Through the design process, the Applicant has excluded solar development from the rising landform near residential properties on Market Lane and Wash Lane due to visibility.

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- Agricultural land classification and land type: Please see section A.2 for a more detailed discussion of agricultural land classification in response to the Site 8 LVM Report.

- Accessibility: Sites 8A and 8B benefit from existing access points, including access from Market Lane, Wash Lane and Brooke Road, which connect to the wider highway network via the B1332 and B1527. An internal haul route is proposed within Site 8A, reducing the extent to which construction traffic would need to travel on Market Lane. Consequently, vehicle movements between Sites 8A and 8B would be limited to a more restricted section of Market Lane, between Access 49 serving Site 8A and Access 50 serving Site 8B, where required. Construction traffic would be managed in accordance with the **Outline CTMP [APP-201]**, which includes a range of measures to minimise impacts on the local highway network and maintain the safe operation of surrounding roads.

- Public Rights of Ways: Site 8 is crossed by PRoW. Impacts to PRoW are assessed within **ES Volume 3, Appendix 7.9 – Public Rights of Way Visual Amenity Assessment [APP-149]** and **ES Volume 1, Chapter 11 – Transport and Access [APP-047].** PRoW within Site 8 have been retained, and are anticipated to remain open to users wherever practicable throughout the construction period, with management measures for temporary closures set out within the **Outline PRoWPPMP [APP-203]**. A permissive path is proposed within Sub-Site 8B, connecting Market Lane to Shotesham FP22, which crosses the central part of Sub-Site 8B. This new path will create a pedestrian link through the Sub-Site, providing access to FP22 from Shotesham FP19 to the south, strengthening the network of greenways and active connections within the landscape.

- Security and Lighting: The Scheme includes deer fencing and steel palisade fencing, as well as internal-facing CCTV systems installed around the perimeter of the Sites. In line with NPS EN-3 Paragraph 2.10.40, steel palisade fencing will be externally finished to be in keeping with the prevailing surrounding environment, with a maximum height of 3m. Lighting is not required within the Solar PV Arrays for the operational phase.

A.1.5 Site 8 was considered suitable against the following environmental and technical considerations:

- Ecology and Biodiversity: The majority of Site 8 is used for intensive arable farming. Site 8 is not with in a statutory ecological designation. Statutory designations in proximity include Shotesham-Woodton Hornbeam Woods SSSI 140m north of Sub-Site 8B and Shotesham Common SSSI located 1.8km north-west of Sub-Site 8B. Market Lane

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RNR is adjacent to Sub-Site 8A. Pye's Covert & Privett Plantation CWS is located 180m north of Sub-Site 8B. Brooke Road RNR is located 490 m north of Sub-Site 8B. Ringers Grove ancient woodland is adjacent to Sub-Site 8A. **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** reports no significant effects to international, national, and local statutory designated sites, County Wildlife Sites, or Roadside Nature Reserves during construction and operation.

- Landscape and Visual: No landscape designation falls within Site 8 as the Applicant does not consider Site 8 to be a Valued Landscape. Solar PV Arrays have been set back and reduced in parts of the Sites, for example, where the landscape is more visually prominent owing to the topography and within a more sensitive landscape area, such as at Sub-Site 8B. Part of Site 8 lies within the saved policy on Rural River Valleys Policy 4.5 of the DMPD;
- Land Use: The majority of Site 8 and the surrounding area is used for intensive arable farming.
- Cultural heritage; There are no Scheduled Monuments, Registered Historic Parks and Gardens, or Registered Battlefields within, or in close proximity to Site 8. Several Grade II* Listed Buildings lie between 1 and 2km of Site 8. Solar PV arrays were removed as part of the design process from Sub-Site 8B owing to the prominence of the landscape and listed buildings.
- Flood Risk; There is a narrow corridor of Flood Zone 2 and 3 within Site 8A, and a small area in Sub-Site 8B. Solar panels are proposed to be located outside of these areas in line with the sequential test.
- Site Size: Site 8 consists of an area of approximately 55.9 ha and therefore exceeds the 40ha of contiguous land considered by the Applicant to be an appropriate minimum site size threshold. Site 8 is located in relative proximity to Sites 7 (connected by CRC10) and 9 (connected by CRC13);
- Field Shading; Site 8 consists of open rural fields with limited tree cover and woodland parcels. Therefore, overshadowing is not considered to be an issue.

A.2 Agricultural Land

A.2.1 Paragraphs 7.2 to 7.7 of the Site 8 LVM Report refer to Stages 1 and 2 of the **Site Selection Assessment [APP-215]** in relation to agricultural land, which set out the area of search and the planning and environmental constraints considered in the site selection, in line with NPS EN-1 and EN-3.

A.2.2 NPS EN-3 Paragraph 2.10.21 states that: '*While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land,*

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brownfield land, contaminated land and industrial land. 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. 'Best and Most Versatile agricultural land is defined as land in grades 1, 2 and 3a of the Agricultural Land Classification (ALC)'.

A.2.3 In line with this policy, Paragraph 4.3.6 of the **Site Selection Assessment [APP-215]** states that: '*the site selection process initially sought to exclude land that the available data identifies as being within an agricultural land classification category that is, or includes, best and most versatile land*'. For the purposes of Stage 2, all ALC grade 1, 2 and 3 land was excluded from the search area.

A.2.4 Paragraphs 4.3.7 and 4.3.10 of the **Site Selection Assessment [APP-215]** explain how Natural England's 1970s Provisional Agricultural Land Classification Map and Predictive Likelihood of BMV Maps were considered by the Applicant. As concluded at 4.3.10, the Order Limits was identified as likely to be some of the lowest quality land in the wider area. **ES Volume 1, Chapter 15 – Agricultural Land and Soils [APP-051]** sets out that the only land shown as falling into the low likelihood of BMV is bordering the River Witham and Yare, plus an area near Framlingham Earl. Broadly, the 'Likelihood of BMV land' mapping shows large areas of 'Higher likelihood of BMV' along Hempnall Beck, west of Long Stratton/ the A140, and north of Great Moulton. Given the very limited area of 'Low Likelihood of BMV', the Sites therefore mostly fall within the lowest category for the likelihood of BMV land in the 20km area, and have avoided large areas identified as having a higher likelihood of BMV land, with the exception of limited areas within Site 4 and Sub-Site 8B. The now outdated Provisional Agricultural Land Classification Map shows the Scheme to be mostly within undifferentiated Grade 3 and Grade 4 land (the poorest quality land within Norfolk), with a small area of Grade 2 within Site 8.

A.2.5 Paragraph 7.7 of the Site 8 LVM Report states: '*The Site selection process therefore fundamentally fails at Stage 2 of the process, and the Site as a whole should not have been considered further where East Anglia is widely acknowledged as having the best arable land in the country*'.

A.2.6 The Applicant notes the position established by national policy that the presence of BMV land does not preclude solar development. Paragraph 2.10.22 of NPS EN-3 states: '*Whilst the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land, or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered . . .*' Paragraph 2.10.23 recognises that developments will likely use some agricultural land.

A.2.7 The mapping within the **Site Selection Assessment [APP-215]** (see Inset 7 of the Site Selection Assessment, and Figures 6 and 7 of Appendix B) show

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that there are very limited areas of land which are not within ALC Grades 1, 2, and undifferentiated Grade 3 within the wider search area. The Order Limits were therefore identified as likely to be some of the lowest quality land relative to the wider search area. It is evident that, in respect of initial site selection within a reasonable distance of the grid connection point, no land is identified as likely to be of a lower quality or overall proportionate lower mix of BMV quality land.

A.2.8 As detailed in the **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**, an ALC survey of the Sites was undertaken. This confirmed that land within the Sites of the Order Limits was a mix of mostly Grades 2 and 3a, with areas of Grade 3b, and small areas of Grade 4. BMV quality land within the Sites amounts to 829.1ha (78.7% of the Sites only; or 68.4% of the Order Limits).

A.2.9 Along within many factors, BMV quality land was a consideration in the design evolution of the Scheme. During the design process, the Applicant sought to, where practicable, reduce the use of BMV quality land within the Solar PV Array areas, including for example, removal of pockets of BMV quality land from the Solar PV Arrays within Site 3, Sub-Site 5B, Site 6 and Sub-Site 8A during the design process. Sub-Site 3A was entirely removed from the Order Limits owing to several factors, including its agricultural land quality (largely Grade 2). Such examples are set out in the **Design Approach Document [APP-212]**.

Predictive ALC Mapping

A.2.10 Paragraph 7.9 of the Site 8 LVM Report states: '*the predictive BMV land assessment used by the Applicant was based on assessments carried out in 2001, and that this information is out of date and is superseded by an up-to-date study by Cranfield Environment Centre in July 2025 - RDE118 Development of a Predictive Agricultural Land Classification Map for England Final Report (draft) Cranfield Environment Centre 31 July 2025.*'

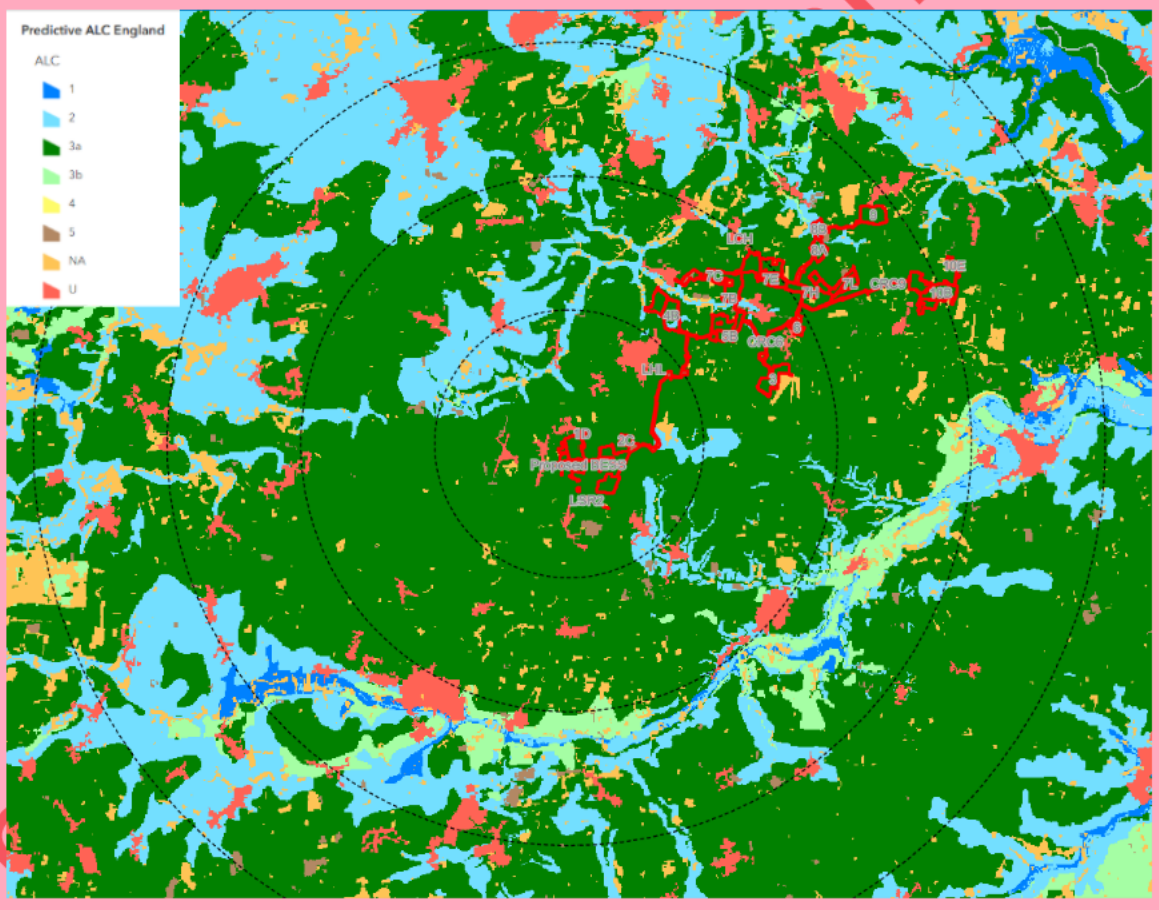
A.2.11 The Predictive Agricultural Land Classification Map (Defra, 2026) for England was published by Defra in May 2026, after the site selection process was undertaken and the application was submitted, and supersedes Natural England's 1970s Provisional Agricultural Land Classification Map. The strategic-scale mapping distinguishes between Grades 3a (BMV) and 3b agricultural land. As set out in the accompanying "Final Report: Development of a Predictive ALC Map for England" (Cranfield Environment and Agrifood, July 2025) much of Norfolk has been upgraded in the estimates and most of Norfolk is now predicted BMV. It is estimated that around 94% of Norfolk's agricultural land is predicted to be of BMV quality. The findings for Sites 1 – 10 and the BESS (Table 15-6 of **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**) are therefore in line with the revised predictive ALC map.

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A.2.12 Paragraph 7.15 of the Site 8 LVM Report states '*an up-to date assessment would show that most of the DCO would fall within BMV land with a high potential to be Grade 3a*.' However, it is to be noted that the Predictive ALC Map for England is still only a prediction. An ALC field survey is still required to determine the land quality. The Applicant has provided a detailed **ALC survey [APP-182]** and a suite of plans **[AS-010]**. The outcomes of this are reported in **ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051]**. The updated estimates within the Predictive ALC Map mean that, for any energy development of this nature there will be a need to use land of BMV quality.

A.2.13 An extract from the Predictive ALC Map is shown on **Figure 1** below in relation to the Scheme and a 20km radius from the proposed National Grid Substation south of Great Moulton.

Figure 1: Predictive ALC (2026) Mapping, the Order Limits, and 20km radius from the Point of Connection



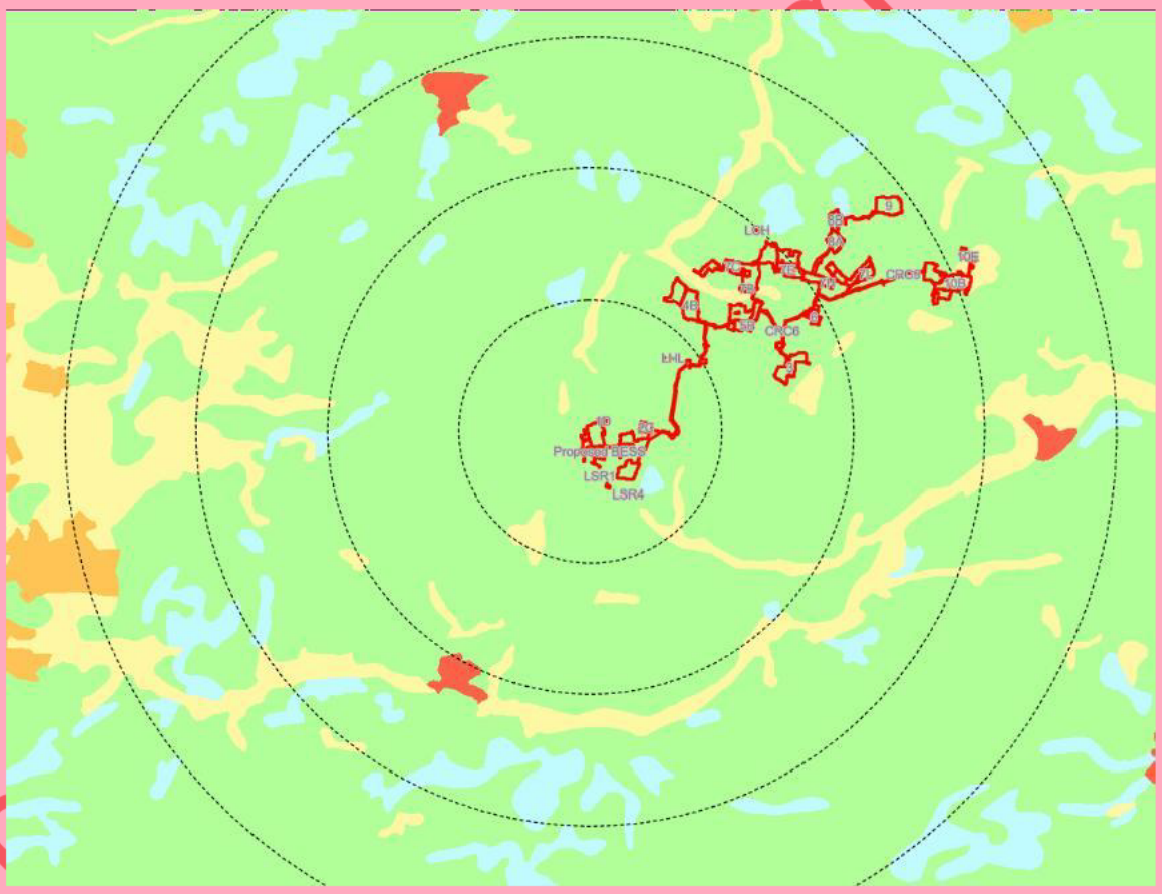
A.2.14 In comparison with Natural England's 1970s Provisional Agricultural Land Classification Map, shown on **Figure 2,** it is clear that the vast majority of the undefined Grade 3 (3a or 3b) land within 20km of the Point of Connection shown by the previous mapping is shown to be ALC Grade 3a (BMV) by the Predictive ALC Map. Non-BMV agricultural land (Grades 3b, 4 and 5, shown in light green, yellow, and brown on the mapping) are notably limited across

the wider region. The Order Limits falls outside of broader extents of ALC Grade 2 across the wider search area.

A.2.15 The vast majority of the Order Limits is identified as ALC Grade 3a by the Predictive mapping, with limited areas of ALC Grade 2 identified as overlapping with Sub-Sites 4B, 8B, and 8A, broadly consistent with the areas identified within the 'Likelihood of BMV mapping' to as areas with a higher likelihood of BMV. Small areas of ALC Grade 4 (non-BMV) land are also shown in Site 10.

A.2.16 Therefore, while the Predictive Mapping was not available at the time of site selection, it supports that, given the scale of the Scheme and prevalence of BMV land identified within 20km of the Point of Connection is identified, site selection has necessarily involved BMV land, but has avoided areas likely to be of a higher ALC grade.

Figure 2 – Provisional Mapping, the Order Limits, and 20km radius from the Point of Connection



A.3 Site 8

A.3.1 In relation to Site 8, Paragraph 7.17 of the Site 8 LVM Report states that the mapping used for site selection shows that Site 8 is likely to be BMV land.

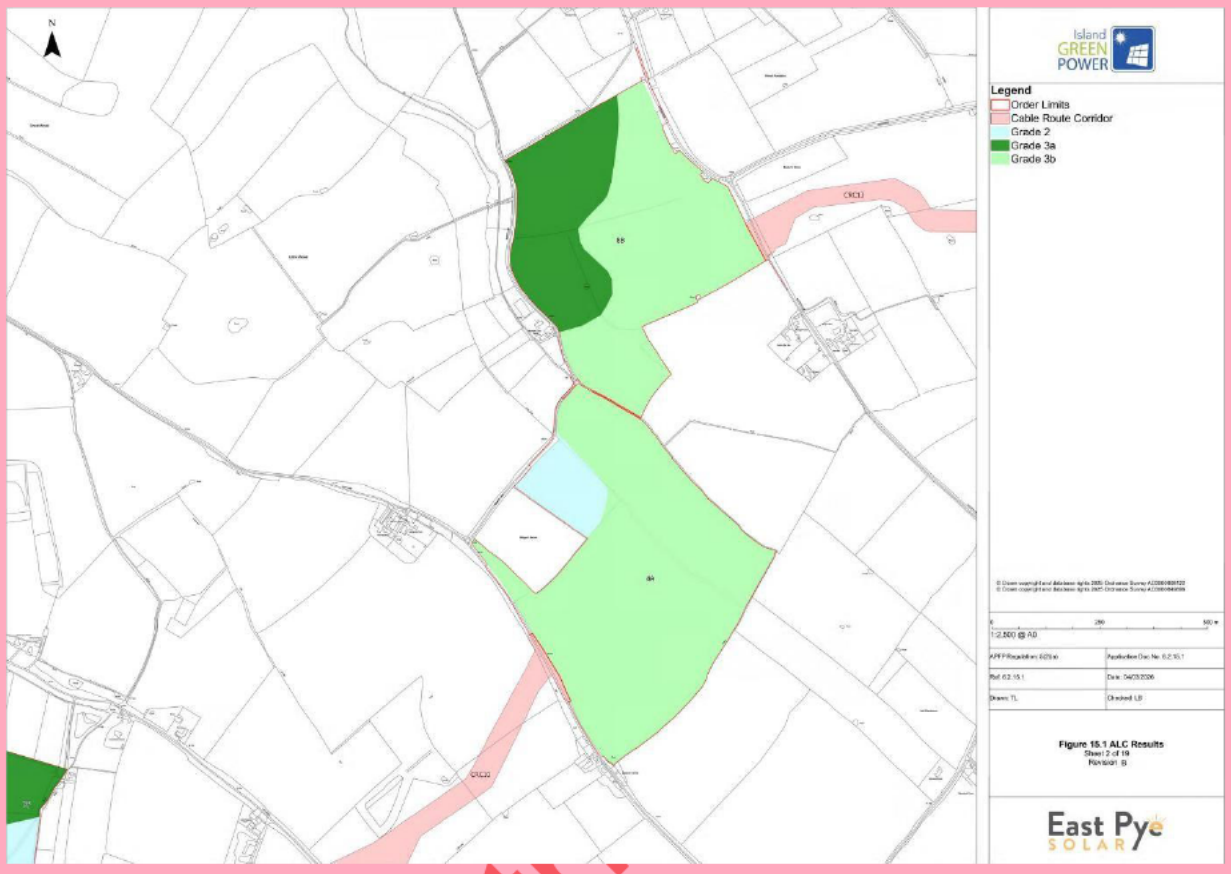
A.3.2 It is recognised in Paragraph 4.3.7 and 5.1.7 of the **Site Selection Assessment [APP-215]** that Natural England's 1970 Provisional Agricultural Land Classification identifies areas of ALC Grade 2 land within the Order Limits, including Site 8, although the vast majority of the Order Limits is identified as predominantly undifferentiated Grade 3.

A.3.3 Paragraph 5.1.7 of the **Site Selection Assessment [APP-215]** recognises that the 'Likelihood of BMV land' mapping indicates that the majority of the Order Limits has a moderate likelihood of BMV land (20 – 60% area BMV) which is predominant across the wider area, and acknowledges that '*Based on the Natural England ALC maps the majority of the Scheme is comprised of Grade 3 agricultural land, with some smaller sections of Grade 4 and a very small sliver of Grade 2 land within Site 8*'. This is consistent with national policy (Paragraph 2.10.21 and 2.10.22 of NPS EN-3) which acknowledges that the presence of BMV land does not preclude solar development.

A.3.4 As set out above, detailed ALC surveys have been undertaken for the land within the Scheme (see **ES Volume 3, Appendix 15.1 – Agricultural Land Classification [APP-182]** and **ES Volume 2, Figure 15.1 – ALC Results [AS-010]**. Parcels 8A and 8B are mostly classified as subgrade 3b moderate quality agricultural land, as shown on the excerpt below. Parcel 8A is mostly subgrade 3b with only a modest patch of Grade 2, and Parcel 8B is subgrade 3b with an area of subgrade 3a. This is shown below. Solar PV arrays are not proposed within the area of ALC Grade 2 land within Sub-Site 8A, and the ALC Grade 3a land within Sub-Site 8B.

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Figure 3: Extract from ES Volume 2: Figure 15.1 – ALC Results [AS-010]



A.3.5 An assessment of the potential significant effects to BMV is set out within **ES Volume 1, Chapter 15 – Agricultural Land and Soils [APP-051]** which concludes a moderate adverse significant permanent construction phase effect to BMV from the tracks, NG Substation, Project Substation and BESS areas, and minor adverse effect from temporary construction compounds.

A.3.6 Further justification for the inclusion of BMV land within the Order Limits is set out within Paragraphs 8.3.176 to 8.3.189 of the Planning Statement.

A.4 Potential Development Areas and Alternative Development Zones

A.4.1 Paragraphs 7.28 and 7.35 of the Site 8 LVM Report refer to the consideration of potential alternatives to the Scheme following the identification of the Point of Connection at the National Grid Substation south of Great Moulton.

A.4.2 As set out at paragraph 4.6.1 of the **Site Selection Assessment [APP-215]**, the Sites which had already been identified at the time a Point of Connection to Norwich Main was being considered all lie within 20km from the PoC location south of Great Moulton, were considered to be suitable against environmental, technical, operational constraints with reference to NPS EN-1 and EN-3, and were therefore considered to still to be viable.

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A.4.3 Notwithstanding, Stage 5 of **Site Selection Assessment [APP-215]** identifies potential alternative solar sites within a 20km radius from the National Grid Substation south of Great Moulton (Potential Development Areas (PDA's)) for the location of the Scheme, by applying the key operational criteria for large scale solar development – site size and land assembly; topography; and environmental constraints, i.e. criteria that were considered for the original land identified at the time Norwich Main was under consideration and which accord with EN-3. The search area is shown on Figure 9 – Search Area from the Point of Connection at Appendix B of the **Site Selection Assessment [APP-215]**.

A.4.4 A principal driver for the consideration of these alternatives was to explore whether there were any potentially non-BMV (excluding all of undefined ALC Grade 3 land, given its potential to be Grade 3a (BMV)) sites within 20km of the new PoC south of Great Moulton. All of the PDA's identified constitute non-BMV land of ALC Grade 4 quality, as identified by the Provisional ALC Mapping. Therefore, while Paragraph 7.29 of the Site 8 LVM Report states that: '*the Site selection criteria as set out above during Stages 1-3 has become redundant, since there is no longer the requirement to be within a 20km distance from the Norwich Main Substation, an alternative Site outside the potential areas of BMV land and on highly constrained sites should have been sought',* the **Site Selection Assessment [APP-215]** demonstrates appropriate and proportionate consideration of potential non-BMV PDAs to the Scheme.

A.4.5 The Predictive ALC Mapping (Defra, 2026) referred to by the Site 8 LVM Report now identifies these PDAs to be a mix of BMV agricultural land (Grades 2 and 3a). As previously discussed, the Predictive ALC Mapping demonstrates very limited areas across the 20km search area that are of a lower than ALC Grade 3a. Therefore, it is not considered necessary to consider these PDAs in any further detail, given that they are no longer identified as being lower grade agricultural land in line with NPS EN-3, notwithstanding the other environmental constraints identified within the **Site Selection Assessment [APP-215]**.

A.4.6 Paragraphs 7.36 to 7.42 of the Site 8 LVM report relate to the RAG evaluation of the PDAs against the Scheme which was undertaken as a proportionate, high-level evaluation of Potential Development Areas (PDAs) against technical, planning and environmental factors. In relation to comments the detail provided within this RAG assessment with regard to PRoW and landscape character, it should be noted that a detailed assessment of landscape and visual effects has been undertaken and is set out within **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]**. **ES Volume 1, Chapter** 7 – Landscape and Visual [APP-043] and **ES Volume 1, Chapter 11 – Transport and Access [APP-047]** further consider cumulative effects to Public Right of Way users.

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A.4.7 The Applicant considers that the site selection process has been undertaken in a proportionate manner in accordance with NPS EN-1, NPS EN-3 and NPS EN-5, noting that Paragraph 4.3.9 of NPS EN-1 states that '*This NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective'*. Once the PoC was identified at the National Grid Substation, the Applicant undertook a review of Potential Development Areas on non-BMV land that was not located within any key environmental constraints or designations.

Alternative Development Zones

A.4.8 Paragraph 4.7.1 of the **Site Selection Assessment [APP-215]** sets out that, following the discounting of the PDAs as suitable and available alternative sites to the Scheme within the parameters defined for Stage 5, the Applicant went on to consider Grade 3 agricultural land within the 20km search area from the PoC. Stage 6 of the **Site Selection Assessment [APP-215]** sets out the consideration of four broad 'Alternative Development Zones' ('ADZs') at a high level against the technical, planning, and environmental criteria used to evaluate the Sites for the Scheme within Stage 6 of the SSA.

A.4.9 Paragraph 7.46 of the Site 8 LVM report states '*When looking at the unconstrained land, in brown in the following excerpt, it is EXCEEDINGLY unlikely that there are no alternative sites close to the new PoC. The serious errors in the Site selection document (areas shown as constrained mixed up with areas that are constrained leading to assessment of the WRONG areas), together with a lack of willingness on the part of the Applicants to find alternative land has fundamentally failed the site selections tests*.'

A.4.10 With regard to the assertion that 'there are no alternative sites to the new PoC', Paragraph 4.7.6 and 5.1.33 of the **Site Selection Assessment [APP-215]** recognises that whilst land within the ADZs may be suitable for solar development, they were not considered in any further detail, given that the land within them was not identified as being any more suitable or available than the Sites that had been identified. As per paragraph 4.3.9 of NPS EN-1, national policy does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the 'best option' from a policy perspective. Policy in NPS EN 1 is clear in that site selection work should be undertaken on a proportionate basis and that any alternative would need to be a reasonable alternative.

A.4.11 At Paragraph 7.49, the Site 8 LVM report refers to Figure 12 in Appendix B of the **Site Selection Assessment [APP-215]**, and states the mapping is misleading as it suggests the areas in grey are more than 3% gradient. The purpose of Figure 12 is to follow sequentially from Figure 11, which show areas of unconstrained land within 20km of Norwich Main Substation which does not fall under statutory ecology, landscape, or heritage designations and is not located within ALC Grades 1-3 (which is also shown on Figure 11). Figure 12 excludes land >3% gradient, which as

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can be seen through a comparison with Figure 11, makes a minimal difference to the land identified as being unconstrained, given Norfolk's generally flat landscape. It is therefore not the case that the mapping suggests the areas in grey are more than 3% gradient, and it is evident from comparison with Figure 10 that the key constraint which defines the area shown in grey is the exclusion of undefined ALC Grade 3 (3a or 3b).

A.4.12 Paragraph 7.50 suggests that the methodology is self-serving because '*If Grade 3 land is acceptable for East Pye's selected sites, then it should not be used at the earlier alternatives stage to make alternative areas appear scarce or unsuitable. Conversely, if Grade 3 land is a meaningful constraint, then the applicant must apply that constraint equally to its own selected sites*.' Paragraph 7.52 further suggests the pool of alternative land is 'misleading'. As set out within the **Site Selection Assessment [APP-215]**, in line with NPS EN-1 and EN-3, the Applicant has considered the potential for lower grade agricultural land within the search area, which is limited in the Provisional ALC mapping (and even more so within the Predictive ALC Maps (2026)), to accommodate the Scheme. The areas which fall outside of ALC Grade 2 and Grade 3 and key constraints, as shown in Figure 10 of the **Site Selection Assessment [APP-215]** clearly define the extent of the PDAs shown in Figure 15.

A.4.13 Paragraph 7.51 states '*There is also a second flaw. The report says the original sites were identified through land agents and willing landowners, and that they did not consider every piece of unconstrained agricultural land because of the large extent involved. That means the "site selection" is not really a neutral environmental sieve. It is largely a land-availability exercise dressed up as a constraints assessment*.'

A.4.14 In accordance with the *'Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land'*, paragraph 8 provides that the Applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored.

A.4.15 This gives clear support in favour of development where land is secured voluntarily. In other words, if there are multiple suitable sites available from an environmental, technical and commercial perspective in accordance with national policy, those with reduced reliance on CA powers are favourable. Further details of this approach are set out in the **Statement of Reasons [APP-018]**. The availability of land, and the willingness of landowners to make land available for the Scheme, is a legitimate and material consideration in the identification of reasonable alternatives. As set out in **ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [APP-041]**, 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-

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decommissioning). Without willing landowners, acquiring land through compulsory acquisition powers would be necessary, which the Applicant has sought to avoid as far as practicable.

There has been a fundamental error in the Alternative Site Selection Process. The above text asserts that CA powers would be required to find alternative land when, as the LVM clearly states, the Applicant, by their own admission, did not feel it necessary to approach alternative landowners. Huges swathes of land around the POC are potentially viable and the Applicant's mapping is misleading and incorrect.

The dogged determination to retain the inappropriate parcels within the scheme has fundamentally undermined the site design in contravention of Policy EN-1.

We would request, if this has not already been carried out, that an in depth interrogation of the Alternative Site Selection Assessment is carried out to ascertain the misrepresentations.

A.5 Ancient Woodland and Designated Ecological Sites

A.5.1 Paragraph 7.21 of the Site 8 LVM Report states that no consideration has been given to ancient woodland. Paragraph 7.22 states that Little Wood ancient woodland and SSSI should be considered as a significant constraint.

A.5.2 Statutory ecological designations and ancient woodland were excluded from the site selection search, as noted in Table 4.1 of the **Site Selection Assessment [APP-215]**.

A.5.3 The likely significant effects on species (including Barbastelle bats), statutory designated sites (including Little Wood), ancient woodland and priority habitats are assessed in **ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044].**

A.5.4 Design buffers, including a minimum 30m offset to Ancient Woodland (increased from 15m following consultation feedback from South Norfolk Council, Natural England, the Forestry Commission and Norfolk Wildlife Trust), are secured through the **Design Principles, Parameters and Commitments [APP-213].** Mitigation is further secured through the outline management plans and the Requirements in Schedule 2 of the **Draft DCO [AS-032]**.

A.5.5 With regards to Ringers Grove ancient woodland, **ES Volume 1, Chapter 8 – Ecology and Biodiversity [APP-044]** sets out that, with good practice measures and the management of habitat buffers within Sub-Site 8B, Ringers Grove will benefit from connectivity with ecologically resilient natural corridors in the landscape compared to the current baseline, which comprises predominantly intensively managed farmland.

mark up with comments

A.6 Topography

A.6.1 Paragraph 7.18 of the Site 8 LVM Report states that '*Furthermore, Site 8b in particular fails again with regard to their own assessment of Irradiance and Topography*.'

A.6.2 Paragraph 4.4.2 of the Site Selection Assessment states that: '*Flat or gently south-facing slopes are considered most suitable and beneficial for solar to maximise electricity generation. Therefore, this factor has influenced the focus on Norfolk as the preferred area for the Scheme, the general topography of which is relatively flat, making it particularly suitable for solar energy*.' Paragraph 4.4.3 states: '*Topographical constraints within the unconstrained areas have been identified and mapped. As flatter land is generally considered to be optimal, land with a gradient of 3% or less was mapped for Stage 3…*'.

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A.6.3 While it is preferable to avoid steep slopes within the site selection, this was not an absolute constraint to the selection of Sites, which are acknowledged within the Site Selection Assessment as generally flat or gently undulating, but was a factor considered alongside other environmental constraints. As shown by **ES Volume 2, Figure 5.1 – Environmental Constraints and Key Features [APP-062],** the site selection avoided steeper areas to the north of the original search area from Norwich Main Substation. The Sites selected by the Applicant, including Site 8, do not completely exclude land over a 3% gradient. The topography within each Site (further illustrated within **ES Volume 2, Figure 7.3 - Topography Plan [APP-068]** has informed the design response, as set out within the **Design Approach Document [APP-212]**. In Sub-Site 8B, solar panels were removed from areas of elevated topography and the prominence of the landscape on the setting of listed buildings. Consideration of topography has informed the assessment of landscape and visual impact set out within **ES Volume 1, Chapter 7 – Landscape and Visual [APP-043]**.

A.6.4 Therefore, topography informed the initial selection of the Sites, which were considered to be suitable for solar PV infrastructure on balance of the factors influencing site selection set out with NPS EN-3, and the design evolution of the Scheme in response to the particular constraints and receptors surrounding each Site.

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