

# **South Norfolk Landscape Susceptibility in relation to Energy Generation, Storage and Transmission Supplementary Planning Document**

## **Consultation Statement**

### **1. Introduction**

- 1.1 This Consultation Statement sets out the early engagement and formal public consultation carried out to inform the preparation of the South Norfolk Landscape Susceptibility in relation to Energy Generation, Storage and Submission Supplementary Planning Document (SPD).
- 1.2 This Consultation Statement has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 to support the adoption of the Landscape Susceptibility in relation to Energy Generation, Storage and Submission SPD.
- 1.3 In accordance with the Regulations, this consultation statement sets out:
  - Who was consulted during the preparation of the SPD.
  - How they were consulted.
  - A summary of the main issues raised during the consultation.
  - How those issues have been addressed in the adopted SPD.

### **2. Background**

- 2.1 The purpose of the Landscape Susceptibility in relation to Energy Generation, Storage and Submission SPD is to support anyone wishing to submit an energy-related planning application. The SPD provides guidance on the implementation and interpretation of policies within the current Local Plans for South Norfolk, including the Greater Norwich Local Plan (GNLP) and the Development Management Policies Document.

### **3. Early Engagement**

- 3.1 The SPD was prepared by The Landscape Partnership on behalf of South Norfolk Council. There was no formal engagement undertaken to prepare the draft SPD, but colleagues from Development Management provided comments throughout the preparation of the document with The Landscape Partnership through regular meetings and reviews.
- 3.2 The draft SPD was presented to South Norfolk Cabinet on 16 June 2025, where it was recommended for public consultation and subsequently endorsed.

Following this, the recommendation was taken to Full Council on 7 July 2025, where it also received endorsement for consultation following some minor amendments.

#### **4. Consultation on SEA/HRA**

4.1 As part of the process for developing the Landscape Susceptibility SPD, an assessment of the requirement for a Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) was needed. Consultation on an SEA Screening Statement took place between 06 March 2025 and 09 April 2025.

4.2 The Council notified the following specified bodies of the SEA screening statement by email inviting comments in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004:

- Environment Agency
- Historic England
- Natural England

4.3 Responses were received from all three of the consulted bodies. A full summary of the responses received for the SEA consultation can be seen in the [SEA determination statement](#).

4.4 The responses received confirmed the Council's position that a further SEA was not required as the SPD will not change or introduce new planning policy and whilst there may be some environmental effects, these have already been covered in principle in the Sustainability Appraisal of the Local Plan.

#### **5. Public Consultation**

5.1 Public consultation of the draft Landscape Susceptibility in relation to Energy Generation, Storage and Transmission SPD took place between 09 July 2025 and 01 September 2025. The consultation was available [online](#) and email and postal comments were also accepted.

5.2 In compliance with regulations, 12, 13 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's SCI, the following actions were also undertaken:

- The consultees in Appendix 1 were contacted by email with details about the consultation and how to respond.
- The documentation was made available on the Council's website.
- The document and response forms were available in libraries. Posters were also sent to libraries.
- Local Members were informed at Full Council prior to consultation.

- Social media posts on Facebook.

## 6. Main Issues and the Council's Response

6.1 A total of 92 comments (from 26 respondents) were received to the draft Landscape Susceptibility SPD consultation.

6.2 Comments were received by the following organisations as well as a number of individuals:

- Historic England
- Natural England
- Highways England
- The Broads Authority
- Norfolk County Council
- Norfolk Policy Constabulary
- Anglian Water
- National Highways
- Yare Valley Society
- CPRE Norfolk
- CODE Development Planners
- SLR Consulting LTD
- Topcroft Parish Council
- Saxlingham Nethergate Parish Council
- Hempnall Parish Council
- Forncett Parish Council
- Brockdish (inc Thorpe Abbots) Parish Council

6.3 A full list of the consultation comments received and the Council's responses to these can be found in Appendix 2. The table below summarises the main points and Council's response to how these issues have been addressed in the final SPD. It does not include minor changes to the text such as clarification, typos or grammatical corrections.

**Table 1: Summary of the Main Issues and Council's Responses**

Main Issue	Council Response
Scope and applicability: Many respondents were concerned that the SPD could be misused by developers of Nationally Significant Infrastructure Projects to justify large-scale schemes. Requests to state that the SPD only applies to LPA decisions and not NSIPs	It is important to note that the original study underpinning the SPD was commissioned to support South Norfolk Council's responses to NSIP proposals, which are decided by the Secretary of State under the Planning Act 2008 and not by the Local Planning Authority. Over time, this work has evolved into a

	<p>broader strategic resource designed to inform and guide consideration of landscape character and susceptibility across a range of energy planning contexts. The SPD does not determine the acceptability of individual schemes; rather, it provides a framework for understanding landscape susceptibility to the various energy-related developments.</p>
<p>Landscape Susceptibility and Developer Use – concern that developers could use the SPD to justify applications in less sensitive areas</p>	<p>As noted in 5.1.3 of the SPD, whilst this susceptibility assessment provides an initial indication of the relative susceptibility of different landscapes to a range of development types it should not be interpreted as a definitive statement on the suitability of a certain location for a particular development proposal. It is not a replacement for detailed studies on specific siting and design, and all developments will need to be assessed on their individual merits through the appropriate planning processes.</p>
<p>Scale and Parameters: objections that the SPD only covers solar PV up to 50MW and BESS up to 1ha, while large schemes are emerging</p>	<p>In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Council's strategic responses to NSIPs.</p>
<p>Heritage and historic environment: Historic England noted insufficient reference to heritage assets</p>	<p>Heritage impacts will be addressed at the application stage. Whilst minor amendments to wording have been included for clarity, the historic environment is beyond the scope of the SPD which assesses susceptibility of landscape character only.</p>

<p>Broads Authority: Strong emphasis on considering impacts on the Broads and its setting, referencing NPPF para 189 and updating the LUR Act duties.</p>	<p>SPD has been updated to include cross-boundary considerations and legislative context. No further changes have been made as the study excludes the Broads Authority Area.</p>
<p>Structure of report: feedback that the SPD is too long and technical</p>	<p>The Council acknowledge this is a long document. The SPD is structured to provide both strategic guidance and technical evidence. Chapter 3 sets out the relevant policy context, while Chapter 5 summarises the key findings of the landscape susceptibility study. Further detail is provided in the appendices to ensure transparency and allow for deeper interrogation of the evidence base where required. We would like to clarify that the landscape assessment has been undertaken by independent consultants and forms part of the technical evidence base. As such, we are not in a position to alter the findings or restructure the assessment itself.</p>
<p>Yare Valley: requests for special status of LCA F1 (Yare Valley Urban Fringe) due to ecological, recreational and heritage importance</p>	<p>The Council recognise the significance of these concerns but did not create a separate section. It is important to clarify that the SPD applies solely to the South Norfolk District area. While LCA F1 forms part of a wider landscape that extends into Norwich and beyond, the SPD does not assess the entire Yare Valley corridor, nor does it seek to do so. Furthermore, the special status of LCA F1 has already been recognised in the original landscape character assessments upon which this SPD and its associated analysis are based. Its designation as F1 reflects its distinct character and context within the wider landscape framework.</p>

6.4 All comments on the public consultation have been considered in preparing the final SPD. None of the comments received have required significant changes to the overall approach.

## **Appendix 1 – Consultee List**

### **Statutory Consultees**

1. Coal Authority
2. Environment Agency
3. Historic England
4. Marine Management Organisation
5. Natural England
6. Network Rail
7. Highways England
8. Breckland District Council
9. Great Yarmouth Borough Council
10. Norwich City Council
11. The Broads Authority
12. Norfolk County Council
13. Suffolk County Council
14. Norfolk Police Constabulary
15. Suffolk Police Constabulary
16. BT/EE
17. City Fibre
18. Zayo
19. ITS Technology Group
20. Hyperoptic
21. Vodafone
22. CTIL
23. Three
24. O2 Telefonica
25. Openreach
26. Mobile Operators Association
27. NHS
28. UK Power Networks
29. National Gas
30. National Grid
31. Avison Young
32. Cadent Gas
33. Fisher German
34. Anglian Water
35. Homes England

## General Consultees

1. PDC Engineering
2. National Grid
3. SLR Consulting
4. Third Revolution Projects
5. Wardwell Armstrong
6. ADAS
7. Cornerstone Planning
8. Urbana
9. Regener8
10. Lichfields
11. Renewable Planning Consultancy Limited
12. Innova
13. Neo Environmental
14. Anglian Water Services
15. Bidwells
16. Broads Society
17. Brown & Co
18. Bullen Developments
19. Butterfly Conservation
20. Campaign for the Protection of Rural England (Norfolk Society)
21. Carter Jonas LLP
22. Centrica PLC
23. Chaplin Farrant Ltd
24. Chapman Chartered Surveyors
25. Civil Aviation Authority
26. Clarke & Simpson
27. Climate Friendly Policy and Planning (CFPP)
28. Climate Hope Action In Norfolk
29. CODE Development Planners Ltd
30. Colney Developments
31. Cornerstone Planning Ltd
32. Costessey Society
33. Country Land and Business Association
34. Countywide property services
35. CPRE Norfolk
36. Durrants
37. EDF Energy
38. Environment Agency (Eastern Region)
39. Farming and Wildlife Advisory Group
40. Fisher German/Gov't Pipeline & Storage
41. Forestry Commission
42. Friends of the Earth
43. Friends of Tud Valley

44. GNLP
45. Gypsy Council
46. Historic Environment Service
47. Lanpro Services Ltd
48. National Farmers Union
49. National Federation of Gypsy Liaison Groups
50. National Highways / Highways England
51. Natural England Consultation Service
52. Norfolk Constabulary (Architectural Liaison)
53. Norfolk County Council - Highways
54. Norfolk Fire and Rescue Service
55. Norfolk Gardens Trust
56. Norfolk Ramblers Association
57. Norfolk Wildlife Trust
58. Norwich Fringe Project
59. Norwich Historic Churches Trust Ltd
60. Norwich International Airport
61. Plandescil Ltd
62. Rapleys LLP
63. RenewableUK
64. Savills (UK) Ltd
65. The Gardens Trust
66. The Landscape Partnership Ltd
67. The Woodland Trust
68. UK Power Networks
69. Upper Waveney Countryside Partnership
70. Woodland Trust
71. Yare Valley Society

## **South Norfolk Town and Parish Councils Consultees**

1. Alburgh Parish Council
2. Aldeby Parish Council
3. Alington with Yelverton Parish Council
4. Ashby St Mary Parish Council
5. Ashwellthorpe & Fundenhall Parish Council
6. Aslacton Parish Council
7. Barford & Wramplingham Parish Council
8. Barnham Broom Parish Council
9. Bawburgh Parish Council
10. Bedingham Parish Meeting
11. Bergh Apton Parish Council
12. Bracon Ash & Hethel Parish Council
13. Bramerton Parish Council
14. Brandon Parva, Coston, Runhall & Welborne Parish Council
15. Bressingham & Fersfield Parish Council
16. Brockdish Parish Council
17. Brooke Parish Council
18. Broome Parish Council
19. Bunwell Parish Council
20. Burgh St Peter & Wheatacre Parish Council
21. Burston & Shimpling Parish Council
22. Caistor St Edmund and Bixley Parish Council
23. Carleton Rode Parish Council
24. Carleton St Peter Parish Meeting
25. Chedgrave Parish Council
26. Claxton Parish Council
27. Colney Parish Meeting
28. Costessey Town Council
29. Cringleford Parish Council
30. Denton Parish Council
31. Deopham & Hackford Parish Council
32. Dickleburgh & Rushall Parish Council
33. Diss Town Council
34. Ditchingham Parish Council
35. Earsham Parish Council
36. East Carleton & Ketteringham Parish Council
37. Easton Parish Council
38. Flordon Parish Council
39. Forncett Parish Council
40. Framingham Earl Parish Council
41. Framingham Pigot Parish Meeting
42. Geldeston Parish Council
43. Gillingham Parish Council

44. Gissing Parish Council
45. Great Melton Parish Council
46. Great Moulton Parish Council
47. Haddiscoe Parish Council
48. Hales & Heckingham Parish Council
49. Hempnall Parish Council
50. Hethersett Parish Council
51. Heywood Parish Meeting
52. Hingham Town Council
53. Holverston Parish Meeting
54. Keswick & Intwood Parish Council
55. Kimberley & Carleton Forehoe Parish Council
56. Kirby Cane & Ellingham Parish Council
57. Kirstead Parish Meeting
58. Langleigh with Hardley Parish Council
59. Little Melton Parish Council
60. Loddon Town Council
61. Long Stratton Town Council
62. Marlingford & Colton Parish Council
63. Morley Parish Council
64. Morningthorpe (and Fritton) Parish Council
65. Mulbarton Parish Council
66. Mundham Parish Council
67. Needham Parish Council
68. Newton Flotman Parish Council
69. Norton Subcourse Parish Council
70. Poringland Parish Council
71. Pulham Market Parish Council
72. Pulham St Mary Parish Council
73. Raveningham Parish Meeting
74. Redenhall with Harleston Town Council
75. Rockland St Mary with Hellington Parish Council
76. Roydon Parish Council
77. Saxlingham Nethergate Parish Council
78. Scole Parish Council
79. Seething Parish Council
80. Shelton & Hardwick Parish Council
81. Shotesham Parish Council
82. Spooner Row Community Council
83. Starston Parish Council
84. Stockton Parish Meeting
85. Stoke Holy Cross Parish Council
86. Surlingham Parish Council
87. Swainsthorpe Parish Council
88. Swardston Parish Council
89. Tacolneston Parish Council

90. Tasburgh Parish Council
91. Tharston & Hapton Parish Council
92. Thurlton Parish Council
93. Thurton Parish Council
94. Tibenham Parish Council
95. Tivetshall Parish Council
96. Toft Monks Parish Council
97. Topcroft Parish Council
98. Trowse with Newton Parish Council
99. Wacton Parish Council
100. Wicklewood Parish Council
101. Winfarthing Parish Council
102. Woodton Parish Council
103. Wortwell Parish Council
104. Wreningham Parish Council
105. Wymondham Town Council

**Appendix 2 – Consultation Comments and Council Response**

Respondent	Rep ID	Support/Object/Comment	Consultation Comments	Council Response	Change to SPD
<b>1.1 Introduction to the Supplementary Planning Document</b>					
National Highways (Ms Alice Lawman, Spatial Planner) [20295]	4295	Comment	<p>It has been noted that once adopted, the SPD will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly.</p> <p>Notwithstanding the above comments, we have reviewed the document and note the details of set out within the draft document are unlikely to have an severe impact on the operation of the trunk road and we offer No Comment.</p>	No comment	No change
Natural England (Sharon Jenkins, Assistant Officer) [20537]	4296	Comment	<p>Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.</p>	No comment	No change

<p>Topcroft Parish Council (Topcroft Parish Clerk) [12818]</p>	<p>4299</p>	<p>Object</p>	<p>The study relates to the following solar photovoltaic schemes: "small scale up to 5MW, medium-field scale up to 15MW, and larger-scale 15to 50MW" i.e. it does not specifically cover NSIPS - however it states that part of the funding for the project: "has enabled the council to commission a study to assess the sensitivities and capacities of the various landscapes of South Norfolk district to accommodate energy-related NSIP and non-NSIP projects." So it does mention a a relevance to NSIP projects</p> <p>Furthermore it does not specifically say (at any point in the text) that NSIP schemes should be considered unacceptable due to their huge impacts on the South Norfolk landscape.</p>	<p>Thank you for your comments regarding the scope and purpose of the South Norfolk Landscape Susceptibility Supplementary Planning Document (SPD). It is important to note that the original study underpinning the SPD was commissioned to support South Norfolk Council's responses to NSIP proposals, which are decided by the Secretary of State under the Planning Act 2008 and not by the Local Planning Authority. Over time, this work has evolved into a broader strategic resource designed to inform and guide consideration of landscape character and susceptibility across a range of energy planning contexts. The SPD does not determine the acceptability of individual schemes; rather, it provides a framework for understanding landscape susceptibility to the various energy-related developments.</p> <p>In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Councils' strategic responses to NSIPs. We trust this clarification addresses your concerns and confirms the intended scope and purpose of the SPD.</p>	<ul style="list-style-type: none"> <li>• The scope of the document has been clarified within the Introduction to provide greater transparency regarding its purpose and application of the SPD.</li> <li>• It has been stated in the Introduction that South Norfolk Council is not responsible for determining Nationally Significant Infrastructure Projects (NSIP) schemes.</li> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> </ul>
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<p>Saxlingham Nethergate Parish Council (Saxlingham Nethergate Parish Clerk) [13242]</p>	<p>4304</p>	<p>Object</p>	<p>The study relates to the following solar photovoltaic schemes: "small scale up to 5MW, medium-field scale up to 15MW, and larger-scale 15to 50MW" i.e. it does not specifically cover NSIPS - however it states that part of the funding for the project: "has enabled the council to commission a study to assess the sensitivities and capacities of the various landscapes of South Norfolk district to accommodate energy-related NSIP and non-NSIP projects." So it does mention a relevance to NSIP projects</p> <p>While it does not specifically cover NSIPs this does not mean that NSIP developers are precluded from using the study to justify the choice of sites where the sensitivity to solar PV is less than in other places.</p> <p>Furthermore it does not specifically say (at any point in the text) that NSIP schemes should be considered unacceptable due to their huge impacts on the South Norfolk landscape. There is a need to add this in to the document and I ask that this is included.</p>	<p>Thank you for your comments regarding the scope and purpose of the South Norfolk Landscape Susceptibility Supplementary Planning Document (SPD). It is important to note that the original study underpinning the SPD was commissioned to support South Norfolk Council's responses to NSIP proposals, which are decided by the Secretary of State under the Planning Act 2008 and not by the Local Planning Authority. Over time, this work has evolved into a broader strategic resource designed to inform and guide consideration of landscape character and susceptibility across a range of energy planning contexts. The SPD does not determine the acceptability of individual schemes; rather, it provides a framework for understanding landscape susceptibility to the various energy-related developments.</p> <p>In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Councils' strategic responses to NSIPs. We trust this clarification addresses your concerns and confirms the intended scope and purpose of the SPD.</p>	<ul style="list-style-type: none"> <li>• The scope of the document has been clarified within the Introduction to provide greater transparency regarding its purpose and application of the SPD.</li> <li>• It has been stated in the Introduction that South Norfolk Council is not responsible for determining Nationally Significant Infrastructure Projects (NSIP) schemes.</li> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> </ul>
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Hempnall Parish Council (Hempnall Parish Clerk) [13769]	4309	Object	In conclusion, while the SPD does not specifically cover NSIPs this does not mean that NSIP developers are precluded from using the study to justify the choice of sites where the sensitivity to solar PV is less than in other places. As already stated, the SPD needs to specify that it is not applicable for NSIP schemes, and it should be clearly stated that all mega solar NSIP schemes are considered unacceptable in South Norfolk due to their huge impact on the landscape and countryside.	Thank you for your comments regarding the scope and purpose of the South Norfolk Landscape Susceptibility Supplementary Planning Document (SPD). It is important to note that the original study underpinning the SPD was commissioned to support South Norfolk Council's responses to NSIP proposals, which are decided by the Secretary of State under the Planning Act 2008 and not by the Local Planning Authority. Over time, this work has evolved into a broader strategic resource designed to inform and guide consideration of landscape character and susceptibility across a range of energy planning contexts. The SPD does not determine the acceptability of individual schemes; rather, it provides a framework for understanding landscape susceptibility to the various energy-related developments. In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Councils' strategic responses to NSIPs. We trust this clarification addresses your concerns and confirms the intended scope and purpose of the SPD.	<ul style="list-style-type: none"> <li>• The scope of the document has been clarified within the Introduction to provide greater transparency regarding its purpose and application of the SPD.</li> <li>• It has been stated in the Introduction that South Norfolk Council is not responsible for determining Nationally Significant Infrastructure Projects (NSIP) schemes.</li> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> </ul>
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19732]	4311	Support	1.1.4 We welcome the reference to protecting and enhancing local character. 1.1.5 We welcome the reference to locally distinctive characteristics.	Thank you for your comments.	No change
<b>1.2 How to use this document</b>					

SLR Consulting Ltd [20549]	4352	Comment	<p>Alternative wording suggested. Paragraph 1.2.3 “All proposals for energy generation, storage, and transmission must seek to achieve sustainable development, and it should be recognised that landscape effects are often a significant consideration. On which basis South Norfolk Council will use this SPD as evidence to resist inappropriate proposals for development in landscapes with a high susceptibility and vulnerability to change, unless significant mitigations are being provided that address the harm.”</p> <p>Consider changing the word “significant” in both sentences as this word does not read correctly in the context it has been used.</p> <p>Suggestions include:</p> <ul style="list-style-type: none"> <li>• an important consideration.</li> <li>• Last sentence: unless appropriate or effective mitigation is provided.</li> </ul>	<p>Thank you for your observation regarding the use of the term "significant". We acknowledge that this term carries specific implications within Environmental Impact Assessment (EIA) terminology, which may lead to unintended confusion in this context. To ensure clarity and avoid any misinterpretation, we will revise the wording accordingly.</p>	<ul style="list-style-type: none"> <li>• Replacement of the word "significant" in Paragraph 1.2.3 to avoid any potential confusion with EIA terminology.</li> </ul>
Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	4354	Comment	<p>1.2.1 – needs to reference the Broads Landscape Character Assessment and the Broads Landscape Sensitivity Study – scheme proposals may be near to the Broads.</p>	<p>We support referencing additional landscape documentation and recommend a clause stating: “Due regard should be given to other adopted landscape guidance relevant to the local context.” This ensures decisions reflect the full scope of existing landscape policy.</p>	<ul style="list-style-type: none"> <li>• Clause “Due regard should be given to other adopted landscape guidance relevant to the local context.” added to Section 1.2.2 of SPD.</li> </ul>
<b>1.3 Background to the study</b>					

Mrs Melanie Hook [20534]	4289	Object	I do not agree with using landscape sensitivity criteria to assess a mega solar NSIP scheme. A few picturesque sites may escape the industrialization (and those villages may encourage you to take that path) but the council will have paid the high price of acceptance of schemes that have the potential to cause devastation in our rural, agricultural county on a scale we all cannot even imagine, and for a gain which is not proved. Please oppose the NSIP schemes outright outright and support the unlucky residents of Norfolk.	<p>Thank you for your comments. While we acknowledge and appreciate your concerns, we would like to clarify that this particular study is focused solely on assessing landscape susceptibility. It does not address broader planning matters, which will be considered individually for each scheme through the appropriate planning processes.</p> <p>It is important to note that the original study underpinning the SPD was commissioned to support South Norfolk Council's responses to NSIP proposals, which are decided by the Secretary of State under the Planning Act 2008 and not by the Local Planning Authority. Over time, this work has evolved into a broader strategic resource designed to inform and guide consideration of landscape character and susceptibility across a range of energy planning contexts. The SPD does not determine the acceptability of individual schemes; rather, it provides a framework for understanding landscape susceptibility to the various energy-related developments.</p> <p>In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Councils' strategic responses to NSIPs. We trust this clarification addresses your concerns and confirms the intended scope and purpose of the SPD.</p>	<ul style="list-style-type: none"> <li>• The scope of the document has been clarified within the Introduction to provide greater transparency regarding its purpose and application of the SPD.</li> <li>• It has been stated in the Introduction that South Norfolk Council is not responsible for determining Nationally Significant Infrastructure Projects (NSIP) schemes.</li> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> </ul>
<b>1.5 Objectives</b>					
Topcroft Parish Council (Topcroft Parish Clerk) [12818]	4297	Object	Developers can therefore use the document to justify an application in an area that is considered less sensitive to their proposals	Thank you for your comments. As noted in 5.1.3, whilst this susceptibility assessment provides an initial indication of the relative susceptibility of different landscapes to a range of development types it should not be interpreted as a definitive statement on the suitability of a certain location for a particular development proposal. It is not a replacement for detailed studies on specific siting and design, and all developments will need to be assessed on their individual merits through the appropriate planning processes.	No change

Topcroft Parish Council (Topcroft Parish Clerk) [12818]	4298	Object	In general terms Rural River Valley LCAs (e.g. Market Lane, Shotesham and Fairstead Lane, Hempnall) are considered more sensitive to solar PV proposals than plateau farmland LCAs (e.g. the area around Tivetshall / Great Moulton). Therefore the danger for all of us fighting the East Pye proposal in its entirety is that while it may help some parishes to build a case for certain fields to be excluded the developer could seek to replace those lost fields by including extra sites elsewhere.	Thank you for your comments. As noted in 5.1.3, whilst this susceptibility assessment provides an initial indication of the relative susceptibility of different landscapes to a range of development types it should not be interpreted as a definitive statement on the suitability of a certain location for a particular development proposal. It is not a replacement for detailed studies on specific siting and design, and all developments will need to be assessed on their individual merits through the appropriate planning processes.	No change
Saxlingham Nethergate Parish Council (Saxlingham Nethergate Parish Clerk) [13242]	4302	Object	The aim of the study is to provide guidance for those seeking to identify suitable sites for the location of energy generation, storage and transmission projects.  Developers can therefore use the document to justify an application in an area that is considered less sensitive to their proposals	Thank you for your comments. As noted in 5.1.3, whilst this susceptibility assessment provides an initial indication of the relative susceptibility of different landscapes to a range of development types it should not be interpreted as a definitive statement on the suitability of a certain location for a particular development proposal. It is not a replacement for detailed studies on specific siting and design, and all developments will need to be assessed on their individual merits.	No change
Saxlingham Nethergate Parish Council (Saxlingham Nethergate Parish Clerk) [13242]	4303	Object	A key objective is to: "assess the landscape susceptibility of different types and scales of energy development/infrastructure in relation to the seven generic landscape types identified in the district (A: Rural River Valley, B: Tributary Farmland, C: Tributary Farmland with Parkland, D: Settled Plateau Farmland, and E: Plateau Farmland, F: Valley Urban Fringe and G: Fringe Farmland)) as defined in the South Norfolk Landscape Character Assessment , along with the 20 geographically discrete landscape character areas identified in the assessment."  In general terms Rural River Valley LCAs (e.g. Market Lane, Shotesham and Fairstead Lane, Hempnall) are considered more sensitive to solar PV proposals than plateau farmland LCAs (e.g. the area around Tivetshall / Great Moulton). Therefore the danger for all of us fighting the East Pye proposal in its entirety is that while it may help some parishes to build a case for certain fields to be excluded the developer could seek to replace those lost fields by including extra sites elsewhere.	Thank you for your comments. As noted in 5.1.3, whilst this susceptibility assessment provides an initial indication of the relative susceptibility of different landscapes to a range of development types it should not be interpreted as a definitive statement on the suitability of a certain location for a particular development proposal. It is not a replacement for detailed studies on specific siting and design, and all developments will need to be assessed on their individual merits.	No change

<p>Hempnall Parish Council (Hempnall Parish Clerk) [13769]</p>	<p>4306</p>	<p>Object</p>	<p>The stated aim of the document is to provide guidance for those seeking to identify suitable sites for the location of energy generation, storage and transmission projects and although the SPD study says it relates to the following solar photovoltaic schemes: "small scale up to 5MW, medium-field scale up to 15MW, and larger-scale 15to 50MW" it also says that the funding for the project: "has enabled the council to commission a study to assess the sensitivities and capacities of the various landscapes of South Norfolk district to accommodate energy-related NSIP and non-NSIP projects." So, there is a reference to it being relevant to NSIP schemes.</p> <p>We consider that while the document may be appropriate for smaller scale schemes determined by the local planning authority, we fear that some aspects of the SPD could be used by NSIP developers to facilitate their mega solar projects.</p> <p>In order to clarify the scope of the document to avoid potential unwarranted interpretations it should be clearly stated that this document is only relevant to planning decisions made by the local planning authority and is not to be applied to NSIP schemes.</p>	<p>Thank you for your comments.</p> <p>It is important to note that the original study underpinning the SPD was commissioned to support South Norfolk Council's responses to NSIP proposals, which are decided by the Secretary of State under the Planning Act 2008 and not by the Local Planning Authority. Over time, this work has evolved into a broader strategic resource designed to inform and guide consideration of landscape character and susceptibility across a range of energy planning contexts. The SPD does not determine the acceptability of individual schemes; rather, it provides a framework for understanding landscape susceptibility to the various energy-related developments.</p> <p>In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Councils' strategic responses to NSIPs. We trust this clarification addresses your concerns and confirms the intended scope and purpose of the SPD.</p>	<ul style="list-style-type: none"> <li>• The scope of the document has been clarified within the Introduction to provide greater transparency regarding its purpose and application of the SPD.</li> <li>• It has been stated in the Introduction that South Norfolk Council is not responsible for determining Nationally Significant Infrastructure Projects (NSIP) schemes.</li> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> </ul>
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<p>Hempnall Parish Council (Hempnall Parish Clerk) [13769]</p>	<p>4307</p>	<p>Object</p>	<p>A key objective of the SPD is to: "assess the landscape susceptibility of different types and scales of energy development/infrastructure in relation to the seven generic landscape types identified in the district (A: Rural River Valley, B: Tributary Farmland, C: Tributary Farmland with Parkland, D: Settled Plateau Farmland, and E: Plateau Farmland, F: Valley Urban Fringe and G: Fringe Farmland)) as defined in the South Norfolk Landscape Character Assessment , along with the 20 geographically discrete landscape character areas identified in the assessment."</p> <p>This could provide useful guidance for small scale developments but there is a danger that NSIP developers could exploit references to less sensitive sites, particularly if they are excluded from areas of higher landscape value. The problem we foresee for those of us fighting the East Pye proposal in its entirety, is that it might help some parishes to build a case for certain fields to be excluded but then the developer could seek to replace those lost fields by including extra sites elsewhere.</p> <p>Therefore, it is really important that the SPD clearly states that it is not applicable to NSIP applications.</p>	<p>Thank you for your comments.</p> <p>It is important to note that the original study underpinning the SPD was commissioned to support South Norfolk Council's responses to NSIP proposals, which are decided by the Secretary of State under the Planning Act 2008 and not by the Local Planning Authority. Over time, this work has evolved into a broader strategic resource designed to inform and guide consideration of landscape character and susceptibility across a range of energy planning contexts. The SPD does not determine the acceptability of individual schemes; rather, it provides a framework for understanding landscape susceptibility to the various energy-related developments.</p> <p>In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Councils' strategic responses to NSIPs. We trust this clarification addresses your concerns and confirms the intended scope and purpose of the SPD.</p> <p>As noted in 5.1.3, whilst this susceptibility assessment provides an initial indication of the relative susceptibility of different landscapes to a range of development types it should not be interpreted as a definitive statement on the suitability of a certain location for a particular development proposal. It is not a replacement for detailed studies on specific siting and design, and all developments will need to be assessed on their individual merits through the appropriate planning processes.</p>	<ul style="list-style-type: none"> <li>• The scope of the document has been clarified within the Introduction to provide greater transparency regarding its purpose and application of the SPD.</li> <li>• It has been stated in the Introduction that South Norfolk Council is not responsible for determining Nationally Significant Infrastructure Projects (NSIP) schemes.</li> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> </ul>
<p>Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]</p>	<p>4355</p>	<p>Comment</p>	<p>1.5.2 this section sets out the study area and states 'excluding areas within the Norwich City administrative boundary'. Should it add 'and excludes the area within the Broads Authority Executive Area where the Broads Authority act as the Local Planning Authority', to make clear why the area to the east is excluded?</p>	<p>We accept the proposed change to section 1.5.2 and agree that referencing the Broads Authority Executive Area here will help clarify the study area's boundaries.</p>	<ul style="list-style-type: none"> <li>• Reference to the Broads Authority Executive Area has been included in Paragraph 1.5.2.</li> </ul>

<p>CPRE Norfolk (Ms Barbara Adamski, Planning Officer) [20551]</p>	<p>4366</p>	<p>Comment</p>	<p>In order to clarify the scope of the document to avoid potential unwarranted interpretations it should be clearly stated that this document is only relevant to planning decisions made by the local planning authority for schemes with a size of up to 50MW and is not to be applied to NSIP schemes.</p> <p>A key objective of the SPD is to: "assess the landscape susceptibility of different types and scales of energy development/infrastructure in relation to the seven generic landscape types identified in the district (A: Rural River Valley, B: Tributary Farmland, C: Tributary Farmland with Parkland, D: Settled Plateau Farmland, and E: Plateau Farmland, F: Valley Urban Fringe and G: Fringe Farmland)) as defined in the South Norfolk Landscape Character Assessment , along with the 20 geographically discrete landscape character areas identified in the assessment. "</p> <p>This could provide useful guidance for small scale developments but there is a danger that NSIP developers could exploit references to less sensitive sites, particularly if they are excluded from areas of higher landscape value. The problem CPRE Norfolk foresee for those who are campaigning against NSIPs proposals as a whole, is that it might help some parishes to build a case for certain fields to be excluded but then the developer could seek to replace those lost fields by including extra sites elsewhere. Therefore, it is really important that the SPD clearly states that it is not applicable to NSIP applications</p>	<p>Thank you for your comments.</p> <p>It is important to note that the original study underpinning the SPD was commissioned to support South Norfolk Council's responses to NSIP proposals, which are decided by the Secretary of State under the Planning Act 2008 and not by the Local Planning Authority. Over time, this work has evolved into a broader strategic resource designed to inform and guide consideration of landscape character and susceptibility across a range of energy planning contexts. The SPD does not determine the acceptability of individual; rather, it provides a framework for understanding landscape susceptibility to the various energy-related developments.</p> <p>In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Councils' strategic responses to NSIPs. We trust this clarification addresses your concerns and confirms the intended scope and purpose of the SPD.</p>	<ul style="list-style-type: none"> <li>• The scope of the document has been clarified within the Introduction to provide greater transparency regarding its purpose and application of the SPD.</li> <li>• It has been stated in the Introduction that South Norfolk Council is not responsible for determining Nationally Significant Infrastructure Projects (NSIP) schemes.</li> <li>• A additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> </ul>
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**1.6 Structure of the Report**

Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	4356	Comment	1.6.1 – landscape sensitivity study or landscape susceptibility study?	<p>At the district scale the report assesses landscape susceptibility. The local landscape character assessment also includes an assessment of landscape value and landscape sensitivity.</p> <p>Susceptibility and sensitivity are similar concepts but there is a technical distinction. Susceptibility is “the ability of a defined landscape or visual receptor to accommodate the specific proposed development without undue negative consequences.” Sensitivity is “a term applied to specific receptors, combining judgements of the susceptibility of the receptor to the specific type of change or development proposed and the value related to that receptor.” Sensitivity therefore includes judgements about value. Judging landscape value is a complex task in its own right, as there are many different aspects of landscape value. We considered that Section 5 would be more robust if it concentrated on susceptibility only. Section 6 however has been widened to include a consideration of value and sensitivity.</p>	<ul style="list-style-type: none"> <li>The report has been adjusted to make the terminology consistent within each section.</li> </ul>
<b>2.1 Overview</b>					
CPRE Norfolk (Ms Barbara Adamski, Planning Officer) [20551]	4367	Comment	Furthermore to ensure full alignment with national and local policy, CPRE Norfolk recommends to incorporate a “Rooftop and Brownfield First” principle into the siting hierarchy for solar energy developments. Promoting the installation of solar panels on industrial, commercial, and public-sector buildings and the use of brownfield and under-utilised sites before considering greenfield proposals, and therefore recognising the solar generation potential in the built environment, would further strengthened the new SPD and better align it with CPRE Norfolk’s landscape-first approach to climate action.	Thank you for the suggestion. While we acknowledge your comments regarding “Rooftop and Brownfield First” principle for solar development, its relative merits fall outside the scope of this SPD. The SPD focuses on providing guidance within the existing planning framework rather than setting strategic policy priorities.	No change

<p>Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]</p>	<p>4374</p>	<p>Comment</p>	<p>This is the first round of engagement. Will you consult again on this SPD? Currently no reference to the Local Nature Recovery Strategy, which should be included for things like planning planting to screen sites. For the cables and pylons – I feel there should be a reference that the s.245 duty (Section 245 of the LUR Act amends the National Parks Act, the Countryside and Rights of Way Act, and the Norfolk and Suffolk Broads Act, relating to protected landscapes) means that when a preferred route is being considered, the need to direct them away from the Broads should be considered – for instance the often floated alternative route for Norwich-Tilbury requires a Norwich – Coast connection that has to go through either the Broads or the Suffolk Coast National Landscape. You may wish to consider adding something that discusses that it is important to note that just because you can't see a proposal, it doesn't mean there isn't a landscape impact. We include this following text in the emerging Local Plan (see below in italics). There is also this appeal decision that talks about this – the appeal is not about energy infrastructure, but its findings about landscape character seem relevant to all development types: Planning Inspectorate APP/E9505/W/25/3359289: Manor Gates Garden, NR29 5AB. Para 6 says 'However, even if it were completely unseen from public land, the boat cover would detract from the special qualities of the Ludham CA and the Broads'. In simple terms Landscape and Visual Impact Assessment is a tool to identify the effects of change resulting from a specific development, and in the case of full LVIAs (EIA development) to assess the significance of the effects. The Guidelines for Landscape and Visual Impact Assessment (GLVIA3), clearly distinguishes between effects on landscape as a resource in its own right, and effects on specific views and general visual amenity experienced by people. There are some common principles set out within chapter 3 of the guidelines that relates to both landscape and visual considerations. However, the guidelines have separate chapters (chapter 5 for Landscape effects, and chapter 6 for visual effects) to deal with the explanation of how these</p>	<p>No further consultation is planned on this SPD. In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, we undertook early engagement with our Development Management colleagues during the preparation of the document. The draft SPD was also published as part of the agenda papers for: South Norfolk Cabinet on 16th June 2025, and Full Council on 7th July 2025.</p> <p>This was followed by an 8-week formal public consultation, which forms the final stage of engagement prior to adoption.</p> <p>We acknowledge the importance of the LNRS in guiding nature recovery and biodiversity enhancement. However, this falls beyond the scope of the current study, which is focused specifically on assessing the susceptibility of landscape character to energy-related development scenarios outlined in the SPD.</p> <p>Thank you for your comments regarding the consideration of protected landscapes and the legislative context. We will reference Paragraph 189 of the 2024 National Planning Policy Framework (NPPF) and Section 17A of The LUR Act.</p> <p>This SPD is focused specifically on landscape susceptibility in relation to South Norfolk's landscape character and is intended to support the assessment of landscape susceptibility at a strategic level. It does not provide guidance on the detailed methodologies or requirements for site-specific LVIAs or EIA processes, which are addressed through separate planning policy and regulatory frameworks.</p> <p>In relation to the Heritage Designations Map, only Grade I, Grade II and Grade II* are mapped in this figure, due to the large number of other listed buildings and the scale of the maps, these will not be included. These can, however, be found on the South Norfolk My Area Map.</p>	<ul style="list-style-type: none"> <li>• Reference to Paragraph 189 of the 2024 National Planning Policy Framework (NPPF) has been added (2.2.5)</li> <li>• Reference to Section 17A of The LUR Act has been added to Chapter 3 (3.3.2) of the SPD.</li> </ul>
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<b>2.2 National Planning Policy Framework (NPPF)</b>					

Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	4357	Comment	2.2 Need to refer to NPPF 2024 para 189. This refers to the setting of the Broads.	The longstanding status and significance of the Broads National Park are fully recognised within our planning approach. While the Broads Authority area is excluded from the study area, we acknowledge its proximity and importance. To reflect this, we will include a reference to paragraph 189 of the National Planning Policy Framework (NPPF) 2024 in Section 2.2 of the SPD	<ul style="list-style-type: none"> <li>Reference to para 189 of NPPF 2024 has been included in 2.2.5</li> </ul>
<b>2.3 South Norfolk Local Plan</b>					
Norfolk Constabulary (Architectural Liaison) (Ms Penny Turner, Architectural Liaison Officer) [13990]	4292	Object	<p>2.3.17 Policy DM 4.9: Incorporating landscape into design emphasises the importance of good quality design: 'Hard' landscape features (such as paving, kerb stones, street furniture, boundary treatments etc) will reflect and where possible enhance locally distinctive character and styles where relevant; or innovative contemporary solutions reflecting local context and reinforcing or creating local distinctiveness and the setting of the development.</p> <p>Although acknowledging wording of 'Hard Landscape Features', when introducing items of value into a rural area, crime prevention expectation is that appropriate boundary treatment must be recognised and installed as a minimum requirement, so as not to place an inappropriate burden on the Constabulary. Due to evolving crimes associated with solar installations and other energy installations (i.e. metal theft) previous use of deer fencing (wire &amp; post) will not be supported for vulnerable perimeters. This is a demarcation treatment and not security fencing, and as such this type of boundary treatment is not fit for purpose to prevent the now increasing crime trend occurring at these facilities nationwide, including South Norfolk. Therefore, I appeal for this document not to promote the potentially problematic fencing by using wording such as wire and post/deer fencing within the Document</p>	2.3.17 is a quote of existing policy. However, we will amend the wording elsewhere in the document to avoid specifying types, ensuring flexibility while supporting security and local distinctiveness.	<ul style="list-style-type: none"> <li>References to specific types of fencing have been removed.</li> </ul>

Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19732]	4312	Support	<p>2.3.7 Policy 3 of GNLP. This is only a partial quotation of policy 3 of the GNLP. The first part of the policy relates to the Built and Historic Environment. RECOMMENDATION: We advise that this should also be included in the SPD since impacts on the historic environment are also important.</p> <p>2.3.10 This is a partial quote of the policy and misses the references to heritage. RECOMMENDATION: We advise that the full policy should also be included in the SPD since impacts on the historic environment are also important.</p> <p>2.3.11 We welcome the reference to character and appearance of the landscape</p>	Thank you for your comments. The Built and Historic Environment is already factored into the existing landscape character areas identified in South Norfolk. These character areas incorporate the historic context and features of the landscape, and they remain unchanged by this study. As such, we don't find direct reference to Policy 3 in the SPD necessary.	No change
<b>2.4 Overarching National Policy Statement for Energy (EN-1)</b>					
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19732]	4313	Support	<p>2.4 Whilst we welcome the reference to the National Policy Statement EN-1 the review in section 2.4 is very selective and does not mention the historic environment section of the Policy Statement. RECOMMENDATION: We advise that reference to the historic environment section of the NPS should also be included in this section of the SPD.</p>	Thank you for your comment. The Built and Historic Environment is already factored into the existing landscape character areas identified in South Norfolk. These character areas incorporate the historic context and features of the landscape, and they remain unchanged by this study. As such, we don't find direct reference to the historic section of the Policy Statement necessary.	No change
<b>3.1 Approach</b>					

<p>Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]</p>	<p>4375</p>	<p>Comment</p>	<p>Proposed new section SPD needs to generally reflect amendments to the Broads Act. The Levelling Up and Regeneration Act, which received Royal Assent on 26 October 2023, amended Section 17A of the Norfolk and Suffolk Broads Act 1988. Section 17A creates a general duty of public bodies and this was amended to replace 'shall have regard to' with 'must seek to further' the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads, promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and protecting the interests of navigation.</p> <p>I would suggest there needs to be a section in the SPD that talks about this – how the impact on the Broads and its setting will be addressed through this SPD, similar to the section on the setting of Norwich. In particular, given that section 3.7.1 says 'When assessing the susceptibility of a landscape to change, consideration must be given to the effects of the development as perceived in neighbouring LCAs (and potentially further afield), not just the LCA in which the development is proposed'. Please see a proposed section below. We have made the section look like the section on Norwich. The second part (Considerations for the LSS) may or may not be needed or you may wish to amend it. We are happy to discuss this with you.</p> <p>Landscape setting of the Broads</p> <p>The Broads is an internationally important wetland and designated protected landscape of the highest order, with a status equivalent to that of a National Park and one of Europe's finest and most important wetlands for nature conservation.</p> <p>Part of the Broads lies within South Norfolk district area. The Levelling Up and Regeneration Act, which received Royal Assent on 26 October 2023, amended Section 17A of the Norfolk and Suffolk Broads Act 1988. Section 17A creates a general duty of public bodies and this was amended to replace 'shall have regard to' with 'must seek to further' the purpose of conserving</p>	<p>Thank you for the detailed comments. We recognise the importance of the Broads as a protected landscape and its relevance to planning considerations in South Norfolk. While the Broads Authority area is excluded from the scope of this SPD, we will make the following amendments:</p> <ul style="list-style-type: none"> <li>• Include paragraph 2.2.5 to reference paragraph 189 of the 2024 NPPF, which highlights the great weight to be given to conserving and enhancing the landscape and scenic beauty of the Broads.</li> <li>• Incorporate details of the Levelling Up and Regeneration Act amendments to Section 17A of the Broads Act within Chapter 3 of the SPD.</li> <li>• Include reference to cross-boundary issues in 3.3.1</li> </ul>	<ul style="list-style-type: none"> <li>• Reference to Paragraph 189 of the 2024 National Planning Policy Framework (NPPF) has been added (2.2.5)</li> <li>• Reference to Section 17A of The LUR Act has been added to Chapter 3 (3.3.2) of the SPD.</li> <li>• Reference to cross-boundary issues has been included in 3.3.1.</li> </ul>
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		<p>and enhancing the natural beauty, wildlife and cultural heritage of the Broads, promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and protecting the interests of navigation.</p> <p>Paragraph 189 of the 2024 NPPF says: 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads<sup>66</sup>. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas'. Footnote 66 says 'English National Parks and the Broads: UK Government Vision and Circular 2010 provides further guidance and information about their statutory purposes, management and other matters'</p> <p>South Norfolk District Council is not the Local Planning Authority for the Broads, and this SPD does not apply to the Broads. But there could be potential for some renewable energy schemes of the type discussed in this SPD within the South Norfolk administrative area to have an impact on the Broads and its setting.</p> <p>When considering schemes that are near to or next to the Broads Authority Executive Area, the impact on the setting of the Broads and on the Broads will be a key consideration. South Norfolk District Council will consult and engage with the Broads Authority at an early stage in the consideration of such proposals.</p> <p>The special landscape qualities of the Broads are set out in the Broads Authority's Landscape Character Assessment and the Broads' Landscape Sensitivity Study assesses the impact of renewable infrastructure on the Broads and these documents will also be used when assessing relevant planning applications.</p>		
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			<p>Schemes near to the Broads will also be assessed against the special qualities of the Broads. These are listed in the Broads Plan, which is the Management Plan for the Broads. The current version can be found here: Introduction. Considerations for the LSS The following paragraphs provide commentary on how the various development scenarios identified at Section 4 would accord with the purposes of the Broads Authority.</p> <p>Solar PV</p> <p>Although Solar PV preserves the existing soils and vegetation cover beneath the panels it nonetheless represents a form of development and could result in the loss of land for other purposes more appropriate in this area(e.g. grazing)Whilst it might be possible to screen Solar PV to mitigate harm on the setting of the Broads, it is likely that there would still be some detrimental impact</p> <p>AD plants</p> <p>AD plants include large structures and clamps, and these could have a substantial negative effect on the setting of the Broads. Whilst it may be possible to screen battery storage with planting, it is likely to still appear incongruous in the landscape</p> <p>Battery Storage</p> <p>Battery Storage represents a utilitarian form of development which could have a substantial negative effect on the setting of the Broads. Whilst it may be possible to screen battery storage with planting, it is likely to still appear incongruous in the landscape.</p> <p>Overhead power lines</p> <p>Overhead powerlines increase the sense of human influence and are a form of development. The scale of the structures and the topography of the Broads means that they are likely to have an adverse impact on the setting of the Broads.</p> <p>Underground cable routes</p>		
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			<p>Underground cable routes would have no perceived effect on the Broads. Substations</p> <p>A substation could have a substantial negative effect on the setting of the Broads. Whilst it may be possible to screen a substation with planting, it is likely to still appear incongruous in the landscape</p>		
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**3.3 The study area**

<p>Yare Valley Society (Mr John Elbro, Chair) [20539]</p>	<p>4328</p>	<p>Object</p>	<p>Part 1 The Yare Valley Society has the following comments on the proposed SPD as it relates to LCA F1: Yare Valley Urban Fringe. The SPD document recognises that LCA F1 is only part of a landscape type that extends into Norwich. It also recognises it is an LCA distinctly different from any other in South Norfolk (Appendix 3 page 76). This is because F1 forms only part of the Norwich urban fringe landscape type, and this, together with its urban fringe character, means an assessment of its landscape susceptibility is more complex than for the other LCAs. The complexity arises because there are additional considerations to be explored before a valid susceptibility assessment can be made. Some of the additional considerations are listed below. The need for their exploration in the SPD justifies a special status for F1: a status that fully recognises F1 is only part of a large and major river valley corridor, and that changes in F1 are likely to impact on the corridor as a whole. Failure to consider the impact on the corridor as a whole will cast doubt on the validity of the susceptibility assessment of F1. To best provide a full and proper assessment for F1, it should be given a separate section in the main document “Landscape Susceptibility in relation to Energy Generation, Storage and Transmission – SPD”. In much the same way has been done for item 7 “Policy DM 4.6: Landscape Setting of Norwich”. It should form a separate item 8. Additional considerations that justify a special status to F1 in the SPD are: •The corridor passes through densely populated residential areas in County and City. These areas are currently increasing rapidly in size (e.g. at Cringleford). The corridor is readily accessible by foot for a growing number of local residents. This growth is making increasing demands for green space for informal recreation to sustain the population’s wellbeing. •The corridor has been earmarked as a linear country park, the Yare Valley Parkway. See the “Southern Norwich Yare Valley Parkway” initiative in the Greater Norwich Growth Board’s Green Infrastructure Strategy for Greater</p>	<p>Thank you for your detailed comments regarding the proposed SPD and how it relates to Landscape Character Area (LCA) F1: Yare Valley Urban Fringe. We acknowledge the unique characteristics of LCA F1 and its importance within the broader Yare Valley corridor. However, it is important to clarify that the SPD applies solely to the South Norfolk District area. While LCA F1 forms part of a wider landscape that extends into Norwich and beyond, the SPD does not assess the entire Yare Valley corridor, nor does it seek to do so. Furthermore, the special status of LCA F1 has already been recognised in the original landscape character assessments upon which this SPD and its associated analysis are based. Its designation as F1 reflects its distinct character and context within the wider landscape framework. As noted in section 5.1.3 of the SPD, the landscape susceptibility assessment provides an initial indication of the relative susceptibility of different landscapes to various forms of energy-related development. It is not intended to be a definitive statement on the suitability of any specific location for development. Rather, it serves as a strategic-level tool to inform planning considerations. All development proposals will continue to be assessed on their individual merits through the appropriate planning application process. This includes detailed site-specific studies that will consider the full range of impacts, including those on the wider Yare Valley corridor, its ecological networks, recreational value, heritage assets, and contribution to climate resilience. We appreciate your recognition of the corridor’s strategic significance and the initiatives such as the Yare Valley Parkway. These are valuable considerations that will be relevant at the planning application stage, where a full and site-specific assessment of impacts can be undertaken.</p>	<p>No change</p>
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			<p>Norwich. This would be major linear park between a potential new country park at Bawburgh and Colney Lakes to the west of Norwich, and Whitlingham Country Park to the east.</p> <ul style="list-style-type: none"> <li>• Part of the corridor contains the Yare Valley Walk, highly valued for the access it gives to much seemingly remote and tranquil green space. An objective of the Parkway is to extend the Yare Valley Walk along the whole length of the corridor lying in the urban fringe.</li> <li>•The corridor is recognised as a Strategic Green Infrastructure Corridor. It forms a key part of the local ecological network. It provides habitat for, and facilitates migration of, flora and fauna, and so helps to sustain biodiversity and enable adaption to climate change. The corridor links five Local Nature Reserves, and a County Wildlife Site site. The vegetation in the corridor together with new wildflower meadows in the valley (being managed largely with the help of volunteers) help counter the current decline in pollinating insects.</li> <li>•The corridor helps combat climate change. Its vegetation and particularly its marshes act as a carbon sink by storing greenhouse gases.</li> <li>•The corridor helps mitigate climate change and pollution. Firstly, its woodland, scrubland and meadows slow the rate of water run-off, reducing flooding and delaying pollutants entering the “chalk stream” river. Secondly, its marshes store large quantities of water in times of flood, so reducing damage from flooding downstream.</li> <li>•The corridor contains significant structures that need to have their natural setting safeguarded. Some of these structures are historic, many have listed status, and some are scheduled monuments. They include: at UEA the Lasdun Wall, the Norfolk and Suffolk Terrace, and the Ziggurat buildings all Grade II or II* listed; the Sainsbury Centre for Visual Arts Grade II* listed; Cringleford Bridge Grade II* listed and a scheduled monument; Keswick Mill and Mill House Grade II listed; the Mill House and Mill House Cottage at Trowse Millgate Grade II listed; and Arminghall Henge is a scheduled monument.</li> </ul>		
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			<p>LCA F1 differs in major ways from other LCAs. A sound assessment of susceptibility is crucial if its contribution to the wellbeing of many County and City residents, and to the wellbeing of the wildlife in the urban fringe, is to be safeguarded. To ensure the validity of the susceptibility study, LCA F1 should be given special status and considered separately as item 8 in the main SPD documentation.</p>		
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<p>Yare Valley Society (Mr John Elbro, Chair) [20539]</p>	<p>4373</p>	<p>Object</p>	<p>The Yare Valley Society response to the consultation on the proposed SPD in respect to LCA F1: Yare Valley Urban Fringe is in two parts. Part 1 dealt with page 76 of Appendix 3 Landscape Susceptibility Analysis F1, and has already been submitted. Part 2 is below and is based on a detailed examination of pages 78 to 85 of Appendix 3 Landscape Susceptibility Analysis of F1 (page 77 is blank). LCA F1: Yare Valley Urban Fringe Part 2 The Yare Valley Society response to pages 78 to 85 of Appendix 3 Landscape Susceptibility Analysis F1. Preliminary comments If a landscape assessment for LT F: Valley Urban Fringe is to be valid, it must fully recognise that it is only part of a much larger Landscape Character Area between Norwich and South Norfolk: The Yare Chalk River Valley. It is remarkable that places of unspoilt, and often seemingly remote, publicly accessible green space in the Yare River Valley corridor between Bawburgh Lakes and Whitlingham Park have survived while being so close to, and in places passing through, urban environments. It is almost on the doorsteps of the local residents of County and City. Prized by the local community, voluntary community organisations such as the Yare Valley Society, Eaton Village Residents Association, and the Yare Valley Meadow Makers actively promote the health, biodiversity and human enjoyment of the Valley. It is a Strategic Green Infrastructure Corridor providing wildlife habitat and facilitating wildlife movement. Its other roles include the storing of carbon in its marshes and vegetation, the slowing of rainwater run-off, and the storing of floodwaters: all helping to reduce and combat the effects of climate change. The Yare Valley Society asks that more weight be given to the above factors in the assessment of LT F: Valley Urban Fringe. Its proximity to the urban environment makes its surviving green space relatively more susceptible to change than might be the case in a rural river valley. Incremental urbanisation of the river valley should be avoided.</p>	<p>We have reviewed the Yare Valley Society's Part 2 response to pages 78 to 85 of Appendix 3: Landscape Susceptibility Analysis F1. We appreciate the effort taken to provide detailed page-by-page commentary and acknowledge the Society's concerns regarding the need to fully recognise the Yare Chalk River Valley as a larger landscape character area. The special status of LCA F1 has already been recognised in the original landscape character assessments upon which this SPD and its associated analysis are based. Its designation as F1 reflects its distinct character and context within the wider landscape framework. While we value the input provided, it is important to note that the landscape susceptibility assessment has been carried out by independent landscape consultants. As such, we are not in a position to alter the findings or structure of their professional assessment.</p>	<p>No change</p>
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			<p>Changes asked for by the Yare Valley Society are indicated below. To make its response as clear as possible, each page from pages 78 to 85 of Appendix 3 Landscape Susceptibility Analysis F1 is dealt with in order and most of the changes are indicated page number by page number in red.</p> <p>Thank you for your careful consideration of the Yare Valley Society response.</p> <p>See Attachment for Comments on Appendix 3.</p>		
SLR Consulting Ltd [20549]	4351	Object	<p>Paragraph 3.3.4 "...development such as a distribution warehouse could potentially result in a significant change to the character of the landscape." - The word 'significant' typically relates to EIA development, so its use in this context is ambiguous. Consider changing "significant" to Large or Major, which either relate to the magnitude of change or the scale of effects.</p> <p>Paragraph 3.3.12 "...The LCAs are mapped below and at Appendix 1   Figure 08." - It would be useful if Appendix 1 can be available as GIS datasets to ensure the LCAs are accurately shown in landscape and visual assessments going forward.</p>	<p>Thank you for your observation regarding the use of the term "significant". We acknowledge that this term carries specific implications within Environmental Impact Assessment (EIA) terminology, which may lead to unintended confusion in this context. To ensure clarity and avoid any misinterpretation, we will revise the wording accordingly.</p> <p>The Landscape Character Areas (LCAs) can now be found 'My Area' Map on the Councils webpage.</p>	<ul style="list-style-type: none"> <li>• Replacement of the word "significant" to "important" to paragraph 3.3.5 to avoid any potential confusion with EIA terminology.</li> <li>• The resolution of the figures has been increased.</li> </ul>

Mr Stephen Dawson [20552]	4368	Comment	<p>I would like to comment on the above document as far as it relates to the Yare Valley. I understand that you have already received from the Yare Valley Society a request for special consideration of area F1 (the Yare Valley) in the LCA, and I fully support their case, but I would also like to add my personal comments.</p> <p>The Valley is an immensely valuable remaining open space, both for nature and for people, in an area that has become more and more urban and populated, and is due to become yet more so.</p> <p>Any work such as the erection of pylons, placing of solar panels, even the disruption caused by putting cables underground, within and close to the Valley, would disrupt it's wildlife and devalue it to the people using it for recreation wildlife interest, and just to go somewhere for peace and quiet</p> <p>I would ask you to take account of this area's value and the potential damage that could be done to it when reaching a decision on LCA.F1</p>	<p>Thank you for your comments. The points you raise are relevant considerations. We acknowledge the unique characteristics of LCA F1 and its importance within the broader Yare Valley corridor. However, it is important to clarify that the SPD applies solely to the South Norfolk District area. While LCA F1 forms part of a wider landscape that extends into Norwich and beyond, the SPD does not assess the entire Yare Valley corridor, nor does it seek to do so. Furthermore, the special status of LCA F1 has already been recognised in the original landscape character assessments upon which this SPD and its associated analysis are based. Its designation as F1 reflects its distinct character and context within the wider landscape framework.</p> <p>All development proposals will continue to be assessed on their individual merits through the appropriate planning application process. This includes detailed site-specific studies that will consider the full range of impacts from energy developments including pylons, solar panels or underground cabling, including those on the wider Yare Valley corridor, its ecological networks, recreational value, heritage assets, and contribution to climate resilience.</p>	No change
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**3.4 Desktop Appraisal / Sources of Information**

<p>Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19732]</p>	<p>4314</p>	<p>Object</p>	<p>3.4.2 Please can you confirm if scheduled monuments and listed buildings as well as non-designated heritage assets have also been included? Insufficient consideration of historic environment in methodology and assessment More generally, in relation to the methodology, we are concerned that the methodology for the study falls short and is very much focussed on landscape with minimal consideration of the historic environment. We appreciate that the Assessment is not completely devoid of consideration for historic environment issues. For example, in Appendix 3 The Landscape Susceptibility Analysis mentions heritage assets including some conservation areas and some registered parks and gardens. However, heritage does not appear to have not been considered in the identification of areas of sensitivity and therefore it is our view that the Landscape Sensitivity Assessment does not give sufficient consideration to heritage assets and their settings. Further, more detailed heritage specific assessment is needed now which should give greater consideration to heritage assets and their setting, as described in Historic England Advice Note 15. Paragraphs 23-27 set out advice regarding how to assess areas for renewable energy development and the importance of considering heritage assets. We would emphasise that a receptor buffering approach is neither appropriate nor sufficient to assess impact upon the significance of heritage assets since it fails to engage with their historic landscape, designed landscape, topographic or archaeological context.</p>	<p>Thank you for your comments. The Built and Historic Environment is already factored into the existing landscape character areas identified in South Norfolk. These character areas incorporate the historic context and features of the landscape, and they remain unchanged by this study.</p> <p>The SPD is focused specifically on assessing landscape susceptibility and character. While the methodology does acknowledge the presence of heritage assets, such as conservation areas and registered parks and gardens, its scope does not extend to a detailed assessment of the historic environment or the setting of individual heritage assets.</p> <p>We recognise the importance of heritage considerations, and these are addressed through separate processes, including individual planning applications and heritage-specific assessments, where appropriate. Guidance such as Historic England Advice Note 15 is valuable in those contexts. Therefore, a more detailed heritage assessment falls outside the scope of this SPD.</p>	<p>No change</p>
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SLR Consulting Ltd [20549]	4350	Object	<p>Suggestions for mapping details. Having reviewed Appendix 1 figures, we note the following:</p> <ul style="list-style-type: none"> <li>• Figure 01: Exiting Norwich Main substation and overhead lines and pylons are not mapped. Should they not be considered given they form the existing baseline and location of proposed energy developments are inherent to the proximity to existing energy infrastructure?</li> <li>• Figure 04: Listed buildings should be mapped and considered as part of heritage designations.</li> <li>• Figure 05: County Wildlife Sites should be mapped and considered as part of local ecological designations.</li> <li>• Figure 08: Long Distance Footpaths and National Cycle Routes should be mapped and considered as part of public access.</li> <li>• General: When zooming into the plans the base plans are very difficult / impossible to read.</li> </ul>	<p>Thank you for your detailed comments on the mapping in Appendix 1. We will map the Norwich Main substation on all figures for context and add overhead lines and pylons to Figure 01 to better reflect the existing energy infrastructure. Figure 04 will be amended to include Grade I, II and II* listed buildings. All listed buildings can also be found on the South Norfolk My Area Map. We accept the proposed changes to Figure 05 and will add County Wildlife Sites (CWS) and Special Protection Areas (SPAs) to the figure. We also accept the proposed changes to Figure 08 and will include Long Distance Footpaths and National Cycle Routes to reflect public access. We will increase the resolution of the map files where possible to improve legibility when zooming in.</p>	<ul style="list-style-type: none"> <li>• Norwich Main Substation has been mapped on all figures in Appendix 1 for context.</li> <li>• Figure 01 has been amended to include Overhead lines and Pylons.</li> <li>• Figure 04 has been amended to include Grade I, Grade II and Grade II* buildings.</li> <li>• Figure 05 has been amended to include CWS and SPAs.</li> <li>• Figure 08 has been amended to include Long Distance Footpaths and the National and Regional Cycle Network.</li> <li>• The resolution of these figures has been increased.</li> </ul>
Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	4358	Comment	3.4.1 – there is no reference to the Broads Landscape Character Assessment or the Broads Landscape Sensitivity Study.	<p>Section 3.4.1 outlines that a desk-based study was undertaken, including a review of relevant background information and previous studies. The list provided is not exhaustive. The Broads Landscape Character Assessment and Broads Landscape Sensitivity Study are not referenced here as this study is limited to the South Norfolk area only and excludes the Broads Authority Executive Area. As such, those documents fall outside the scope of this assessment.</p>	No change

### 3.5 Sensitivity Analysis

SLR Consulting Ltd [20549]	4349	Object	<p>Paragraph 3.5.2 “The field survey work was carried out by a team of Landscape Architects, all of whom were experienced in the special qualities of South Norfolk’s landscape, using a standard proforma to record data in a consistent manner.” - Suggest changing the word “special” as special qualities are associated with National Parks, which the study area does not include. Suggest use 'distinctive' or 'local' or omit the word altogether.</p> <p>Paragraph 3.5.8, having reviewed Appendix 2 Criteria for Assessing Susceptibility to Change we have the following comments:</p> <p>Table 1: Solar: Could existing energy infrastructure in the landscape be referenced, such as under scale or land cover or visual characteristics for Lower Susceptibility. Proposed solar farms need to be located in areas close to existing overhead lines, which form part of the baseline and experience of the landscape.</p> <p>Under landform, Higher Susceptibility – steep slopes and narrow valleys is not relevant to Norfolk as illustrated in Appendix 1, Figure 02 Topography and Hydrology – perhaps this should be more focused and specific to Norfolk.</p> <p>Table 3: Battery Storage</p> <ul style="list-style-type: none"> <li>• Under landform – perhaps under Lower Susceptibility, it should be stated as ‘flat’, as any slight variation in existing landform requires level changes to accommodate BESS.</li> <li>• Under human influence – Norwich Main substation should be referenced under Lower Susceptibility.</li> </ul> <p>General</p> <ul style="list-style-type: none"> <li>• The definitions in each table do not seem to be specific to / focused on different types of energy development, they could be attached to any type of development, which doesn’t seem to reflect the purpose of the SPD.</li> <li>• Some energy developments need to be located close to existing energy infrastructure whether it is a substation or pylons and overhead lines, which would form the existing baseline. This is</li> </ul>	<p>Thank you for your comment. To avoid any confusion with terminology commonly associated with National Parks, we will omit the word “special” from the description.</p> <p>Thank you for your comments regarding Table 1. To promote the longevity and relevance of this SPD, we have chosen not to include specific references to the existing infrastructure within the sensitivity criteria, as such infrastructure can change rapidly and risk making the document outdated. Instead, a map of consented and proposed renewable energy schemes within South Norfolk is provided on the Council’s website. This ensures that users have access to current information while maintaining the long-term applicability of the SPD.</p> <p>While we appreciate that Norfolk is generally characterised by a flatter landscape, there are areas within South Norfolk that feature relatively steep slopes and narrow valleys. These features can still influence landscape susceptibility and visual sensitivity. Therefore, the inclusion of this criterion remains relevant to the assessment.</p> <p>Technical considerations are different from considerations of the effects on the landscape. It is accepted that there are technical considerations, but this study is purely about the susceptibility of the landscape. To be sound the SPD needs to consider landscape only.</p> <p>The criteria in Appendix 2 need to be abstract so that they can be applied to any landscape. The criteria should not reference specific places.</p> <p>It could be valid to consider proximity to the substation etc. in relation to specific development proposals, but this study relates to the character areas and has therefore to be somewhat generalised.</p> <p>Notwithstanding the above, it is accepted that human influence from pylons or existing substations reduces the susceptibility of the landscape, and the report has been modified to reflect this.</p> <p>Technical considerations and existing human influence would be considered in relation to specific development proposals when these come forward.</p>	<ul style="list-style-type: none"> <li>• To avoid any confusion with terminology commonly associated with National Parks, the word “special” has been omitted from Paragraph 3.5.2.</li> <li>• It is accepted that human influence from pylons or existing substations reduces the susceptibility of the landscape, and the report has been modified to reflect this.</li> </ul>
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			not well reflected in the table definitions and should be reconsidered.		
<b>3.6 Assessment of overall susceptibility</b>					
SLR Consulting Ltd [20549]	4348	Object	<p>Field pattern been excluded from consideration in Battery Storage developments and substations (although considered for Solar PV developments). When green infrastructure is an important consideration in siting proposed developments, field patterns should be a factor. Battery Storage should consider being sited within an existing field pattern.</p> <p>Skylines are omitted from consideration for Solar PV and Battery Storage developments. This should also be considered. Solar farms in more open locations can impact skylines. Skylines near proposed Solar PV and Battery Storage developments usually contain pylons and overhead lines as part of the baseline and should be considered.</p>	Whilst different factors can be considered for different types of development (and this is recommended by the guidance), field patterns and skylines have been added to the analysis as suggested.	<ul style="list-style-type: none"> <li>Field patterns and skylines have been added to the analysis as suggested.</li> </ul>
<b>3.7 Limitations</b>					
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19732]	4315	Support	<p>Paragraph 3.7.1 This is an important section of the SPD, setting out the limitations of the LSS. Bullet point 4 is particularly pertinent and helpfully clarifies that the study only really considers landscape.</p> <p>RECOMMENDATION: We advise including the words 'or heritage assets' after 'ecological habitats' at the end of the third sentence of the fourth bullet point.</p>	Thank you for your recommendation. We agree that the suggested addition would help clarify the scope of the study.	<ul style="list-style-type: none"> <li>'or heritage assets' added to Para 3.7.1 to clarify that the study only considers the landscape character.</li> </ul>
<b>4.1 Energy-related development scenarios considered in the LSS</b>					

Annetta Berry [20530]	4283	Object	<p>The threshold for Solar NSIPs begins at 100MW yet this document only a Examines scenarios up to 50MW. The panels for many of these larger schemes are 4.5m high panels which lay horizontal at night time and midday. These have a negative impact on birds, insects and bats, which mistake them for bodies of water. solar infrastructure should not be situated next to woodland, especially ancient woodland. we have a significant number of barbastelle maternity colonies that will be damaged by both construction and operation. visual impacts on our large numbers of listed buildings and conservation areas need more protection.</p>	<p>Thank you for your comments.</p> <p>In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Councils' strategic responses to NSIPs.</p> <p>We acknowledge the concerns raised regarding the impacts on birds, insects and bats however, these matters fall outside the scope of this study, which is focused on landscape character in relation to renewable energy development. Ecological and heritage impacts will be fully considered at the planning application stage, where site-specific assessments and relevant policy considerations can be appropriately addressed.</p>	<ul style="list-style-type: none"> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> </ul>
Mr Patrick Floyd [15060]	4287	Object	<p>We are looking too much arable land to energy that is not needed in our area. The National Grid(National Greed) is obsessed with pylons when there are better alternatives available when considering offshore wind farms. As for solar, I'm afraid I've see the damage it does to biodiversity. They say that it's a natural environment for wildlife, then fence it off for security and cut any wild plants for safety! Im still worried by battery farms. The risks are still great in a rural area, especially in dry, hot periods!</p>	<p>Thank you for your comment. This SPD focuses specifically on landscape character and susceptibility in relation to renewable energy development. Broader issues such as ecological impacts and safety risks, while important, fall outside the scope of this assessment.</p>	No change

<p>Brockdish (including Thorpe Abbots) Parish Council (Teresa Hines, Clerk) [20541]</p>	<p>4310</p>	<p>Object</p>	<p>Councillors were very disappointed with this document. We found it excessively long and unstructured and consequently very difficult to form a complete picture of the measures being proposed. It was frustrating to read a large amount of text only then to find that it related only to BESS of less than 1 Ha. and totally irrelevant to the proposal at Dodd's Wood which is probably 50 Ha in size.</p> <p>The Parish Council suggests that you create a new document which:</p> <ol style="list-style-type: none"> <li>1. Carries out research into the likely size of BESS proposals likely to be coming forward and then addresses sites of that size.</li> <li>2. Begins with 2 or perhaps 3 pages which state the essential policies, proposals and criteria which the Council will use in assessing proposals. This will help to both clarify the issues in the Council's mind and make it easier for consultees to respond. It will also make a document which can be more effectively defended at public inquiries.</li> <li>3. The reasoned justification and technical data can then form a second part so that anyone interested can interrogate that information as required.</li> </ol> <p>see above</p>	<p>Thank you for your comments.</p> <p>We appreciate the time taken to review the document and acknowledge the concerns raised.</p> <p>We recognise that the scale of BESS developments is increasing since we first commissioned this work in 2024, and in response to this, we have commissioned The Landscape Partnership to undertake a dedicated assessment to address the landscape considerations associated with larger-scale BESS scenarios.</p> <p>The SPD is structured to provide both strategic guidance and technical evidence. Chapter 3 sets out the relevant policy context, while Chapter 5 summarises the key findings of the landscape susceptibility study. Further detail is provided in the appendices to ensure transparency and allow for deeper interrogation of the evidence base where required.</p> <p>We would like to clarify that the landscape assessment has been undertaken by independent consultants and forms part of the technical evidence base. As such, we are not in a position to alter the findings or restructure the assessment itself.</p>	<ul style="list-style-type: none"> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> </ul>
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Norfolk County Council - LLFA (Ms Sarah Luff, Strategic Flood Risk Planning Officer) [20414]	4332	Object	<p>The LLFA notes that while the SPD is focusing on the implications for the local plan, the SPD was meant to consider all energy projects. Yet in section 4.1.2, the different development scales are shown to be under the threshold of the NSIP scales of development. However, the majority of the proposed energy infrastructure development exceeds these thresholds. It would be useful for the LPA to provide some commentary on how the LPA would expect the SPD to interact with the NSIP applications and the applicant's considerations.</p>	<p>It is important to note that the original study underpinning the SPD was commissioned to support South Norfolk Council's responses to NSIP proposals, which are decided by the Secretary of State under the Planning Act 2008 and not by the Local Planning Authority. Over time, this work has evolved into a broader strategic resource designed to inform and guide consideration of landscape character and susceptibility across a range of energy planning contexts. The SPD does not determine the acceptability of individual schemes; rather, it provides a framework for understanding landscape susceptibility to the various energy-related developments.</p> <p>In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Councils' strategic responses to NSIPs. We trust this clarification addresses your concerns and confirms the intended scope and purpose of the SPD.</p>	<ul style="list-style-type: none"> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> </ul>
SLR Consulting Ltd [20549]	4343	Object	<p>Alternative wording suggested. Paragraph 4.1.2 notes for Solar PV the following sizes have been considered:</p> <ul style="list-style-type: none"> <li>• small-scale solar PV projects, up to 5 MW</li> <li>• medium-scale solar PV projects, 5 to 15 MW</li> <li>• larger-scale solar PV projects, 15 to 50 MW</li> </ul> <p>Should another category be included, such as 'very large-scale' given that more frequent schemes that are larger than 50 MW are being proposed? These scales seem almost out of date before the SPD has been published. Whilst schemes over 50 MW are currently determined by SoS, the NSIP threshold is due to increase to 100 MW at the end of 2025.</p> <p>For Battery Storage it is noted that "up to 1ha in size" is considered. Again, should a larger category be considered given that 500MW and 1GW size battery developments are now being proposed.</p>	<p>Thank you for your comments. In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Councils' strategic responses to NSIPs.</p>	<ul style="list-style-type: none"> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> </ul>

**4.2 Other energy-related development types**

Norfolk County Council - Minerals and Waste Team (Ms Caroline Jeffery, Principal Planner) [20338]	4330	Object	Paragraph 4.2.3 refers to landfill gas projects – these would be waste management developments to be determined by the County Planning Authority and therefore should not be included in the SPD. Paragraph 4.2.4 states that advanced conversion technologies are designed to recover energy from waste – therefore, these would be waste management developments to be determined by the County Planning Authority and should not be included in the SPD.	This section is a description of energy development types of which landfill gas projects is one, and not a commentary on TCPA responsibilities. The merits of advanced conversion technologies is a planning application matter, where all considerations including the continued operations of critical infrastructure can be assessed together.	No change
<b>4.3 Overview of energy-related development scenarios</b>					
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19732]	4316	Object	4.3.2 We note that the SPD states that the design development guidelines only relate to landscape susceptibility and not to other areas of potential environmental impact. Indeed, the guidelines set out at paragraph 4.3.4 are mainly landscape focussed. However, the historic environment is an important aspect of the landscape and should therefore be included in any development guidelines. RECOMMENDATION: We advise that a more holistic approach is needed which captures historic environment considerations for design as well.	We acknowledge that the SPD specifies the design development guidelines are intended to address landscape susceptibility and do not extend to other potential environmental impacts. As stated in paragraph 4.3.4, the guidelines are primarily focused on landscape considerations. While the historic environment is an important aspect of the wider landscape, it is not within the scope of this particular assessment.	No change

<p>Norfolk County Council - LLFA (Ms Sarah Luff, Strategic Flood Risk Planning Officer) [20414]</p>	<p>4333</p>	<p>Object</p>	<p>In relation to section 4.3.4 bullet point 5, there is mention of the need to "Consider the landscape effects of drainage features such as SuDs, which can have a highly engineered form and suburbanising associated paraphernalia. Ensure they have sufficient space to enable shallow sides and opportunities for habitat creation, so as to create meaningful and positive additions to the landscape." The LLFA supports this approach and notes that frequently the applicant's do not consider the compacted platform areas created to facilitate the proposed development as an area that behaves as an impermeable surface. Subsequently, in section 4.7.8, the text states presences a counter-perspective of "Engineered drainage features such as SuDS features and earthworks, including artificial mounds that might be used to screen the development, can have an intrusive effect in the landscape." there is inconsistency in the consideration of the inclusion of SuDS in the proposed design that could undermine their inclusion. While the LLFA appreciates the technical consideration presented in both sections, it is not clear why it is a positive for solar farms and a negative for Battery Energy Storage System (BESS) sites to include SuDS.</p> <p>2.3. In addition, the temporary construction areas would also need to be considered in terms of surface water management and an appropriate area would need to be provided to facilitate the management of the increase in surface water runoff from the construction infrastructure. It is also noted that in a number of applications that have been reviewed to date, the need for frequent maintenance of the proposed temporary energy development such as solar farms and BESS facilities will require construction compound facilities to be built and removed every few years causing regular disturbance to the landscape and local surface water management. The use of surface level SuDS is required for all stages of the development's life cycle, however for SuDS to be effective they require time for the vegetation to mature in order to provide the benefits to the water quality, biodiversity and amenity. Therefore, the LLFA suggests there should be the need to consider the construction facilities that are needed to</p>	<p>Thank you for your comments.</p> <p>The point about the compacted platforms is noted.</p> <p>SuDS features are not referred to in relation to solar developments.</p> <p>The guidelines for Battery Storage and AD Plants have been amended. The use of SuDS is supported. Adverse effects on the landscape would only be from poorly designed SuDS features.</p> <p>Construction and long-term maintenance are beyond the scope of this SPD and will be considered at the planning application. And the consideration of potential impacts of development would also be dealt with as part of the planning application process.</p>	<ul style="list-style-type: none"> <li>The guidelines for Battery Storage and AD Plants have been amended. The use of SuDS is supported.</li> </ul>
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			<p>maintain the proposed development and whether a longer term construction facilities area (access, laydown area, surface water management and utilities connections) should be provided throughout the lifetime of the development to reduce the disturbance to the local area and ensure better management of long term risks such as surface water runoff.</p> <p>Furthermore, it is worth noting that in the subsequent bullet point 6, the "artificial mounds that might be used to screen the development" are also likely to be formed from compacted material that would likely have an increased runoff rate from the structures. This would likely increase the potential size of the attenuation areas to be constructed to prevent the increase in flood risk from the development.</p>		
SLR Consulting Ltd [20549]	4347	Comment	<p>This section could be expanded to mention green infrastructure as a whole, rather than individual components. There is no mention of connecting existing and proposed landscape features, multi-functionality that proposals can serve, and wider benefits.</p> <p>Perhaps a reference to BNG can be added too, that proposals should enhance/ reflect landscape character and not be proposed to hit a certain percentage, which may be inappropriate.</p> <p>There is no mention of using/ encourage the use of recessive colours, which may help to blend/ integrate in proposals to the wider landscape setting.</p>	Thank you for your comments. This lies outside the scope of this study. Areas such as Green Infrastructure (GI), Biodiversity Net Gain (BNG), and design are addressed through separate planning policies and guidance	No change

**4.4 Cumulative Effects**

Annetta Berry [20530]	4284	Object	<p>This suggests that if there's already one massive solar farm in one location then the appropriate solution is to put another one in the same area, as this landscape is already impacted. This is not an acceptable approach as the whole area will be destroyed, particularly for wildlife that will not be able to cope with that excessive development.</p> <p>Other types of development should be actively promoted in those affected areas (in line with local plans) to safeguard the area for communities and wildlife, such as extensive planting of new woodland to de-industrialise the appearance of the area.</p>	Thank you for your comments. As noted in 5.1.3, whilst this susceptibility assessment provides an initial indication of the relative susceptibility of different landscapes to a range of development types it should not be interpreted as a definitive statement on the suitability of a certain location for a particular development proposal. It is not a replacement for detailed studies on specific siting and design, and all developments will need to be assessed on their individual merits through the appropriate planning processes.	No change
SLR Consulting Ltd [20549]	4346	Object	Timeframes of proposed developments are not mentioned and should be considered as part of cumulative assessments. For example, proposed are more likely to be permanent, but proposed solar farms would be over the long-term and reversible.	Thank you for your comment. There is disagreement with this comment. The assessment of cumulative impact should be made on the development proposed and not a speculative appraisal of how that development may increase or decrease in scale over several decades.	No change
Mr Gary Wootton [20531]	4285	Object	I am against the development of Solar Farms in rural and green areas. The senseless damage to the environment caused by these follies must be stopped. How are we to save this planet by destroying wildlife and our lifegiving trees by erecting environment-damaging solar panels across our fields ? This is an absolute disgrace. Chasing Net Zero is unachievable within a single generation, but if we must have renewable energy then develop offshore windfarms. Scientists and engineers agree that offshore windfarms can provide sufficient power for our needs so stop destroying the very things you're supposedly trying to save.	Thank you for your comments.	No change
Mr Keith Weston [20455]	4290	Object	East Pye Solar proposal is for 500MW (10 times the upper size in your parameters)	<p>Thank you for your comment.</p> <p>In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Councils' strategic responses to NSIPs.</p>	<ul style="list-style-type: none"> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district</li> </ul>

<p>Norfolk Constabulary (Architectural Liaison) (Ms Penny Turner, Architectural Liaison Officer) [13990]</p>	<p>4293</p>	<p>Object</p>	<p>Due to evolving crimes associated with solar installations and other energy installations (i.e. metal theft) previous use of deer fencing (wire &amp; post) will not be supported for vulnerable perimeters. This is a demarcation treatment and not security fencing, and as such this type of boundary treatment is not fit for purpose to prevent the now increasing crime trend occurring at these facilities nationwide, including South Norfolk. Therefore, I appeal for this document not to promote the potentially problematic fencing by using wording such as wire and post/deer fencing within the Document – specifically within the below sections:  Overview of the development type  4.5.1 "The proposals typically include a 2m high post and wire fence, pole-mounted CCTV cameras, and access tracks. Some security lighting may be proposed in conjunction with the buildings." Request remove 'post and wire' wording.  4.5.7 "2m high security fencing, comprising deer fencing with a low visual presence." Request remove 'deer'</p>	<p>We acknowledge the concerns raised about the use of wire and post/deer fencing, particularly in relation to vulnerabilities around energy installations. We agree to amend the wording elsewhere in the document to avoid specifying types, ensuring flexibility while supporting security and local distinctiveness.</p>	<ul style="list-style-type: none"> <li>References to specific types of fencing have been removed.</li> </ul>
<p>Norfolk Constabulary (Architectural Liaison) (Ms Penny Turner, Architectural Liaison Officer) [13990]</p>	<p>4294</p>	<p>Comment</p>	<p>To promote police preferred fencing standards, could I request additional wording within the DESIGN DEVELOPMENT GUIDELINES 4.5.11. There follow bullet points that are relevant to the siting and design of Solar PV in South Norfolk therefore this section could be of use to promote the change/upgrade in fencing standards that current situation dictates.  "Appropriate security fencing for development must be considered – Crime Prevention measures will request 2m weldmesh style fencing to meet BS1722 standards on vulnerable boundaries." However,....  .....Enhance existing screening through planting that integrates with features such as woodland and hedgerows within the wider landscape, to reinforce local character and biodiversity. Or to introduce similar wording as found within section 4.10 Substations but substitute steel "2.75m palisade" for "2.0m weldmesh/palisade style of BS1722 standard"</p>	<p>The SPD is focused on the effects of energy developments on South Norfolk's landscape character and does not set out detailed requirements for security or crime prevention measures. While fencing may be necessary in some cases, the type and design of fencing, including compliance with standards such as BS1722, is more appropriately considered at the planning application stage, where site-specific needs can be assessed.</p>	<p>No change</p>

<p>Topcroft Parish Council (Topcroft Parish Clerk) [12818]</p>	<p>4300</p>	<p>Object</p>	<p>The parameters assumed in the study include coverage of the impacts of : "Ground mounted panels up to a maximum of 4m high" (this should be 4.5 metres) and a: "25 year life, followed by full decommissioning and removal of all structures and a return to an agricultural land use or habitat creation typical of the LCA" (East Pye is 40 to 60 years)</p>	<p>Thank you for your comment. In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Councils' strategic responses to NSIPs.</p>	<ul style="list-style-type: none"> <li>• The parameters assumed for Solar PV projects has been updated to "A lifespan of up to 40 years".</li> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> </ul>
<p>Topcroft Parish Council (Topcroft Parish Clerk) [12818]</p>	<p>4301</p>	<p>Object</p>	<p>The study also fails to take account of the fact that the threshold for NSIP schemes is increasing from 50mw to 100mw and therefore in the near future it will be LPAs like SNC that will be covering solar PV applications up to 100mw - the sensitivity analysis conducted in this study does not cover the 50mw to 100mw range. The document should not be adopted until this range of potential developments is included.</p>	<p>Thank you for your comment. In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Councils' strategic responses to NSIPs.</p>	<ul style="list-style-type: none"> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> </ul>

<p>Saxlingham Nethergate Parish Council (Saxlingham Nethergate Parish Clerk) [13242]</p>	<p>4305</p>	<p>Object</p>	<p>The parameters assumed in the study include coverage of the impacts of : "Ground mounted panels up to a maximum of 4m high" (this should be 4.5 metres) and a: "25 year life, followed by full decommissioning and removal of all structures and a return to an agricultural land use or habitat creation typical of the LCA" (East Pye is 40 to 60 years)</p> <p>The study also fails to take account of the fact that the threshold for NSIP schemes is increasing from 50mw to 100mw and therefore in the near future it will be LPAs that will be covering solar PV applications up to 100mw - the sensitivity analysis conducted in this study does not cover the 50mw to 100mw range. The document should not be adopted until this range of potential developments is included."</p>	<p>In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Councils' strategic responses to NSIPs.</p>	<ul style="list-style-type: none"> <li>• The parameters assumed for Solar PV projects has been updated to "A lifespan of up to 40 years".</li> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> </ul>
<p>Hempnall Parish Council (Hempnall Parish Clerk) [13769]</p>	<p>4308</p>	<p>Object</p>	<p>The study also fails to take account of the fact that the threshold for NSIP schemes is increasing from 50mw to 100mw and therefore, in the near future it will be LPAs like SNC that will be covering solar PV applications up to 100mw - the sensitivity analysis conducted in this study does not cover the 50mw to 100mw range. The document should not be adopted until this range of potential developments is included.</p> <p>The parameters assumed in the study include coverage of the impacts of : "Ground mounted panels up to a maximum of 4m high" (this should be 4.5 metres) and a: "25 year life, followed by full decommissioning and removal of all structures and a return to an agricultural land use or habitat creation typical of the LCA" This timeframe is inadequate as for example, the East Pye scheme is for 40 to 60 years.</p>	<p>In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Councils' strategic responses to NSIPs.</p>	<ul style="list-style-type: none"> <li>• The parameters assumed for Solar PV projects has been updated to "A lifespan of up to 40 years".</li> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> </ul>

<p>Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19732]</p>	<p>4317</p>	<p>Support</p>	<p>4.5.3 The threshold is due to change in December 2025. RECOMMENDATION: We advise that the change in threshold should be noted here. 4.5.11 We note the reference to conservation areas and listed buildings and park in bullet point 3 and 5. Bullet point 3 should also refer to scheduled monuments and registered parks and gardens RECOMMENDATION: Amend bullet point 3 to make it clear that this also includes scheduled monuments and registered parks and gardens. Also amend wording as currently implies just the settings of those designated heritage assets that should be avoided but it should also include the assets themselves.</p>	<p>Thank you for your comments. In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Councils' strategic responses to NSIPs.</p> <p>We acknowledge the comments regarding bullet points 3 and 5, and accept the recommendation to amend bullet point 3 to include scheduled monuments and registered parks and gardens as further examples of designated heritage assets. However, we note that the bullet point provides examples only and is not intended to be an exhaustive list, as the scope of the study is limited to landscape character. In terms of designated heritage assets, any potential impact on the assets themselves, not just their settings, would be assessed through the planning application process</p>	<ul style="list-style-type: none"> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> <li>• Bullet point 3 of 4.5.11 amended to include reference to scheduled monuments and registered parks and gardens.</li> </ul>
<p>Norfolk County Council - LLFA (Ms Sarah Luff, Strategic Flood Risk Planning Officer) [20414]</p>	<p>4334</p>	<p>Support</p>	<p>In section 4.5, the LLFA suggests that grid connection infrastructure such as substations are included in the description of the solar farms and BESS as more often we are now seeing this infrastructure included in applications due to a general lack of this type of infrastructure in the area. Therefore, it would be appropriate to acknowledge the grid connection infrastructure into the considerations. In addition, it is noted that frequently solar farms now come forward with BESS facilities incorporated into the solar farms. This should also be mentioned in this section.</p> <p>The LLFA has reviewed the renewables mapping browser and notes that there are a number of proposed developments that appear to be not included on the mapping such as the Markshall Solar Farm with BESS facility, the Tasway Energy Park, the proposed extension to the Yelverton solar farm and more.</p>	<p>Thank you for your comments. If a detailed scheme were to come forward comprising a combination of, for example, solar panels, BESS, and substation infrastructure, consideration would be given to all relevant sections of the SPD to ensure a comprehensive assessment.</p> <p>The renewable energy project map is regularly updated; however, it will only include Town and Country Planning Act (TCPA) schemes that have been submitted as formal planning applications or screening opinions.</p>	<p>No change</p>

Mrs Lisa Stubbs [20545]	4338	Object	Put solar PV on already built space. Roofs of barns,warehouse and on carpark before ever considering green spaces. It destroys character of landscape by being black and reflective short term (20 years), and by the changed nature of the landscape by the use of screening in the long term, which doesn't mitigate visual intrusion in the short term life of these 'farms'. This is an open broad landscape in so many places, enclosing with artificial planting will change landscape in the long term.	Thank you for your comments. The purpose of the SPD is to provide guidance on the landscape susceptibility associated with renewable energy proposals, including solar energy developments. It is intended to support the assessment of planning applications by offering a framework for evaluating potential impacts on landscape character. It is important to clarify that the SPD does not seek to determine or prescribe specific locations where energy development should or should not occur. Decisions regarding the spatial distribution of energy infrastructure fall outside the scope of this document and are addressed through other strategic planning processes. Instead, the SPD focuses on ensuring that proposals coming forward are appropriately sited, designed, and assessed in relation to their landscape context.	No change
CODE Development Planners Ltd (Mr Michael Carpenter, Director) [20543]	4340	Object	The SPD notes potential landscape effects and suggests a number of design guidelines. However these are of a general nature and require clear clarification that each proposal should be judged on its own merits and not dismissed against these general statements of effect and design guidelines. Individual site circumstances and mitigation solutions can often overcome concerns.	Thank you for your comments. As noted in 5.1.3, whilst this susceptibility assessment provides an initial indication of the relative susceptibility of different landscapes to a range of development types it should not be interpreted as a definitive statement on the suitability of a certain location for a particular development proposal. It is not a replacement for detailed studies on specific siting and design, and all developments will need to be assessed on their individual merits through the appropriate planning processes.	No change
SLR Consulting Ltd [20549]	4345	Object	The capacity threshold at which solar projects are classed as nationally significant infrastructure projects (NSIPs) will rise to 100MW from 31 December 2025.  Under potential landscape effects: "As extensive developments, solar arrays may be particularly visible in open landscapes, on slopes, or where overlooked, especially where covering significant areas." Rephrase/ omit some words. Small-scale solar farm developments are not always "extensive". Change "significant" to 'large'.  "Solar PV schemes can take fertile agricultural land out of production for many years." It is also worth highlighting that solar farms can also retain "productive" farmland through grazing/ other farming practices.	In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Councils' strategic responses to NSIPs.  We accept the recommendation to change the wording from "significant" to "large" to avoid any potential confusion with terminology used in Environmental Impact Assessment (EIA) regulations. We also agree to remove the word "extensive".	<ul style="list-style-type: none"> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> <li>• The words 'extensive' and 'significant' have been removed from this section to avoid any potential confusion with EIA terminology.</li> </ul>

Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	4360	Object	<p>4.5.8 – bullet point re agricultural land – could the land be used for grazing perhaps? If that is the case, is that worth mentioning? You mention that in 4.5.7...</p> <p>4.5.8 – maybe not a landscape effect per se, but there could be potential for biodiversity enhancements. You could mention that.</p> <p>In terms of solar, we have this criterion in our emerging policy, in case you wanted to mention it as well: Proposals within 300 m of a water body must demonstrate that they will not reflect polarised light that may attract aquatic insects or deceive them into laying eggs on the solar panels.</p> <p>4.5.11 (and in other places) – what is ‘time depth’?</p> <p>4.5.11 – is there an issue with shadow from planting, reducing the efficiency of some of the solar panels?</p>	<p>Thank you for your comments. With regard to the first point, the bullet point in Section 4.5.8 states that “Solar PV schemes can take fertile agricultural land out of production for many years”, which acknowledges the potential impact without implying certainty. Therefore, no amendment is considered necessary.</p> <p>In relation to the second point for 4.5.8, while biodiversity enhancements are an important consideration, they fall outside the scope of this SPD, which focuses specifically on landscape character. Such matters will be assessed through the planning application process.</p> <p>We will add the definition for ‘time depth’ as a footnote for clarity.</p> <p>Section 4.5.11 addresses this point in the eighth bullet, which states: “The layout should avoid effects on existing trees and hedges. Since panels are unlikely to be positioned where they would be shaded by vegetation, this is usually relatively easily achieved.” This acknowledges the potential issue of shading and confirms that layouts are typically designed to avoid such impacts on solar panel efficiency.</p>	<ul style="list-style-type: none"> <li>• ‘Time-depth’ definition has been included as a footnote on page 37.</li> </ul>
<b>4.6 AD Plants</b>					
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19732]	4318	Support	<p>4.6.8 We note reference to greater time depth at bullet point 9 and viewpoints from Conservation Areas at bullet point 14. We also welcome reference to local vernacular at bullet pint 16 and historic assets at bullet point 19. However, there is currently insufficient reference to the historic environment including designated and non-designated heritage assets and their settings. RECOMMENDATION: Add a new bullet point to read: Ensure that designated heritage assets including Listed Buildings, Conservation Areas Scheduled Monuments and Registered Parks and Gardens as well as non-designated heritage assets and their settings are conserved and enhanced through careful siting and design of AD plants as well as appropriate landscape mitigation.</p> <p>Amend bullet point 19 from historic assets to heritage assets in line with the NPPF terminology.</p>	<p>We acknowledge the recommendation however, this level of detail is beyond the scope of the SPD, which focuses specifically on landscape character. Consideration of the impact on heritage assets will be addressed through the planning application process, where a more comprehensive assessment can be undertaken in line with relevant heritage and planning policies.</p> <p>We are happy to accept the suggested amendment to bullet point 19, and will update the terminology from historic assets to heritage assets to ensure consistency with the National Planning Policy Framework (NPPF)</p>	<ul style="list-style-type: none"> <li>• Bullet point 19 wording has been amended to ensure consistency with NPPF terminology.</li> </ul>

<p>Norfolk County Council - Minerals and Waste Team (Ms Caroline Jeffery, Principal Planner) [20338]</p>	<p>4329</p>	<p>Object</p>	<p>Norfolk County Council as the Minerals and Waste Planning Authority for Norfolk are concerned that the SPD on 'landscape susceptibility in relation to energy generation, storage and transmission' includes policy guidance in relation to waste management development which are County Matters to be determined by the County Planning Authority and not by South Norfolk Council. Therefore, we advise that the following changes must be made to the SPD: The SPD includes AD Plants; whether an AD plant is a waste management development and a County Matter, or not, is determined by the feedstock. Therefore, it should be made clear within the SPD that the SPD is only applicable to the type of AD plants that are not waste management developments as these applications would be determined by the County Planning Authority in accordance with policies in the Minerals and Waste Local Plan.</p> <p>Paragraph 4.6.2 states that AD Plants can be classified into two general categories and includes those receiving waste feedstock. It should be made clear in the SPD that the SPD does not cover any AD Plants that receive waste as a feedstock because these would be waste management developments and County matters to be determined by the County Planning Authority.</p>	<p>We acknowledge Norfolk County Council's comments regarding the inclusion of Anaerobic Digestion (AD) plants within the SPD. To ensure clarity, we accept the recommendation to specify that the SPD applies only to AD plants that are not classified as waste management developments.</p> <p>We will amend the relevant sections, including Paragraph 4.6.2, to make clear that AD plants receiving waste feedstock fall under the jurisdiction of the County Planning Authority and are assessed in accordance with the Minerals and Waste Local Plan. The SPD will only apply to AD plants that do not involve waste feedstock and therefore do not constitute County Matters.</p>	<ul style="list-style-type: none"> <li>• 4.6.2 has been amended to make clear that AD plants receiving waste feedstock fall under the jurisdiction of the County Planning Authority and are assessed in accordance with the Minerals and Waste Local Plan.</li> <li>• The SPD will only apply to AD plants that do not involve waste feedstock and therefore do not constitute County Matters.</li> </ul>
<p>Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]</p>	<p>4361</p>	<p>Support</p>	<p>4.6.8 – a handy bullet on lighting, but that needs to be included in solar section as well. But it should begin with only install lighting that is justified. Have you thought about adding images to show, for example, what an AD plant or battery storage facility look like?</p>	<p>We acknowledge the helpful suggestion regarding lighting and agree that a bullet point will be added to the solar farm section to reflect this. The new bullet will begin with: "Only install lighting that is justified" to ensure lighting is considered appropriately in relation to landscape character.</p> <p>We have given careful consideration to the addition of illustrations but have decided against incorporating illustrations at this stage.</p>	<ul style="list-style-type: none"> <li>• A bullet point has been added to the solar farm section regarding lighting (page 38).</li> </ul>
<p><b>4.7 Battery Storage</b></p>					

Mr Steven Gray [20533]	4286	Object	Impact needs to consider noise and safety. BESS noise pollution adversely affect wildlife and human life. Norfolk fire service has limited capability to manage BESS fires.	Thank you for your comments. The risks associated with Battery Energy Storage System (BESS) developments are beyond the scope of this SPD, which specifically focuses on assessing the impacts of energy-related scenarios on landscape character. Broader considerations, including safety and technical risks, would be addressed through the planning application process and relevant regulatory frameworks.	No change
Mr Keith Weston [20455]	4291	Object	The East Pye Solar proposal does not follow the following design guideline: "Ensure the scale of development is appropriate for its context."	Thank you for your comments.	No change
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19732]	4320	Support	4.7.11 We note that there is reference to greater time depth at bullet point 8 and areas with historical significance e.g. parklands at bullet point 9. We note reference to viewpoints from conservation areas at bullet point 13, local vernacular at bullet point 15 and historic assets at bullet point 18. However, there is currently insufficient reference to the historic environment including designated and non-designated heritage assets and their settings. RECOMMENDATION: Add a new bullet point to read: Ensure that designated heritage assets including Listed Buildings, Conservation Areas Scheduled Monuments and Registered Parks and Gardens as well as non-designated heritage assets and their settings are conserved and enhanced through careful siting and design of battery storage developments as well as appropriate landscape mitigation. Amend bullet point 18 from historic assets to heritage assets in line with the NPPF terminology	We acknowledge the recommendation however, this level of detail is beyond the scope of the SPD, which focuses specifically on landscape character. Consideration of the impact on heritage assets will be addressed through the planning application process, where a more comprehensive assessment can be undertaken in line with relevant heritage and planning policies.  We are happy to accept the suggested amendment to bullet point 18, and will update the terminology from historic assets to heritage assets to ensure consistency with the National Planning Policy Framework (NPPF)	<ul style="list-style-type: none"> <li>Bullet point 18 wording has been amended ensure consistency with NPPF terminology.</li> </ul>

<p>Norfolk County Council - LLFA (Ms Sarah Luff, Strategic Flood Risk Planning Officer) [20414]</p>	<p>4335</p>	<p>Support</p>	<p>In section 4.7.5, the text indicates that batteries and other components are considered to be a permanent development. However, recent experience has seen a large number of temporary applications come forward for temporary sites of 40 to 60 years in duration. As a battery unit is expected to have 15 to 20 year design life, the replacement of the battery units to facilitate the design life of the development for the long term temporary period. The site would then need to be decommissioned to meet with the planning permission. It is frequently not clear what would be removed. However often it is only the units that would be decommissioned, while the support infrastructure such as grid connections, cabling and access facilities remain, yet the applicant wants all components to be treated as a temporary development rather than acknowledging the permanent nature of the development. This is an issue for the LLFA as it alters the surface water management assessment and design parameters such as climate change allowances and the possible resilience measures. Similar issues occur on the solar farm sites too.</p>	<p>Thank you for your comment. Matters relating to the decommissioning of sites, including what infrastructure may remain or be removed, fall outside the scope of this SPD. These considerations are addressed through the planning application process. The SPD focuses on what is introduced into the landscape, rather than what may be removed at the end of a development's operational life.</p> <p>We acknowledge your point regarding the temporary nature of BESS schemes and have updated the parameters here to reflect the temporary nature of BESS schemes.</p>	<ul style="list-style-type: none"> <li>Amended the parameters to reflect the temporary nature of BESS schemes in 4.7.5.</li> </ul>
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SLR Consulting Ltd [20549]	4344	Object	<p>4.7.4 "A typical site area for a 50MW capacity battery storage is likely to be around 1ha in size, depending on the battery technology used. The relatively small size of the battery storage allows some flexibility in terms of their exact siting." It should be noted that in order for sites to achieve BNG sites are likely to become larger in area. Paragraph 4.7.5 "Although batteries and other components have a design life, planning permissions are not typically limited in duration, and battery storage installations are therefore assumed to be permanent. As such, it is not assumed that sites would be returned to the previous use at the end of the operation phase." In most cases a decommissioning strategy is required to provide details on how the site will be returned to its former use. Paragraph 4.7.7 it is noted that the parameters assumed in the LSS includes "Battery storage cabinets up to 3m high". This seems quite low and restrictive given that in some locations BESS units are double stacked or even with single units the inclusion of noise attenuation kits on top of battery storage units can increase the height. In some locations BESS units are being constructed on plinths due to potential flooding issues. A typical height of up to 4m would seem more reasonable, or higher for double stacked units.</p>	<p>In response to the increasing volume and scale of energy proposals within the district, we have commissioned the consultants to include an additional assessment specifically addressing larger Solar PV and Battery Energy Storage System (BESS) schemes. This enhancement will ensure that the SPD remains a relevant and robust piece of guidance for informing local planning landscape assessments of energy-related developments, while maintaining its advisory role in shaping the Councils' strategic responses to NSIPs.</p> <p>Decommissioning strategies and the return of sites to their former use are matters considered through the planning application process and fall outside the scope of this SPD. The SPD focuses on what is introduced into the landscape, rather than what may be removed at the end of a development's operational life.</p> <p>With regards to the parameters assumed in paragraph 4.7.7, this has been updated to reflect the additional assessment for larger-scale, over 1ha in size battery storage projects.</p>	<ul style="list-style-type: none"> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> </ul>
Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	4362	Comment	<p>4.7.6 – what does 'a single scale of battery storage' mean? 4.7.10 - cumulative effectives or cumulative effects?</p>	<p>The phrase "a single scale of battery storage" means that only one scenario of Battery Energy Storage System (BESS) development, as outlined in 4.7.7 has been considered in the assessment. However, in light of the increasing scale of Battery Energy Storage System (BESS) projects being received by the Council, we have commissioned The Landscape Partnership to include an additional category to address the landscape considerations associated with a larger-scale BESS scenarios.</p> <p>The use of "cumulative effectives" in Section 4.7.10 is a typographical error. We will correct this to "cumulative effects" in the final version of the SPD</p>	<ul style="list-style-type: none"> <li>• An additional assessment category has been introduced for very large-scale solar developments (over 50MW) and larger-scale Battery Energy Storage System (BESS) schemes (over 1 hectare).</li> <li>• These changes ensure that the SPD can effectively inform the Council's responses to NSIP projects, as well as address the larger-scale Town and Country Planning Act (TCPA) schemes currently coming forward within the district.</li> <li>• Corrected typographical error in 4.7.10.</li> </ul>

Anglian Water Services (Tessa Saunders, Spatial Planning Advisor) [19845]	4370	Comment	Battery Energy Storage Systems: Whilst Anglian Water's direct interest in the location of BESS is generally in respect of source protection zones, and protecting the quality of water abstractions, and the water supply/connections required to maintain a fire suppression system at a BESS site; it is noted that some proposals that seek to reduce water use for fire suppression (and containment systems to prevent potential contaminants from spent firewater entering aquifers) through alternative fire suppression systems, and increasing the distance between the battery units. Whilst potential landtake for BESS may increase, this is positive for reducing reliance on potable water resources, improving containment of fire risk and potential contaminants entering aquifers. The landscape guidelines are helpful considerations when balancing other factors in the decision-making process, such as appropriate mitigation measures to minimise risks, for the layout and siting for a BESS.	Thank you for your comments. The points raised are noted.	No change
<b>4.8 Overhead powerlines</b>					
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19732]	4319	Support	4.8.18 We welcome the reference to sub note to Rule 2 of the Holford Rules relating to overhead lines and designated heritage assets.	Thank you for your comments.	No change
Norfolk County Council - LLFA (Ms Sarah Luff, Strategic Flood Risk Planning Officer) [20414]	4336	Support	In relation to the points made in section 4.8.7, the LLFA <b>notes the lack of comment on the need for a substantial temporary construction area around location of the pylon that has is some applications suggested that some temporary topsoil striping or disturbance is required in addition to the construction compound areas, temporary haul roads and other construction facilities to enable construction activities.</b> This is of interest to the LLFA due to the potential to alter and disrupt surface water flow paths, surface water attenuation and potential impacts associated with soil and subsoil compaction that could result in an increase in flood risk. The LLFA notes the support for the consideration of the use of green roofs in the various designs in chapter 4. <b>The LLFA supports this inclusion and suggests that it would be helpful to link it to the SuDS design too.</b>	Thank you for your comments. The points raised regarding temporary construction areas, topsoil disturbance, and the long-term implications for surface water management and flood risk are noted. However, these matters fall outside the scope of this SPD, which focuses specifically on landscape character. Such considerations will be addressed through the planning application process. We also welcome the LLFA's support for the inclusion of green roofs in design considerations. While the SPD references their potential landscape benefits, detailed SuDS design and integration will similarly be considered at the planning application stage.	No change

Mrs Lisa Stubbs [20545]	4339	Object	Cynically, I didn't notice believe local issues will be heard in a national infrastructure debate. However, short term, lowest cost thinking will destroy our landscapes for ever. Rule 6 was written when there was far less infrastructure. The effect of it is to blight more and more new areas, affecting more people and visual amenity. These cables can and be routed and laid in lower visual impact ways. Once the countryside is covered, it's character will be lost for ever.	Thank you for your comments.	No change
Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	4363	Comment	4.8.30 says - 'There is a presumption that underground cable routes are more appropriate than overhead powerlines within protected or more sensitive landscapes. The effect of overhead powerlines within the setting of the National Park Broads will also have to be carefully considered to avoid effects on the designated landscape'.	We accept the proposed change to Section 4.8.30	<ul style="list-style-type: none"> <li>Amended paragraph 4.8.30 to '<i>There is a presumption that underground cable routes are more appropriate than overhead powerlines within protected or more sensitive landscapes. The effect of overhead powerlines within the setting of the National Park Broads will also have to be carefully considered to avoid effects on the designated landscape</i>'.</li> </ul>
<b>4.9 Underground cable routes</b>					
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19732]	4321	Support	4.9.11 We welcome the references to heritage in bullet points 5, 6 and 7. However, there is currently insufficient reference to the historic environment including designated and non-designated heritage assets and their settings. For example, there can be considerable impacts on non-designated archaeology through cabling routes. RECOMMENDATION: Add a new bullet point to read: Ensure that designated heritage assets including Listed Buildings, Conservation Areas Scheduled Monuments and Registered Parks and Gardens and their settings are conserved and enhanced through careful routing of underground cables. Careful consideration should be given to avoiding harm to non-designated heritage assets where possible.	Thank you for your recommendation. The scope of this SPD is limited to landscape character. Considerations relating to designated and non-designated heritage assets, including potential impacts from underground cabling routes, will be assessed through the planning application process in accordance with relevant heritage and planning policies.	No change

Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]	4364	Comment	<p>4.9.1 – you might want to mention that there have been some occasions where overhead lines have been put underground to benefit the landscape.</p> <p>4.9.2 – what does a 'single scale' mean?</p> <p>4.9.3 – are the 6 trenches temporary?</p> <p>4.9.10 – are these projects underground? Maybe say that if that is the case.</p>	<p>We note your comment regarding undergrounding overhead lines for landscape benefit. However, no amendments are considered necessary to the SPD</p> <p>The phrase “a single scale” means that only one scenario of underground cable route development, as outlined in 4.9.3, has been considered in the assessment for this section.</p> <p>The trenches referred to are temporary works associated with construction, while the cable corridors themselves are permanent infrastructure.</p> <p>Paragraph 4.9.10, which in the consultation version of the SPD listed examples of consented cable routes, has been removed. Readers are now directed to the Renewable Energy Map available on South Norfolk Council’s website for up-to-date information.</p>	No change
Anglian Water Services (Tessa Saunders, Spatial Planning Advisor) [19845]	4371	Comment	<p>Underground cable routes: The design development guidelines include 'minimising the width of the required corridor' may be difficult to achieve in practice. From engagement with NSIP promoters we are aware that the width of these corridors is determined by safety factors and construction methods e.g. the distance required between the cables (dependent on voltage). In addition, the width can be influenced by the method of trenching and the depth the cables will need to be buried. As a result of interfaces with our underground assets (water mains and sewers) and the potential for adverse impacts inter alia heat dispersion from high voltage cables on our assets may result in the corridors being wider unless alternative mitigation measures can be identified.</p>	<p>Thank you for your comments. We acknowledge the points raised however no amendments are considered necessary to the SPD.</p>	No change

**4.10 Substations**

<p>Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19732]</p>	<p>4322</p>	<p>Support</p>	<p>4.10.14 We welcome reference to designated areas of cultural value in Horlock’s Rule 2 for siting of substations. 4.10.17 We welcome the references to heritage in bullet points 8,9, 13, 15 and 18. However, there is currently insufficient reference to the historic environment including designated and non-designated heritage assets and their settings. RECOMMENDATION: Add a new bullet point to read: Ensure that designated heritage assets including Listed Buildings, Conservation Areas Scheduled Monuments and Registered Parks and Gardens as well as non-designated heritage assets and their settings are conserved and enhanced through careful siting and design of substations as well as appropriate landscape mitigation.</p>	<p>Thank you for your comments. The historic environment, including designated and non-designated heritage assets, falls outside the scope of this assessment, which is focused specifically on landscape character. Therefore, no amendments to the SPD are considered necessary</p>	<p>No change</p>
<p>Broads Authority (Ms Natalie Beal, Planning Policy Officer) [12415]</p>	<p>4365</p>	<p>Comment</p>	<p>4.10.11 – the description of a typical substation says it includes lighting. Yet this section says lighting is not considered, save for emergency attendance. So, do these schemes have lighting associated with them or not? Throughout – it is not clear what is meant when it says: No external lighting, save that for emergency attendance 4.10.14 part 4 – a random number 4 in there</p>	<p>Thank you for your comments. Substations are typically not externally lit during normal operation and lighting will be removed from the potential landscape effect in the assumptions.  Thank you for noting the typographical error, this has been corrected.</p>	<ul style="list-style-type: none"> <li>• Lighting has been removed in the assumptions for substations, as they are only lit in emergency situations not during normal operation.</li> <li>• Corrected typographical error.</li> </ul>

**5.1 Overview**

<p>Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19732]</p>	<p>4323</p>	<p>Support</p>	<p>5.1.3 We welcome this paragraph which provides a helpful caveat explaining the limitations of Susceptibility Assessment. However, this could be expanded along the lines of the suggested paragraphs under b) on page 2. In addition, the caveats setting the use and limitations of the Study should not just be in Chapter 5 but should be clearly set out at the start of the document. RECOMMENDATION: Expand the paragraph along the lines of our suggested paragraphs under b) on page 2 [<i>A detailed heritage impact assessment will be required during the planning application process for each site to consider all designated and non-designated heritage assets and their settings. The Landscape Susceptibility Study which identifies sensitive landscapes and some heritage assets, should be used as a starting point for landscape and heritage assessments for applications. Applications should include visualisations showing the relationship to heritage assets and settings. Viewpoints should be agreed in consultation with interested parties. Cross boundary impacts should be addressed. Harm to the significance of heritage assets should be avoided or minimised through careful and sensitive siting and design.</i>]. Also include scope and caveats at the start of the document in the Introduction. It is unclear why Section 5 is just limited to Susceptibility and not widened to include value and hence Sensitivity like Section 6. Please can you clarify.</p>	<p>We note these comments. However, the limitations of the study are already set out in Chapter 3, within the Methodology section.</p> <p>At the district scale the report assesses landscape susceptibility. The local landscape character assessment also includes an assessment of landscape value and landscape sensitivity.</p> <p>Susceptibility and sensitivity are similar concepts but there is a technical distinction. Susceptibility is “the ability of a defined landscape or visual receptor to accommodate the specific proposed development without undue negative consequences.”</p> <p>Sensitivity is “a term applied to specific receptors, combining judgements of the susceptibility of the receptor to the specific type of change or development proposed and the value related to that receptor.”</p> <p>Sensitivity therefore includes judgements about value. Judging landscape value is a complex task in its own right, as there are many different aspects of landscape value. We considered that Section 5 would be more robust if it concentrated on susceptibility only. Section 6 however has been widened to include a consideration of value and sensitivity.</p>	<p>No change</p>
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<p>Norfolk County Council - LLFA (Ms Sarah Luff, Strategic Flood Risk Planning Officer) [20414]</p>	<p>4337</p>	<p>Comment</p>	<p>In relation to section 5 considerations, it is worth noting that in flood risk assessment terms under NPPF guidance, solar farms are considered as 'Essential infrastructure' while BESS and AD sites would be considered as 'Highly vulnerable' as this energy infrastructure does not need to be located in a flood risk area for operational reasons. As a BESS is for the storage of electricity and as there is no obvious need for the installations to require a coastal or water-side locations or need for them to be located in other high flood risk areas, then a BESS facility is considered to be in the 'Highly Vulnerable' class of development. As NPPF requires that all sources of flood risk are assessed in the Sequential Test. In the Sequential Test, a 'Highly Vulnerable' development in Flood Zone 2 or equivalent from other sources of flood risk would require the exception test. While a site is Flood Zone 3 or equivalent from other sources of flood risk would not be considered acceptable development for that location. This is likely to direct these developments away from lower lying areas or areas where surface water flow paths are present.</p>	<p>The LSS considers only the susceptibility of landscape character to change. There may be other very good reasons why a particular site is unsuitable or inappropriate for development. It is quite possible that an area may have relatively low sensitivity to a particular form of development in landscape terms but would be unsuitable in other respects e.g. due to the presence of important ecological habitats. Identification of such matters are beyond the scope of this study.</p> <p>As noted in 5.1.3, whilst this susceptibility assessment provides an initial indication of the relative susceptibility of different landscapes to a range of development types it should not be interpreted as a definitive statement on the suitability of a certain location for a particular development proposal. It is not a replacement for detailed studies on specific siting and design, and all developments will need to be assessed on their individual merits through the appropriate planning processes.</p>	<p>No change</p>
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SLR Consulting Ltd [20549]	4342	Object	<p>While noting that Table 1 is a summary of the LSS. The table highlights that for all solar farms above 15MW, the susceptibility to development is mostly high with a few medium-high. This seems overly generic and should be considered on a case by case basis. Perhaps this can be reviewed for some 'farmland areas' and making it clear this is subjected to individual site assessment.</p>	<p>A professional judgement has been made for the LCA as a whole in relation to a theoretical development of a certain size, and this does result in broad judgements. This type of study cannot by its nature consider individual development proposals, but it is agreed that actual development proposals should be considered on a case-by-case basis. It is accepted that there may be variations within a LCA, and this point has been made within the limitations section.</p> <p>As noted in 5.1.3, whilst this susceptibility assessment provides an initial indication of the relative susceptibility of different landscapes to a range of development types it should not be interpreted as a definitive statement on the suitability of a certain location for a particular development proposal. It is not a replacement for detailed studies on specific siting and design, and all developments will need to be assessed on their individual merits through the appropriate planning processes.</p> <p>The judgements have been reviewed and many of the judgements have been amended down a step. There is some potential for mitigation (of views), but equally the farmed character would change, so the susceptibility to the larger schemes is assessed as Medium-High. Having looked at other studies it is considered that other consultants would reach similar conclusions, and this is the fairest assessment we can make</p>	<ul style="list-style-type: none"> <li>• The judgements have been reviewed and many of the judgements have been amended.</li> </ul>
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**6.5 Landscape Sensitivity of the LCAs surrounding Norwich Main**

Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19732]	4324	Comment	6.5.7-6.5.10 Can you clarify, was landscape value used for the Norwich Main Substation Sensitivity Assessment but not for the wider Susceptibility Study in section 5? If so, why the difference in approach?	<p>Susceptibility and sensitivity are similar concepts but there is a technical distinction.</p> <p>Susceptibility is “the ability of a defined landscape or visual receptor to accommodate the specific proposed development without undue negative consequences.”</p> <p>Sensitivity is “a term applied to specific receptors, combining judgements of the susceptibility of the receptor to the specific type of change or development proposed and the value related to that receptor.”</p> <p>Sensitivity therefore includes judgements about value. Judging landscape value is a complex task in its own right, as there are many different aspects of landscape value.</p> <p>We considered that Section 5 would be more robust if it concentrated on susceptibility only. Section 6 however has been widened to include a consideration of value and sensitivity.</p>	No change
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**6.6 Summary of LCA Sensitivity to Change**

Ms Hilary Hann [20550]	4353	Object	<p>I am concerned that this area is not being given special status as it has impact on the whole corridor. With more residential areas being developed there is more need for green spaces to be given priority for our health. The Yare Valley Parkway is an important part of the Green infrastructure Strategy for Greater Norwich between Bawburgh and Whitlingham. Ecologically the area is important and must be preserved for flora and fauna, to retain marshland and help prevent flooding and stop run off of water into our chalk stream river..The marshes also help reduce impact of climate change by storage of greenhouse gases so must be preserved.</p> <p>Apart from these natural phenomena we have some iconic buildings and structures some Grade 1 listed, within this area and their natural settings should also be kept as they are naturally e.g UEA, Sainsbury Centre.</p> <p>For these reasons I would suggest that to make this special status in the planning approach.</p>	<p>Thank you for your comments. The points you raise are relevant considerations. We acknowledge the unique characteristics of LCA F1 and its importance within the broader Yare Valley corridor. However, it is important to clarify that the SPD applies solely to the South Norfolk District area. While LCA F1 forms part of a wider landscape that extends into Norwich and beyond, the SPD does not assess the entire Yare Valley corridor, nor does it seek to do so. Furthermore, the special status of LCA F1 has already been recognised in the original landscape character assessments upon which this SPD and its associated analysis are based. Its designation as F1 reflects its distinct character and context within the wider landscape framework.</p> <p>All development proposals will continue to be assessed on their individual merits through the appropriate planning application process. This includes detailed site-specific studies that will consider the full range of impacts from energy developments including pylons, solar panels or underground cabling, including those on the wider Yare Valley corridor, its ecological networks, recreational value, heritage assets, and contribution to climate resilience.</p>	No change
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**7.1 Background**

Forncett Parish Council (Forncett Parish Clerk) [13522]	4288	Support	Forncett Parish Council welcomes this policy which seeks to minimise destruction of natural habitat, scenery, natural features etc and mitigate and moderate the effects and impacts of energy infrastructure development.	Thank you for your comments.	No change
Anglian Water Services (Tessa Saunders, Spatial Planning Advisor) [19845]	4372	Comment	7 Policy DM 4.6: Landscape Setting of Norwich Anglian Water's Whitlingham water recycling centre and sludge treatment centre is within the Norwich Southern Bypass Protection Zone (NSBPZ). As an existing critical infrastructure site within the NSBPZ, there will need to be some balance between the aims of protecting the openness of the zone with our associated net zero ambitions, the continued expansion to increase capacity to accommodate wastewater and sludge treatment, and other legislative requirements that need to be met. Whitlingham WRC is also used to provide latent heat from our low carbon heat source to heat large tomato greenhouses, demonstrating the breadth of renewable and low carbon energy sources and opportunities that can be provided by wastewater treatment, including to support low carbon farming. Anglian Water welcomes the reference in the SPD (para. 7.2.8) that AD plants proposed at sewage works would be accepted as they are constrained in their locations. We agree that our water recycling centres and sludge treatment centres are critical infrastructure sites where renewable energy development is an essential factor of the site operation (e.g. Anaerobic digestion)	Thank you for your comments.	No change
<b>7.2 Norwich Southern Bypass Landscape Protection Zone</b>					
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19732]	4325	Comment	7.2.11 Whilst underground cables would not affect the openness of the NSBLPZ, they do have other potential negative effects including impacts on below ground archaeology. Routing should give careful consideration of archaeology. RECOMMENDATION: Include reference to consideration of archaeology in routing selection	Consideration of archaeology is beyond the scope of this study, which is focused solely on landscape character	No change

Norfolk County Council - Minerals and Waste Team (Ms Caroline Jeffery, Principal Planner) [20338]	4331	Object	<p>Of particular concern is paragraph 7.2.8 which states:  “...Similarly, if an AD plant were to be proposed at the sewage works for the treatment of sewage it would be accepted that the location is determined by the existing infrastructure. Larger AD Plants, including those which process municipal waste, are not constrained in terms of their location, and there is no reason why they should be sited within the sensitive NSBLPZ.”</p> <p>These type of developments are waste management development that would be County Matters determined by the County Planning Authority, and the South Norfolk SPD should therefore not contain any policy related to these types of development and these sentences should be deleted from the SPD.</p>	Thank you for your comments. It is agreed that this paragraph of 7.2.8 should be removed from the SPD as it relates to Developments that would be County matters determined by the County Planning Authority.	<ul style="list-style-type: none"> <li>Paragraph removed from 7.4.8 which relates to developments that would be determined by the County Planning Authority</li> </ul>
CODE Development Planners Ltd (Mr Michael Carpenter, Director) [20543]	4341	Object	<p>Given the urgent national and local need for renewable energy generation, the SPD should adopt a more balanced and criteria-based approach, recognising that solar PV within the NSBLPZ can, in certain locations, be delivered in a manner that preserves the overall landscape objectives of the SPD while contributing to biodiversity enhancement and climate change mitigation. <b>We therefore suggest the SPD wording is revised to allow for case-by-case consideration based on Landscape and Visual Impact Assessment evidence, rather than a blanket presumption of conflict.</b></p>	Thank you for your comments. All proposals will be considered on a case-by-case basis. Biodiversity enhancement and climate change mitigation are important considerations and will be addressed through the planning application process and therefore are beyond the scope of this SPD.	No change
<b>7.3 Key Views</b>					
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19732]	4326	Comment	<p>7.3.7 Whilst we appreciate that Overhead Power Lines are to an extent permeable in relation to views, they would be a significant detractor. As currently worded this paragraph seems to underplay their impact on views.  <b>RECOMMENDATION:</b> Amend paragraph to read ‘significantly detract’.</p>	Thank you for your comments. Paragraph 7.3.7 states: 'An overhead power line would detract from existing views but would not obstruct them per se.' This wording acknowledges the visual impact while reflecting the relative permeability of such infrastructure.	No change
<b>7.4 Undeveloped Approaches to Norwich</b>					

<p>Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19732]</p>	<p>4327</p>	<p>Comment</p>	<p>7.4.8 Again we consider that as currently worded this paragraph underplays the impact of overhead power lines on undeveloped approaches to Norwich. There would be an urbanising effect and loss of sense of an undeveloped approach. RECOMMENDATION: Amend paragraph to read, Whilst the existing land uses tend to remain the same below the powerlines, there would be direct effects on the undeveloped approaches.</p>	<p>Thank you for your comments on this point. The comments are noted, and we accept the recommendation to amend Paragraph 7.4.8.</p>	<ul style="list-style-type: none"> <li>• Amendments to Paragraph 7.4.8 accepted and amended to <i>“Whilst the existing land uses tend to remain the same below the powerlines, there would be direct effects on the undeveloped approaches.”</i></li> </ul>
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