



**THE DROVES**  
SOLAR FARM

# **The Drovers Solar Farm**

## **Preliminary Environmental Information Report**

### **Volume III, Chapter 9: Transport and Access**

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# **Appendix 9.1**

## **Consultation and Legislation, Planning Policy and Guidance**



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# 1 Consultation and Legislation, Planning Policy and Guidance

## Consultation

- 1.1.1 The Planning Inspectorate (PINS) was provided with the Scoping Request in November 2024 (**Volume III, Appendix 2.1**), which included a chapter setting out the proposed scope of transport and access assessment and methodology for the Scheme. A Scoping Opinion was subsequently issued in December 2024 by the Planning Inspectorate on behalf of the Secretary of State (**Volume III, Appendix 2.2**). The comments from PINS in respect of the transport and access assessment have been summarised in Table 1.1 below, alongside commentary on where the comments have been addressed in **Volume I, Chapter 9: Transport and Access**
- 1.1.2 Further consultation has been undertaken throughout the pre-application phase of the Scheme, and a summary of this, as relevant to transport and access, is also provided within Table 1.1 below.
- 1.1.3 The scope and information set out within this chapter has been, and will continue to be, informed by initial scoping and ongoing consultation with a number of relevant bodies. In the first instance, the information set out has been informed by the formal Scoping Opinion provided by the PINS, with consultees having been contacted and/or providing input into the consultation in relation to transport and access.

**Table 1.1 Summary of Consultation Undertaken as of April 2025**

Consultee	Comments	Response
PINS - Scoping Report – November and December 2024	PINS agreed that alternative modes of construction access can be scoped out on the basis that there are no viable alternative modes of transport for construction materials to site and the origin of materials to be used as well as the relevant port is not yet known.	In accordance with the PINS response alternative modes of construction access have been scoped out of the ES.
PINS via Scoping Opinion dated 18th December 2024 (ID Ref 3.4.2)	PINS agreed that impacts as a result of operational traffic movements are unlikely to be significant and this matter can be scoped out of the ES.	In accordance with the PINS response the operational traffic movements have been scoped out of the ES. The traffic associated with scheduled replacement programs is to be managed and mitigated appropriately by way of the Outline



Consultee	Comments	Response
		<p>Outline Traffic Management Plan (OTMP) and Operational Environmental Management Plan (OEMP) which would be provided at the ES stage and secured by way of requirement on the DCO.</p>
<p>PINS via Scoping Opinion dated 18th December 2024 (ID Ref 3.4.3)</p>	<p>PINS did not agree to scope out transport and access effects during decommissioning, noting that indicative traffic numbers for either the construction or decommissioning phases were not provided within the Scoping Report and no evidence was provided to support the claim that traffic numbers during decommissioning would be lower than during construction.</p>	<p>The PINS response is noted and the consideration of the decommissioning phase is discussed in more detail within the PEIR and future ES.</p>
<p>PINS via Scoping Opinion dated 18th December 2024 (ID Ref 3.4.4)</p>	<p>PINS agreed that an assessment of impacts associated with the transport of hazardous loads can be scoped out of the ES, on the basis that the number and composition of any hazardous loads and any safety measures would be described within the ES.</p>	<p>An assessment of impacts associated with the transport of hazardous loads has been scoped out of the ES. The number and composition of hazardous loads if any, and safety measures have been described in Chapter 3 of the ES.</p>
<p>PINS via Scoping Opinion dated 18th December 2024 (ID Ref 3.4.5)</p>	<p>PINS advised that the ES should confirm the final study area and key roads included in the assessment and explain how they have been identified. A plan illustrating the extent of the study area, and the expected route(s) of construction traffic, should be included in the ES.</p>	<p>The final study area and key roads included in the assessment are confirmed in Section 9.5 of this chapter, along with an explanation of how they have been identified. Figure 9.1 illustrates the extent of the study area and the expected route(s) of construction traffic. This information is provided at PEIR and will be updated (if required) and provided for review as part of the ES.</p>



Consultee	Comments	Response
PINS via Scoping Opinion dated 18th December 2024 (ID Ref 3.4.6)	PINS noted that any modelling and growth rates used in the assessment should be agreed with the local transport authority, where possible.	The modelling approach and growth rates used in the assessment have been agreed with NCC.
PINS via Scoping Opinion dated 18th December 2024 (ID Ref 3.4.7)	PINS advised that the ES should confirm the locations where traffic counts have been undertaken, explain why these locations were selected, and confirm the dates that the counts were undertaken.	An overview of the traffic location is provided within the chapter, the scope of which has been agreed with NCC. Any future surveys that may be required will be agreed with NCC and detailed within the ES.
NH via email dated 16th October 2024	NH noted they usually object to compulsory acquisition of highways land but would work proactively to reach agreement for temporary use if considered safe. Any mitigation required would be subject to GG119 Road Safety Audit. They recommended early engagement which would feed into a Statement of Common Ground for the examination.	Engagement has been initiated with NH regarding the small portion of National NH in the Order limits at the Fakenham Road interchange with the A47. Initial assessment indicates that traffic impact would primarily occur during construction and would be negligible. Initial tracking indicates that HGV deliveries can access the route with no works needed, although abnormal loads may require minor temporary improvement works to the central island/kerb of the A47/A1065 southern slip road. Engagement with NH will continue and a Statement of Common Ground will be prepared for the examination. A Road Safety Audit will be undertaken and agreed with NH prior to submission.
Norfolk County Council (NCC)	NCC reviewed the locations of the proposed automatic traffic count (ATC) surveys and requested additional surveys to be undertaken to the east and north of	Additional ATC surveys will be undertaken on the roads requested by NCC to the east and north of the A1065 during the summer months



Consultee	Comments	Response
	the A1065 on Sporle Road, South Acre Road, Castle Acre Road, Ruckwold's Road and Bailey Street (both sides of the A1065).	of 2025 to capture a more representative flow, including harvest period and holiday traffic. The findings from these additional surveys will be incorporated into the final ES.
NCC via email dated 15th November 2024	NCC recommended getting the minor roads surveyed in case of an increase in use by local traffic not wanting to use the A1065 if closures or traffic management were in place. They noted that from previous NSIP schemes, local members had requested traffic surveys for routes away from the main routes.	The recommendation for additional minor road surveys has been noted. These surveys will be conducted during the summer months of 2025 to capture the harvest period and holiday traffic as requested during consultation with stakeholders, including NCC. The findings from these additional surveys will be incorporated into the final ES.

## 1.2 Legislation, Planning Policy and Guidance

### Legislation

- 1.2.1 The following legislative, policy and guidance documents relate to how transport and access related impacts should be assessed, in terms of identifying the level of impact of the Scheme and any necessary mitigation measures.
- 1.2.2 Planning policy and guidance relating to transport and are identified as being relevant to the Scheme comprise the following.
- 1.2.3 While there is no legislation specifically relevant to the assessment of transport and access in relation to the Scheme, the Climate Change Act 2008 [Ref 9-6] sets a legally binding target for the UK to achieve a net zero carbon account by 2050.

### Planning Policy

#### National Planning Policy

- 1.2.4 The key national policies relevant to the Scheme are outlined below.

Overarching National Policy Statement (NPS) for Energy (EN-1) 2024 [Ref 9-7]:



- 1.2.5 Paragraph 5.14.5 states *“If a project is likely to have significant transport implications, the applicant’s ES should include a transport appraisal”*
- 1.2.6 Paragraph 5.14.6 states *“Applicants should consult National Highways and Highways Authorities as appropriate on assessment and mitigation”*
- 1.2.7 Paragraph 5.14.7 states *“The applicant should prepare a travel plan including demand management and monitoring measures to mitigate transport impacts”*
- 1.2.8 Paragraph 5.14.11 states that *“Where mitigation is needed, possible demand management measures must be considered. This could include identifying opportunities to;*
- *Reduce the need to travel by consolidating trips*
  - *Locate development in areas already accessible by active travel and public transport*
  - *Provide opportunities for shared mobility*
  - *Re-mode by shifting travel to a sustainable mode that is more beneficial to the network*
  - *Retime travel outside of the known peak times; and*
  - *Reroute to use parts of the network that are less busy”*

NPS for Renewable Energy Infrastructure (EN-3) 2024 [Ref 9-8]:

- 1.2.9 Paragraphs 2.10.120 to 2.10.126 relate to assessing the transport and access impacts of renewable energy projects, notably paragraph 2.10.123 states that *“Applicants should assess the various potential routes to the site for delivery of materials and components where the source of the materials is known at the time of the application, and select the route that is most appropriate”*.

- 1.2.10 NPS for Electricity Networks Infrastructure (EN-5) 2024 [Ref 9-9]:

- Paragraph 2.9.19 states that Applicants should: *“...make the design of access roads, perimeter fencing, earth-shaping, planting and ancillary development an integral part of the site layout and design, so as to fit in with the surroundings.”*

National Planning Policy Framework 2024 (NPPF) [Ref 9-10]:

- 1.2.11 Paragraph 116 states: *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”*
- 1.2.12 Paragraph 118 states: *“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.”*

**Local Planning Policy**

NCC Local Transport Plan 4 Strategy 2021-2036 (2022) [Ref 9-11]:



- 1.2.13 Policy 2 states: “*The priority for reducing emissions will be to support a shift to more sustainable modes and more efficient vehicles, including lower carbon technology and cleaner fuels; this includes the facilitation of necessary infrastructure.*”

Breckland District Council Local Plan (2023) [Ref 9-12]:

- 1.2.14 Policy TR 01 Sustainable Transport Network states that “Development should:
- *seek to minimise the need to travel*
  - *promote opportunities for sustainable transport modes*
  - *not adversely impact on the operation or safety of the strategic road network*
  - *improve accessibility to services; and support the transition to a low carbon future”*
  - *Policy TR 02 states “Development proposals that are likely to generate a significant number of heavy goods vehicle movements will be required to demonstrate by way of a Routing Management Plan that no severe impacts will be caused to the efficient and safe operation of the road network and no material harm caused to the living conditions of residents”;*
- 1.2.15 Policy TR 02 also states “Major development proposals should include an assessment of the impacts of new development on the existing transport network; and demonstrate how they will maximise connectivity within and through a development and to the surrounding areas, including the provision of high quality and safe pedestrian and cycle routes. Where potential transport impacts are identified, developers will be expected to produce Transport Assessments to assess the impacts and identify appropriate mitigation, together with Travel Plans where appropriate.

### Guidance

- 1.2.16 The assessment methodology discussed within the Transport and Access chapter 9 of the PEIR has been informed by the Environmental Assessment of Traffic and Movement (EATM, 2023) Guidance produced by the Institute of Environmental Management and Assessment (hereafter referred to as the 'IEMA EATM Guidance') [Ref 9-1], with further details provided in Section 9.4 of the PEIR.
- 1.2.17 In summary, the IEMA EATM Guidance sets out thresholds and assessments for the following effects:
- Severance;
  - Driver Delay;
  - Pedestrian Delay;
  - Non-motorised User Amenity;
  - Fear and Intimidation;
  - Road Safety; and
  - Hazardous and Large Loads.



## References

- Ref 9-1 Institute of Environmental Management and Assessment (IEMA) (2023). Environmental Assessment of Traffic and Movement (EATM) Guidance.
- Ref 9-6 Climate Change Act 2008.
- Ref 9-7 Overarching National Policy Statement for Energy (EN-1). Department for Energy Security and Net Zero, 2024.
- Ref 9-8 National Policy Statement for Renewable Energy Infrastructure (EN-3). Department for Energy Security and Net Zero, 2024.
- Ref 9-9 National Policy Statement for Electricity Networks Infrastructure (EN-5). Department for Energy Security and Net Zero, 2024.
- Ref 9-10 Department for Levelling Up, Housing and Communities. National Planning Policy Framework (NPPF), 2024.
- Ref 9-11 Norfolk County Council (2022). Local Transport Plan 4 Strategy 2021–2036.
- Ref 9-12 Breckland District Council (2023). Breckland Local Plan.



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