



THE DROVES
SOLAR FARM

The Drovers Solar Farm

Preliminary Environmental Information Report

Volume III, Chapter 14: Socio-economics and Human Health

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Appendix 14.1

Consultation and Legislation, Planning Policy and Guidance



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1 Consultation and Legislation, Planning Policy and Guidance

1.1 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 socio-economics and human health 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 socio-economics and human health assessment have been summarised in Table 1.1 below, alongside commentary on where the comments have been addressed in **Volume I, Chapter 14: Socio-economics and Human Health**.
- 1.1.2 Further consultation has been undertaken throughout the pre-application phase of the Scheme, and a summary of this, as relevant to socio-economics and human health, 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 PINS, with consultees having been contacted and/or providing input into the consultation in relation to socio-economics and human health.

Table 1.1 Summary of Consultation Undertaken as of January 2025

Consultee	Comments	Response
Feedback from the Scoping Opinion from PINS dated 18 December 2024		
Planning Inspectorate (on behalf of the Secretary of State) Scoping Opinion	<p>Socio-Economics - Proposed to scope out loss of agricultural land – All phases</p> <p>The Scoping Report proposes to scope this matter out on the basis that the agricultural land on site represents a small percentage of the UKs total agricultural land area. The Inspectorate notes that the total land take for the site is approximately 1133ha and an ALC Survey is currently being undertaken. As the ALC grade for the site is not currently known, it is not possible to rule out significant effects at this stage and the Inspectorate does not agree to scope this matter out. The ES should either assess the impacts from the loss of agricultural</p>	This effect has been scoped into this assessment.



Consultee	Comments	Response
	<p>land or, if the percentage of BMV land is found to be negligible, provide a statement, supported by the ALC grading of the site, explaining why the loss of agricultural land would not be significant.</p>	
	<p>Socio-Economics - Changes in demand for temporary workers accommodation – Construction and Decommissioning</p> <p>The Scoping Report proposes to scope this matter out on the basis that the supply of construction workers in the local area far exceeds the demand created by the Scheme and the number of specialist workers that are located further afield would not be significant. Limited information has been provided on the accommodation capacity of the local area and the Inspectorate is therefore not in a position to scope this matter out.</p>	<p>This effect has been scoped into this assessment.</p>
	<p>Socio-Economics - Access to open space and Public Rights of Way (PRoW) – All Phases</p> <p>The Scoping Report states that any PRoWs on Site are located along access routes and are unlikely to be affected by the Scheme and that they are unlikely to see significant use. The Inspectorate notes that PRoW usage surveys have not been undertaken for the Scheme. Furthermore, it is not explicit within the report whether any PRoWs are proposed to be closed or re-directed during construction and decommissioning. As such, the Inspectorate is not in a position to scope this matter out and the ES should assess the impact on PRoWs and access to open space during construction and decommissioning phases.</p>	<p>Volume III, Appendix 6.9 Amenity and Recreation identifies that no physical effects (i.e. permanent extinguishment or permanent diversion) to the PRoW is proposed. Temporary closures or diversions may be required for a very limited time period during construction to establish internal access tracks within the Site boundary where they cross PRoW but will be limited in extent and duration (it is likely to take just a few days to construct an access track across an existing PRoW).</p>



Consultee	Comments	Response
		<p>These diversions will be managed in accordance with the measures set out in the Outline Construction Environmental Management Plan (oCEMP) and Outline Decommissioning Environmental Management Plan (oDEMP) such as providing clear signage to recreational users and banksmen to manage plant movements and crossing where appropriate.</p> <p>It is more appropriate to assess this potential effect in relation to human health rather than socio-economics. The human health assessment considers changes to both physical health and wellbeing resulting from access to these types of spaces. Therefore, socio-economic effects related to PRow, open space, and physical activity are scoped out from further assessment in this chapter but are considered from a health perspective.</p>
	<p>Socio-Economics - Changes in commuting patterns – All phases</p>	<p>This effect has been scoped into this assessment.</p>



Consultee	Comments	Response
	<p>The Scoping Report proposes to scope this matter out on the basis that the site is served by roads with a good level of transport capacity and traffic generated by the Scheme would be mitigated by the measures outlined in the Construction Traffic Management Plan (CTMP). The Inspectorate notes that Driver Delay and other construction traffic impacts are scoped into the Transport and Access chapter (Paragraph 9.8.2). As such, the Inspectorate is not in a position to scope this matter out and the ES should assess changes in commuting patterns during construction and decommissioning of the Scheme. The Inspectorate agrees however that the operation of the Scheme is not likely to result in significant changes to commuting patterns and this matter can be scoped out of the ES.</p>	
	<p>Health - Physical activity – All phases</p> <p>The Scoping Report proposes to scope this matter out on the basis that impacts to PRowS would be limited and temporary. The Inspectorate notes that PRow usage surveys have not been undertaken for the Scheme, and it is not explicit within the Scoping Report whether any PRowS are proposed to be closed or re-directed during construction/decommissioning. The Inspectorate is therefore not in a position to scope this matter out and the ES should assess the health impacts associated with disruption to physical activity.</p>	<p>This effect has been scoped into this assessment.</p>
	<p>Health - Climate change and adaption – Construction and decommissioning</p> <p>The Scoping Report does not provide an estimation of the expected Greenhouse Gas (GHG) emissions during construction and decommissioning. As such, the Inspectorate considers that insufficient information has been provided to rule out significant effects. The Inspectorate is therefore not in a position</p>	<p>This effect will be assessed in Volume I, Chapter 13: Climate Change</p>



Consultee	Comments	Response
	<p>to scope this matter out. The ES should provide an assessment of the impact of GHG emissions from the construction and decommissioning of the Scheme on human health.</p> <p>Health - Bio-physical environment – Air quality – All phases</p> <p>The Scoping Report proposes to scope out health effects resulting from changes to air quality during the construction and decommissioning phases, stating that dust emissions would be managed via a CEMP and are not expected to be significant. Insufficient information has been provided on the number of expected traffic movements to support this. As such, the Inspectorate is not in a position to scope this matter out and the ES should assess the health effects resulting from changes to air quality during the construction and decommissioning phases of the Scheme, or provide a statement, supported by information on expected vehicle movements, as to why effects would not be significant. The Inspectorate agrees that the number of vehicle trips generated by operation and maintenance of the Scheme are unlikely to result in significant effects and is content to scope this matter out for the operation/ maintenance phase.</p>	<p>As outlined in the Scoping Opinion Response (Volume III, Appendix 2.3) The Air Quality section of Volume I, Chapter 15: Other Environmental Matters of the ES will provide information on the number of expected vehicle movements associated with the construction and decommissioning phases. The ES will provide detail of construction vehicle traffic flows and locations of the nearest sensitive receptors associated with the Construction and Decommissioning Phases which are not anticipated to exceed Environmental Protection UK (EPUK) and IAQM screening criterion for either sensitive human or ecological receptors. For the purposes of this assessment of vehicle movement impacts in this PEIR, the construction vehicle movements are assumed to be 368 two-way LDV</p>



Consultee	Comments	Response
		<p>annual average daily traffic (AADT) movements and 86 two-way Heavy Goods Vehicle (HGV) AADT movements. As can be seen, the construction traffic vehicle movements do not exceed the screening criteria for detailed assessment, as set out in the EPUK and IAQM guidance. Therefore, air quality can be scoped out the assessment.</p>
	<p>Health - Bio-physical environment – Land quality – All phases</p> <p>The Scoping Report proposes to scope out health effects related to land quality, stating that the agricultural land quality or soil resource is unlikely to be significantly affected during any phase of the Scheme. On this basis and having regard to the nature and characteristics of the Scheme, the Inspectorate is content that this matter can be scoped out of further assessment. Should significant adverse effects be identified in ES Chapter 12: Water Quality and Ground Conditions for any phase, the ES should assess impacts on health where significant effects are likely.</p>	<p>As Volume I, Chapter 12: Water Resources finds no residual significant adverse effects on agricultural land quality or soil resource, this effect has been scoped out of this assessment in line with the Scoping Opinion. This will be reviewed again in the ES if any impacts are later deemed significant.</p>
<p>Norfolk County Council</p>	<p>Ensuring mental health impacts of the Scheme are included in the assessment of health effects within the ES.</p>	<p>Mental health impacts are considered as part of the health effects assessment.</p>
<p>Consultation</p>		
<p>Norfolk Council, Breckland Council,</p>	<p>Employment and skills: Stakeholders were satisfied with our overall approach,</p>	<p>Engagement will be conducted with potential employment</p>



Consultee	Comments	Response
King's Lynn and West Norfolk.	but want to ensure that relevant partner organisations are engaged with.	and skills partnerships as part of the Statutory Consultation process.
Norfolk Council, Breckland Council, King's Lynn and West Norfolk	<p>Tourism accommodation</p> <p>Breckland Council was happy with our approach with respect to tourism accommodation that could be used by construction workers during the Construction Phase. No issues were raised about capacity for the construction workers who may need to stay in the LCA during the Construction Phase.</p> <p>Officer is going to coordinate with colleagues to undertake further checks/comparisons on the data. This will be picked up at the ES stage.</p>	<p>Volume I, Chapter 14: Socio-economics and Human Health will continue to engage with the council to assess the potential use of local tourism accommodation by construction workers.</p>
Norfolk Council, Breckland Council, King's Lynn and West Norfolk health teams, Norfolk and Waveney Integrated Care System	<p>Health: Norfolk County Council have confirmed that they are happy with the approach taken in Volume I, Chapter 14: Socio-economics and Human Health, provided that mental health impacts are considered throughout. Main comments were:</p> <p>Socio-economic and Health Chapter</p> <p>It was agreed that the socio-economic and health assessments would be combined into a single chapter, provided that health has its own dedicated subsections and distinct conclusions separate from other socio-economic factors. The chapter should explicitly reference health in the title (e.g., "Socio-economic and Health"). While potential impacts (e.g., air quality) will be assessed in separate chapters, the health section should summarise these and assess any synergistic or cumulative effects.</p> <p>Importance of Mental Health</p> <p>The importance of assessing the project's impact on mental health and wellbeing was highlighted, particularly regarding</p>	<p>Volume I, Chapter 14: Socio-economics and Human Health adopts the approach agreed with the health officer, with mental health impacts considered throughout the assessment where relevant.</p>



Consultee	Comments	Response
	<p>changes to the local environment and perceived health risks, such as concerns about EMFs. It was agreed that mental health impacts would be meaningfully assessed, with reference to the MWIA Collaborative’s Mental Well-being Impact Assessment Toolkit. An EMF assessment will also be undertaken, and the findings will be incorporated into the health and wellbeing section.</p> <p>Construction Dust Assessment</p> <p>It was confirmed that a construction dust assessment will be undertaken. If the timing allows, the findings should be reflected in the health and wellbeing conclusions to ensure potential impacts are properly considered.</p>	

1.2 Legislation, Planning Policy and Guidance

National

Overarching National Policy Statement for Energy (EN-1) and National Policy Statement for Renewable Energy Infrastructure (EN-3) (November 2023)

- 1.2.1 The assessment is informed by the planning policy requirements set out within the Overarching National Policy Statement (NPS) for Energy (EN-1, November 2023), which identifies the potential beneficial and adverse socio-economic impacts that should be considered as a result of energy developments [Ref 14-1] The national policy for energy infrastructure outlines the guidance for likely scope and geographical coverage for energy infrastructure developments, including the associated likely socio-economic impacts. It states that all relevant socio-economic impacts should be considered. The policy also states that the applicant is strongly encouraged to carry out engagement with relevant local authorities early on to better understand issues and opportunities.
- 1.2.2 The NPS for renewable energy infrastructure (EN-3, November 2023) and NPS for electricity networks infrastructure (EN-5, November 2023) in conjunction with EN-1 provides the primary policy decisions by the Secretary of State on applications for nationally significant renewable energy infrastructure and electrical networks infrastructure, including solar [Ref 14-2].

Socio-economics

- 1.2.3 Key policy from EN-3 relating to socio-economics includes that applicants should set out where there may be socio-economic benefits in retaining infrastructure after the operational life, such as retaining pathways through the site. It also states that the Secretary of State



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should take into the account the economic (and other benefits) of the best and most versatile agricultural land and ensure the applicant puts forward appropriate mitigation measures to minimise the impacts on soils or soil resources.

- 1.2.4 In addition, paragraph 2.6.2 of EN-3 states that where flexibility is sought in the consent, the likely worst-case social and economic effects of the Scheme should be assessed. Key policy from EN-5 relating to socio-economics states that though decarbonisation is a priority for the government, the development of new infrastructure must minimise costs to consumers and limit community and environmental impacts where possible.

Human Health

- 1.2.5 The EN-1 also identifies that energy infrastructure has the potential to impact on the health and wellbeing of the population [Ref 14-3].
- 1.2.6 Paragraph 4.4.3 of EN-1 states that “*where the proposed project has an effect on humans, the ES should assess these effects for each element of the project, identifying any potential adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate.*”
- 1.2.7 Paragraph 4.4.6 of EN-1 states that “*Opportunities should be taken to mitigate indirect impacts, by promoting local improvements to encourage health and wellbeing this includes potential impacts on vulnerable groups within society and impacts on those with protected characteristics under the Equality Act 2010, i.e. those groups which may be differentially impacted by a development compared to wider society as a whole.*”

National Planning Policy Framework (December 2024)

Socio-economics

- 1.2.8 Chapter 6 of the National Planning Policy Framework (NPPF, December 2024) focuses on building a strong and competitive economy, stating that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development [Ref 14-4]. The approach should allow for each area to build on its strengths, counter any weaknesses and address the challenges of the future.

Human Health

- 1.2.9 Additionally, Chapter 8 emphasises the importance of promoting healthy and safe communities. It highlights the need to encourage social interaction, promote healthy lifestyles, and ensure that local facilities and services are provided to meet the needs of the community, contributing to overall well-being and social cohesion.

The Additionality Guide, Fourth Edition (2014) [Ref 14-5]

- 1.2.10 The guidance was produced by English Partnerships and provides guidelines to assess the impact of a Scheme after accounting for displacement, multiplier and leakage impacts. Additionality is defined as ‘the extent to which activity takes place at all, on a larger scale, earlier or within a specific designated area or target group as a result of the intervention’. Whilst this document has now been withdrawn, it contains helpful guidance on assessing additionality.



The DLUHC Appraisal Guide (2023) [Ref 14-6]

- 1.2.11 The DLUHC appraisal guide (2023) has superseded the Homes & Communities Agency (HCA) Additionality Guide, which is has now been withdrawn. The DLUHC guide reflects the revised Green Book (2020) and Levelling Up White Paper (2022), providing additional advice on how to rigorously assess value for money and a greater focus on spatial and distributional impacts. However, in the context of additionality, the guidance is not as detailed in terms of specific assumptions around additionality. Therefore, this analysis has utilised both the DLUHC guidance and the HCA Additionality Guide to assess additionality.

Health and Social Care Act 2012 [Ref 14-7]

- 1.2.12 The Act introduced legal duties about health inequalities. It included specific duties for health bodies which require the bodies to consider reducing health inequalities in England. The Act also creates duties on local planning authorities to take steps they consider appropriate for improving the health of the people in their area.

Equality Act 2010 [Error! Reference source not found. 14-8]

- 1.2.13 The Act requires public bodies to consider all individuals when carrying out their day-to-day work – in shaping policy, in delivering services and in relation to their own employees. It also requires that public bodies have due regard to the need to:
- eliminate discrimination;
 - advance equality of opportunity; and
 - foster good relations between different people when carrying out their activities.

Environmental Protection Act 1990 [Ref 14-9]

- 1.2.14 Part III of the Act sets out provisions in relation to statutory nuisance. This includes where any premises emit fumes, gases, dust, artificial light or noise that is prejudicial to health or a nuisance.

Regional and Local Policy

- 1.2.15 The following are key regional and local policy documents relevant for considering the impact of the Scheme on socio-economic and health outcomes.

Better Together for Norfolk. Norfolk County Council Strategy (2021-2025) [Ref 14-10]

- 1.2.16 This document outlines the strategic objectives being prioritized for the 2021–2025 period. These objectives include creating a vibrant and sustainable economy, providing better opportunities for children and young people, fostering healthy, fulfilling, and independent lives, building strong, engaged, and inclusive communities, and promoting a greener, more resilient future. The Council's vision is for the County to be a place where everyone can start life well, live well, and age well, ensuring that no one is left behind. The aim is to cultivate a vibrant, entrepreneurial, and sustainable economy, supported by the right jobs, skills, training, and infrastructure. Additionally, communities should feel safe, healthy, empowered, and connected, with their unique characteristics respected and preserved.

Local Growth plan: Norfolk Economic Strategy 2024-2029 (January 2025) [Ref 14-11]



- 1.2.17 This strategy acts as the councils Local Growth Plan, identifying local priorities and will provide a key role in the Government’s new Modern Industrial Strategy which seeks to ensure growth in every part of the UK. It closely aligns to the Government’s Five Missions, including Norfolk’s key role in making the UK an offshore clean energy superpower, and breaking down barriers to opportunity and kickstarting economic growth.

Breckland Local Plan (2023) [Ref 14-12]

- 1.2.18 Breckland District Council’s Local Plan identifies 19 strategic objectives for all new development. The objectives relevant to the Scheme include:

- Strategic objective 4 – “To adapt and mitigate against the impacts of climate change”;
- Strategic objective 8 – “Promote and support economic growth in sustainable and accessible locations in a flexible manner, diversifying the urban and rural economic base of the District to enable a prosperous mix where investment is encouraged, skills are developed and retained and new and existing businesses are supported”;
- Strategic objective 14 – “Promote a safe and healthy environment, and high quality design minimising the impacts of development and ensuring quality of life and sense of place”; and
- Strategic objective 17 – “To improve the health and well-being of our communities by reducing health inequalities, promoting healthy living and supporting locally accessible, high quality health care.”

Breckland Corporate Plan 2024 to 2028 [Ref 14-13]

- 1.2.19 This Corporate Plan sets out the approach to deliver Breckland’s vision for the district. It builds on the achievements of the plan launched in 2021. It includes tackling the challenges of major cost of living pressures and constraints on public spending, whilst seeking to position the District to benefit from the opportunities of rapidly changing technology and the national economy. The Council aims to achieve the three following key themes:

- Inspiring Communities: Enabling everyone to lead happy, healthy, and fulfilling lives;
- Thriving Places: Creating opportunities for skilled jobs and economic growth; and
- Working Smarter 2035: Protecting the environment—now and for future generations; and putting customers first by delivering quality, value-for-money services that meet their needs.

Future Breckland – Thriving People and Places (2023) [Ref 14-14]

- 1.2.20 The Future Breckland programme sets out a comprehensive set of plans, co-designed with residents, businesses/public sector agencies and town council partners, to transition Breckland for the future. The anchor to the Future Breckland approach has been to focus the depth of detail on the opportunities presented within Breckland’s five Market Towns, and their surrounding hinterlands. As a collectively owned community plan, Future Breckland informs future priorities and investment.

Breckland Housing and Economic Development Needs Assessment (HEDNA) (2024) [Ref 14-15]



- 1.2.21 The HEDNA provides evidence regarding the overall need for housing with assessment of the quantity and type of employment land needed. This document has analysed the economic baseline of Breckland and has identified key issues within the economy. This has been used to inform the update of the Breckland Local Plan.

West Norfolk Economic Vision and Strategy [Ref 14-16]

- 1.2.22 This document is a roadmap for project decisions and investment that aims to ensure that King's Lynn & West Norfolk hit their long-term goal of sustainable growth. It outlines the strategic priorities for the next 20 years, including improving connectivity, supporting business growth, fostering entrepreneurship and technological adoption, raising skill levels, promoting healthier and more active communities, and building resilience to the impacts of climate change.

Breckland's Health and Wellbeing Strategy 2023-2025 [Ref 14-17]

- 1.2.23 Breckland's Health and Wellbeing Strategy 2023-2025 highlights the local authority's vision of transforming the way in which people access the right opportunities to improve their health and wellbeing. Similarly, King's Lynn and West Norfolk's Health and Wellbeing Strategy 2023-2026 highlights the local authority's vision to improve the health and wellbeing of the communities of west Norfolk through effective collaborative working with partners, service providers and the communities themselves.

Norfolk and Waveney integrated care strategy [Ref 14-18]

- 1.2.24 Norfolk and Waveney have developed an integrated care strategy and Norfolk joint health and wellbeing strategy [**Ref 14-19**]. One of the key aims of the strategy is to ensure that people can live as healthy a life as possible. This means preventing avoidable illness and tackling the root causes of poor health. They are aware that the health and wellbeing of people living in some parts of Norfolk and Waveney are particularly poor and aim to change the fact how healthy you are should not depend on where you live.

Guidance

- 1.2.25 There is no specific guidance available which establishes a methodology for assessing the health effects of a solar farm. This section therefore provides a summary of the assessment methodology including the baseline analysis, and the relevant standards and guidance that will be used.
- 1.2.26 The human health assessment is undertaken in line with the latest best practice guidance on health impact assessment (HIA). The following standards and guidance will inform the health assessment:
- Public Health England, 2020. Health Impact Assessment in spatial planning: a guide for local authority public health and planning teams;
 - Norfolk and Waveney Integrated Care Board, 2022. Planning in health;
 - Institute of Environmental Management and Assessment (IEMA) Effective Scoping of Human Health in Environmental Impact Assessment (IEMA, 2022);
 - IEMA Health in Environmental Impact Assessment - A Primer for a Proportionate Approach (IEMA, 2017);



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- International Association for Impact Assessment (IAIA), Human Health: Ensuring a high level of protection (IAIA, 2020); and
- Mental Well-being Impact Assessment: a Toolkit (National MWIA Collaborative, 2011).



References

- Ref 14-1 DLUHC, 2023. National Planning Policy Framework
- Ref 14-2 Department for Energy Security & Net Zero, 2023. National Policy Statement for Renewable Energy Infrastructure (EN-3); Department for Energy Security & Net Zero, 2023. National Policy Statement for Electrical Networks Infrastructure (EN-5)
- Ref 14-3 Department for Energy Security and Net Zero, 2024. Overarching National Policy Statement for energy (EN-1)
- Ref 14-4 DLUHC, 2023. National Planning Policy Framework
- Ref 14-5 HCA, 2014. Additionality Guide fourth edition 2014
- Ref 14-6 MHCLG, 2023. DLUHC appraisal guide
- Ref 14-7 UK Government, 2012. Health and Social Care Act 2012
- Ref 14-8 UK Government, 2012. Equality Act 2010
- Ref 14-9 UK Government, 1990. Environmental Protection Act 1990
- Ref 14-10 Norfolk County Council, 2021. Better Together, for Norfolk
- Ref 14-11 Norfolk Council, 2025. Local Growth Plan: Norfolk Economic Strategy 2024-2029
- Ref 14-12 Breckland District Council, 2023. Breckland Local Plan
- Ref 14-13 Breckland District Council, N/A. Breckland Corporate Plan 2024 to 2028
- Ref 14-14 Breckland District Council, 2023. Future Breckland – Thriving People and Places
- Ref 14-15 Icen, 2024. Breckland Housing and Economic Development Needs Assessment 2024
- Ref 14-16 King's Lynn & West Norfolk, 2024. West Norfolk Economic Vision and Strategy
- Ref 14-17 Breckland Health & Wellbeing Partnership, N/A. Strategy 2023-2025
- Ref 14-18 Norfolk and Waveney Integrated Care System, N/A. Norfolk and Waveney Integrated Care Strategy and Norfolk Joint Health and Wellbeing Strategy
- Ref 14-19 Norfolk and Waveney Integrated Care System, 2024, Integrated Care Strategy 2024



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