

**DWD**

# Alternative Site Assessment

Necton Greener Grid Park

Land to south of Necton Substation,  
Necton, Swaffham, PE37 8EG

Statkraft UK

6 New Bridge Street  
London EC4V 6AB

T: 020 7489 0213

F: 020 7248 4743

E: [info@dwdllp.com](mailto:info@dwdllp.com)

W: [dwdllp.com](http://dwdllp.com)

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**CONTENTS**

**1.0 INTRODUCTION .....1**  
Overview ..... 1  
Site Summary ..... 1

**2.0 PROPOSED DEVELOPEMNT .....3**  
The Proposed Site ..... 3  
The Proposed Development ..... 3  
Local Developments..... 5

**3.0 PLANNING POLICY.....6**

**4.0 ALTERNATIVE SITE ASSESSMENT METHODOLOGY.....13**

**6.0 SUMMARY AND CONCLUSIONS .....23**

**APPENDIX 1: THE SEARCH AREA**

**APPENDIX 2: CONSTRAINTS**

**APPENDIX 3: SHORT-LISTED ALTERNATIVE SITES**

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## **1.0 INTRODUCTION**

### **Overview**

- 1.1 This Alternative Site Assessment has been prepared on behalf of Statkraft UK Ltd ('Statkraft' or the 'Applicant') in support of a planning application for the development of a Greener Grid Park ('GGP') that will include the construction and operation of a Grid services facility. The Proposed Development has been designed to support the flexible operation of the National Grid and the decarbonisation of electricity supply by reducing reliance on fossil fuels to provide stability to the grid.
- 1.2 The proposal is hereafter referred to as the 'Proposed Development'. The project is known as 'Necton Greener Grid Park'.

### **Site Summary**

- 1.3 The 'Proposed Site' comprises approximately 12.78 hectares ('ha') of agricultural land located at Land Near Necton, Norfolk. However, for the main part of the Site only 1.92 ha will be required (with the remainder of the Site area used for access and cable connections. Therefore, for alternative sites to be considered they will need to be a minimum of 1.9 ha. The Site is located immediately adjacent to the Site boundary.
- 1.4 The National Planning Policy Framework ('NPPF') provides that grades 1, 2, and 3a are 'best and most versatile' land). The Agricultural Land Classification survey undertaken as part of this Application states that the main compound comprises Grade 3a (good quality) agricultural land.

### **Statkraft UK LTD**

- 1.5 Statkraft is 100% owned by the Norwegian state and is Europe's largest generator of renewable energy. In the UK, Statkraft develop, own and operate wind, solar, hydro and Greener Grid Park projects.
- 1.6 Since 2006 Statkraft has invested over £1.4 billion in the UK's renewable energy infrastructure and is a leading provider of Power Purchase Agreements (PPAs), having facilitated over 6 GW of new-build renewable energy generation through PPAs. Statkraft were appointed deliver grid stability services to National Grid ESO, supporting their target to deliver a zero-carbon electricity system by 2025. The first two projects in Moray and Liverpool are operational.

### **Purpose and Structure of this Report**

- 1.7 The purpose of this report is to demonstrate the need and rationale for the Proposed Development and seek to identify if there are any potentially more suitable sites situated on:

- previously developed and or/non-agricultural land (hereafter referred to collectively as ‘previously development land’); or
- lower or equal grade agricultural land (3, 4 and 5).

1.8 This assessment is carried out in support of the planning application and seeks to demonstrate that the Applicant has given due consideration to the benefits and constraints associated with the Proposed Site. It should be read in conjunction with the Planning, Design and Access Statement (‘PDAS’) and the plans and drawings accompanying the application.

1.9 Importantly, it should be noted that there is no statutory or defined policy requirement to carry out an ‘alternative site assessment’ or similar. The Applicant has adopted a policy to carry out alternative site assessments for proposals when developing on greenfield sites in order to show that the site has been chosen with proper consideration of all relevant factors.

1.10 The remainder of this report is structured as follows:

- Section 2 – key features of the site and the proposed development;
- Section 3 – relevant planning policy;
- Section 4 – the methodology applied to identify and assess alternative sites;
- Section 5 – application of the methodology and assessment of alternative sites; and
- Section 6 – summary and conclusions.

## **2.0 PROPOSED DEVELOPEMNT**

### **The Proposed Site**

- 2.1 The Site is located within the administrative boundary of Breckland Council and is located approximately 600 m north east from the village of Necton and a further 35km to the west of the centre of Norwich. A Site Location Plan is submitted as part of this application.
- 2.2 As mentioned above, the Site is approximately 12.78 ha in size and is largely comprised of agricultural land, though the main compound covers approximately 1.92 ha. There is some existing screening in the form of trees found along the western boundary of the Site. The Site can be accessed from an existing access off the A47 to the west of the Site, which is a single carriageway with a 60mph speed limit, with a further temporary construction access proposed.
- 2.3 Within the wider area there are several farmsteads that are scattered around. Corbett Farm is the closest and found approximately 440 m to the north west of the Site. The closest residential dwellings can be found on St Andrews Lane approximately 600 m to the south of the Site. To the immediate north of the Site is Necton onshore substation which is a primary driver for the location of this development. Pylons can be found running into the power station and in close proximity to the application site, however none of these cross over the Site. The Site is otherwise surrounded by agricultural fields and areas of small areas of woodland. There are several constructed and approved energy projects in located nearby Site, further details of which can be found in the Planning History section of this chapter.
- 2.4 An Agricultural Land Classification ('ALC') Survey was carried out for a wider site which showed that the chosen Site comprises Subgrade 3a (Good Quality) agricultural land. Therefore, the Site is classed as Grade 3 for the purposes of this document. The wider ALC survey assessed 87.7ha of land and found that it contained a mixture of Grade 2 and Subgrades 3a and 3b land in irregular land parcels.

### **The Proposed Development**

- 2.5 The Proposed Development comprises of the following:
  - 2 no. of Communications House each measuring 7m in length by 13m in width and with a height of 3.5m.
  - 2 no. Emergency Generators each measuring 3.5m in length by 12.95m in width and with a height of 3.5m.
  - 2 no. Offices each measuring 3.1m in length by 9.8m in width and with a height of 3.5m.

- 2 no. Stores each measuring 2.4m in length by 6.1m in width and with a height of 2.60m
- 1 no. Cooler 1 measuring 8.2m in length by 2.8m in width and with a height of 2.5m.
- 1 no. SC Building measuring 15m in length by 12.5m in width and with a height of 7m
- 1 no. Aux Transformers measuring 3m in length by 2m in width and with a height of 3.6m.
- 1 no. Cooler 2 measuring 9.7m in length by 12.9m in width and with a height of 2.6m.
- 1 no. Control Container measuring 16 m in length by 21m in height and with a height of 5.2m.
- 1 no. HISC Building measuring 18m in length by 28m in width and with a height of 11m.
- 1 no. Circuit Breaker and Auxiliary Transformer measuring 18.4m in length by 12.5m in width and with a height of 10m.
- 1 no. HV Yard measuring 78.6m in length by 42.2m in width by 11.87m in height.
- Indicative Proposed Cable Corridor to Point of Connection of Substation.
- Permanent Road Option which connects onto the existing track that serves access to Necton substation.
- Temporary Construction Access.
- Palisade fencing including electrical pulse fence with security gate to height of 3m.
- Weldmesh fencing including electrical pulse fence with security gate to height of 3m.
- CCTV Light Posts measuring to 6m with downward facing motion sensing lighting.
- Landscape and Biodiversity Mitigation Planting.
- 1 no. SUDs basin and indicative pipeline corridor.
- All associated and ancillary site works necessary to facilitate the development including: all necessary drainage systems, foundations works for the above compounds, various underground cables and ducts, equipment plinths, internal services roads and other necessary infrastructure.

2.6 The Indicative Site Layout Plan (Reference: STA002-PL-03) that forms part of the planning application submission illustrates the intended layout.

### **Local Developments**

- 2.7 There are several approved renewable energy developments proposed as well as recently consented in close proximity to the Proposed Site and these are covered in section 3 of the Planning, Design and Access Statement. However, the nearby Norfolk Vanguard (PINS Ref. EN010079) and Norfolk Boreas (PINS Ref. EN010087) Development Consent Order ('DCO') projects, both of which are promoted by Vattenfall, are of particular relevance to this document as a significant amount of land around the Point of Connection was included within their respective areas. These are hereafter referred to as the 'Existing DCOs'.



### 3.0 PLANNING POLICY

3.1 The Search Area (as described in Section 4.6 of this report) is located entirely within the local authority of Breckland Council. As such, the planning policy and guidance most relevant to the rationale of the proposed development and consideration of alternative sites is considered to comprise the following:

- Breckland Council Local Plan (2019)
- National Planning Policy Framework (NPPF) (2021)
- The Energy National Policy Statements (NPSs)
- National Planning Policy Guidance
- Other relevant UK Climate Change Policy

3.2 For further detail of the planning policy specifically relevant to the Site and the compliance of the Proposed Development with it, please refer to the Planning, Design and Access Statement that forms part of the application submission.

3.3 The specific guidance set out in each of the above documents is summarised below.

#### Local Planning Policy

3.4 With regards to Solar PV Farms, Policy ENV 10 'Renewable Energy Development' recognises the suitability of the District for Solar PV farm development, citing the opportunities for greater energy production and potential biodiversity enhancement, and cautioning the need for landscape and visual impacts to be mitigated:

*"The Council will consider favourably opportunities for biodiversity enhancements around arrays, the potential for complete restoration of the land and appropriate mitigation such as landscape buffers (trees and hedgerows) where compatible in the context of the Council's Landscape Character Assessment and Settlement Fringe Study. Whilst large scale ground-mounted PV solar farms developments can have a negative impact on the rural environment, particularly in undulating landscapes, the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively".*

3.5 Policies CP 12 (Energy) and DC 15 (Renewable Energy) of the Core Strategy, which support commercial scale renewable energy development, in principle. In particular, Policy CP 12 states 'Commercial scale renewable energy generation developments will be supported throughout the District. Large scale developments of this type will be subject to a comprehensive environmental

*assessment which will be based on the individual and unique circumstances of the case. When considering such assessments, regard will be given to the wider environmental benefits of providing energy from renewable sources as well as effects on amenities and the local environment’.*

3.6 Policy DC 15 Renewable Energy of the Core Strategy states that ‘Proposals for renewable energy development will be supported in principle’. It goes on to state that ‘*Permission will be granted for these developments unless it, or any related infrastructure such as power lines or access roads etc, has a significant detrimental impact or a cumulative detrimental impact upon:*

- *Sites of international, national or local nature and heritage conservation importance;*
- *The surrounding landscape and townscape;*
- *Local amenity as a result of noise, fumes, electronic interference or outlook through unacceptable visual intrusion;*
- *Highway safety.*

*Where development is permitted, mitigation measures will be required as appropriate to minimise any environmental impacts, such measures will be secured via condition or legal agreement. All development proposals for a renewable energy generation scheme should, as far as is practicable, provide for the site to be reinstated to its former condition should the development cease to be operational’.*

3.7 Policy TR 02 (Transport Requirements) states that developments should be of high quality, sustainable in design, construction and layout as well as offering maximum flexibility in the choice of travel modes for all potential users. Proposals will be permitted that:

- *“Integrate satisfactorily into existing transport networks;*
- *mitigate impacts on the local or strategic highway networks arising from the development itself, or the cumulative effects of development, through the provision of, or contributions towards, any relevant transport improvement deemed to be necessary, including those secured by legal agreement;*
- *protect, and where possible enhance, access to public rights of way;*
- *provide safe, suitable and convenient access for all users, including appropriate parking and servicing provision in terms of amount, design and layout (Appendix 2 provides a starting point); and*

- *avoid inappropriate traffic generation and do not compromise highway safety.*

*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.*

*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”.*

3.8 Policy ENV 01 states, “... strategic green infrastructure corridors shown on the Policies Map, should be safeguarded, retained and, where opportunities arise, enhanced. Enhancement of the green infrastructure network will be sought through the promotion of positive action, and the development management process.”

3.9 Policy ENV 02 (Biodiversity Protection and Enhancement) states that development likely to have an adverse effect (either directly or indirectly) on a site of national, regional or local biodiversity, or geological interest, as identified on the Policies Map, will not be permitted unless:

*“a. it can be clearly demonstrated that there are reasons for the proposal that outweigh the need to safeguard the special ecological / geological interest of the site, and;*

*b. it has been demonstrated, where development would result in significant harm, that it cannot be reasonably located on an alternative site that would result in less or no harm, and;*

*c. residual harm, after all measures to prevent and adequately mitigate have been applied, will be adequately compensated for.”*

### **National Planning Policy Framework**

3.10 The NPPF was published in June 2021. The NPPF sets out the Government’s planning policies for England and how these are to be applied, including in respect of the development of agricultural land and renewable energy.

3.11 Paragraph 152 states, “*The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise*

*vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure”.*

3.12 Paragraph 158(a) recognises that LPAs should not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions. Importantly, paragraph 158(b) states that applications for renewable and low carbon development should be approved if the impacts are (or can be made) acceptable.

3.13 Paragraph 174 states that local planning authorities should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

### **National Planning Practice Guidance**

3.14 The policies contained within the NPPF are expanded upon and supported by the NPPG, which was originally published in March 2014 and has been updated periodically since.

- 3.15 With regards to energy security, paragraph 001 (Reference ID: 5-001-20140306) states *“Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses. Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable”*.
- 3.16 With regard to the suitable sites for renewable energy developments, paragraph (005 Reference ID: 5-005-20150618) states:
- *There are no hard and fast rules about how suitable areas for renewable energy should be identified, but in considering locations, local planning authorities will need to ensure they take into account the requirements of the technology and, critically, the potential impacts on the local environment, including from cumulative impacts. The views of local communities likely to be affected should be listened to.*
  - *When identifying suitable areas it is also important to set out the factors that will be taken into account when considering individual proposals in these areas. These factors may be dependent on the investigatory work underpinning the identified area.*

### **Overarching National Policy Statements for Energy**

- 3.17 NPS EN-1 is a material consideration for planning applications under the Town and Country Planning Act 1990 and is the only policy document that provides any practical guidance in terms of alternative site assessments for energy projects.
- 3.18 The principles set out at paragraph 4.4.3 of EN-1 state:
- the consideration of alternatives should be carried out in a proportionate manner;
  - there should be a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security and climate change benefits) in the same timescale as the proposed development;
  - alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable (e.g. on the market and available), should be excluded on the grounds that they are not important and relevant;
- and

- alternative proposals which are vague or inchoate can be excluded on the grounds that they are not important and relevant.

3.19 The above principles are effective provisions in terms of scoping the alternative site assessment in this document; although, as stated, there is currently no statutory or specific planning policy requirement to consider alternative sites in relation to the development of best and most versatile (or other) agricultural land in EN-1 or in other planning policy document.

#### **National Policy Statement for Electricity Networks Infrastructure**

3.20 NPS EN-5 is a material consideration for planning applications under the Town and Country Planning Act 1990 and features a section on factors influencing site selection by applicants for electricity networks infrastructure and is considered to be of some relevance here. Paragraph 2.2.1 states “The specific criteria considered by applicants, and the weight they give to them, will vary from project to project.” Although related to electricity network projects, paragraph 2.2.2 is considered to be of relevance here and notes that *“the applicant will need to take a number of factors, including engineering and environmental aspects, into account.”*

#### **Draft Overarching National Policy Statement for Energy Planning**

3.21 In March 2023, the Department for Energy Security and Net Zero published and begun consultation on an updated suite of Energy NPS’. Including a Draft Overarching National Policy Statement for Energy Planning.

3.22 Paragraphs 4.2.21 onwards set out principles that should influence the Secretary of State’s decision making and, although referring to Nationally Significant infrastructure Projects, provide useful guidance:

*“Given the level and urgency of need for new energy infrastructure, the Secretary of State should, subject to any relevant legal requirements (e.g. under the Habitats Regulations) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives:*

- *the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner*
- *only alternatives that can meet the objectives of the proposed development need to be considered*

*The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy*

*security, climate change, and other environmental benefits) in the same timescale as the proposed development.*

*The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and it should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals.”*

### **UK Energy and Climate Change Policy**

3.23 Whilst not planning policy documents, the following, also form material considerations:

- National Infrastructure Commission – Net Zero Opportunities for the Power Sector (2020);
- UK Government’s National Infrastructure Strategy November 2020.
- Energy White Paper: Powering our Net Zero Future December 2020.
- Climate Change Committee The Sixth Carbon Budget: The UK’s path to Net Zero December 2020.
- UK Government’s press release of acceleration of carbon reduction to 2035 April 2021.
- The Committee on Climate Change (‘CCC’) - Reducing UK emissions Progress Report to Parliament (June 2021); and
- HM Government Net Zero Strategy, Build Back Greener October 2021.

## **4.0 ALTERNATIVE SITE ASSESSMENT METHODOLOGY**

### **Overview**

- 4.1 This section sets out the qualitative, sequential methodology utilised to carry out the assessment. It should be noted that this type of methodology has been utilised to support many planning applications relating to energy projects in the UK.
- 4.2 The assessment is split into two parts:
1. Previously developed land – to establish whether there are any potential alternative sites located on previously developed land that could be utilised (note: the Proposed Site is not previously developed land); and
  2. Lower or equal grade agricultural land – to establish whether there are any potential alternative sites located on lower or equal grade land that could be utilised (note: the Proposed Site is classed as Grade 3 for the purposes of this assessment).
- 4.3 The methodology utilised to carry out the assessment is sequenced as follows:
- definition of a search area;
  - analysis of previously developed land;
  - analysis of lower or equal grade agricultural land;
  - establishment of a long-list;
  - long-list filtering to create a short-list of sites; and
  - assessment of the short-list.
- 4.4 The above are explained in turn in the remainder of this section.

### **The Search Area**

- 4.5 It is important to identify a technically sound area of search (hereafter referred to as the ‘Search Area’) from which potential alternative sites are identified for assessment.
- 4.6 There is no specific guidance in relevant planning policy documents to determine the geographic area that should be applied. The Search Area for this assessment has therefore been based on the technical requirement to connect the Proposed Development to a National Grid substation (hereafter referred to as the ‘Substation’) within 600 m cable length for reasons of electrical efficiency and responsiveness. The GGP would require larger and more plant items (i.e. larger buildings and structures) if located further than 600m, which would have corresponding impacts



on viability as well as amenity and character in the area in which it sits, and is considered undesirable. Necton Substation was selected based on the timescales allowed for connecting to the grid and the substations that had physical space for a new connection. Notably, Statkraft's other GGP Sites have been located in similar proximity to the connecting substation.

4.7 The Proposed Development would connect into the existing substation located north of the Site (the 'Point of Connection').

4.8 The Search Area for alternative sites has therefore been defined to include a simple radius of 600 m around the Point of Connection – please refer to Appendix 1, which illustrates the Search Area. This is considered generous as in most instances a direct cable run will not be possible due to obstacles. This is considered qualitatively in the assessment of the short-listed sites.

### **Analysis of Previously Developed Land**

4.9 Relevant publicly available data was reviewed to identify previously developed land within the Search Area that could potentially be available for the Proposed Development.

4.10 The data included what are considered to comprise the most up-to-date, relevant adopted and/or emerging Development Plan Documents ('DPD') produced by Breckland Council. The following types of allocation/sites were added to a 'long-list' of potentially suitable sites;

- land allocated for renewable energy or other similar development; and
- land allocated for employment, or another land use that could potentially be compatible with energy development.

4.11 To further supplement the DPDs, the following were also reviewed:

- the Estates Gazette website (<http://propertylink.estatesgazette.com>) where a search for commercial/industrial land can be carried out within a defined search area; and
- the most recent version of the Council's brownfield land registers which is maintained on the Council's register in accordance with government guidelines.

### **Analysis of Lower or Equal Grade Agricultural Land**

#### Scope – Agricultural Land Classification Grades Considered in the Assessment

4.12 The Agricultural Land Classification ('ALC') system classifies land into five grades (1-5), with Grade 3 subdivided into sub-grades 3a and 3b. Best and most versatile (BMV) land is defined as Grades 1, 2 and 3a and is the land which is most flexible, productive and efficient in response to inputs and which can best deliver food and non-food crops for future generations.

4.13 The nationally available (or 'Provisional') ALC survey data obtained from Natural England does not distinguish between Subgrade 3a and 3b. There are small areas within the Search Area where the sub-division data is available from Natural England and, where available, this has been applied.

4.14 As mentioned above, the Proposed Site comprises Grade 3a (good quality) agricultural land. The rest of the site is classified as non agricultural/other land. Therefore, the assessment set out in this report focuses on considering whether there are any potential alternative Grade 3, 4 or 5 sites, i.e. lower or equal grade agricultural land than the Proposed Site.

#### Site Identification Criteria

4.15 In order to identify potentially suitable sites, the surrounding area was divided into 'unconstrained land'. In the context of this Alternative Site Assessment, 'unconstrained land' can be defined as land with a lower or equal grade agricultural land.

4.16 Sites have been divided to avoid being crossed by overhead lines (OHLs) or featuring associated towers. Although it is theoretically possible to divert OHLs, this would require the erection of several towers and OHLs rather than repositioning, due to the proximity to the substation. This would increase landscape and visual impact and have significant financial and timely effects on the Proposed Development.

4.17 Any identified sites were then added to the long list.

#### **Filtering of the Long-List**

4.18 The long list was then 'filtered' to remove any sites below 1.9 ha (the approximate area of the main compound of the Proposed Site). Any sites that did not meet this criterion were filtered out.

4.19 Multiple sites equating to a total of 1.9 ha were not considered in the assessment, because a scheme comprising of multiple sites is not considered to represent a comparable alternative. This is because in comparison to a single, continuous site, multiple sites would have other potentially limiting factors, including, but not limited to, legal agreements with multiple land owners; the complexity of connecting multiple sites to the electricity distribution network; and the impacts on rural character from removal of existing vegetation features/field boundaries.

4.20 For the above reasons, the consideration of multiple sites is not considered proportionate, realistic or deliverable as an alternative when considering, amongst other things, the principles set out in paragraph 4.4.3 of NPS EN-1.

### **Assessment of the Short-List**

4.21 The remaining sites were added to a 'short-list' and assessed against a range of policy, environmental and viability criteria (determined with reference to relevant planning policy), as follows:

- Is the land likely to be available, e.g. on the market or proposed for another use?
- Distance from the potential point of connection – is an unobstructed cable run of up to 600m to the point of connection available, with suitable connections providing more viable connections?
- Is the Site clear and developable?
- Is the land of suitable shape and size for the purpose of the proposed development?
- Is suitable highway access for construction and maintenance available or can be introduced without substantial improvements or alterations to the highway or substantial land take?
- What is the distance to sensitive receptors?
- Any other relevant considerations?

4.22 The assessment of the short-list determined whether there are any potential feasible alternative sites. The assessment utilised professional experience and judgement to draw conclusions.

## 5.0 ALTERNATIVE SITE ASSESSMENT

5.1 This section sets out the following parts of the assessment:

- previously developed land search;
- lower or equal grade agricultural land search;
- long-list filtering; and
- assessment of sites on the short-list.

### Previously Developed Land

5.2 The search area lies entirely in the administrative area of Breckland Council. The assessment considers their Development Plan Documents and supporting evidence base documents. Relevant brownfield land registers and the Estates Gazette online search were also reviewed. Where sites were identified in multiple documents, only one entry is included below.

5.3 **Zero sites** were added to the long-list following analysis of previously developed land.

### Lower or Equal Grade Agricultural Land

5.4 **Nine Sites** were added to the long-list following the analysis of lower or equal grade agricultural land.

### Long-List and Filtering

5.5 The long-list (with application of the filtering criterion) is shown below in Table 5.1.

**Table 5.1: Long-list and Filtering**

Site Reference	Site Address	Approx. Area (ha)	Source	Filtering – 1.9 ha or above?
ALS01	Land East of Moor Lane	2.55	Agricultural Land Search	
ALS02	Land South of Spicers Cor	7.27	Agricultural Land Search	
ALS03	Land Adjacent North East of Necton Onshore Substation	5.32	Agricultural Land Search	
ALS04	Land to the South of Indigo House	1.71	Agricultural Land Search	
ALS05	Land East of Necton Onshore Substation	8.10	Agricultural Land Search	
ALS06	Land North West of Ivy Todd Village	6.95	Agricultural Land Search	
ALS07	Land Adjacent East of Necton Onshore Substation	3.54	Agricultural Land Search	
ALS08	Land South East of Necton Onshore Substation	4.00	Agricultural Land Search	
ALS09	Land South East of A47	5.10	Agricultural Land Search	

### **Assessment of the Short-List**

- 5.6 Eight sites assessed were of sufficient size to be considered a suitable alternative to the Proposed Site. Therefore, eight sites were added to the short-list. A map of the short-listed sites is included at Appendix 3 of this report.
- 5.7 The criteria set out in Section 4 of this report are first applied to the Proposed Site to provide context and demonstrate suitability and then applied to short-listed sites. The assessment was desk-based; carried out with reference to, amongst other things, available aerial imagery and Figures 1-9 at Appendix 1.

### The Proposed Site

- 5.8 The GGP element of the Proposed Site comprises part of an agricultural field located east of the A47 and adjacent south to Necton Onshore Substation covering an area of approximately 12.78 ha in total, although the main compound covers an area of 1.9a ha. The village of Necton is located approximately 0.6 km to the south west.
- 5.9 The Applicant has rights over the land and, as mentioned above, the Site has been specifically awarded a contract by National Grid ESO in order to provide over two thirds of the East of England's inertia as part of their NAO Stability Pathfinder Phase 3 tender process, as they look to increase inertia and short circuit level in England and Wales while reducing reliance on traditional coal and gas plants which are being phased out of Britain's energy system, in a way which will deliver over £14 billion in savings by 2035.
- 5.10 The Proposed Site is of a suitable shape and size for the purposes of the Proposed Development, benefits from short connection of around 300 m, is clear and developable and benefits from an existing permanent access to the highway for use during operation. The closest residential area comprises properties on St Andrews Lane in Necton which are approximately 600 m south of the Site.

### ALS01 – Land East of Moore Lane

- 5.11 ALS01 comprises part of an agricultural field covering an area of approximately 2.55 ha north of the Proposed Site and south east of the A47.
- 5.12 The land is not known to be available to the Applicant, on the market or proposed for another use. The Point of Connection is approximately 300 m south of the Site, crossing a ditch and agricultural fields and going around an electricity pylon. The site is clear and developable and of regular shape. The Site does not benefit from any direct access to the highway. The closest existing farm track is located approximately 120 m north of the Site, across land included in the existing DCO. According

to the nationally available provisional ALC data the site is Grade 3, but is directly east of Grade 2 agricultural land.

- 5.13 It follows that ALS01 is similar to the Proposed Site but is adjacent to a farmstead and is not understood to be available to the Applicant and so does not comprise a better alternative to the Proposed Site.

ALS02 – Land South of Spicers Cor

- 5.14 ALS02 comprises an agricultural field covering an area of approximately 7.27 ha north east of Proposed Development Site, located south east of the A47.

- 5.15 The land is not known to be available to the Applicant, on the market or proposed for another use. The Point of Connection is approximately 300 m south of the Site, crossing a ditch and agricultural fields and going around an electricity pylon. The site is clear and developable and of regular shape. The Site does not benefit from any direct access to the highway but is south of an access track which connects it to the highway across land included in the Existing DCOs. The Site is adjacent to a farmstead known as Top Farm' According to the nationally available provisional ALC data the site is Grade 3.

- 5.16 It follows that ALS02 is similar to the Proposed Site but is adjacent to a residential property within a farmstead and is not understood to be available to the Applicant and so does not comprise a better alternative to the Proposed Site.

ALS03 – Land Adjacent North East of Necton Onshore Substation

- 5.17 ALS03 comprises part of an agricultural field covering an area of approximately 5.32 ha north east of Necton Onshore Substation, located adjacent east to the A47.

- 5.18 The land is not known to be available to the Applicant, on the market or proposed for another use. The Point of Connection is just under 200 m from the site, crossing an agricultural field. The site is clear and developable but of an irregular shape. The Site does not benefit from any useable direct access, nor is it adjacent to any. It appears that the wider field can be accessed from the south, going through land which is part of the Existing DCOs. There is a small access opposite Moor Lane but from a review of Google Street View it does not seem well used and trees have recently been planted inside the access. The site is directly adjacent to the road but benefits from screening. The majority of the Site comprises Subgrade 3a agricultural land, with a small area of Subgrade 3b.

5.19 It follows that ALS03 is similar to the Proposed Site but does not benefit from a practical existing access and is of a less regular shape and so does not comprise a better alternative to the Proposed Site.

ALS05 – Land East of Necton Onshore Substation

5.20 ALS05 comprises part of an agricultural field covering an area of approximately 8.10 ha east of the Necton Substation, located approximately 850 m east north of the village of Ivy Todd.

5.21 The land is not known to be available to the Applicant, on the market. However, part of this site is proposed to be used by National grid as part of their Necton Substation expansion planning application (Breckland planning ref, 3PL/2022/1003/F).

5.22 The Point of Connection is approximately 100 m west of the Site, crossing a ditch. The site is clear and developable and of regular shape except for a tree. The Site does not benefit from any direct access to the highway but is south of an access track which connects it to the highway across land included in the existing DCO. The site is directly adjacent to the road but benefits from screening. The majority of the Site comprises Subgrade 3b agricultural land, with areas of Subgrade 3a.

5.23 It follows that ALS05 is similar to the Proposed Site but does not benefit from a practical existing access and so does not comprise a better alternative to the Proposed Site.

ALS06 – Land North West of Ivy Todd Village

5.24 ALS06 comprises part of an agricultural field covering an area of approximately 6.95 ha located approximately 400 m west of the Proposed Development Site, located approximately 800 m north of the village of Ivy Todd.

5.25 The land is not known to be available to the Applicant, on the market or proposed for another use. The Point of Connection is about 450 m west of the Site, crossing ditches and agricultural fields. The site is clear and developable and of regular shape. The Site does not benefit from any direct access to the highway but is east of an access track which connects it to the highway across land included in the Existing DCOs. The majority of the Site comprises Subgrade 3a agricultural land, with areas of Subgrade 3b.

5.26 It follows that ALS06 is similar to the Proposed Site but does not benefit from a practical existing access and is further from the Point of Connection and so does not comprise a better alternative to the Proposed Site.

ALS07 – Land East of Necton Onshore Substation

- 5.27 ALS07 comprises part of an agricultural field covering an area of approximately 3.54 ha located north east of the Necton Substation.
- 5.28 The land is not known to be available to the Applicant, on the market or proposed for another use. The Point of Connection is approximately 100 m west of the Site, crossing a ditch. The site is clear and developable but of a slightly irregular shape. The Site does not benefit from any direct access to the highway but is north of an access track which connects it to the highway across land included in the Existing DCOs. The Site comprise a mixture of Subgrade 3a and 3b agricultural land.
- 5.29 It follows that ALS07 is similar to the Proposed Site but does not benefit from a practical existing access and is of a less regular shape and so does not comprise a better alternative to the Proposed Site.

ALS08 – Land South East of Necton Onshore Substation

- 5.30 ALS08 comprises part of an agricultural field covering an area of approximately 4.00 ha south east of the Proposed Development Site, located approximately 600 m north east of the village of Ivy Todd.
- 5.31 The land is not known to be available to the Applicant, on the market or proposed for another use. The Point of Connection is approximately 250 m north of the Site, crossing a ditch and agricultural fields. The Site is clear and developable, besides a tree, but is of an irregular shape. The Site does not benefit from any direct access to the highway but is approximately 100 m east of an access track which connects it to the highway across land included in the Existing DCOs. The site comprises Subgrade 3a agricultural land.
- 5.32 It follows that ALS08 is similar to the Proposed Site but does not benefit from a practical existing access and is of a less regular shape and so does not comprise a better alternative to the Proposed Site.

ALS09 – Land South East of A47

- 5.33 ALS09 comprises part of an agricultural field covering an area of approximately 5.10 ha located south east of the A47 and west of the Proposed Site.
- 5.34 The land is not known to be available to the Applicant, on the market or proposed for another use. The Point of Connection is located approximately 500 m north east of the site. The site is clear and developable but is of a slightly irregular shape. Furthermore, due to the site's location in the middle of a field it would make the farming of the rest of the field less practical. The site does not benefit



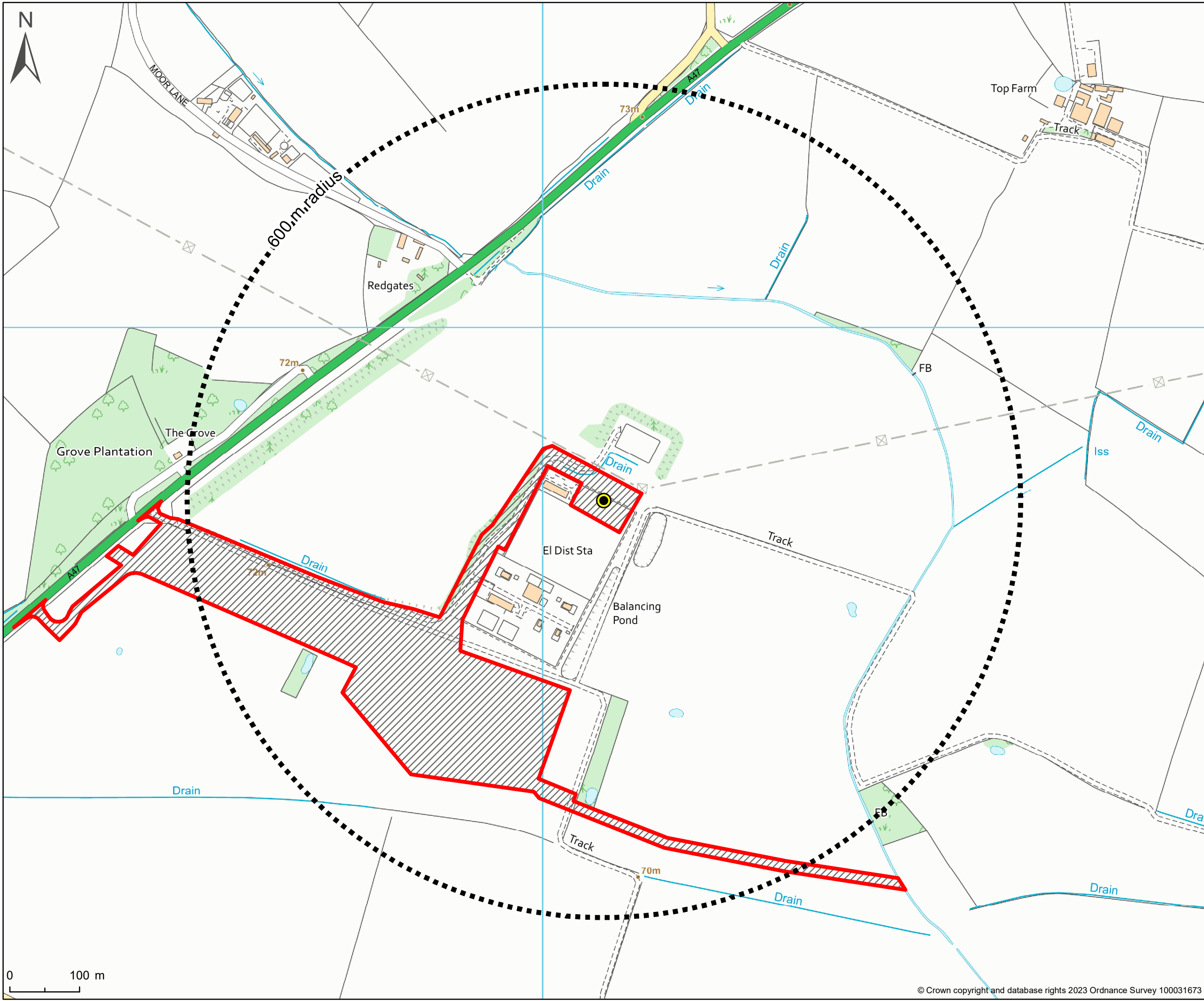
from any direct access to the highway but is approximately 50 m south of the existing substation access. The site comprises a mixture of Subgrade 3a and 3b land. Residential properties on St Andrews Lane Necton are located approximately 400 m south of the Site.

- 5.35 It is notable that a pre-app was submitted for the Proposed Site and two other sites, including one in a similar location to ALS09. The advice received indicated that the Proposed Site was the preferable location.
- 5.36 It follows that ALS09 is similar to the Proposed Site but due to its location in the middle of an agricultural field would make the remainder of the field more difficult to farm and is closer to residential properties in Necton.

## **6.0 SUMMARY AND CONCLUSIONS**

- 6.1 The Alternative Site Assessment found that a notable portion of land within the search area is constrained due to the agricultural land being Grade 2 land, which is of an overall higher grade than the Proposed Site which is assessed as predominantly Grade 3a land. Committed development such as the Windfarm DCO projects also constrained the land available for alternative sites. Nonetheless, a portion of the search area was able to be assessed on qualitative and technical elements necessary to the success of the Proposed Development. The assessment concluded that the surrounding land was less suitable due to highway access, availability to the Applicant, distance from the Point of Connection and shape.
- 6.2 With regards to brownfield sites and those allocated for development, no sites were identified within the Search Area. This is because the Search Area is predominantly rural and no built up areas are located within the search area.
- 6.3 As mentioned above, the Site has been specifically awarded a contract by National Grid ESO in order to provide over two thirds of the East of England's inertia as part of their NAO Stability Pathfinder Phase 3 tender process, as they look to increase inertia and short circuit level in England and Wales while reducing reliance on traditional coal and gas plants which are being phased out of Britain's energy system, in a way which will deliver over £14 billion in savings by 2035.
- 6.4 It is concluded that none of the abovementioned sites comprise a more feasible alternative to the Proposed Site. Therefore, this Alternative Site Assessment has not identified any previously developed sites or sites comprising lower or equal grade agricultural land.

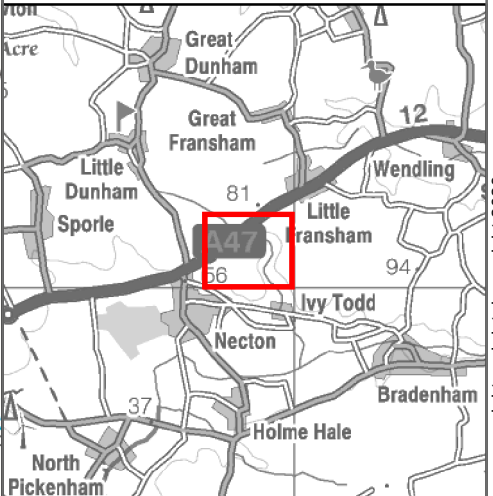
## **APPENDIX 1: THE SEARCH AREA**



0 100 m

PROJECT NAME:  
Necton

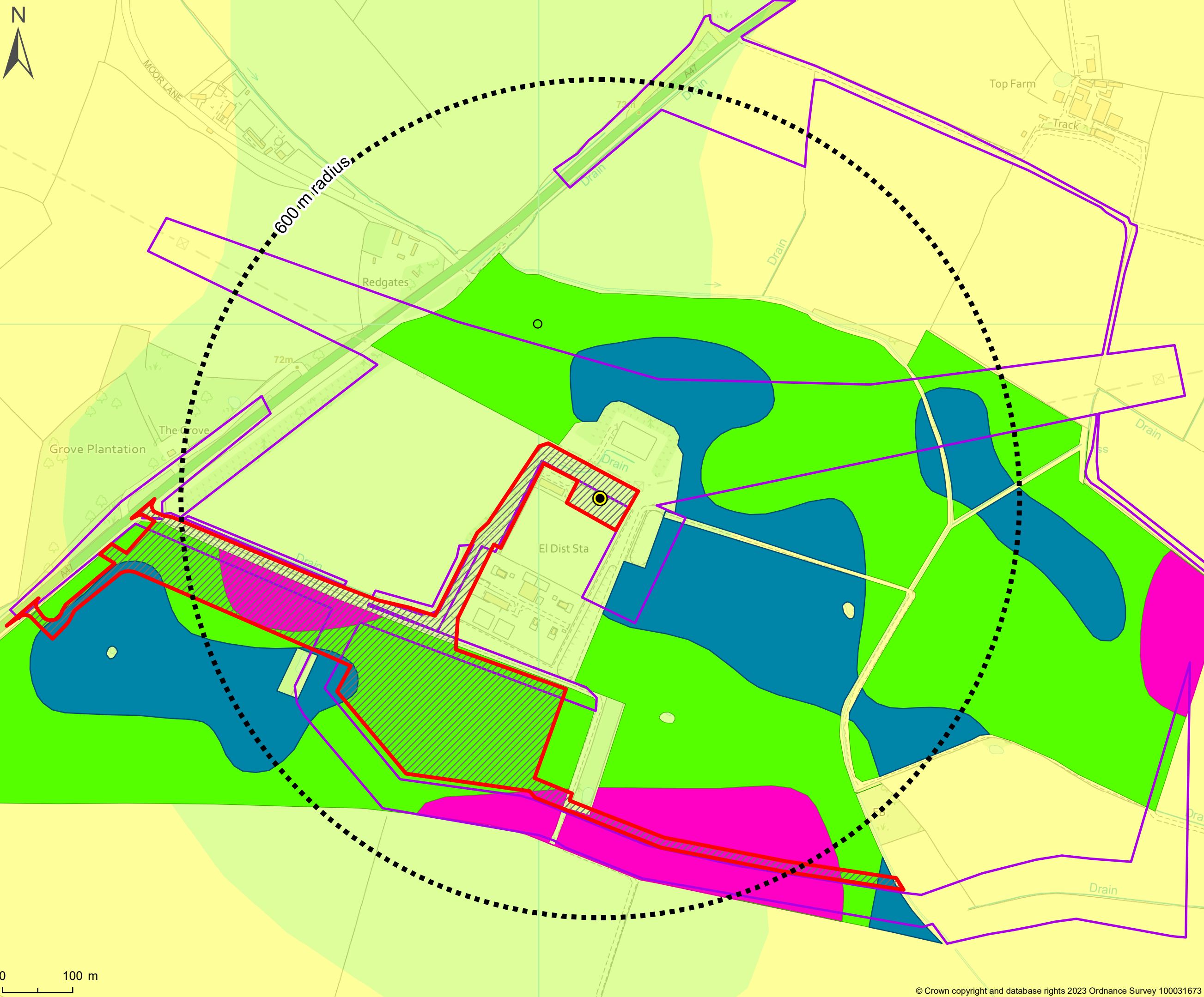
KEY:  
 Point of Connection  
 Search area boundary (600 m)  
 Planning Application Boundary












TITLE:  
Figure 1  
Search Area

DATE: 10/07/2023	DRAWN BY: CH
SIZE: A3	CHECKED BY: CH
SCALE: 1:5,000	CO-ORD SYSTEM: BNG

## **APPENDIX 2: CONSTRAINTS**



PROJECT NAME:  
Necton

- KEY:
-  Point of Connection
  -  Search area boundary (600 m)
  -  Planning Application Boundary
  -  Vattenhall Norfolk Vanguard Onshore Wind Farm
- Local ALC Survey**
-  Grade 2
  -  Grade 3a
  -  Grade 3b
- ALC Grade - Provisional:**
-  Grade 2 - Very Good Quality
  -  Grade 3 - Good to Moderate Quality

Note: Windfarm boundary data not available - boundary generated manually.  
 Note: © Natural England copyright.  
 Contains Ordnance Survey data © Crown copyright and database right 2023. Only Grade 2 and 3 visible on map extent.



TITLE:  
Figure 4  
Combined constraints

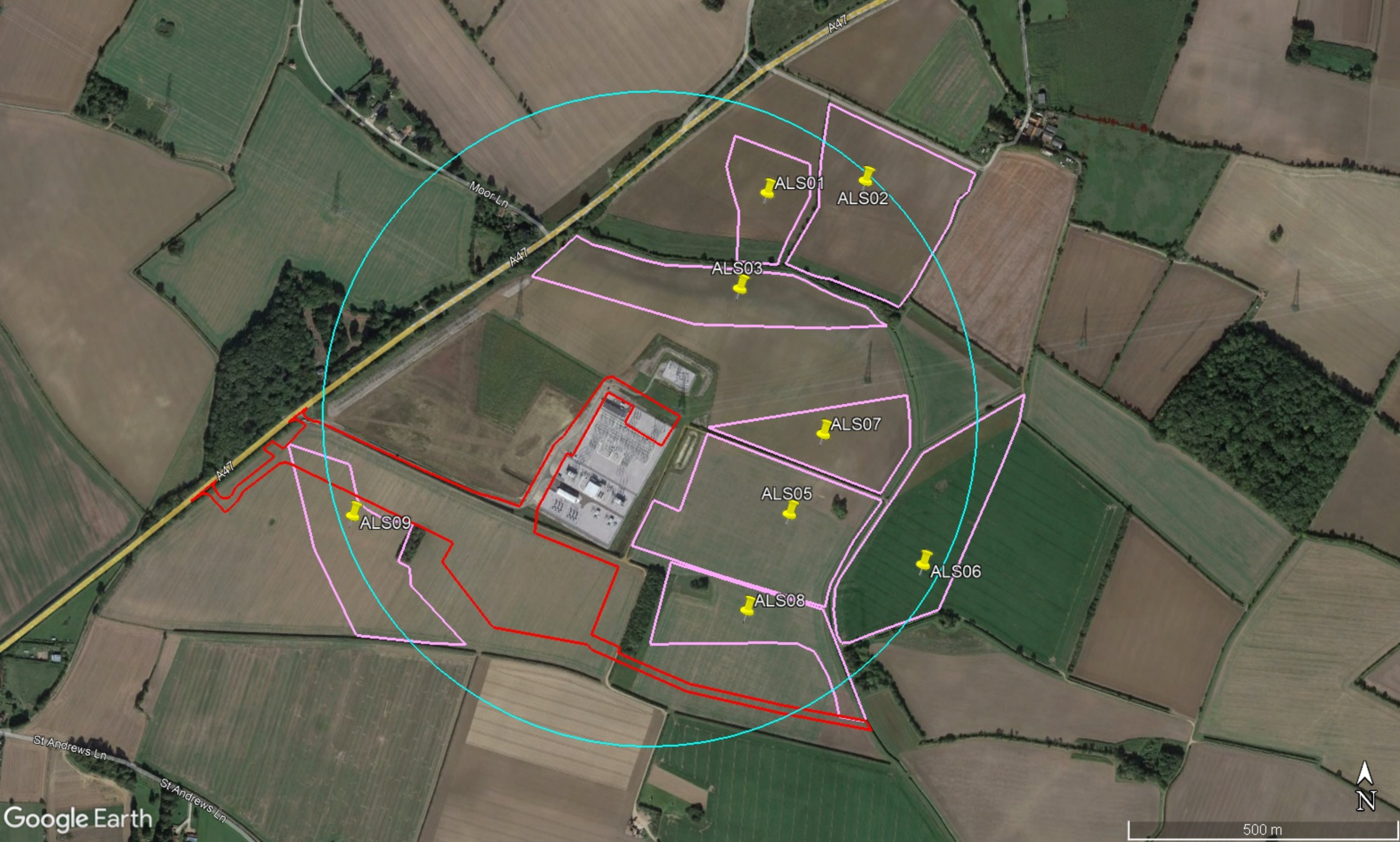
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SCALE: 1:5,000	CO-ORD SYSTEM: BNG

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## **APPENDIX 3: SHORT-LISTED ALTERNATIVE SITES**





ALS01

ALS02

ALS03

ALS07

ALS05

ALS06

ALS08

ALS09