

# The Droves Solar Farm

### **Consultation Report**

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## **Executive summary**

#### Introduction

This Consultation Report ('the Report') has been prepared on behalf of The Droves Solar Farm Limited ('the Applicant') to provide an account of the statutory consultation undertaken under Sections 42, 47 and 48 of the Planning Act 2008 (PA 2008) [Ref. 1], together with ongoing non-statutory engagement, and sets out how consultation responses have been taken into account in relation to the Development Consent Order (DCO) Application for the construction, operation, maintenance, and decommissioning of The Droves Solar Farm (hereafter referred to as the 'Scheme').

#### The Scheme

The Scheme comprises the construction, operation, maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station and Associated Development comprising Battery Energy Storage System (BESS), a Customer Substation, and Grid Connection Infrastructure, including a new National Grid Substation. The Scheme would allow for the generation and export of over 50MW Alternating Current (AC) of renewable energy, connecting into the National Electricity Transmission System (NETS) overhead line that passes through the Site.

As the Scheme would have a generating capacity in excess of 50MW, it is considered to be a Nationally Significant Infrastructure Project (NSIP) under the PA 2008. The Scheme would be located within the Order limits, also referred to as 'the Site'.

#### Pre-application consultation overview

In accordance with Sections 42, 47 and 48 of the PA 2008, the Applicant undertook preapplication consultation on the Scheme ahead of submitting the DCO Application to the Secretary of State.

This involved consultation with prescribed bodies under Section 42(1)(a); those with an interest in the land, as defined in Section 44 and consulted under Section 42(1)(d); communities and organisations in the vicinity of the Scheme who might be affected directly or indirectly, in accordance with Section 47; and wider local, regional and national communities and organisations invited to comment on the proposals under Section 48.

The Applicant also consulted with local authorities in accordance with Section 42(1)(b) and as set out in Section 43(1) of the PA 2008. In addition to formally consulting with relevant local authorities under Section 42 of the PA 2008, the Applicant commenced ongoing regular meetings with Norfolk County Council in July 2024, Breckland District



Council in August 2024 and the Borough Council of King's Lynn & West Norfolk in September 2024.

A chronological outline of the pre-application consultation activities, which are described in more detail throughout this Report, is provided in **Table 1** below.

Table 1 Timeline of pre-application consultation activities

Date	Stage	Summary of activities
August – September 2024	Introduction of the Scheme to consultees (Section 2.3 – 2.7)	The Applicant informed locally elected representatives of the Scheme through letters, inviting them to introductory briefing meetings. A newsletter was subsequently issued to the wider community to publicise the proposals.
September – October 2024	Early-engagement workshops (Section 2.5 – 2.6)	The Applicant held a series of early- engagement workshops with invited stakeholders, including local councils, community groups and technical consultees, to introduce the proposals for the Scheme and help understand key issues and potential constraints in the local area.
November 2024	Scoping Report submitted (Section 3.2)	The Applicant submitted a Scoping Report to the Planning Inspectorate (on behalf of the Secretary of State) on 7 November 2025. Through this report, the Applicant notified the Planning Inspectorate that it intended to provide an Environmental Statement (ES) in respect of the Scheme in accordance with Regulation 8(1)(b) of the EIA Regulations.
December 2024	Workshop Summary Report (Section 2.6)	The Applicant published a Workshop Summary Report outlining the feedback received during the early-engagement workshops and how this was being used to inform the Scheme. The document was shared with stakeholders and uploaded to the Scheme website on 3 December 2024.
December 2024	Scoping Opinion and receipt of Schedule 1 (Section 3.2)	A Scoping Opinion was adopted by the Planning Inspectorate (on behalf of the Secretary of State) on 18 December 2025 and included the list of consultation bodies notified by the Planning Inspectorate under Regulation 11(1)(a) of the EIA Regulations.



February – March 2025	Consultation on draft Statement of Community Consultation with local authorities under Section 47 of the PA 2008 (Section 4.3)	The Applicant consulted with local authorities identified under Section 43(1) of the PA 2008 on the draft Statement of Community Consultation between 5 February and 6 March 2025.
April 2025	Publication of Statement of Community Consultation in accordance with Section 47 of the PA 2008 (Section 4.4)	The final Statement of Community Consultation was published in accordance with Section 47 of the Act on 23 April 2025.
May 2025	Notification to the Planning Inspectorate under Section 46 of the PA 2008 (Section 5.3)	In accordance with Section 46(2) of the PA 2008, the Applicant notified the Planning Inspectorate of the proposed Application prior to commencing statutory consultation. As required by Section 46(1), the Applicant provided the same information as would be supplied to consultees under Section 42.
May 2025	Publication of Preliminary Environmental Information Report (PEIR) (and Non-Technical Summary (NTS) of the PEIR)	The Applicant published a Preliminary Environmental Information Report on 21 May 2025 for consultation under Sections 42, 47 and 48 of the PA 2008, inviting responses by 9 July 2025 (a 49-day consultation period). The Preliminary Environmental Information Report was available for consultation throughout this period.
May – June 2025	Parallel consultation under Sections 42, 44, 47 and 48 of the PA 2008	The Applicant commenced consultation under Section 42 on 21 May 2025, in parallel with consultation under Sections 47 and 48 of the PA 2008, with responses invited by 9 July 2025 (a 49-day consultation period).
May – June 2025	Consultation under Section 42 of the PA 2008 (Section 5.2)	On 14 May 2025, the Applicant wrote by recorded delivery to all consultees identified under Sections 42(1)(a) and 42(1)(b) of the PA 2008 to notify them of the statutory consultation. The letter provided details on how to access the consultation documents, how to respond and the deadline for submissions, and included a copy of the Section 48 notice.



		Consultation under Section 42 then commenced on 21 May 2025, with a response deadline of 9 July 2025 (a 49-day period). The Applicant invited all consultees to provide written feedback on the Scheme.
May – June 2025	Statutory consultation under Section 47 of the PA 2008 (Section 5.4)	The Applicant held a seven-week community consultation on the detailed proposals for the Scheme, including the Preliminary Environmental Information Report, in accordance with the Statement of Community Consultation.
		A range of consultation activities were undertaken within a defined Primary Consultation Zone ('PCZ'). The Applicant:
		<ul> <li>issued direct communications, including a Consultation Newsletter and Leaflet, to all residential and business addresses within the PCZ</li> </ul>
		<ul> <li>hosted five in-person consultation events across a range of dates, times and accessible venues</li> </ul>
		<ul> <li>made hard copies of key Scheme documents, including the PEIR and its NTS, available at a local information point</li> </ul>
		<ul> <li>distributed digital copies of the Consultation Poster and Leaflet to local councils and organisations within the PCZ to help publicise the consultation</li> </ul>
		<ul> <li>maintained engagement with near neighbours and key stakeholders throughout the consultation period</li> </ul>
		<ul> <li>placed site notices within the Site to provide notification of the consultation and the opportunities to participate.</li> </ul>
September – October 2025	Targeted Consultation (Section 8.2)	The Applicant undertook a targeted consultation for 28 days between 3 September and 1 October 2025, engaging relevant consultees on a number of updates to the Scheme.
November 2025	Submission of Application	In accordance with Section 37 of the PA 2008, this Consultation Report has been prepared by the Applicant to support the DCO Application.



## Consultation feedback and regard had

The Applicant has continued to refine the Scheme design as consultation progressed. A summary of how regard has been had to feedback received during statutory consultation is provided in Sections 7 and 8, with the full record of responses and the Applicant's replies included in Consultation Report Appendix G: Section 42 – Responses Received and Applicants Responses [APP/5.2] and Consultation Report Appendix H: Section 47 – Responses Received and Applicants Response [APP/5.2].



### 1 Introduction

#### 1.1 Purpose of document

1.1.1 This Consultation Report ('the Report') has been prepared on behalf of The Droves Solar Farm Limited ('the Applicant') to provide an account of the statutory consultation undertaken under Sections 42, 47 and 48 of the Planning Act 2008 (PA 2008) [Ref. 1], together with ongoing non-statutory engagement, and sets out how consultation responses have been taken into account in relation to the Development Consent Order (DCO) Application for the construction, operation, maintenance, and decommissioning of The Droves Solar Farm (hereafter referred to as the 'Scheme').

#### 1.2 The Order limits

1.2.1 The extent of the Order limits are shown in Location Plan [APP/2.1] and the Scheme is described in full in ES Chapter 5: The Scheme [APP/6.1] and shown spatially on the Works Plan [APP/2.3].

#### 1.3 The Scheme

- 1.3.1 The Scheme comprises the construction, operation, maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station and Associated Development comprising a Battery Energy Storage System (BESS), a Customer Substation, and Grid Connection Infrastructure, including a new National Grid Substation. The Scheme would allow for the generation and export of over 50MW Alternating Current (AC) of renewable energy, connecting into the National Electricity Transmission System (NETS) overhead line that passes through the Site.
- 1.3.2 As the Scheme would have a generating capacity in excess of 50MW, it is considered to be a Nationally Significant Infrastructure Project (NSIP) under the PA 2008.
- 1.3.3 The Scheme would be located within the Order limits, also referred to as 'the Site'. The Order limits contain all elements of the Scheme comprising the Solar PV Site, the Customer Substation, the National Grid Substation, the BESS, Grid Connection Infrastructure, Mitigation and Enhancement Areas, and the Highway Works (shown in ES Figure 3.1: Scheme Location [APP/6.3] and described further in ES Chapter 3: Order limits and Context [APP/6.1]).

#### 1.4 About IGP

1.4.1 IGP have delivered nearly 40 solar projects worldwide that have generated more than 3 GW of energy capacity. This includes 21 solar projects in the UK. These range in size from below 5 MW to Nationally Significant Infrastructure Projects (NSIPs) such as Cottam,



currently the UK's largest consented solar project. Cottam will generate 600 MW of clean, renewable and secure electricity and includes 600 MW of Battery Storage that will store then release energy as needed.

### 1.5 Report structure

1.5.1 This Report is organised (as shown in **Table 2**) to reflect the Applicant's approach to preapplication consultation and how it complies with the requirements of the PA 2008. It sets out the consultation undertaken, feedback received, and how this has been taken into account in the design of the Scheme.

Table 2 Key consultation activities and relevant Chapters

Consultation activity	Chapter	
	Publication of Scheme information (Section 2.2)	
Chapter 3 – Overview of early engagement (August 2024 – March 2025)	Introduction of the Scheme to consultees and initial engagement (Section 2.3)	
	Early-engagement workshops (Section 2.5)	
Chapter 4 – Environmental Impact Assessment (EIA) Scoping	Consultation under EIA Regulations (Section 3.2)	
Chapter 5 – Developing the Statement of Community Consultation (SoCC)	Local authority consultation of the draft SoCC (Section 4.3)	
	Publicity under Section 47 of the Act (Section 4.4)	
Chapter 6 – Statutory consultation	Statutory consultation under Section 42 of the Act (Section 5.2)	
	Section 46 (notifying the Planning Inspectorate) (Section 5.3)	
	Statutory consultation under Section 47 of the Act (Section 5.4)	
	Section 48 (newspaper notices) (Section 5.5)	
Chapter 7 – Section 42 statutory consultation: responses received, issues raised and changes made	Qualitative analysis of responses received under Section 42 of the Act (Section 6.2)	



Chapter 8 – Section 47 statutory consultation: responses received, issues raised and changes made	T :	
raised and enangee made	Qualitative analysis of responses received under Section 47 of the Act (Section 7.4)	
Chapter 9 – Further engagement	Ongoing non-statutory engagement (Section 8.1)	
	Summary of targeted consultation (Section 8.2)	

## 1.6 Relevant guidance and advice

- 1.6.1 In undertaking the pre-application consultation and in compiling this Report, the Applicant has complied with or had regard to the relevant legislation and guidance, including the PA 2008 (as amended), the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ('the APFP Regulations') [Ref. 2], the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') (as amended) [Ref. 3], and relevant government guidance.
- 1.6.2 As well as preparing this Report, the Applicant has set out how it has complied with guidance and advice on consultation in the **Application Cover Letter [APP/1.1]** and the **Section 55 Checklist [APP/1.5]** that form part of the DCO Application.



## 2 Overview of early engagement (August 2024 – March 2025)

#### 2.1 Introduction

- 2.1.1 The Applicant devised a non-statutory (early) engagement approach which included a series of issue-based workshops, rather than an exhibition-led model, to gather focused input from stakeholders on specific technical and local issues. Alongside these workshops, a period of ongoing engagement was maintained, enabling the Applicant to meet regularly with stakeholders and adopt an iterative design process in which feedback was continually taken into account.
- 2.1.2 This early engagement commenced in August 2024 with the publication of information regarding the Scheme, followed by introductory briefing meetings with key stakeholders. These briefings provided an initial overview of the proposals and invited early discussion ahead of the programme of early-engagement workshops.
- 2.1.3 In September and October 2024, the Applicant held these early-engagement workshops with invited stakeholders, including local councils, community groups and technical consultees, to introduce the proposals for the Scheme and to identify key issues and potential constraints in the local area. Further details of each stage of early engagement are provided throughout this Chapter.

#### 2.2 Publication of Scheme information

- 2.2.1 Information regarding the Scheme was published in the public domain in August 2024. This involved the launch of a dedicated website (www.drovessolarfarm.co.uk).
- 2.2.2 The website publicised the Applicant's free-to-use communications channels for community enquiries regarding the Scheme. The Scheme's communication channels included a freephone number (0800 0129 154) and an email address (info@drovessolarfarm.co.uk).

## 2.3 Introduction of the Scheme to consultees and initial engagement

2.3.1 In August 2024, to coincide with the launch of the Scheme website (as described in **Section 2.2**), the Applicant undertook initial engagement with local authorities based on the administrative boundaries for the proposed Scheme. The Applicant contacted officers from Breckland District Council, Norfolk County Council and the Borough Council of King's Lynn & West Norfolk.



- 2.3.2 The primary aim of this initial engagement was to introduce the early-stage proposals for the Scheme, including the early environmental assessments and site selection work carried out to date.
- 2.3.3 As part of the initial engagement, the Applicant issued letters via email on 19 August 2024, introducing the Scheme to:
  - · Breckland District Council
  - · Norfolk County Council
  - · Borough Council of King's Lynn & West Norfolk
  - · Swaffham Town Council
  - · host and neighbouring parish councils; and
  - host and neighbouring constituency area MPs.
- 2.3.4 The letter invited stakeholders to an introductory briefing on the Scheme. The Applicant subsequently met with local councillors from Breckland District Council, Norfolk County Council and the Borough Council of King's Lynn & West Norfolk, representatives from host and neighbouring parish councils and the Member of Parliament (MP) for Ely and East Cambridgeshire. A summary of these introductory briefing meetings is provided in **Table 3**.

Table 3 Summary of introductory briefing meetings

Date	Stakeholder attendees
	Swaffham Ward Councillor, Breckland District Council (x2)
	Executive Director, Breckland District Council
4 Contombox 2004	Saham Toney Ward Councillor, Breckland Council
4 September 2024	Vice Chair of Infrastructure and Development Select Committee, Marshland South Division, Norfolk County Council
	Councillor, The Brecks Division, Norfolk County Council
6 September 2024	Councillor, Little Dunham Parish Council
o September 2024	Councillor, Holme Hale Parish Council
9 September 2024	Councillor, Little Dunham Parish Council
	Mayor & Town Councillor, Swaffham Town Council
	Councillor, Little Dunham Parish Council
	Councillor, Castle Acre Parish Council



	Chairman, Little Dunham Parish Council
11 September 2024	Wissey Ward Councillor, Borough Council of King's Lynn & West Norfolk
11 September 2024	MP for Ely and East Cambridgeshire

2.3.5 During this initial stage of engagement, the Applicant collaborated with stakeholders to help understand key issues and potential constraints in the local area.

### 2.4 Applicant's approach to 'near neighbours'

- 2.4.1 After the Applicant's communications channels were open (see **Section 2.2**) to all and any interested parties, and efforts were made to publicise the Scheme, the Applicant made additional efforts to contact owners and occupiers of residential properties closest to the Scheme.
- 2.4.2 The Applicant identified two residential properties as being 'near neighbours' to the Scheme (see Consultation Report Appendix A: Non-statutory Engagement Supporting Material [APP/5.2]). These properties were considered near neighbours because they were within 50 metres of the proposed Scheme boundary, with an absence of existing built infrastructure between the residential property and the proposed Scheme boundary.
- 2.4.3 The Applicant issued letters to these residential properties in August 2024 to introduce the occupiers to the Scheme, publicise consultation opportunities and invite them to read about the Scheme. The letters also provided the contact details for the Community Relations Team in case the occupiers had any questions or if they wished to meet with the Applicant. The letter is provided in Consultation Report Appendix A: Non-statutory Engagement Supporting Material [APP/5.2].

## 2.5 Early-engagement workshops

- 2.5.1 Following the introduction of the Scheme, in September and October 2024 the Applicant held a series of early-engagement workshops with invited stakeholders, including local councils, community groups and technical consultees, to introduce the proposals and help understand key issues and potential constraints in the local area. Consultation Report Appendix A: Non-statutory Engagement Supporting Material [APP/5.2] contains a list of invited stakeholders and an example of the invitations issued to stakeholders.
- 2.5.2 These workshops took the form of a presentation by the project team, followed by a collaborative masterplanning exercise between stakeholders and the developer, to capture local knowledge and incorporate this into ongoing environmental assessments and design development.



- 2.5.3 Information was presented using a Microsoft PowerPoint presentation along with printed maps and plans. Copies of all materials that were available to view at the workshops are provided in Consultation Report Appendix A: Non-statutory Engagement Supporting Material [APP/5.2].
- 2.5.4 Attendees were able to share their comments throughout the session by engaging with the materials, including using printed comment sheets. A summary of the in-person workshops is provided in **Table 4**.

Table 4 Summary of in-person early-engagement workshops

Workshop	Attendees
	Swaffham Climate Change and Environment Group
	Vice Chairman, Necton Parish Council
	Councillor, Necton Parish Council
	Representative for South Acre Parish Council (x2)
	Chair, Castle Acre Parish Council
	Councillor, Castle Acre Parish Council
17 September 2024, from 14:00 until 17:00, at the Dragonfly Hotel, King's Lynn	Councillor, Little Dunham Parish Council
	Wissey Ward Councillor, King's Lynn & West Norfolk Borough Council
	Cabinet Member for Planning and Licensing, Airfield Ward, King's Lynn & West Norfolk Borough Council
	Councillor, Airfield Ward, King's Lynn & West Norfolk Borough Council, CPRE Norfolk Trustee
	Access Field Officer, East of England, British Horse Society
	Director of Planning and Building Control, Breckland District Council
1 October 2024, from 17:00 until 20:00, at the George Hotel, Swaffham	Principal Planning Policy Officer, Breckland District Council
	Councillor, Little Dunham Parish Council
	Chair, Holme Hale Parish Council
	Swaffham Methodist Church



Swaffham		Change	and
Environment	Group		

2.5.5 Four online workshops were held with technical stakeholders to discuss specific topic areas in more detail. These sessions used slides relevant to each technical discipline, drawn from the same presentation delivered at the in-person events. They were followed by a question-and-answer session to address questions and gather additional feedback. A summary of the technical workshops is provided in **Table 5**.

Table 5 Summary of online technical workshops

Workshop	Attendees
	Principal Planner, Norfolk County Council
Water and Flood workshop: 24 September 2024, from 10:00 until 12:00, using	Strategic Flood Risk Planning Officer, Norfolk County Council
Microsoft Teams	Head of Development Management, Norfolk County Council
Planning, Community Benefit and Socio- economic workshop: 24 September 2024, from 14:00 until 16:00, using Microsoft Teams	INCREES Project, Norfolk County Council
Traffic and Transportation workshop: 26 September 2024, from 10:00 until 11:30, using Microsoft Teams	Network Co-ordinator NSIP and Major. Projects, Highways, Norfolk County Council Officer, Norfolk County Council
Ecology and Biodiversity workshop: 23 January 2025, from 10:00 until 11:00, using Microsoft Teams	Norfolk Wildlife Trust

2.5.6 The Applicant notes that the later Ecology and Biodiversity workshop was arranged to discuss written feedback provided on materials presented as part of the early-engagement workshops.

### 2.6 Feedback from the early-engagement workshops

- 2.6.1 Following the early-engagement workshops, the Applicant produced a Workshop Summary Report (the 'Summary Report') in November 2024.
- 2.6.2 The Summary Report (which can be found in **Consultation Report Appendix A: Non-statutory Engagement Supporting Material [APP/5.2]**) provided a summary of the information presented and discussed at the early-engagement workshops. It also outlined



- the key themes from the comments received and explained how this feedback has been incorporated into the masterplanning process for the Scheme.
- 2.6.3 The Summary Report was shared with stakeholders invited to the early-engagement workshops, alongside the offer of a meeting to discuss its content, and uploaded to the Scheme website on 3 December 2024.

#### 2.7 Public newsletter

2.7.1 To raise awareness of the Scheme, in October 2024 the Applicant circulated an initial newsletter to local communities (defined by a PCZ) of approximately 5,760 residential and business addresses, as shown by **Figure 1**.

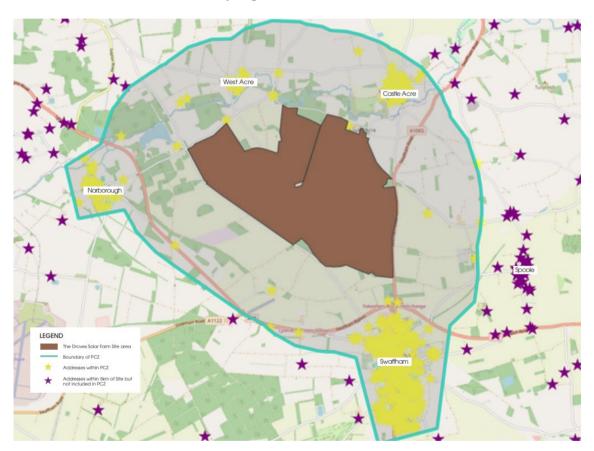


Figure 1 Non-statutory consultation PCZ

2.7.2 The newsletter included information about the Scheme, such as an indicative timeline, Site map and details on how to contact the project team – including the website, email address and Freephone number – for those seeking further information. It was also made available on the Scheme's website. The newsletter is provided in Consultation Report Appendix A: Non-statutory Engagement – Supporting Material [APP/5.2].



## 2.8 Ongoing engagement

- 2.8.1 In the period between the early-engagement workshops and the statutory consultation, the Applicant continued to engage with stakeholders.
- 2.8.2 Details of ongoing engagement with key stakeholders, including the composition of each group, when the engagement took place and a summary of the engagement, are provided in **Table 6**.

Table 6 Meetings held as part of the Applicant's ongoing engagement for the Scheme

Date	Stakeholder (name/ organisation)	Summary of meeting
19 September 2024	Technical Support Manager  - Borough Council of King's Lynn & West Norfolk  Assistant Director Environment and Planning – Borough Council of King's Lynn & West Norfolk  Planning Control Manager – Borough Council of King's Lynn & West Norfolk	Meeting to introduce the Scheme and address initial concerns, including potential impacts from construction traffic and on heritage settings.
29 October 2024	Director of Planning and Building Control – Breckland District Council Principal Planner – Norfolk County Council Project Support Officer – Norfolk County Council	Meeting with officers to present the scoping boundary, provide an update on survey progress and submission timelines, and share preliminary dates for statutory consultation alongside plans for informal engagement on the draft Statement of Community Consultation.
26 November 2024	Director of Planning and Building Control – Breckland District Council  Head of Development Management – Breckland District Council  Principal Planner – Norfolk County Council	Meeting to provide a planning update and undertake informal consultation on the draft Statement of Community Consultation.



20 January 2025	Senior Planner – Borough Council of King's Lynn & West Norfolk  Principal Conservation Officer – Borough Council of King's Lynn & West Norfolk  Planning Control Manager for Environment & Planning – Borough Council of King's Lynn & West Norfolk	Meeting to discuss the Landscape and Visual Impact Assessment, viewpoint locations and cultural heritage setting.  Stakeholders expressed support for the overall approach, which informed the Preliminary Environmental Information Report.
21 January 2025	MP for North West Norfolk	A meeting held to brief the MP on the Scheme. The MP noted that he had received some correspondence regarding Scheme, though less than for other developments in Norfolk.  He raised concerns about the cumulative impact of solar development in the region and the pace at which such schemes are being brought forward nationally.
21 January 2025	Director of Planning and Building Control – Breckland District Council  Principal Planner – Norfolk County Council  Project Support Officer – Norfolk County Council  Head of Development Management – Breckland District Council	Meeting to discuss early engagement on the draft Statement of Community Consultation, with a commitment to share the full document for comment once prepared.
10 February 2025	Ministry of Defence	Meeting to discuss a now-redundant fuel pipeline and confirm current ownership.  It was agreed that the pipeline has been decommissioned, with MOD rights relinquished, and responsibility now lies with affected landowners.



18 February 2025	Environment Agency	Initial call to discuss ways of working and approach to future engagement.
24 February 2025	Advanced Public Health Officer – Norfolk County Council	Meeting to discuss the health assessment methodology for the Environmental Impact Assessment.
		Norfolk County Council confirmed agreement with the overall approach and provided suggestions for improvement.
28 February 2025	Westacre Estate (owner)	Meeting with the Westacre Estate to explore opportunities for collaboration on landscape and ecological initiatives.
3 March 2025	Heritage and Events Manager – Breckland District Council  Senior Planner – Borough Council of King's Lynn & West Norfolk  Advanced Public Health Officer – Norfolk County Council  Advanced Public Health Officer – Norfolk County Council  Head of Employment and Skills – Norfolk County Council  Skills Policy Manager – Norfolk County Council  Chief Executive Officer – Norfolk County Council  INCREES Project – Norfolk County Council  Principal Planner – Norfolk County Council	Meeting brought together Norfolk County Council's skills leads and FE partners to inform the development of the Employment and Skills Strategy.  Stakeholders supported the approach and proposed a number of additional skills and initiatives for the final strategy.



18 March 2025	Strategic Growth Manager – Breckland District Council	Meeting to discuss the Applicant's tourism accommodation and assets analysis. Breckland District Council welcomed the work to date and offered suggestions for contacts and potential improvements.
		potentiai improvements.

## 3 Environmental Impact Assessment (EIA) Scoping

#### 3.1 Introduction

3.1.1 The Environmental Impact Assessment (EIA) process is used to evaluate the likely significant environmental effects of a Scheme prior to the determination of a DCO Application. The findings of the EIA are presented in an ES enabling the decision-making body to fully understand (and therefore consider) the environmental implications of a proposed development.

#### 3.2 Consultation under EIA Regulations

- 3.2.1 On 7 November 2024, the Applicant submitted a Scoping Request for the Scheme to the Secretary of State confirming in accordance with Regulation 8(1)(b) of the EIA Regulations that an ES would be prepared in respect of the Scheme.
- 3.2.2 The Planning Inspectorate, on behalf of the Secretary of State, consulted statutory bodies and issued a Scoping Opinion on 18 December 2025, which included an updated list of consultees notified under Regulation 11(1)(a) and (1)(c) of the EIA Regulations.
- 3.2.3 The Applicant reviewed this list to ensure all organisations were included in subsequent consultation. Responses to the Scoping Opinion, and how they have been addressed, are detailed in the relevant **ES [APP/6.1 6.5]** Chapters.
- 3.2.4 On 14 May 2025, in accordance with Regulation 13 of the EIA Regulations and prior to statutory consultation, the Applicant issued a Section 48(1) notice to consultation bodies and other persons notified under Regulation 11(1)(a) and (1)(c) of the EIA Regulations. This included:
  - a covering letter (provided in Consultation Report Appendix E: Statutory Consultation Under Section 42 of the Act – Supporting Material [APP/5.2]), which publicised the consultation opportunities and offered the opportunity to arrange a meeting to discuss the Scheme further; and



- a copy of the Section 48 notice, which included details of the public consultation events and the locations where the consultation documents could be inspected free of charge.
- 3.2.5 The Applicant issued the Section 48 notice and accompanying covering letter by post and, where appropriate email addresses were available, by email. Six initial non-deliveries by post and five by email were identified. The Applicant subsequently made successful follow-up attempts to contact each consultee affected. Full details of these additional deliveries, including dates of issue, are provided in Consultation Report Appendix E: Statutory Consultation Under Section 42 of the Act Supporting Material [APP/5.2].
- 3.2.6 The Applicant also notes that the Defence Infrastructure Organisation was contacted on 2 June 2025 in response to concerns raised regarding the height of the proposed overhead line works. Further details of this engagement are also set out in **Section 8.1**.
- 3.2.7 Alongside this, the Applicant held ongoing discussions and meetings with technical consultees on the Scheme, including the surveys and assessments undertaken as part of the EIA and proposed design changes ahead of the PEIR. The relevant ES [APP/6.1 6.5] Chapters include sections describing this engagement and explaining how it informed the design.



## 4 Developing the Statement of Community Consultation (SoCC)

## 4.1 Identification of local authorities within Section 43(1) of the Act

- 4.1.1 As prescribed by Section 47(1) of the PA 2008, the Applicant prepared a Statement of Community Consultation ('SoCC') setting out how it proposed to consult people living in the vicinity of the Scheme. In accordance with Section 47(2), the Applicant consulted the relevant local authorities under Section 43(1) on the contents of the SoCC (see Consultation Report Appendix B: Preparation of the SoCC [APP/5.2]).
- 4.1.2 The Applicant identified Norfolk County Council and Breckland District Council as relevant host authorities under Section 43(1) of the Act. The Borough Council of King's Lynn & West Norfolk was also identified as a neighbouring authority which has a direct border with the Site. These host and neighbouring authorities were formally consulted on the draft SoCC.

#### 4.2 Informal consultation on the draft SoCC

- 4.2.1 The Applicant began early engagement on the SoCC with Planning Officers from Norfolk County Council and Breckland District Council in October and November 2024.
- 4.2.2 The Applicant introduced the SoCC and shared a high-level timeline for its preparation and consultation during scheduled planning meetings on 29 October 2024 and 26 November 2024.
- 4.2.3 A draft outline was also shared via email with the Planning Officers as part of an informal consultation in January 2024. Planning Officers met with the Applicant on 21 January 2025, to discuss the draft outline.
- 4.2.4 Key comments from the meeting with local authority Planning Officers included the importance of briefing key members in advance of public events and wider community consultation, and the suggestion that separate meetings be arranged for individual authorities and parishes. The Applicant considered this feedback and amended the SoCC to include pre-statutory consultation briefing meetings.
- 4.2.5 Planning Officers also recommended that the team liaise with the communications teams at Norfolk County Council, Breckland District Council and the Borough Council of King's Lynn & West Norfolk, to explore opportunities for promoting the consultation through their channels, such as social media. This measure was subsequently included in the draft SoCC.
- 4.2.6 Officers further advised that an additional information point, which did not require membership, would be preferable. The Applicant investigated potential additional venues and libraries outside the original search area; however, given the rural location of the



Scheme, no suitable venue could be identified, and this measure was therefore not included in the draft SoCC for consultation.

4.2.7 The Applicant shared a meeting note acknowledging the key comments with Planning Officers via email on 24 January 2025. An acknowledgement of receipt was received from Norfolk County Council and Breckland District Council.

#### 4.3 Local authority consultation on the draft SoCC

- 4.3.1 Following informal consultation with Planning Officers from Norfolk County Council and Breckland District Council, the draft SoCC was amended and finalised, ahead of the formal consultation period under Section 47(2) of the PA 2008.
- 4.3.2 The draft SoCC was sent to Norfolk County Council, Breckland District Council and the Borough Council of King's Lynn & West Norfolk on 5 February 2025. This marked the beginning of the 28-day formal consultation period, in compliance with the PA 2008.
- 4.3.3 A deadline for responses was set for 6 March 2025. A reminder notification was sent on 20 February 2025.
- 4.3.4 Breckland District Council responded on 21 February 2025 to confirm that they were satisfied with the Applicant's overall approach to consultation. Their response also included four comments for consideration.
- 4.3.5 The Borough Council of King's Lynn & West Norfolk responded on 3 March 2025 with several comments for review. The Council expressed broad agreement with the Applicant's intended scope as set out in the draft SoCC.
- 4.3.6 Norfolk County Council submitted their comments on 4 March 2025. Norfolk County Council welcomed the Applicant's intended approach to engagement with local communities across Norfolk. They also provided several comments for consideration.
- 4.3.7 The Applicant confirmed receipt of each response, once received. A formal notification email (see **Consultation Report Appendix B: Preparation of the SoCC [APP/5.2]**) was shared upon the close of consultation on 6 March 2025.
- 4.3.8 The responses from local planning authorities to the draft SoCC can be found in Consultation Report Appendix B: Preparation of the SoCC [APP/5.2].
- 4.3.9 Following the close of consultation, the Applicant reviewed and incorporated the feedback received, where practicable. The Applicant issued a formal response to the identified host and neighbouring authorities on 31 March 2025.
- 4.3.10 **Tables 7–9** detail the feedback received from Breckland District Council, the Borough District Council of King's Lynn & West Norfolk and Norfolk County Council, and the actions taken as a result.



Table 7 Breckland District County Council response and actions taken

Section of SoCC	Comment	Regard had
8. Who we are consulting	The Indicative PCZ map at Appendix 2 shows the area extending into King's Lynn & West Norfolk. [Breckland District Council] would support that. At Section 8 of the document the PCZ is referenced as being within the host authority of Breckland. [Breckland District Council] think the text should reflect that it includes the neighbouring district as well. [Breckland District Council] [is] also pleased to note that the PCZ includes all of Swaffham.	The Applicant amended the SoCC to reflect that the PCZ includes the neighbouring Borough Council of King's Lynn & West Norfolk.
9. How we will consult	I am pleased to see that neighbouring, as well as host, Parish and Town Councils appear to be included within the circulation list. I think it would be beneficial to clarify that member Briefings will include not only Breckland and NCC [Norfolk County Council] but King's Lynn & West Norfolk as well. I would suggest that the host Parishes and neighbouring Parishes are briefed separately as well.	The Applicant updated the SoCC to clarify that the Borough Council of King's Lynn & West Norfolk would be invited to briefing meetings alongside Breckland District Council and Norfolk County Council.  The Applicant subsequently held briefing meetings with key members on 29 April and 8 May 2025.  The Applicant held separate briefing meetings for host and neighbouring parish councils on 6 and 8 May 2025.
9. How we will consult	As well as Swaffham Library to host hard copies of documents I would suggest King's Lynn, Dereham or Fakenham libraries as well as Parish Council Offices and Swaffham Town Council offices.	The Applicant considered King's Lynn Library, Dereham Library and Fakenham Library for hosting consultation materials and determined that they were located too far away and outside the PCZ, and therefore would not be accessible or convenient for consultees.  The Applicant considered, but did not take forward, the use of



Swaffham Town Council offices, as these would have duplicated the function of the Swaffham Library. Similarly, parish council offices were not used as local information points, as opening hours were not consistent enough to ensure reliable public access.

Table 8 Norfolk County Council response and actions taken

Section of SoCC	Comment	Regard had
6.1 Early engagement	The County Council would like to see further information on which stakeholders were engaged with, as mentioned in Section 6.1; it isn't clear whether this included the groups listed in Appendix 1. It is also unclear whether the letters sent to neighbours are the same as the 5,760 addresses who received the newsletter. It would be helpful to append the content of the letter and newsletter they received.	The Applicant updated the SoCC to reflect those invited to introductory briefing meetings.  Additionally, the Applicant clarified the recipients of the near-neighbour letter as those within 50 metres of the Site, and the newsletter as those within the PCZ.  It was decided not to append the newsletter, as some of the information became out of date; however, it was made available on the Scheme website.
6.2 Approach to consultation	The County Council would like to see the consultation period, currently listed as 6 weeks, extended to an 8–10-week period to allow adequate time for the County Council to fully assess its statutory functions as the Highway Authority, Lead Local Flood Authority, Public Health, Mineral and Waste Planning, Economic Development, Historic Environment, etc. In addition, there is a Bank Holiday during the consultation period reducing the number of working days.	Taking into account the Council's comments, and in recognition of public holidays during the consultation period and the potential cumulative impacts of other developments, the Applicant extended the consultation period to seven weeks.  The statutory consultation subsequently ran from 21 May 2025 until 23:59 on 9 July 2025.



7.1 Early- engagement workshops	It would be helpful to include as an appendix the information presented at the engagement workshops, referred to in Section 7.1.	The materials presented at the engagement workshops were made available on the Scheme website and were signposted in the SoCC.  Given the volume of materials – including detailed maps and a presentation – it was not considered practical to include them as an appendix to the SoCC.
8. Who we are consulting	The County Council would like to be named as a statutory consultee in Section 8.	The Applicant named Norfolk County Council as a statutory consultee.
8. Who we are consulting	The Norfolk Fire and Rescue Service request they are added as a non-statutory consultee, in the list of non-statutory consultees referred to in Section 8.	The Applicant considers that the Norfolk Fire and Rescue Service is a statutory consultee under the APFP Regulations and therefore included them accordingly in the updated wording.
8. Who we are consulting	The Norfolk County Council Skills team are pleased to see that schools and colleges in the relevant area will be consulted, as mentioned in Section 8. The Skills team would also like to see further engagement for skills and employment, either through a dedicated employment and skills session / workshop within this phase of engagement, or by consulting more widely with the Skills team, local colleges and the Local Skills Improvement Plans (LSIP) to understand the local skills context. Consulting further at this stage will better inform the Socio-Economic section of the Preliminary Environmental Information Report (PEIR), and the Environmental Impact Assessment (EIA) on workforce development in due course.	An Employment and Skills workshop was held, with representatives from Norfolk County Council, Breckland District Council and the Borough Council of King's Lynn & West Norfolk invited to attend.  The Applicant has continued to engage with relevant stakeholders, including the Norfolk County Council Skills Team, local colleges and other key organisations, to identify issues and opportunities and explore how the Scheme can support existing programmes and maximise local opportunities.  The Applicant has also assessed workforce requirements across all phases of the Scheme. The outcomes of this assessment, together with findings from ongoing



		engagement, will be reported in the outline Employment, Skills and Supply Chain Strategy (oESSCS) [APP/7.15] and ES Chapter 14: Socio-Economics [APP/6.2], which will be submitted as part of the DCO Application.
N/A	Where possible, the County Council requests early sight of consultations such as the PEIR and NTS ahead of the formal consultation, to allow as much time as possible to assess the documents, prepare its response and go through the County Council's reporting mechanisms. The County Council would be willing to sign a non-disclosure agreement (NDA) where appropriate.	The Applicant shared a digital copy of the PEIR, via the Council's internal SharePoint site, on 20 June 2025  The Applicant acknowledged the County Council's willingness to sign a non-disclosure agreement, but considered this unnecessary given the working relationship and ongoing engagement between the parties.  The Applicant also notes that a Planning Performance Agreement will be entered into with Norfolk County Council, which includes confidentiality provisions.
9. How we will consult	The County Council is pleased with the number and location of consultation events proposed.  The Council suggests the events are not scheduled during May half term as this may limit numbers that can attend.	The Applicant understood that the May half-term holiday was scheduled between 26 and 30 May 2025, but also recognised that holiday schedules vary between schools.  The consultation events were therefore scheduled at a range of times, including later dates in June, to accommodate this and maximise overall attendance throughout the consultation period.
Appendix 1	The local interest groups listed in Appendix 1 appears to be a list of all groups, rather than focused on those that are local to the Scheme and/or would	The Applicant revised the list of Local Interest Groups to better reflect those that are either directly affected by or have a particular interest in the proposals for the Scheme.



	have a particular interest in the proposals.	The updated list can be found in Appendix 1 of the SoCC.
Appendix 2		The Applicant amended the map to include a Legend that clarified areas referred to.

Table 9 Borough Council of King's Lynn & West Norfolk response and actions taken

Section of SoCC	Comment	Regard had
7. Non-statutory consultation	Please can you ensure that consideration is given to areas outside the PCZ in Appendix 2, particularly in regard to areas impacted by other NSIP schemes – for example High Grove Solar. The effects of the schemes in combination may warrant broader consultation.	The Applicant recognised the importance of assessing and communicating the potential cumulative impacts.  The Applicant engaged with RWE on behalf of High Grove Solar Farm, to produce a statutory consultation exhibition banner and joint map. Both materials aimed to illustrate the two Schemes and direct stakeholders to participate in both statutory consultations.  The Applicant also implemented a number of outreach measures, including a press release, to ensure that those outside the PCZ were notified of the statutory consultation and given the opportunity to provide feedback.  A cumulative impact assessment was also produced as part of the PEIR. This evaluates the potential cumulative impacts associated with The Droves Solar Farm, alongside other NSIP schemes, such as High Grove Solar Farm, and other developments.



8. Who we are consulting	We request that Host and Neighbouring Parish Councils are specifically included within Section 8. As it stands, Castle Acre Parish Council are excluded from the document and are not included either in the main text or Appendix 1. Castle Acre Parish Council are an important consultee given the proximity of the Site and impacts on their area.	The Applicant agrees and amended the SoCC to include explicit reference to neighbouring parish councils.
10. Promoting the consultation	In Section 10, for your reference, we would normally expect notices in publications to include the Eastern Daily Press (EDP), Lynn News, and Your Local News.	The Applicant noted this and considered the suggested publications. A decision was made based on distribution in relation to the PCZ, with the Applicant determining that the Eastern Daily Press provided sufficient coverage to effectively engage the PCZ.  The Section 47 notice was published in print and online in the Eastern Daily Press.  The Section 48 notices were published in print and online in the Eastern Daily Press.

### 4.4 Publicity under Section 47 of the Act

#### Introduction

- 4.4.1 In compliance with the publicity requirements of Section 47(6) of the PA 2008, the SoCC was published in a locally circulating newspaper in advance of the statutory consultation launch and the issuing of the Section 48 notice (see **Section 5.5**).
- 4.4.2 This notice provided information on how to access the SoCC, as well as how the Applicant intended to engage with stakeholders and local communities during the upcoming sevenweek statutory consultation.
- 4.4.3 The Section 47 notice was published in print and online in the Eastern Daily Press on 23 April 2025. Copies of the SoCC advertisement, as published, are provided in Consultation Report Appendix D: Published Section 47 and Section 48 Notices [APP/5.2].



#### Availability of the SoCC

- 4.4.4 To coincide with the publishing of the Section 47 notice, a printed copy of the SoCC was displayed at Swaffham Library from 23 April 2025 until the close of statutory consultation on 9 July 2025.
- 4.4.5 The SoCC was available to view at each of the four consultation events during the statutory consultation period, and a digital version was available to view and download free of charge from the Scheme website from 23 April 2025.
- 4.4.6 On publishing the SoCC on 23 April 2025, the Applicant issued a copy of the final published SoCC to stakeholders, alongside a copy of the Section 47 notice. Copies of the communications issued are set out in **Consultation Report Appendix B: Preparation of the SoCC [APP/5.2]**.
- 4.4.7 A copy of the published SoCC can be found in **Consultation Report Appendix C: Copy** of the SoCC and Compliance with the SoCC [APP/5.2].

#### Coordination of SoCC publication with RWE's High Grove Solar Farm

- 4.4.8 The Applicant notes that the publication date of the Section 47 notice was agreed in consultation with Norfolk County Council, to provide clarity for stakeholders and to take account of the proximity of the Scheme to RWE's High Grove Solar Farm, also located within Breckland District.
- 4.4.9 To distinguish the two schemes, the Applicant coordinated the timing of its SoCC publication with RWE, ensuring both were published in the same week. This approach was intended to minimise confusion within local communities by making clear that the schemes were separate and subject to distinct consultation processes.
- 4.4.10 The Applicant has continued to work in collaboration with RWE to coordinate planned engagement activities.



## 5 Statutory consultation

#### 5.1 Overview of statutory consultation

- 5.1.1 The Applicant conducted a period of statutory consultation on the Scheme for seven weeks (49 days), between 21 May and 9 July 2025.
- 5.1.2 To ensure that anyone with an interest in the Scheme could find out more and share their views, the Applicant designed and delivered a comprehensive consultation strategy using a range of techniques.
- 5.1.3 This included issuing consultation letters and newsletters to prescribed consultees and local residents, publishing statutory notices in accordance with Section 48 of the PA 2008, and making consultation documents available online and at local information points.
- 5.1.4 The Applicant also held five in-person consultation events and two online webinars, supported by exhibition materials and feedback forms (both online and hard copy), as well as a Freephone line and dedicated email address.
- 5.1.5 Full details of the consultation activities, methods of publicity, materials made available and opportunities for consultees to provide feedback are set out in this Chapter.
- 5.1.6 The statutory consultation sought feedback on all aspects of the Scheme, including:
  - the Project Level Design Principles, guiding the design and development of the Scheme throughout its life cycle
  - indicative masterplans identifying potential areas for the Solar PV Arrays, Associated Development, and potential mitigation and enhancement opportunities
  - the PEIR, containing preliminary assessments of the Scheme's likely environmental effects associated with its construction, operation and decommissioning
  - visualisations of the Scheme from selected viewpoints
  - issues associated with the construction and operation of the Scheme and proposed mitigation measures; and
  - possible community benefits, including funding for local initiatives.
- 5.1.7 The consultation also sought general feedback about other local issues or sensitivities that the Applicant should be aware of. The key themes arising from the consultation, together with how the Applicant has taken these into account, are provided in **Sections 6.2** and **7.4**.
- 5.1.8 The Applicant notes that the statutory consultation was originally scheduled to run for six weeks, closing on 2 July 2025. In response to feedback during the SoCC consultation and to account for public holidays during the consultation period, the Applicant extended the statutory consultation to seven weeks.



## 5.2 Statutory consultation under Section 42 of the PA 2008

#### Introduction

- 5.2.1 Section 42 of the PA 2008 requires the Applicant to consult prescribed consultees, relevant local authorities and certain categories of land interests. The following sections set out how the Applicant identified and consulted each category of consultee.
- 5.2.2 A full list of Section 42(1)(a) prescribed consultees and Section 42(1)(b) local authorities consulted in relation to the Scheme is provided in Consultation Report Appendix E: Statutory Consultation Under Section 42 of the Act Supporting Material [APP/5.2]. A full list of persons falling within Section 44 of the PA 2008 is included in the Book of Reference [APP/4.3] submitted with the DCO Application.

#### Identification of consultees under Section 42(1)(a)

- In accordance with Section 42(1)(a), the Applicant consulted all prescribed consultees identified and notified by the Planning Inspectorate on behalf of the Secretary of State, in line with Regulation 11(1)(a) and 11(1)(c) of the EIA Regulations. These parties are referred to in this Report as statutory consultees and are listed in Consultation Report Appendix E: Statutory Consultation Under Section 42 of the Act- Supporting Material [APP/5.2].
- 5.2.4 In addition to the consultees identified by the Planning Inspectorate, the Applicant identified and included a further six non-prescribed organisations to be consulted as statutory consultees. These organisations were provided with the same information and consulted in the same manner as the prescribed consultees. These consultees are identified in Consultation Report Appendix E: Statutory Consultation Under Section 42 of the Act Supporting Material [APP/5.2].
- 5.2.5 The Applicant did not consult the Greater London Authority ('the GLA') under Section 42(1)(c) of the PA 2008, as the Scheme area is not located within Greater London and therefore the GLA is not a relevant consultee.
- 5.2.6 The Applicant did not consult the Marine Management Organisation under Section 42(1)(aa) of the PA 2008, as the Scheme is not considered likely to affect any of the areas specified in subsection (2) of Section 42 (e.g. tidal or offshore areas) or Schedule 1 of the APFP Regulations.

#### Identification of consultees under Section 42(1)(b)

- 5.2.7 Section 42(1)(b) of the PA 2008 requires the Applicant to consult with the local authorities identified in Section 43 of the PA 2008, which sets out four categories of authority:
  - A is a neighbouring local authority (Section 43(2)) that shares a boundary with a unitary council or lower-tier district 'B' council within whose area development is situated



- B is either a unitary council or a lower-tier district council in which the development is situated a host local authority
- C is an upper-tier county council in which the development is situated a host local authority; and
- D is either a unitary council or an upper-tier county council which shares a boundary with a host 'C' authority a neighbouring local authority (Section 43(2)(a)).
- 5.2.8 Details of the identification of relevant local authorities, including whether they are an A, B, C or D authority, and the criteria for their identification, are included in **Table 10**.

Table 10 Identification of consultees under Section 42(1)(b)

Name	A, B, C or D authority	Criteria for identification
Norfolk County Council	С	Upper-tier county authority in which the development is situated (host).
Breckland District Council	В	Lower-tier district authority in which the development is situated (host).
Broadland District Council	А	Neighbouring lower-tier district authority sharing a boundary with host district.
South Norfolk Council	А	Neighbouring lower-tier district authority sharing a boundary with host district.
Cambridgeshire County Council	D	Neighbouring upper-tier county authority sharing a boundary with Norfolk County Council (host county).
Fenland District Council	A	Neighbouring lower-tier district authority sharing a boundary with Norfolk County Council.
East Cambridgeshire District Council	A	Neighbouring lower-tier district authority in Cambridgeshire sharing a boundary with Norfolk County Council (host).



Borough Council of King's Lynn & West Norfolk	A	Neighbouring lower-tier district authority sharing a boundary with Breckland District Council (host district).
Lincolnshire County Council	D	Neighbouring upper-tier county authority sharing a boundary with Norfolk County Council (host county).
Mid Suffolk District Council	A	Neighbouring lower-tier district authority in Suffolk sharing a boundary with Norfolk County Council.
North Norfolk District Council	A	Neighbouring lower-tier district authority sharing a boundary with Breckland District Council.
South Holland District Council	A	Neighbouring lower-tier district authority in Lincolnshire sharing a boundary with Norfolk County Council.
Suffolk County Council	D	Neighbouring upper-tier county authority sharing a boundary with Norfolk County Council (host county).
The Broads National Park	А	Local planning authority overlapping with Norfolk County Council.
West Suffolk Council	A	Neighbouring lower-tier district authority in Suffolk sharing a boundary with Norfolk County Council.



5.2.9 **Figure 2** illustrates the location of the relevant local authorities listed in **Table 10** and their administrative boundaries in relation to the Scheme.

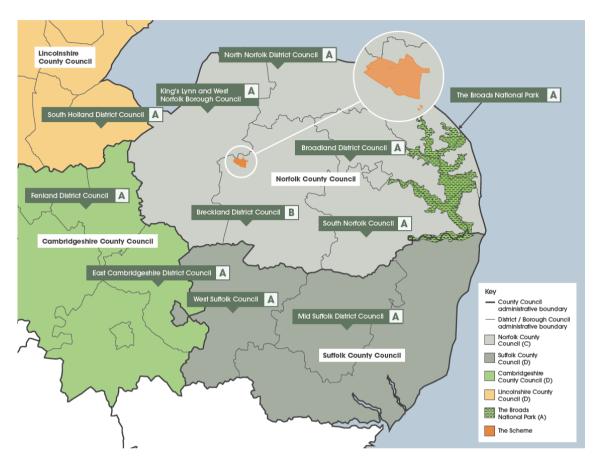


Figure 2 Map indicating category A, B, C, and D authorities in relation to the Scheme

- 5.2.10 The Applicant notes that the Scheme boundary included in **Figure 2** is reflective of that shown during statutory consultation.
- 5.2.11 The Applicant also notes that Norfolk County Council requested an extension to the consultation deadline to 18 July 2025 to allow sufficient time to review the consultation materials. This request was granted by the Applicant.

# Identification of consultees under Section 42(1)(d)

- 5.2.12 Section 42(1)(d) of the PA 2008 requires the Applicant to consult each person who is within one or more of the categories set out in Section 44 of the PA 2008 with respect to the Scheme boundary.
- 5.2.13 This requires the developer to consult with:
  - landowners, lessees, tenants or occupiers (Category 1 persons, as per Section 44(1))
  - those with an interest in the land or certain powers with respect to the land (Category 2 persons, Section 44(2)); and



- those who the Applicant thinks would or might be entitled to make a relevant claim under Section 44(4) (Category 3 persons).
- 5.2.14 The Applicant therefore carried out a diligent inquiry using the methods set out below to identify and consult those with an interest in the land.
- 5.2.15 Desktop Referencing began with the extraction of HM Land Registry data to identify all relevant freehold, leasehold, mortgagee, beneficiary, other charges, private rights and restrictive covenant information, which was then stored in a land referencing database.
- 5.2.16 Updates were requested from the Land Registry on a quarterly basis to ensure that the latest information was available ahead of key milestones. This process ensured that any changes occurring prior to the Section 42 consultation, and again before submission of the **Book of Reference [APP/4.3]**, were captured.
- 5.2.17 Additional desktop activities were undertaken to confirm information received through site enquiries and the Land Registry was accurate, including Companies House searches to ensure registered companies' details were verified and the registered office was appropriate for the service of notices and other correspondence.
- 5.2.18 Land Interest Questionnaires (LIQs) were posted using Royal Mail to all parties to confirm their interest and request further information. This included a request for information about a recipient's own interests, associated third-party interests and the spatial extent of the property. Included with the questionnaires were individual plans showing the anticipated land ownership boundaries.
- 5.2.19 Respondents were asked to complete the LIQs, amend the boundary plans where required, and return the completed documents to the land referencing team using the prepaid envelopes provided. The land referencing team reviewed the returned information and entered it into the land referencing database or contacted respondents to resolve any queries or conflicting information.
- 5.2.20 Recipients of the LIQs were also offered the means to respond or ask questions via an online portal, by email, or through a dedicated phoneline. The land referencing team recorded all information received and responded to all queries.
- 5.2.21 Where land ownership information could not be ascertained through desktop or site referencing methods, the land referencing team erected notices at the Site requesting information. The notices were checked regularly over the consultation period and replaced if removed. All updates were recorded in the land referencing database and the Geographic Information System.
- 5.2.22 Site notices were also put up on 21 May 2025 and were checked weekly throughout the statutory consultation to help identify any additional land interests. The notices were taken down on 10th July 2025, in line with the end of the statutory consultation period. The notices are provided in Consultation Report Appendix E: Statutory Consultation Under Section 42 of the Act Supporting Material [APP/5.2].



A list of land interests consulted (noting their interest in the land) during the statutory consultation phase is provided in Consultation Report Appendix E: Statutory Consultation Under Section 42 of the Act – Supporting Material [APP/5.2]. Persons identified within Consultation Report Appendix E: Statutory Consultation Under Section 42 of the Act – Supporting Material [APP/5.2] and the Book of Reference [APP/4.3] (at the time) were consulted.

# Undertaking consultation under Section 42 of the PA 2008

- 5.2.24 In undertaking consultation under Section 42 of the PA 2008, the Applicant formally wrote by recorded delivery to statutory consultees to notify them of the consultation on 14 May 2025
- 5.2.25 The letter set out the background to the Scheme and the Applicant's intention to submit a DCO Application, and confirmed that the recipient had been identified as a consultee under Section 42(1)(a) or Section 42(1)(b) of the PA 2008. It provided details on where to access the consultation documents, how to respond to the consultation and the deadline for response, as well as a copy of the Section 48 notice (further details on the publication of the Section 48 notice are provided in **Section 5.5**).
- 5.2.26 The letter also confirmed that the consultation documents, including the PEIR and the NTS of the PEIR, were available electronically on the Scheme website.
- 5.2.27 A subsequent email was issued to all consultees for which an email address could be identified on 14 May 2025, ensuring they also had a digital version of the letter and Section 48 notice.
- 5.2.28 The Applicant identified five initial non-deliveries by post and four by email. The Applicant subsequently made successful follow-up attempts to contact each consultee affected.
- 5.2.29 Full details of the letter and email distribution, together with any additional measures undertaken to ensure that all consultees identified under Sections 42(1)(a) and 42(1)(b) of the PA 2008 received the consultation letter and accompanying materials, are provided in Consultation Report Appendix E: Statutory Consultation Under Section 42 of the Act Supporting Material [APP/5.2].
- 5.2.30 Consultees identified under Section 42(1)(d) were contacted on 14 May 2025 and issued with a version of the letter sent to consultees identified under Section 42(1)(a) and Section 42(1)(b). An example copy of this letter is shown in Consultation Report Appendix E: Statutory Consultation Under Section 42 of the Act Supporting Material [APP/5.2].
- 5.2.31 In addition to issuing the consultation letters, the Applicant undertook a site visit with representatives from Norfolk County Council, Breckland District Council, the Borough Council of King's Lynn & West Norfolk, and the Norfolk Local Access Forum. The Applicant also held a meeting with the East of England Ambulance Service. Details of these meetings are provided in **Table 11**.



Table 11 Additional engagement under Section 42 of the PA 2008 during statutory consultation

Date	Stakeholder (name / organisation)	Meeting summary
30 May 2025	Project Support Officer, Norfolk County Council  Principal Planner, Norfolk County Council  Ashill Ward Councillor, Breckland District Council  Norfolk Fire and Rescue Service	Site visit and walkover to discuss the Scheme, including heritage considerations and potential impacts on Public Rights of Way.
9 June 2025	East of England Ambulance Service NHS Trust	An online meeting was held to discuss the potential for a joint Statement of Common Ground between Norfolk Constabulary, the East of England Ambulance Service NHS Trust, and Norfolk Fire and Rescue Service.

5.2.32 A total of 25 responses were received under Section 42 of the PA 2008 during this round of engagement through hard-copy letters and emails.

Statement of compliance with consultation under Section 42 of the PA 2008

- 5.2.33 The Applicant considers that it fully complied with Section 42 of the PA 2008. The Applicant:
  - consulted with all prescribed persons under Sections 42(1)(a)–(d) relevant to the Scheme, including landowners under Section 44; and
  - provided a total consultation period of 49 days, exceeding the statutory minimum of 28 days.

# 5.3 Section 46 (notifying the Planning Inspectorate)

- 5.3.1 In accordance with Section 46(2) of the PA 2008, the Applicant notified the Planning Inspectorate of the proposed application prior to commencing statutory consultation.
- 5.3.2 In accordance with Section 46(1) of the PA 2008, which requires that the same information be provided as if the Planning Inspectorate were being consulted under Section 42, the



- letter provided details on where to access the consultation documents, how to respond to the consultation and the deadline for response, as well as a copy of the Section 48 notice.
- 5.3.3 The Applicant received an acknowledgement of the receipt of its notification under Section 46 of the PA 2008 from the Planning Inspectorate on 15 May 2025.
- 5.3.4 A copy of the letter sent to the Planning Inspectorate, along with confirmation of receipt its receipt, is provided in Consultation Report Appendix E: Statutory Consultation Under Section 42 of the Act Supporting Material [APP/5.2].

# 5.4 Statutory consultation under Section 47 of the Act

#### Introduction

- 5.4.1 The Applicant consulted the local community in accordance with the SoCC, as prescribed by Section 47(7) of the PA 2008.
- 5.4.2 Statutory consultation commenced on 21 May 2025 and ran for seven weeks (49 days) until 9 July 2025, undertaken in parallel with consultation under Section 42 and publicity under Section 48 of the PA 2008.
  - Defining a Primary Consultation Zone (PCZ) and identifying consultees
- 5.4.3 The Applicant defined a new PCZ (see **Figure 3**) for statutory consultation, to reflect changes to the Scheme's boundary since the early-engagement workshops.
- 5.4.4 The PCZ sits within the administrative areas of the host local planning authority, Breckland District Council, and the neighbouring authority, the Borough Council of King's Lynn & West Norfolk, both within Norfolk County Council.
- 5.4.5 The PCZ contains approximately 7,000 residential and business addresses and extends two kilometres from the Site with additional extensions around residential clusters, including:
  - Swaffham
  - Narborough
  - · West Acre
  - · Castle Acre; and
  - · Sporle with Palgrave.
- 5.4.6 The PCZ for the Scheme was identified by:
  - extending the PCZ by a minimum of 2km from the proposed Site



- considering areas within the vicinity of the proposed Site that may experience a degree of visual impact, such as residential properties in Castle Acre, and ensuring these were included; and
- extending the zone further, where proportionate and reasonable, to follow logical existing boundaries and avoid inappropriate severance of communities.
- 5.4.7 The extension of the PCZ was considered sufficient based on the anticipated impacts of the Scheme, ensuring engagement with members of the community who may be directly or indirectly affected during the construction, operation, maintenance or decommissioning of the Scheme.
- 5.4.8 Throughout the statutory consultation, a number of consultation activities took place within the PCZ. The Applicant:
  - issued direct communications, including a Consultation Newsletter and Consultation Leaflet, to all addresses within the PCZ, including residential and business addresses
  - hosted a series of five in-person consultation events across a range of dates, times and accessible venues
  - made hard-copy Scheme information, including the PEIR and NTS of the PEIR, available at a local information point
  - issued digital copies of the Consultation Poster and Leaflet to local councils and organisations within the PCZ to publicise the consultation
  - maintained ongoing engagement with near neighbours and key stakeholders throughout the statutory consultation period; and
  - placed site notices within the Site to provide notification of the consultation and consultation opportunities.
- 5.4.9 Further details of the statutory consultation activities carried out under Section 47(7) of the PA 2008 are provided throughout **Section 5.4** of this Report.



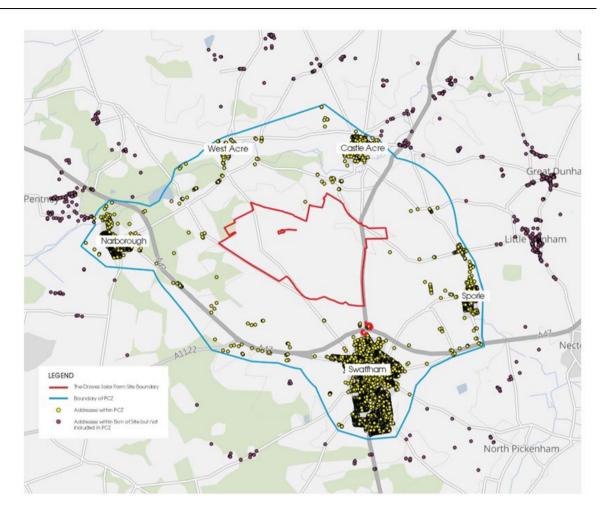


Figure 3 Statutory consultation PCZ

- 5.4.10 In addition to local residents and businesses in the vicinity of the Scheme (as defined by the PCZ), the Applicant consulted with the following groups under Section 47(7) of the PA 2008:
  - Members of Parliament
  - · neighbouring parish councils
  - · local government elected representatives
  - schools and colleges in the PCZ
  - Norfolk Wildlife Trust
  - local interest groups, including Community groups, voluntary organisations and faith communities
  - environmental groups in the PCZ; and
  - organisations representing specific groups in society, such as Age UK Norfolk and local disability groups.



A list of consultees engaged as part of the statutory consultation under Section 47 of the Act, in addition to those within the PCZ, in accordance with Section 47(7) of the PA 2008, is provided in Consultation Report Appendix F: Statutory Consultation Under Section 47 of the Act – Supporting Material [APP/5.2].

**Promoting statutory consultation under Section 47 of the Act** 

- 5.4.12 The Applicant recognised that some consultees outside the PCZ may still have had an interest in the Scheme and would wish to participate in the consultation.
- 5.4.13 To maximise awareness and ensure accessibility, the Applicant employed a range of methods to promote the statutory consultation to these consultees, as well as to residents and businesses within the PCZ and those consulted under Section 47(7) of the PA 2008. A full list of promotional activities is provided in **Table 12**.

Table 12 Methods to promote the statutory consultation under Section 47 of the PA 2008

Method	Detail
Stakeholder briefings	A separate invitation, distinct from the Section 42 letters, was issued to local planning authorities and host and neighbouring parish councils on 12 March 2025, inviting them to attend a pre-statutory consultation briefing meeting. Copies of the communications issued are provided in Consultation Report Appendix F: Statutory Consultation Under Section 47 of the Act – Supporting Material [APP/5.2].
	Two briefing meetings were held for key members from Norfolk County Council, Breckland District Council and the Borough Council of King's Lynn & West Norfolk on 29 April 2025 and 8 May 2025.
	Following a request for a briefing meeting, an invitation was extended to Norfolk Fire and Rescue Service. A representative attended the session held on 8 May 2025.
	Two separate briefing meetings were held for representatives from host and neighbouring parish councils on 6 May 2025.
Consultation Newsletter	The Applicant issued a Consultation Newsletter (Consultation Report Appendix F: Statutory Consultation Under Section 47 of the Act – Supporting Material [APP/5.2]) to all addresses in the PCZ on 2 May 2025, providing an overview of the Scheme and how to participate in the statutory consultation.
	The Newsletter was uploaded to the Scheme website on 6 May 2025.



	On 9 May 2025, the Applicant circulated a copy of the Consultation Leaflet and Poster (Consultation Report Appendix F: Statutory Consultation Under Section 47 of the Act – Supporting Material [APP/5.2]) to stakeholders via email.
Consultation Leaflet and Consultation Poster	In the covering note, the Applicant invited recipients to share the materials with their relevant networks and contacts, at their discretion.
	A copy of the Consultation Newsletter was also included, with an offer to provide hard copies of the Consultation Leaflet, Poster and Newsletter upon request.
	The Consultation Poster and Leaflet were uploaded to the Scheme website on 6 May 2025.
Press release	A press release (Consultation Report Statutory Consultation Under Section 47 of the Act - Supporting Material [APP/5.2]) was issued via email to local and national media outlets on 14 May 2025.
	The press release provided wider notification to local stakeholders of the consultation events, reaching stakeholders outside the PCZ.
Scheme website	The Scheme website was updated on 9 May 2025 to announce the upcoming statutory consultation and provide details on how to participate.
	A further update was made on 20 May 2025, confirming that the statutory consultation was live (see Consultation Report Appendix F: Statutory Consultation Under Section 47 of the Act - Supporting Material [APP/5.2]).
Information point and community collection points	Consultation materials were available to view at Swaffham Library throughout the statutory consultation period. Hard copies of the PEIR, the NTS of the PEIR, and the SoCC were available for reference, while the Consultation Information Booklet and Feedback Form were available to take away.
	The same materials, excluding the PEIR, were also provided at two community collection points: Westacre Theatre and Narborough Community Centre.
	Copies of the Consultation Poster and Leaflet (Consultation Report Appendix F: Statutory Consultation Under Section 47 of the Act - Supporting Material [APP/5.2]) were displayed at each location, providing details on how to participate in the consultation.



# Section 47 engagement events

5.4.14 As part of the statutory consultation, the Applicant hosted four in-person consultation events (**Figure 4**) for members of the public to engage with. Details of the in-person events can be found in **Table 13**.

Table 13 In-person consultation events held during statutory consultation under Section 47 of the PA 2008

Date and time	Location	Attendees
31 May 2025 11:00 – 17:00	Sporle Community Centre, 78 The Street, Sporle, King's Lynn, PE32 2DR	15
2 June 2025 10:00 – 14:00	Narborough Community Centre, Chalk Lane, Narborough, King's Lynn, PE32 1SR	12
5 June 2025 12:30 – 13:30	Swaffham Assembly Rooms, 1 Market Place Swaffham, Norfolk, PE37 7AB	48
11 June 2025 12:00 – 19:00	Westacre Theatre, River Road, West Acre, Norfolk, PE32 1UA	16

5.4.15 The in-person events were held in locations serving as community hubs, accessible by both public and private transport, and selected with reference to key residential clusters within the PCZ. At each event, materials were on display and members of the project team were present to answer questions and discuss the proposals with attendees.



- 5.4.16 These events were scheduled to take place during the middle of the seven-week statutory consultation period, allowing interested members of the community sufficient notice to attend and review the consultation materials, as well as time following the events to consider the information ahead of the response deadline of 23:59 on 9 July 2025.
- 5.4.17 The Applicant notes that an additional 'pop-up' event was held in Castle Acre on 12 June 2025. The event was arranged in response to concerns raised during the pre-statutory consultation briefing meeting held on 6 May 2025 (see **Table 15**), about the absence of a consultation event in Castle Acre, given its proximity to the Scheme. Unlike the main consultation events, no banners were displayed; however, indicative masterplans were available for attendees to view and discuss with the project team. This event was attended by 68 stakeholders and was not included in the SoCC as it was arranged after the SoCC had been published.
- 5.4.18 To publicise the additional session, the Applicant prepared a leaflet (see Consultation Report Appendix F: Statutory Consultation Under Section 47 of the Act Supporting Material [APP/5.2]) which was shared with Castle Acre Parish Council, uploaded to the Scheme website on 3 June 2025, and displayed on local village noticeboards from 27 May 2025.



Figure 4 In-person consultation event

5.4.19 In addition to the in-person events, the Applicant held two online consultation events in a webinar format using the Livestorm platform. The platform could be accessed via a web browser without the need to download additional software, and participants were also able to join by telephone if required. A summary of the webinar events is provided in **Table 14**.



Table 14 Webinars held during statutory consultation under Section 47 of the PA 2008

Date and time	Format	Attendees
5 June 2025 12:30 – 13:30	Webinar	1
25 June 2025 18:30 – 19:30	Webinar	4

- 5.4.20 Instructions on how to register for the webinars, and the registration links, were available on the Scheme website throughout the statutory consultation period. The webinars were also publicised through the Consultation Newsletter, Leaflet, Poster and Information Booklet.
- 5.4.21 During each session, the project team delivered a presentation reflecting the content of the Exhibition Banners displayed at the in-person events, which was followed by a question-and-answer session to respond to queries from attendees.

# Stakeholder briefing meetings

- 5.4.22 Ahead of the statutory consultation, on 12 March 2025, an invitation was issued to local planning authorities and host and neighbouring parish councils, inviting them to attend a pre-statutory consultation briefing meeting.
- 5.4.23 The purpose of the briefing was to ensure that local authorities and parish councils were aware of the key updates to the Scheme and the planned engagement activities as part of the statutory consultation. Two briefing meetings were held for key members from Norfolk County Council, Breckland District Council, and the Borough Council of King's Lynn & West Norfolk on 29 April 2025 and 8 May 2025.
- 5.4.24 Two separate briefing meetings were held for representatives from host and neighbouring parish councils on 6 May 2025. Following a request for a briefing, an invitation was also extended to Norfolk Fire and Rescue, with a representative attending the sessions on 29 April and 8 May 2025. A summary of these meetings is provided in **Table 15**.

Table 15 Summary of pre-statutory consultation briefing meetings

Date	Stakeholder attendees (name / organisation)	Meeting summary
29 April 2025	Principal Planner, Norfolk County Council	Attendees sought clarity on grid connection, highlighted the need for local



	Ashill Ward Councillor, Breckland District Council  Strategic Flood Risk Planning Officer, Norfolk County Council  Placemaking and Partnerships Manager, Breckland District Council  Forest Ward Councillor, Breckland District Council  Norfolk Fire and Rescue Service	knowledge to identify traffic pinch points, and raised questions on wintering bird surveys and BESS safety.
6 May 2025	Councillor, Sporle Parish Council	Discussions focused on the consultation process, grid connection, substation visibility, BESS safety, ecological impacts and proposed mitigation measures.
6 May 2025	Councillor, Sporle Parish Council  Cllr Fraser Bateman, Necton Parish Council  Chair, Castle Acre Parish Council  Councillor, South Acre Parish Council  Councillor, South Acre Parish Council	Parish council representatives raised concerns regarding the use of Best and Most Versatile (BMV) land, potential noise impacts and BESS safety. Representatives also noted the absence of a consultation event in Castle Acre, and the Applicant agreed to explore arranging a local meeting or session.
8 May 2025	Project Support Officer, Norfolk County Council  Principal Planner, Norfolk County Council  Lauditch Ward Councillor, Breckland District Council  Norfolk Fire and Rescue Service	Questions were raised regarding the project life cycle and grid connection, and the project team noted that additional work on pylons may be required.  The Fire and Rescue Service emphasised the importance of early engagement to ensure that fire safety considerations are fully addressed.



5.4.25 Briefing meetings were also held during the statutory consultation period, both through the Applicant's initiative and in response to stakeholder requests. These sessions provided an opportunity to update stakeholders on the Scheme and answer questions. A summary of these meetings is provided in **Table 16**.

Table 16 Summary of briefing meetings held during statutory consultation under Section 47 of the PA 2008

Date	Stakeholders (name / organisation)	Meeting notes
30 June 2025	Norfolk Community Foundation	Meeting to discuss the Scheme's progress and IGP's approach to community benefits.
		Norfolk Community Foundation provided further insight into their organisation's work and shared additional materials to support ongoing engagement.
1 July 2025	u3a Climate Change Group	Meeting to provide details of the Scheme and discuss environmental topics, including Agricultural Land Classification and biodiversity initiatives. Opportunities for continued engagement were also explored.
16 July 2025	Norfolk Wildlife Trust	Norfolk Wildlife Trust expressed overall support for the Scheme and showed interest in continuing discussions to explore future local initiatives and community benefit opportunities.

- 5.4.26 On 19 June 2025, a letter was issued via email to non-statutory consultees identified as stakeholders most likely to have a direct interest in the proposals, owing to local environmental, heritage, community and recreational interests.
- 5.4.27 This invitation encouraged participation in the statutory consultation and offered the opportunity to attend a dedicated briefing meeting. The meetings with Norfolk Community



Foundation, King's Lynn u3a Climate Change Group and the Norfolk Wildlife Trust were held in response to this invitation.

5.4.28 The Applicant notes that the meeting with Norfolk Wildlife Trust took place outside the statutory consultation period, following an extension of the consultation deadline to 18 July 2025 to ensure the availability of relevant attendees.

### **Consultation materials**

- 5.4.29 To support the statutory consultation, the Applicant prepared a range of consultation materials designed to provide clear, accessible information about the Scheme, explain how to participate and encourage informed feedback.
- 5.4.30 These materials were made available online, in hard copy and at consultation events. All materials were available to view and download free of charge from the Scheme website throughout the statutory consultation period. The full set of materials is summarised in **Table 17**.
- 5.4.31 All consultation documents were available upon request in hard copy and in accessible formats, such as braille or large print. Requests for a printed hard copy of the PEIR (including in accessible formats) would have been considered on a case-by-case basis, with a typical charge of £750 to cover printing and postage costs. Requests for individual volumes would have been charged based on the cost per volume requested. No such requests were received during the consultation period.
- 5.4.32 Copies of the consultation materials are provided in Consultation Report Appendix F: Statutory Consultation Under Section 47 of the Act Supporting Material [APP/5.2].

**Table 17 Consultation materials** 

Materials	Details
Consultation Newsletter	A Consultation Newsletter was posted to all addresses in the PCZ. It provided an overview of the Scheme, the consultation and how people can get involved.
	The Consultation Newsletter indicated where the other consultation documents could be accessed and publicised the consultation events, including locations, dates and timing.
Consultation Leaflet and Consultation Poster	The Consultation Leaflet and Consultation Poster detailed the statutory consultation dates, explained where the consultation documents could be accessed, and set out how members of the community could participate.



Consultation Information Booklet	The Consultation Information Booklet provided a summary of the Scheme and outlined the design principles and how the design had evolved since the non-statutory consultation, including maps illustrating the Scheme layout.  It also included details of the public consultation events, such as the dates, times and locations of the exhibitions and webinars, as well as information on how to access other materials.
Consultation Feedback Form	The Feedback Form allowed consultees to provide feedback on the Scheme. It could be completed digitally via the Scheme website or in hard copy.
Exhibition materials	Consultation events contained Exhibition Banners that provided an overview of the Scheme.  A number of maps and plans, including the Indicative Masterplan, were also available to view.
Preliminary Environmental Information Report (PEIR) and Non-Technical Summary (NTS) of the PEIR	The PEIR describes the Scheme and contains a preliminary assessment of the likely environmental effects of the Scheme, along with an outline of proposed measures to mitigate adverse effects.  A NTS of the PEIR was also provided as part of the statutory consultation materials.
Statement of Community Consultation (SoCC)	The SoCC set out how the Applicant intended to consult people living in the vicinity of the land that is needed for the Scheme.

5.4.33 Consultation materials were made available in hard copy at the local information point, with selected materials also placed at community collection points for the duration of the statutory consultation. Details of the local information point, community collection points and the documents available at each location are set out later in this Chapter.

#### Joint consultation materials with RWE

- As part of ongoing engagement with RWE regarding the High Grove Solar Farm, the Applicant worked with RWE to produce a joint exhibition banner. The banner included a map showing both schemes and was designed to help consultees clearly distinguish between them and understand how to participate in both consultations. It was made available on the Scheme website throughout the statutory consultation period and is provided via the Exhibition Banners in Consultation Report Appendix F: Statutory Consultation Under Section 47 of the Act Supporting Material [APP/5.2].
- 5.4.35 The joint map, showing both schemes, was also uploaded to the FAQ section of the Scheme website and was available throughout the statutory consultation period.



## Information point and community collection points

- 5.4.36 In addition to being available on the Scheme website, at consultation events and upon request, the Applicant also ensured that materials could be collected in person from the local information point and community collection points. These locations were selected within the PCZ and close to key residential clusters to ensure convenient access and were agreed with the local planning authorities during the SoCC consultation process.
- 5.4.37 The Applicant maintained regular contact with each location and replenished materials as required, ensuring that consultation documents remained available throughout the statutory consultation period, further details of which can be found in the SoCC compliance table (Consultation Report Appendix C: Copy of the SoCC and Compliance with the SoCC [APP/5.2]).
- 5.4.38 Details of the local information point and community collection points, including their locations and the materials available at each, are provided in **Table 18**.

Table 18 Information point and community collection points

Venue	Designation	Materials to take away	Reference materials
Swaffham Library	Information point	Consultation Information Booklet Feedback Form	SoCC NTS PEIR
Narborough Community Centre	Community collection point	Consultation Information Booklet Feedback Form	SoCC NTS
Westacre Theatre	Community collection point	Consultation Information Booklet Feedback Form	SoCC NTS

# **Enquiry channels and consultation response**

5.4.39 The enquiry channels listed in **Table 19** were available throughout the consultation for members of the community and other stakeholders to contact the project team, ask questions, request further information or request printed copies of consultation materials and documents. These communication channels will continue to be active throughout the pre-application period.



**Table 19 Enquiry channels** 

Method	Contact details	Hours of operation
Telephone	0800 0129 154	9am to 5:30pm weekdays (with an answerphone facility to take messages outside these hours)
Email	info@drovessolarfarm.co.uk	Members of the public were able to email 24 hours a day, with emails being monitored between 9:00 and 17:30 weekdays. The Community Relations Team aimed to acknowledge all emails received as soon as practicable and endeavoured to provide a substantive response within 10 working days of receipt.
Post	FREEPOST THE DROVES SOLAR FARM	Respondents were able to provide their responses in written format via the Freepost address.

- 5.4.40 Respondents were able to provide their responses in the following ways:
  - completing the Feedback Form online, which could be accessed via the Scheme website: www.drovessolarfarm.co.uk
  - completing a printed Feedback Form, which could be collected from a consultation event, local information point, community collection point or on request by contacting the Community Relations Team; completed forms could be handed to the project team at events, scanned and emailed back to info@drovessolarfarm.co.uk, or sent to FREEPOST THE DROVES SOLAR FARM (no stamp or further details required)
  - emailing comments to info@drovessolarfarm.co.uk; and
  - writing to FREEPOST THE DROVES SOLAR FARM (no stamp or further details required).
- 5.4.41 A total of 97 responses were received under Section 47 of the PA 2008 during this round of engagement through the online Feedback Form, hard-copy letters, emails and hard-copy feedback forms.
  - Statement of compliance with consultation under Section 47 of the PA 2008
- 5.4.42 The Applicant considers that it fully complied with Section 47 of the PA 2008 through the following actions undertaken to meet its statutory obligations:
  - consulted on the SoCC with all relevant local authorities as defined under Section 43(1), providing at least 28 days to respond (see **Section 4.3**)



- advertised the SoCC in the prescribed manner (see Section 4.4); and
- commenced statutory community consultation through the publication of the SoCC and in accordance with its commitments (see Consultation Report Appendix C: Copy of the SoCC and Compliance with the SoCC [APP/5.2]).

# 5.5 Section 48 (newspaper notices)

## Introduction

- 5.5.1 Section 48 of the PA 2008 requires the Applicant to publicise the proposed DCO Application in the prescribed manner. A deadline for receipt of comments to the publication must also be provided.
- 5.5.2 Regulation 4 of the APFP Regulations requires an applicant to publish the notice for two successive weeks in one or more local newspapers, once in a national newspaper and once in the London Gazette. The regulation also sets out the information that must be included in the notice under Regulation 4(4).
- 5.5.3 Section 48 publicity took place in parallel with consultation under Section 42 and 47 of the PA 2008. The parallel consultation process provided the same response times for the Section 47, 42 and 48 consultations, that is, 21 May until 23:59 on 9 June 2025.

#### **Publication of notices**

- 5.5.4 In accordance with the requirements of Section 48 of the Act and Regulation 4 of the APFP Regulations, notices publicising the consultation were published once in a nationally circulating newspaper, once in the London Gazette and twice in a locally circulating newspaper, containing the required information under Regulation 4(4) of the APFP Regulations.
- The Section 48 notices were advertised in the nationally circulating publications listed in **Table 20** and in the locally circulating publication listed in **Table 21**. Copies of the notices, as published in the newspapers, are provided in **Consultation Report Appendix D:**Published Section 47 and Section 48 Notices [APP/5.2].



# **Table 20 National newspapers**

Publication	Format	Date of notice
The Guardian	Print and online	14 May 2025
The London Gazette	Print and online	14 May 2025

# **Table 21 Local newspapers**

Publication	Format	Date of notice one	Date of notice two
Eastern Daily Press	Print and online	14 May 2025	21 May 2025

5.5.6 All consultees identified under Section 42 of the PA 2008 were provided with a copy of the Section 48 notice as required by Regulation 11 of the EIA Regulations. These consultees are listed in Consultation Report Appendix E: Statutory Consultation Under Section 42 of the Act – Supporting Material [APP/5.2].



# 6 Section 42 statutory consultation: responses received, issues raised and changes made

# 6.1 Introduction

- 6.1.1 The Applicant has had regard to all responses received to the statutory consultation under Section 42 of the PA 2008.
- 6.1.2 The Applicant received 25 responses to the statutory consultation undertaken in accordance with Section 42(1)(a) and Section 42(1)(b) of the PA 2008, and one response under Section 42(1)(d).
- 6.1.3 This Chapter provides a summary of the responses received and the issues raised. A detailed record of all comments from statutory consultees, together with the Applicant's response, is provided in Consultation Report Appendix G: Section 42 Responses Received and Applicants Response [APP/5.2].

# 6.2 Qualitative analysis of responses received under Section 42 of the PA 2008

6.2.1 The feedback received from statutory consultees during the statutory consultation has been summarised by key themes and issues. A summary of these, together with the Applicant's response, is provided in **Table 22**.



Table 22 Summary of key themes from statutory consultation under Section 42, including how the Applicant has considered this feedback

Feedback	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
National Policy		
Some consultees considered the Scheme inconsistent with the National Planning Policy Framework (NPPF), while others felt it aligned with national policy and the Government's net zero objectives.	No	The Planning Statement [APP/5.5] and Policy Compliance Document [APP/5.6] provide detailed evidence of compliance with relevant national and local policy documents, including the National Planning Policy Framework and Breckland Local Plan, which the Applicant considers will be both important and relevant to the Secretary of State's decision.
Local Policy		
Local authorities expressed support for low-carbon energy projects but raised concerns about potential impacts on the sensitive local environment. Some consultees also considered the Scheme to conflict with the Borough Council of King's Lynn & West Norfolk Local Plan and the Castle Acre Neighbourhood Plan, viewing it as an unsustainable form of development.	Yes	An assessment of the Scheme's environmental impact is provided in the ES [APP/6.1 - 6.4]. In response to feedback, solar PV panels have been removed entirely from Field 33 and from the northern half of Field 35. The BESS, National Grid Substation, and Customer Substation have been located in Fields 24 and 27 to minimise effects on sensitive receptors.  While the relevant National Policy Statements form the primary basis for decisionmaking on applications for development consent, the Secretary of State may also consider other important



and relevant matters, such as Neighbourhood Plans of authorities. local However, as the project is outside the areas included in the Borough Council of King's Lynn & West Norfolk Local Plan and the Castle Acre Neighbourhood Plan. these plans have not been included as part of the formal assessment. Site selection Justification for the size of the development can be found in the Statement of Need [APP/5.4]. The Applicant notes that Agricultural Land Classification (ALC) surveys have confirmed that 51.7% of the Order limits comprise BMV land, with further details provided in ES Chapter 11: Soils **Agriculture** and Several consultees raised [APP/6.2]. concerns about the size of The **Policy Compliance** the Site, the use of BMV No Document [APP/5.6] land, and the cumulative confirms that the use of impact of multiple solar BMV land as part of the developments in the region. Scheme is justified, considering the economic and other benefits of the land. Cumulative effects across all phases of the Scheme are assessed in the topic Chapters the ES of [APP/6.1 6.5]. summary of cumulative effects is provided in ES Chapter 18: Summary of Effects [APP/6.2]. Agricultural land use

Construction



Field 32, which comprises a Consultees raised concerns mix of Grade 1 and Grade 2 about the use of BMV land land, has been removed and its implications for local from the Scheme farming and national food security. They welcomed The National Grid the removal of Field 32 Substation and Customer Yes (Grade 1 and 2 land) from Substation have also been solar development and also sited to avoid Grade 1 land. suggested relocating the BESS and the and **BESS** and Customer Customer Substation is Substation to avoid using primarily located on Grade Grade 1 land. 3b land. Cumulative impacts consultees Many highlighted the proximity of Cumulative effects across the proposed High Grove all phases of the Scheme Solar Farm. raising are assessed in the topic concerns about cumulative ES Chapters of the impacts on BMV land, food [APP/6.1 6.4]. security, the environment, summary of cumulative Public Rights of Way, and Yes effects is provided in ES local wellbeing. Chapter 18: Summary of Effects [APP/6.2]. Some felt cumulative Applicant considers the effects had not been fully assessment undertaken to assessed and be sufficient. further recommended assessment. Water, hydrology, and flood risk The Applicant notes that there are no natural Consultees noted the watercourses within the Scheme's proximity to the Order limits and drainage River Nar, a protected chalk ditches within the Site are stream and Site of Special not connected to the wider Scientific Interest (SSSI), river network supplying the and raised concerns about River Nar. As such, there is surface water run-off, Yes limited potential for pollution risks – particularly pollution of the surface water environment from the during construction - and potential effects Scheme. drainage, water resources, Good construction practice and flooding associated and measures to protect with the BESS. the water environment are secured in the outline



		Environmental Management Plan (oCEMP) [APP/7.6], which includes silt traps, settlement lagoons, and procedures for handling oils and fuels.	
Soils			
Consultees noted that taking the land out of arable use could improve soil health and enhance biodiversity across the Site.	No	The Applicant agrees with these comments. ES Chapter 11: Soil and Agriculture [APP/6.2] provides further detail on the assessments undertaken regarding soils.	
Impact on cultural heritage sites and archaeology			
Many consultees raised concerns about the Scheme's impact on the historic character of the area, particularly the use of northern fields (33 and 35) near Bartholomew Hill Plantation and Castle Acre for infrastructure such as the BESS, Customer Substation, and National Grid Substation.  Alternative locations suggested included Fields 24, 26, and 27, with further recommendations to retain Fields 32 and 35 as mitigation or enhancement zones to reduce heritage impacts.	Yes	The Applicant notes that the Customer Substation, National Grid Substation and BESS are located within Fields 24 and 27, south of Bartholomew's Hill Plantation, and that solar PV panels have been removed entirely from Field 33 and the northern half of Field 35.  Solar PV panels are proposed only in the southern half of Field 33 and within Field 34, both of which lie on south-facing slopes, minimising potential effects on heritage assets to the north. An assessment of effects is provided in ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2].	
Landscape and visual			
Consultees raised concerns about visual impacts on sensitive areas such as Castle Acre and South	Yes	The Applicant notes that landscape and visual impacts have been assessed in <b>ES Chapter 6</b> :	



Acre, including the effect of security lighting on dark skies. Suggested mitigation included screening, using natural, earth-toned materials for infrastructure and considering alternative panels in the northern part of the Site to reduce visual impact.

# Landscape and Visual [APP/6.2].

To minimise the landscape and visual impacts of new infrastructure, the **Design** Principles. **Parameters** and Commitments [APP/5.8] secure embedded mitigation measures. including the planting of new hedgerows, native woodland belts, and scrub within the buffers.

In response to feedback received, solar PV panels have been removed entirely from Field 33 and the northern half of Field 35.

The colour and finishes of buildings and infrastructure will be approved by the relevant planning authority under the draft Development Consent Order (draft DCO) [APP/3.1].

The Applicant also notes that the Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation, which would only include motionsensing lighting and be used only for security and maintenance purposes.

### Glint and glare

Consultees raised concerns about potential glint and glare effects on local **RAF** aviation, including Marham, as well as on nearby properties and PRoW. notina possible cumulative impacts with High Grove Solar Farm.

Yes

The Applicant continues to engage with the Ministry of Defence regarding RAF Marham. Further details of this engagement and the assessments undertaken are provided in ES Chapter



Further clarification was requested on whether proposed screening, such as hedgerow planting, would be established prior to solar panel installation.

# 16: Other Environmental Matters [APP/6.2].

Advanced planting along the A1065 and the boundaries of Field 27 will be undertaken in winter 2025/2026, infilling existing hedgerow gaps (excluding access points) to provide several years of growth before construction and help mitigate glint and glare effects.

# **Ecology**

Several consultees raised about concerns the Scheme's potential impact on local wildlife, particularly in relation to deer and bird movements. importance of maintaining enhancing habitat and connectivity through wildlife corridors. such as ecological buffers and hedgerows, was emphasised. Some suggested that Bartholomew's Plantation. Harrington's Pit, Plot 69, and the area north of Drove Fincham be designated for additional ecological mitigation and landscape enhancement.

Yes

Buffers have been applied to all existing hedgerows, marl pits, and woodlands within the Order limits, as secured in the Design Principles, Parameters and Commitments [APP/5.8] document.

Additional Mitigation and Enhancement Areas are proposed south of Bartholomew's Plantation and around Harding's Pit, providing ecological connectivity as shown on the Green Infrastructure Plans within the outline Landscape and Ecological Management Plan (oLEMP) [APP/7.11].

The operational area of the Scheme will be enclosed by perimeter fencing designed to allow wildlife movement, incorporating mammal gates and above-ground clearances.

Potential effects on birds and bats, including collision risk and the 'lake effect,' have been assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2].



		Ground-nesting and wintering birds have also been fully considered, with detailed mitigation set out in ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP/6.4].
Biodiversity		
Consultees emphasised the importance of achieving at least 10% Biodiversity Net Gain across habitats, rivers, and hedgerows, and highlighted the need to protect and enhance high-value habitats such as woodlands. Some questioned whether the Scheme would deliver a true net gain, particularly during construction, and advised a full BNG assessment.	Yes	A Biodiversity Net Gain Assessment Report [APP/7.4] forms part of the Application and demonstrates that biodiversity gains in habitat and hedgerow units will significantly exceed 10%.
Public Rights of Way		
Some consultees expressed mixed views on the Scheme's impact on both major and minor PRoW, noting the importance of the visual and historic character of Peddars Way and the Nar Valley Way to local identity and tourism. Others felt that high hedgerows or trees used for screening could reduce enjoyment and views along footpaths, suggesting a 15 m buffer.	Yes	The Applicant notes these comments and confirms that approximately 3.5 km of new permissive paths have been incorporated into the Scheme to enhance connectivity between Swaffham and the Nar Valley. Further details are provided in the outline Public Right of Way and Permissive Path Management Plan (oPRoWPPMP) [APP/7.12].  The Applicant has considered the impact on PRoW users, as assessed in ES Chapter 6: Landscape and Visual [APP/6.2] and has committed to a minimum 15 m offset for the solar PV panels (including security



		fencing) from all PRoWs, with further details provided in the <b>Design Approach Document [APP/5.7]</b> .		
Traffic and access	Traffic and access			
Consultees raised concerns about potential impacts on the Strategic Road Network (SRN), particularly the A47, during construction, including the safety of road users and the cumulative effects of other developments.  Requests were made for further details on construction vehicle routing, though it was acknowledged that impacts on the SRN would significantly reduce once construction is complete.	Yes	The Applicant confirms that an outline Construction Traffic Management Plan (oCTMP) [APP/7.7] has been submitted as part of the DCO Application.  The Applicant further confirms that the oCTMP [APP/7.7] establishes management and mitigation measures, as well as a monitoring strategy, for construction-phase traffic for the Scheme.  The impact on the A47 will also be managed through the measures detailed in the oCTMP [APP/7.7].		
Construction				
Consultees raised concerns about construction-related noise, air pollution, and impacts on wildlife and community wellbeing, noting potential cumulative effects with the proposed High Grove Solar Farm.	No	The Applicant notes that oCEMP [APP/7.6] sets out the proposed measures to manage and mitigate environmental effects during construction.  The Applicant also notes that construction programmes for the two schemes are not expected to overlap for a prolonged period and are sufficiently separated to result in negligible cumulative effects.		
Noise and vibration				
Consultees raised concerns about noise and vibration impacts on residents,	No	Potential noise effects, including those associated with construction, PRoW		



wildlife, and PRoW during construction and operation, and highlighted the need to assess potential cumulative effects with the proposed High Grove Solar Farm.

and human health, are assessed within ES Chapter 10: Noise and Vibration [APP/6.2], which concludes that no significant adverse effects are predicted.

ES Chapter 10: Noise and Vibration [APP/6.2] also considers cumulative effects associated with High Grove Solar Farm. Given that the construction programmes for the two schemes are not expected to overlap for a prolonged period and are sufficiently distant, cumulative effects are considered negligible.

#### National Grid Substation

Consultees noted that the Scheme relies on a new National Grid Substation for connection grid and requested that it be located lowest-quality the agricultural land within the Order limits. They also suggested siting all substations south of Hills Bartholomew Plantation (fields 26 and 27) minimise landscape impact, and proposed additional visual mitigation such as woodland shelter ecological belts and screening.

Yes

The Applicant notes that the Customer Substation, National Grid Substation and BESS are located within Fields 24 and 27, south of Bartholomew's Hill Plantation. The Nation Grid Substation is also located on primarily Grade 3b land.

The Applicant notes that additional screening, such as woodland shelter belts, has also been incorporated to minimise landscape and visual impacts.

### Battery Energy Storage Systems (BESS) Safety

Consultees raised concerns about the health and safety risks associated with the BESS, particularly in the event of a fire, and the availability of water resources to manage such incidents. They also

Yes

Engagement with the Norfolk Blue Light Partners has been undertaken, as detailed in this Report, and discussions continue regarding a Statement of Common Ground.



highlighted the need for All BESS units will be fitted adequate bespoke emergency with а Fire service access to the Site. **Detection and Suppression** especially around the BESS System, as outlined in the and substation areas, and outline Battery Safetv recommended preparing an Management Plan emergency response plan (oBSMP) [APP/7.14]. in consultation with Norfolk Blue Light Partners. Community Benefits Most consultees emphasised the importance of a locally distributed, well-The Applicant is committed tailored community benefits ensuring fund. There was broad communities benefit from support for proposed public the Scheme. Throughout recreation pre-application environmental process, the Applicant has Yes enhancement areas, consulted on community including new and improved benefits and, based on footpaths such as feedback and ongoing Swaffham Link. Some discussions, will determine consultees also felt the how best to distribute Applicant should commit to funding. a substantial financial or compensation package for

local communities.



# 7 Section 47 statutory consultation: responses received, issues raised and changes made

# 7.1 Introduction

- 7.1.1 The Applicant has had regard to all responses received to the consultation held in compliance with Section 47 of the PA 2008.
- 7.1.2 A total of 93 responses were received to the statutory consultation held in accordance with Section 47 of the PA 2008. This included 49 online feedback forms, 11 hard-copy feedback forms, 6 forms submitted via email, 26 freeform emails and 1 telephone call.
- 7.1.3 This Chapter provides a summary of the responses received and the issues raised. The feedback received is presented in full in Consultation Report Appendix H: Section 47 Responses Received and Applicants Response [APP/5.2], along with the Applicant's response to this feedback.

# 7.2 Approach to feedback

- 7.2.1 The Applicant invited feedback in writing or online. Guidance on how to submit responses was provided through the Scheme website, statutory consultation materials and correspondence with the Community Relations Team.
- 7.2.2 The consultation Feedback Form (online and hard copy) contained a combination of closed (multiple choice) and open-ended questions, enabling consultees to provide views on their interest in the Scheme, the proposals, potential community benefits and the consultation process. Accordingly, the feedback received comprised both quantitative (closed question) and qualitative (open-ended question) responses.
- 7.2.3 All responses were reviewed, transcribed and processed to identify key issues and requests for design changes. Key themes arising from the Section 47 qualitative questions are summarised in **Section 7.4** of this Report. A full record of the qualitative responses received via feedback forms, emails and the Freephone service are provided in **Consultation Report Appendix H: Section 47 Responses Received and Applicants Response [APP/5.2]**, together with the Applicant's response to this feedback.



# 7.3 Quantitative analysis of responses received

#### Introduction

- 7.3.1 This section presents the responses to the closed questions included in both the online and hard-copy feedback forms. It was not mandatory for respondents to answer every question, and in some instances multiple answers could be selected.
- 7.3.2 The Feedback Form also included a section for personal details. Responses to the demographic questions provided by consultees are presented throughout this section.

## Responses to questions relating to respondent interest and age

7.3.3 **Figure 5** shows how respondents described their interest in the Scheme. The majority (71%) identified as local residents. Smaller proportions stated that they work locally (9%), are local representatives (5%), landowners (1%) or local business owners (1%). A further 9% attributed their interest to being regular visitors, while 4% selected "Other". No respondents identified as a "statutory organization" or "local interest group", and therefore these categories are not included in **Figure 5**.

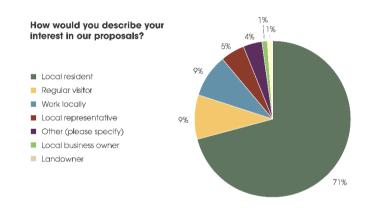


Figure 5 Responses to the question "How would you describe your interest in our proposals?"

- 7.3.4 Respondents could also use the freeform box to specify the nature of their interest in the Scheme. A total of 13 respondents (20%) chose to provide additional details. Of these, the majority of respondents stated that they were a parish councillor (38%). Other respondents identified as a member of the Swaffham Climate and Environment Group (15%), Castle Acre Fishing Club (23%), Nar Valley Fishing Club (8%), retired emergency planner (8%) or a representative of Norfolk Wildlife Trust (8%). This data is presented in **Figure 6**.
- 7.3.5 Two feedback forms were submitted on behalf of an organisation by representatives who were authorised to do so. These were for the Swaffham Climate and Environment Group and Norfolk Wildlife Trust.



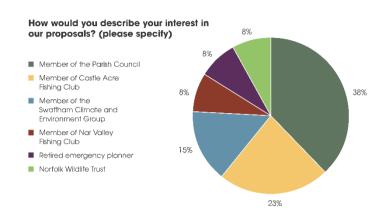


Figure 6 Responses to the question "How would you describe your interest in our proposals?"

7.3.6 Of respondents who shared their age range, the majority (39%) selected "51–65", closely followed by "Over 65" (30%). Other respondents selected "36–50" (14%) or selected the "Prefer not to say" option (17%). No respondents selected the age ranges "19–35" or "18 and under". The results are presented in **Figure 7**.

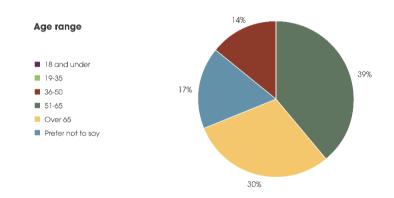


Figure 7 Responses to the question "Age range"

# Consultation responses on general sentiment and attitudes

7.3.7 The Applicant received 66 responses to the question: "How supportive are you of the development of solar farms to help meet the UK Government's commitment to boosting energy security and achieving net zero emissions by 2050?". Of those who responded, 3 (4%) stated that they were "Supportive", 27 (41%) stated that they were "Supportive, but I have some concerns", 9 (14%) stated that they were "Unsupportive, but I would like to find out more", 25 (38%) stated that they were "Completely against" and 2 (3%) stated that they were "Unsure". This data is presented in **Figure 8**.



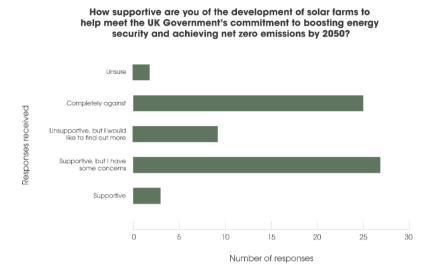


Figure 8 Responses to the question "How supportive are you of the development of solar farms to help meet the UK Government's commitment to boosting energy security and achieving net zero emissions by 2050?"

Based on the consultation materials, how supportive are you

7.3.8 The Applicant received 66 responses to the question: "Based on the consultation materials, how supportive are you of the proposals presented for The Droves Solar Farm?". Of those who responded, 2 (3%) stated that they were "Supportive", 13 (20%) stated that they were "Supportive, but I have some concerns", 6 (9%) stated that they were "Unsupportive, but I would like to find out more", 42 (64%) stated that they were "Completely against" and 3 (4%) stated that they were "Unsure". The data is presented in Figure 9.

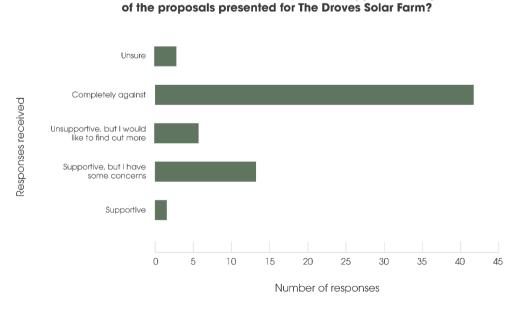


Figure 9 Responses to the question 'Based on the consultation materials, how supportive are you of the proposals presented for The Droves Solar Farm?'



#### Responses relating to Project Level Design Principles

7.3.9 The Applicant sought feedback on the Project Level Design Principles guiding the design and development of the Scheme throughout its life cycle. The responses to each Project Level Design Principle are shown in **Figure 10**.

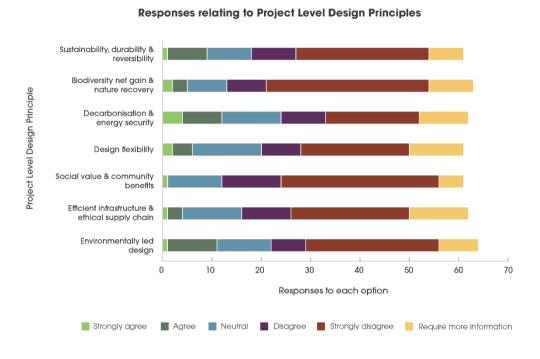


Figure 10 Responses relating to Project Level Design Principles

#### Responses relating to Masterplanning Strategies

7.3.10 The Applicant sought feedback on the Masterplanning Strategies developed to support the implementation of the Project Level Design Principles through a Site-specific approach. The responses to each Masterplanning Strategy are shown in **Figure 11**.



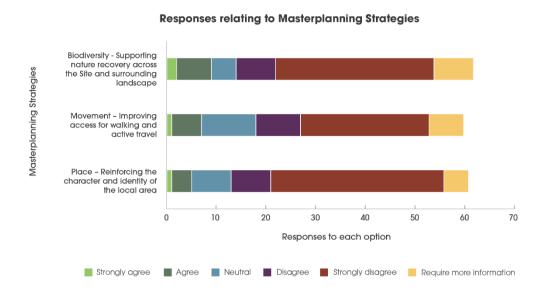


Figure 11 Responses relating to Masterplanning Strategies

# 7.4 Qualitative analysis of responses received under Section 47 of the PA 2008

- 7.4.1 The key themes identified from qualitative responses received during the statutory consultation from consultees engaged under Section 47 of the PA 2008 are summarised in **Table 23**. This includes responses to open questions in the Feedback Form as well as non-conforming responses received via email, Freepost or Freephone.
- 7.4.2 The table also sets out how the Applicant has had regard to this feedback in developing the Scheme, in accordance with Section 49 of the PA 2008.
- 7.4.3 A detailed record of all comments received, together with the Applicant's response, is provided in Consultation Report Appendix H: Section 47 Responses Received and Applicants Response [APP/5.2].



Table 23 Summary of key themes from statutory consultation under Section 47, including how the Applicant has considered this feedback

Feedback	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Needs case and site selection	1	
Many respondents supported the principle of renewable energy but raised concerns about the Scheme's scale and location, suggesting alternatives such as rooftop or brownfield solar development or other technologies, such as wind and nuclear.	No	The Applicant welcomes the support for renewable energy.  The Scheme represents a vital contribution to the UK's low-carbon energy mix. Solar power is a clean, reliable, and home-grown source of electricity that reduces dependence on global energy markets and supports national Net Zero objectives.  The Statement of Need [APP/5.4] and Planning Statement [APP/5.5], submitted in support of the DCO Application, set out the justification for the Scheme and its proposed scale within the context of the clear and urgent national need for low-carbon energy generation.
Consultation		
Respondents expressed mixed views on the statutory consultation, with some feeling the seven-week period and level of detail were insufficient, while others found the materials clear and welcomed the in-person events. Some respondents referenced the Castle Acre event and felt that it should have been planned ahead of the consultation launch	No	The Applicant notes these comments but remains confident that the seven-week statutory consultation period provided adequate time for participation and feedback, exceeding the minimum 28-day statutory requirement.  Materials were designed to be accessible to a wide audience, including both technical documentation (the



PEIR) and non-technical materials such as the Non-Technical Summary and Consultation Information Booklet.

The Applicant also notes that the consultation events were appropriately staffed with knowledgeable members of the project team to answer questions on all aspects of the Scheme, and that an additional event in Castle Acre was arranged in direct response to local interest to ensure meaningful engagement.

#### Property

Respondents raised concerns about potential effects on property values in nearby areas, particularly Castle Acre, West Acre, and South Acre, citing visual, noise, and air quality impacts.

Some requested that the BESS, Customer Substation, and National Grid Substation be relocated further from residential areas and whether questioned compensation would be offered for any loss in property value.

Yes

The Applicant notes these concerns but is not aware of any evidence in the UK demonstrating that solar farms have reduced nearby property values.

The potential visual, noise and air quality impacts of the Scheme have been fully assessed in ES Chapter 6: Landscape and Visual [APP/6.2], ES Chapter 10: Noise and Vibration [APP/6.2] and ES Chapter 16: Other Environmental Matters [APP/6.2], all of which confirm that no significant adverse effects are predicted and that appropriate mitigation measures would be place.

In response to consultation feedback, the BESS, Customer Substation, and National Grid Substation have been located within Fields 24 and 27 to reduce



		potential effects on nearby residential areas.
Ethics and supply chain		
Respondents raised concerns about the sourcing and manufacture of solar panels, the BESS, and associated infrastructure, citing issues such as supply chain ethics, production standards, and carbon footprint, and requested greater transparency from the Applicant.	No	The Applicant notes these concerns and reiterates that it is a signatory of the Solar Energy UK Supply Chain Statement, committing to a transparent, ethical, and sustainable supply chain free from human rights abuses.  The carbon and climate effects associated with the manufacture, construction, and operation of the Scheme have been assessed in ES Chapter 13: Climate Change [APP/6.2]. Once operational, the Scheme will achieve emissions reductions compared to the without-project baseline, in which equivalent power generation would rely on the 2033 grid mix that includes higher-carbon energy sources.
National and local policy		
Some respondents questioned whether the Scheme was in line with the National Planning Policy Framework and the Castle Acre Neighbourhood Plan, suggesting it was unsustainable, while others felt the Government's net zero ambitions would outweigh local opposition in the DCO process.	No	While the relevant National Policy Statements form the primary basis for decision-making on applications for development consent, the Secretary of State may also consider other important and relevant matters, such as Neighbourhood Plans of host local authorities.  As the project is outside the area covered by the Castle Acre Neighbourhood Plan, these plans have not been included in the formal assessment. The Applicant



nonetheless recognises the value of local consultation and engagement in shaping the Scheme and remains committed to maintaining open dialogue with local communities and stakeholders throughout the DCO process. Impact on local business and tourism, and recreational activity The Applicant notes that ES Socio-Chapter 14: **Economics** [APP/6.2] assesses the impact of the Scheme on local tourism and businesses. and Respondents raised identifies no significant concerns about potential adverse effects. long-term effects on local businesses, tourism, and The Applicant welcomes outdoor recreation. efforts to enhance access Scheme suggesting the through the Site. The could harm the rural and Applicant notes that PRoW historic character that permissive routes supports the regional proposed as part of the economy. Yes Scheme are detailed within oPRoWPPMP While some felt it would [APP/7.12]. negatively affect the experience of Public Rights The Applicant also notes of Way, others welcomed the concerns raised and efforts to enhance access confirms that the potential and proposed additional impacts of the Scheme on features such as new PRoW users, amenity, and routes. seating. and recreation have been signage. considered. Further information the on landscape visual and effects is provided in ES Chapter 6: Landscape and Visual [APP/6.2]. Cultural heritage and archaeology respondents The Applicant notes these highlighted the historic and concerns. cultural importance of the Yes In response to feedback area, expressed concern received and further about impacts on Castle assessments, Fields 35 and Acre Castle and Priory, and



requested that infrastructure, particularly in Fields 33 and 35. be relocated further south toward the A1065 to protect heritage assets.

the northern half of Field 33 have been kept free of solar PV panels.

The BESS, National Grid Substation, and Customer Substation have been removed from Fields 33 and 35, and are now proposed only within Fields 24 and 27 further south of Bartholomew's Hill Plantation.

An assessment of the Scheme's effects on heritage assets and mitigation proposed measures is provided in ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2], which concludes there are no significant adverse effects anticipated.

#### Community benefits

Respondents suggested both on-site and off-site community benefits. including natural footpaths, green spaces, biodiversity features, and funding for local facilities or jobs, developed in partnership with organisations such as Norfolk Wildlife Trust and the RSPB.

viewed community benefits

as an attempt to buy local

support for the Scheme.

number

Yes

of

however,

The Applicant is committed ensuring that communities benefit from the Scheme. Throughout the pre-application process, the Applicant has consulted on community benefits and, based on feedback and ongoing discussions, determine how best to allocate funding, particularly for off-site benefits such as local facilities and organisations.

The Applicant also notes that the Scheme would deliver a number of on-site benefits. including new permissive routes and ecological enhancement measures.

Landscape and visual

small

respondents,



respondents Many emphasised the importance the area's visual landscape to its local identity and felt the Scheme could disrupt its rural character.

Concerns focused on the visual impact of the BESS, Customer Substation, and National Grid Substation, with requests to relocate them south of Fields 33 and 35 to reduce effects on Castle Acre, South Acre, and West Acre.

Respondents also highlighted the visual sensitivity of Fields 19, 20, 21, and 22 due to their elevated topography, and raised concerns that fencing and ecological screening could make PRoW feel enclosed.

The need for wider buffers along paths and the potential for light pollution from security lighting were also noted.

concerns and confirms that ES Chapter 6: Landscape and Visual [APP/6.2] assesses the likely landscape and visual impacts of the Scheme, including its aesthetic and perceptual qualities such as tranquillity. Measures have been taken through the iterative design process to revise the Scheme layout concentrate and development beyond the ridaeline. reducina visual effects on sensitive receptors, including Castle Acre, South Acre, and West Acre.

The Applicant notes these

Solar PV panels have been removed from Field 35 and the northern half of Field 33, with the National Grid Substation and Customer Substation now proposed within Fields 24 and 27, south of Bartholomew's Hill Plantation

Mitigation measures, detailed in the **Design** Approach **Document** [APP/5.7], include extensive planting and screening to reduce visual impacts during operational phase, including a tree belt along the western and eastern boundaries of Field 27 to filter views of the National Grid and Customer Substations.

Consideration has also been given to maintaining the character of PRoW, with a minimum 15m buffer applied and wider offsets along the Droves to prevent a sense of enclosure.

Yes



		The design of any security lighting would also be sensitive to the local dark skies environment.
Agricultural land use		
Most respondents opposed the use of BMV land for the Scheme, citing risks to Norfolk's farming economy and national food security, and emphasised the need to restore the Site to productive use after decommissioning, though	Yes	The Policy Compliance Document [APP/5.6] submitted as part of the DCO Application confirms that the use of BMV land as part of the Scheme is justified, given the economic and other benefits of the land.  The Applicant also notes that Field 32, which comprised entirely Grade 1 and 2 BMV land, was removed from the Scheme.  The Applicant also notes
decommissioning, though some expressed doubt this would happen.		that when the operational phase of the Scheme ends, the Solar PV Site would be decommissioned and the land returned to the landowner. The landowner would then choose how the land is to be used and managed.
Project design		
Respondents provided mixed feedback on the Project Level Design Principles and Masterplanning Strategies, with some suggesting the Scheme conflicted with the existing landscape and local character, while others saw opportunities to protect wildlife habitats and enhance ecological connectivity.	Yes	The Applicant welcomes the comments on the Project Level Design Principles (secured via the Design Principles, Parameters and Commitments [APP5.8] document) and Masterplanning Strategies, noting that the protection of wildlife habitats and the enhancement of ecological connectivity across the Site are key objectives.
		A Green Infrastructure Strategy is provided as an



appendix to the **oLEMP** [APP/7.11] and has been developed support to landscape character opportunities within the Site. in line with the Norfolk draft Local Nature Recovery Strategy and Norfolk Plan Biodiversity Action objectives.

Indicative area for solar PV panels (including glint and glare)

Respondents objected to the use of agricultural land and the scale of the proposed solar PV panels, raising concerns about glint glare affecting the and panoramic landscape. nearby residents, aircraft, and road users. They felt the Applicant should commit to appropriate screening and south-facing fixed panel minimise orientation to reflective impacts.

Yes

Justification for the scale of the development is set out in the **Statement of Need** [APP/5.4]. Provided that solar PV panels are not installed until advance planting has become established, no significant glint and glare impacts are anticipated.

Advance planting and hedgerow enhancement will be undertaken during winter 2025-2026 along eastern boundary of the Site (see **Appendix** Advanced Planting Plan of the oLEMP [APP/7.11]) to existing gaps screening between the Site and the A1065.

Indicative siting zone for BESS, Customer Substation and National Grid Substation

The indicative siting of the BESS, Customer Substation, and National Grid Substation was a leading concern for respondents.

Many objected to their proposed locations in Fields 33 and 35, while others noted potential ecological impacts in Fields 24, 26,

Yes

The Applicant acknowledges that the location of the BESS and substations was a key concern during the statutory consultation.

In response to feedback received and further assessments, the BESS, National Grid Substation, and Customer Substation have been removed from Fields 33 and 35, and are



and 27 due to recorded bat activity.

Respondents suggested that the substations should be placed together toward the southern end of the Site to make use of existing tree belts for visual mitigation.

now proposed only within Fields 24 and 27, further south of Bartholomew's Hill Plantation. The Applicant also notes that the BESS, National Grid Substation and Customer Substation are proposed to be collocated.

Indicative area for mitigation, enhancement and/or retained agricultural buildings

Respondents welcomed the inclusion of Mitigation and Enhancement Areas within the Site and encouraged their extension in the northern and north eastern sections, particularly Fields 33 and 35.

Additional suggestions included incorporating natural footpaths, creating new green spaces such as wildflower meadows and grasslands, and introducing further planting.

The Applicant welcomes the positive feedback on the proposed Mitigation and Enhancement Areas, as well as suggestions on additional measures.

In response to comments received and further environmental assessment, Fields 35 and the northern half of Field 33 have been kept free of solar PV panels.

#### Connectivity

Respondents welcomed the Applicant's commitment to accessibility and active particularly travel. the proposed Swaffham Link, which some suggested become should permanent right of way after decommissioning. They encouraged inclusion of additional paths and recreational routes to support local wellbeing.

However, some raised concerns about PRoW access and safety during construction, as well as potential site security issues, recommending a

The Applicant welcomes these comments and suggestions. In response, approximately 3.5 km of new permissive paths have been incorporated into the Scheme to improve connectivity, including the proposed Swaffham Link.

Further details are provided in the **oPRoWPPMP** [APP/7.12], which also sets out measures for maintaining safe and accessible routes for all phases of the Scheme.

Yes

Yes



detailed safety and security plan.		
Ecology		
Respondents raised concerns about the Scheme's long-term effects on local wildlife, particularly the habitats, movements, and breeding patterns of birds, bats, and deer.  Others offered suggestions to enhance biodiversity, including creating green corridors to link rewilding areas, adding wildflower margins, and undertaking early hedgerow and tree planting.	Yes	The Applicant notes these concerns and confirms that the Scheme has been designed to maintain and enhance wildlife movement through the creation of wildlife corridors and buffer zones. Hedgerow strengthening will support connectivity for species such as birds, bats, and deer across the Site.  The Scheme has also been assessed using the government's Biodiversity Net Gain Metric, which concludes that it will deliver biodiversity gains well in excess of 10%,as set out in the Biodiversity Net Gain Assessment Report [APP/4.7], and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme.
Biodiversity		
Respondents encouraged the Applicant to commit to a BNG of at least 10%, with some urging it to exceed this target.  Others questioned the feasibility of achieving onsite BNG, suggesting potential impacts could outweigh benefits, while many emphasised the importance of supporting	No	The Applicant welcomes the support for BNG and confirms its commitment to exceeding the minimum 10% target.  The Scheme has also been designed to contribute to the Norfolk Nature Recovery Network through habitat creation, enhancement, and long-term ecological
the Norfolk Nature Recovery Network through		management. Further details of the proposed mitigation measures are set



habitat protection and enhancement.		out in the Design Approach Document [APP/5.7].  Measures for the planting, management, and monitoring of landscaping and ecological mitigation are set out in the oLEMP [APP/7.11].
Watercourses, hydrology and	flood risk	
Respondents highlighted the importance of protecting the River Nar SSSI and its chalk stream, expressing concern about potential contaminated run-off, increased flood risk, and water use in the event of a BESS fire, including how any polluted water would be safely managed and prevented from entering the river.	No	The Applicant acknowledges these comments and recognises the importance of protecting the River Nar SSSI and its chalk stream. The Scheme incorporates robust drainage and containment measures to prevent contamination and manage surface water effectively.  Regarding the BESS, the Applicant notes that an automated penstock would be used on a containment tank, consistent with best practices at BESS sites in environmentally sensitive locations. The attenuation basin will also function as an interceptor to contain and manage any potential spills or losses. Further details are provided in ES Chapter 12: Water Resources [APP/6.2].
Construction of the Scheme		
Respondents' primary concerns regarding the construction phase related to noise, traffic, and pollution, including road safety risks and disruption from temporary road or PRoW closures.	No	The Applicant notes that noise, traffic and pollution effects during construction are assessed in ES Chapter 10: Noise and Vibration [APP/6.2], ES Chapter 9: Transport and Access [APP/6.2] and ES Chapter 16: Other



Some also noted that changes to access routes could increase deer collisions.

Respondents emphasised the need for a detailed Construction Management Plan that addresses cumulative impacts and potential overlaps with other schemes.

**Environmental Matters** [APP/6.2] respectively, with no significant effects identified.

traffic Any temporary management the for Scheme would be mitigated through appropriate sianaae and road diversions, as detailed in oCTMP [APP/7.7], upon which the CTMP will be based and secured by way of a requirement in the DCO.

Cumulative effects are also considered in ES Chapter 9: Transport and Access [APP/6.2].

#### Operation and maintenance of the Scheme

Respondents raised concerns about potential noise and light pollution during operation, the fire risk associated with the BESS, and the need for adequate emergency access.

Questions were also asked about solar panel cleaning methods and the use of sheep for site maintenance, with some recommending the Applicant explore agrivoltaics to diversify land use.

design of any security lighting will be sensitive to the local dark skies environment.

The Applicant notes that the

Engagement has also been ongoing with Norfolk Fire and Rescue and the East of England Ambulance Service, as detailed in this Report. The Applicant further confirms that a Statement of Common Ground will be prepared.

Once the elements of the Scheme have been installed, the land may be considered for sheep grazing, in combination with ecological other activities. management Further details of which can be found in the oOEMP [APP/7.8].

No

#### Decommissioning of the Scheme



Respondents emphasised the importance of restoring the land to agricultural use decommissioning, though many doubted its suitability for arable farming due to potential compaction, surface water chemical and run-off, impacts. Some, however, felt the Applicant had adequately considered site restoration in its plans.

No

When the operational phase of the Scheme ends, the Solar PV Site would be decommissioned and the land returned to the landowner, except the National Grid Substation, which would remain.

After the decommissioning phase, the landowner would decide how the land would be used and managed.

Further details can be found in the **Outline**Decommissioning

Strategy (oDS) [APP/7.10], prepared by the Applicant as part of the DCO Application.



## 8 Further engagement

## 8.1 Ongoing non-statutory engagement

8.1.1 In the period following the close of statutory consultation, the Applicant continued to engage with stakeholders and the community. A summary of this engagement is provided in **Table 24**.

Table 24 Summary of additional ongoing non-statutory engagement

Date	Stakeholder (name/organisation)	Summary of meeting
15 August 2025	Defence Infrastructure Organisation (DIO)	Meeting held to discuss the DIO's concerns regarding the Scheme's location in relation to the Precision Approach Radar and associated safety zones at RAF Marham.
6 November 2025	Fenland and West Norfolk Friends of the Earth	Presentation covering key aspects of the Scheme and the wider need case for solar, followed by a question-and-answer session.  Topics of discussion included opportunities for further consultation, the Examination process, the use of agricultural land and visual impact.

- 8.1.2 The Applicant also notes that on 24 October 2025, additional materials were shared with National Grid Electricity Transmission (NGET), including an extract of **Schedule 1** of the **draft Development Consent Order [APP/3.1]**, a draft of the **Works Plan [APP/2.3]** showing the National Grid Substation and Grid Connection Infrastructure, and an illustrative layout. The Applicant notes that this material was provided to support further engagement and discussion, and the opportunity for continued dialogue was offered.
- 8.1.3 NGET responded on 11 November 2025, sharing a letter previously issued to the Applicant on 18 September 2025, which sets out NGET's high-level requirements for a proposed substation. NGET's statutory consultation response, and the Applicant's consideration of that feedback, is provided in **Consultation Report Appendix G: Section**



**42 – Responses Received and Applicant's Responses [APP/5.2]**. Details of the grid connection agreement are set out in the **Grid Connection Statement [APP/7.1]**.

## 8.2 Summary of targeted consultation

- 8.2.1 The Applicant undertook a period of targeted consultation between 3 September 2025 and 1 October 2025, during which feedback was encouraged on four localised changes to the Scheme boundary.
- 8.2.2 Prior to the commencement of the targeted consultation, the Applicant held briefing meetings with Norfolk County Council, Breckland District Council and the Borough Council of King's Lynn & West Norfolk to introduce the targeted consultation, provide an overview of the changes and answer any questions.
- 8.2.3 Statutory consultees engaged under Section 42 during the statutory consultation were reengaged, alongside near neighbours (defined as properties within 50 metres of the Scheme boundary) and non-statutory consultees identified as those most likely to have a direct interest in the proposals owing to local environmental, heritage, community and recreational interests.
- 8.2.4 The Applicant also engaged separately with Castle Acre Parish Council to discuss the promotion of the consultation within the community, given its proximity to the proposed changes.
- 8.2.5 Targeted consultation undertaken by the Applicant is further documented in Consultation Report Appendix I: Targeted Consultation Overview and Supporting Materials [APP/5.2].



## 9 Conclusion

### 9.1 Concluding remarks

- 9.1.1 The Applicant has undertaken a comprehensive pre-application consultation on the Scheme. This consultation has been informed by and complied with the requirements of the PA 2008 and associated guidance and legislation.
- 9.1.2 As part of this pre-application consultation, the Applicant carried out a period of early (non-statutory) engagement to introduce the Scheme. This included a series of early-engagement workshops with consultees, which informed an iterative design process.
- 9.1.3 Outcomes from this early and ongoing engagement were reported during statutory consultation and are set out in statutory consultation materials. A Workshop Summary Report was also produced to capture and respond to the issues raised during the workshops.
- 9.1.4 Between the early-engagement workshops and the statutory consultation, the Applicant also maintained ongoing engagement with stakeholders. This continued dialogue fed into the iterative design process, ensuring that feedback was considered and incorporated as the design of the Scheme evolved.
- 9.1.5 During the statutory consultation, the Applicant coordinated engagement under Sections 42, 47 and 48 of the PA 2008 to enable meaningful engagement with statutory consultees and the local community in tandem, and ensuring that feedback on the PEIR could be considered alongside wider engagement.
- 9.1.6 A targeted consultation was subsequently undertaken to seek further feedback from key consultees in relation to design changes.
- 9.1.7 Throughout, the Applicant has sought to address comments wherever possible. Feedback received has fed directly into the design process and final proposals, and the Applicant's responses to issues raised are set out in this Report.
- 9.1.8 As well as preparing the Report, the Applicant has set out how it has complied with guidance and advice on consultation in the **Section 55 Checklist [APP/1.5]** that is also part of the DCO Application.
- 9.1.9 The Applicant is grateful to all parties who have engaged in the pre-application consultation.



#### References

- Ref. 1 Planning Act 2008. (the PA 2008). Available at: https://www.legislation.gov.uk/ukpga/2008/29/contents [Accessed 10 November 2025]
- Ref. 2 The Infrastructure Planning (Applications: Prescribed Forms and Procedure)
  Regulations 2009. ('the APFP Regulations'). Available at:
  https://www.legislation.gov.uk/uksi/2009/2264/schedule/1/made [Accessed 10 November 2025]
- Ref. 3 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. ('the EIA Regulations'). Available at:
  https://www.gov.uk/guidance/environmental-impact-assessment [Accessed 10 November 2025]

