THE DROVES
SOLAR FARM

The Droves Solar Farm

Consultation Report Appendix G: Section 42 - Responses Received and Applicants Response

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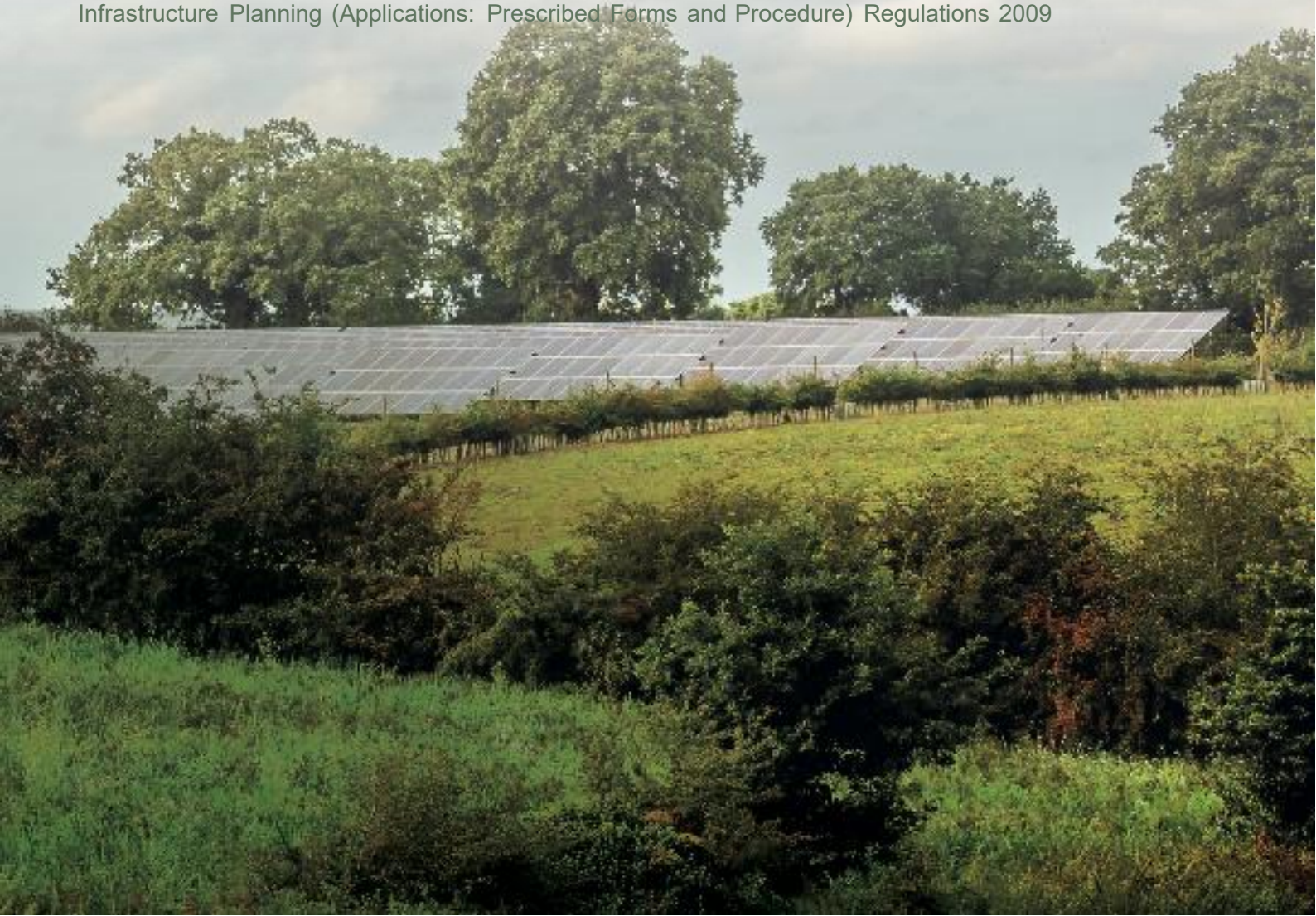

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1 Section 42 Applicant Responses

1.1 Anglian Water

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Anglian Water	Introduction	Thank you for consulting Anglian Water on the statutory consultation for The Droves Solar Farm (the Project), which is located within the local planning authority areas of Breckland District Council and Norfolk County Council. Anglian Water is the statutory water and sewerage undertaker within the Project area – as defined by the draft Order Limits. This response is in our statutory capacity regarding water resources, water supply network, water recycling assets and the sewer network, as well as the related role of surface drainage.	No	The Applicant thanks Anglian Water for responding to the consultation and notes its statutory capacity.
	Anglian Water utilities	Preliminary Environmental Impact Report (PEIR) Interfaces with Anglian Water Assets: Paragraph 3.2.9 identifies that overhead utilities and existing underground utilities exist within the Site. Within Chapter 15 Other Environmental Matters, para 15.5.2 goes on to explain that it is considered there is limited potential for likely significant effects on all above ground telecommunications, utilities and television infrastructure, and thus scoped out of the Environmental Statement (ES).	No	The Applicant confirms that the matters raised have been scoped out of the **ES [APP/6.1 – 6.5]**.
	Utility Assets and Pipelines	In para 15.5.6 a number of underground utility assets and pipelines are listed as identified through a preliminary high-level review of Applicant provided information within the Site boundary. This includes reference to a Foul Main Sewer– Anglian Water - aligned with the A1065 on the east of the Site. This is a rising main transferring wastewater flows from Castle Acre to Swaffham.	No	The Applicant notes these comments and that the identified Foul Main Sewer is a rising main transferring wastewater flows from Castle Acre to Swaffham. The **outline Construction Environmental Management Plan (oCEMP) [APP/7.6]** sets out that where works are carried out within proximity to water distribution infrastructure e.g. highways works, a 'Watching Brief' will be conducted during works by a Hydrologist or Engineer.
	Watercourses Access	In addition, there are two Anglian Water water mains along the A1065 corridor which are within the proposed Order Limits for the Off-Site Highway Works to A1065/A47 Fakenham Road interchange. These works are identified in para 3.2.2. and shown on the site boundary Figure 3.2. The PEIR states that these are potential areas for highways/junction improvement works to facilitate the Project, such as road widening. Both water mains run along the	No	The Applicant notes these comments and the presence of water mains along the A1065 north/south corridor. **ES Chapter 12: Water Resources [APP/6.2]** notes that where works are carried out in close proximity to water distribution or sewer infrastructure, a 'Watching Brief' will be conducted during the works by a Hydrologist or Engineer.

		A1065 north/south corridor, and therefore a direct interface with any road/junction widening works is likely.		The Watching Brief should be used to clearly mark and demarcate any sensitive areas around the pipes which serve the property and aim to isolate pipes from construction works and avoid impact on the pipe infrastructure. Employees will be briefed on the pipework and locations and be briefed on any controls and conditions put in place prior to the commencement of works. Road widening is minor and would utilise the existing drainage network. Should any works cross the pipes, then measures will be implemented to prevent damage to the pipes, such as laying of steel matting or concrete above the pipework, as detailed in the **oCEMP [APP/7.6]**.
	Watercourses	There is also a possible surface water sewer interface within the southern A47/A1065 interchange Order Limits. Excepting those already confirmed/identified - no further Anglian Water assets appear to be located within the wider site Order Limits for The Droves Solar Farm core site area(CSA), however a water main along the A1065 does extend to the southern boundary of the Order Limits.	No	The Applicant acknowledges the presence of a foul-water sewer running north to south, immediately adjacent to the A1065. The Applicant further notes that no additional assets are located within the Order limits. **ES Chapter 12: Water Resources [APP/6.2]** notes that where works are carried out in close proximity to water distribution or sewer infrastructure, a 'Watching Brief' will be conducted during the works by a Hydrologist or Engineer. The Watching Brief should be used to clearly mark and demarcate any sensitive areas around the pipes which serve the property and aim to isolate pipes from construction works and avoid impact on the pipe infrastructure. Employees will be briefed on the pipework and locations and be briefed on any controls and conditions put in place prior to the commencement of works. Should any works cross the pipes, then measures will be implemented to prevent damage to the pipes, such as laying of steel matting or concrete above the pipework, as detailed in the **oCEMP [APP/7.6]**.
	Watercourses Access	It is noted that the Transport Assessment and ES will outline any permanent highway improvements to assist with the movement of vehicles, which will be secured through the Order Limits and Access and Right of Way Plans (para 9.5.1). It is recommended that further advice should be sought from Anglian Water on the asset interfaces of the Project – this advice can include: • Clash detection and resolution • Early design and technical assurance • Asset protection and diversion planning • Review of red line boundary implications.	No	The Applicant notes this comment and the topics or areas for which advice can be sought. The Applicant welcomes further engagement with Anglian Water, if required.

	Consultation and engagement	Whilst, costs would be incurred to support project development and internal planning, this can be discussed further with the Applicant. This would provide a high-level desktop assessment of each interface between the Project and Anglian Water assets or projects, and will be dependent on project size, complexity and requirement from the Project. Typically, this includes input from both Anglian Water Services and our delivery teams. This process will also help to inform mitigation measures in the outline Construction and Environment Management Plan (oCEMP) to be included in the ES.	No	The Applicant notes this comment and acknowledges that costs are incurred as part of the statutory consultation process. The Applicant welcomes further engagement with Anglian Water and will be in contact in the future.,
	Indicative area for mitigation, enhancement and/or retained agricultural buildings Watercourses	Anglian Water welcomes the statement in para. 15.5.8 that sufficient and practical offsets and/or suitable mitigation measures (e.g. buffers) will be fed into the oCEMP to ensure construction work is carried out such that impacts on services are minimised. We support direct collaboration with the Applicant on the crossing of utilities. Whilst there are no anticipated significant effects on utilities as a result of the Construction Phase of the Scheme, we agree that the embedded mitigation measures to minimise the potential effects on underground utilities, outlined in paragraphs 15.2.12-15.5.13, should be addressed through the oCEMP and secured by Protective Provisions for Anglian Water in the DCO Application.	No	The Applicant welcomes these comments and confirms that the **oCEMP [APP/7.6]** submitted as part DCO Application sets out mitigation measures to minimise the effects on water resources during construction. The Applicant has also included a set of protective provisions for the benefit of Anglian Water in **Schedule 15** to the **draft Development Consent Order (draft DCO) [APP/3.1]**, and the Applicant welcomes Anglian Water's comments on these.
	Consultation and engagement Protective Provisions Watercourses	Anglian Water has held initial discussions with the Applicant and look forward to progressing negotiations prior to the submission of the DCO Application, to ensure safeguarding distances and measures for working in proximity will be incorporated into the development parameters for the Scheme and protective provisions agreed where required. The template Protective Provisions for Anglian Water has been sent to the Applicant for inclusion in the DCO. Anglian Water welcomes the assurance that any safeguarding areas that are in place for existing infrastructure will be observed and incorporated into the design of the Scheme assessed in the ES.	No	The Applicant notes this comment and welcomes further engagement, where required. The Applicant has included a set of protective provisions for the benefit of Anglian Water in Schedule 15 to the **draft DCO [APP/3.1]**, and the Applicant welcomes Anglian Water's comments on these. **ES Chapter 12: Water Resources [APP/6.2]** notes that where works are carried out in close proximity to water distribution or sewer infrastructure, a 'Watching Brief' will be conducted during the works by a Hydrologist or Engineer. The Watching Brief should be used to clearly mark and demarcate any sensitive areas around the pipes which serve the property and aim to isolate pipes from construction works and avoid impact on the pipe infrastructure. Employees will be briefed on the pipework and locations and be briefed on any controls and conditions put in place prior to the commencement of works. Should any works cross the pipes, then measures will be implemented to prevent damage to the pipes, such as

				laying of steel matting or concrete above the pipework, as detailed in the **oCEMP [APP/7.6]**.
	Watercourses Protective Provisions	AWS requires the following standoff distances are applied for working each side of the medial line of AWS pipes. This information is taken from our Protective Provisions template which will need to be agreed with AWS prior to the DCO Application submission. • 4 metres where the diameter of the pipe is less than 250 millimetres; • 5 metres where the diameter of the pipe is between 250 and 400 millimetres; and A distance to be agreed on a case-by-case basis and before the submission of the plan under sub-paragraph (1) is submitted where the diameter of the of the pipe exceeds 400 millimetres.	No	The Applicant has included a set of protective provisions for the benefit of Anglian Water in Schedule 15 to **draft DCO [APP/3.1]**, and the Applicant welcomes Anglian Water's comments on these. **ES Chapter 12: Water Resources [APP/6.2]** notes that where works are carried out in close proximity to water distribution or sewer infrastructure, a 'Watching Brief' will be conducted during the works by a Hydrologist or Engineer. The Watching Brief should be used to clearly mark and demarcate any sensitive areas around the pipes which serve the property and aim to isolate pipes from construction works and avoid impact on the pipe infrastructure. Employees will be briefed on the pipework and locations and be briefed on any controls and conditions put in place prior to the commencement of works. Should any works cross the pipes, then measures will be implemented to prevent damage to the pipes, such as laying of steel matting or concrete above the pipework, as detailed in the **oCEMP [APP/7.6]**.
	Watercourses Indicative area for mitigation, enhancement and/or retained agricultural buildings	Water Resources Chapter 12 Public Water Supplies The reference to our underground assets within the Project area in paras. 12.4.34 and 12.4.36 should be corrected to reflect the interfaces identified earlier in our response. Whilst the Embedded Mitigation measures state that water used for the Project will not be sourced through a new abstraction and will be sourced offsite (para 12.5.4), the water required for the construction and operation of the site will need to come from somewhere, even if it is tankered in. The indicative siting for the battery energy storage system (BESS), Customer substation and National Grid Substation is not in close proximity to a public water supply. Anglian Water's current position on new unplanned non-domestic water requests are to decline requests that exceed 20m3/day. Our non-domestic water requests position statement can be found here. It is noted that the demand for water during construction, has not been calculated and suggest that the oCEMP provides a requirement for the preparation of a Construction Water Management Plan (CWMP) to detail the water requirements, sources of supply and measures to reduce consumption. We would encourage pre-planning enquiries are made through our InFlow platform to	No	The Applicant anticipates that 20 m^3 per day will not be sufficient to meet the demands of the Construction Phase. However, it is unlikely that each element of usage would peak simultaneously. The Applicant acknowledges the sensitivity of the groundwater resource in the region and acknowledges that a demand for water could negatively affect water resources regionally. The anticipated water demand for the Scheme during the Construction Phase, and the possible approach to Scheme Water Supply has been outlined in **ES Chapter 12: Water Resources [APP/6.2]**. Water abstractions are not proposed as part of the Scheme. **ES Chapter 12: Water Resources [APP/6.2]** also outlines the construction and operational activities which will require water, such as welfare facilities and dust suppression, and that the source of the water is likely to be from an offsite provider and not via groundwater abstraction. There will be two dedicated water supply tanks onsite for use within a firefighting event. The Applicant welcomes further engagement regarding the matter, where required.

		ensure the Project's water supply requirements can be appropriately addressed, and whether network reinforcement is needed to provide any domestic water requirements at the substations, and fire-suppression water storage infrastructure for the BESS.		
	Watercourses	However, if in the intervening period, prior to submission, the Project calculates that it is likely to exceed 20m3/day for non-domestic water (does not include water for fire suppression or domestic uses such as sanitary uses), we would require the submission of a Water Resources Assessment for consideration by our internal Board to determine whether the water could be made available. We would request that this level of demand is appropriately addressed through the ES and CWMP, detailing the amount of water for domestic and non-domestic use. The requirements for fire suppression at the BESS are noted.	No	The Applicant anticipates that 20 m³ per day will not be sufficient to meet the demands of the Construction Phase. However, it is unlikely that each element of usage would peak simultaneously. The Applicant also anticipates that the Scheme is likely to be supplied by a combination of Anglian Water Mains, the landowners' existing agricultural supply, and a water tankered option as outlined **in ES Chapter 12: Water Resources [APP/6.2]**, and this will be confirmed through a CEMP, which is based on the measures outlined in the **oCEMP [APP/7.6]**.
	Watercourses Battery Energy Storage Systems Fire Safety	Embedded Mitigation and Assessment of Likely Effects The risks to groundwater quality are noted in para 12.6.62 (Potential Phase Effects), including from accidental spillage of contaminants from infrastructure damage or a pollution event arising from a battery fire. The Project is primarily within SPZ2, with a small area of proposed solar arrays within SPZ1, identified as being associated with an Anglian Water abstraction at Marham (para 12.4.34). Anglian Water would seek to ensure that the oCEMP and Pollution Prevention Plan includes the necessary water management measures to prevent impacts to groundwater receptors – as identified in the Embedded Mitigation (para 12.5.3). As part of our raw water source risk assessments, Anglian Water assesses catchments for the presence of potentially polluting activities which can lead to pro-active engagement and chemical sampling to ensure treatment and monitoring at our sources is robust and proportionate to the risks present within those catchments. Our catchment risk assessments focus on the SPZ's 1 and 2 and will extend further if there are known specific risks of concern.	No	The **oCEMP [APP/7.6]** provides clear embedded mitigation, based on construction good practice, which will limit the potential for impacts on the groundwater resource. The FRA outlines that a sealed drainage system linked to a contaminated water tank with an automatic penstock will be utilised in the rare event of a battery fire.
	Watercourses Battery Energy Storage Systems Fire Safety	It is noted that the water used for fire suppression will not be directly applied to the affected BESS container, and will primarily be used to cool the remaining BESS containers during a fire event, with the containment of spent firefighting water, to be contained in a tank or SuDS attenuation feature to allow for testing of water quality, to identify the	No	The Flood Risk Assessment (provided in **ES Appendix 12.2: Flood Risk Assessment (FRA) [APP/6.4]**) outlines that a sealed drainage system linked to a contaminated water tank with an automatic penstock will be utilised in the rare event of a battery fire, preventing spent suppressant

		appropriate method of discharge. Anglian Water would not expect SuDS to form part of any firefighting water disposal system due to the vulnerability of the chalk aquifer, location of the site within a groundwater SPZ 2, and risk of contaminated water impacting controlled waters (groundwater). Anglian Water considers that spent water used for fire-fighting would be best stored in a tank before it can be appropriately disposed of.		from reaching the infiltration components of the SuDS network.
	Watercourses	As SuDS are proposed as part of the drainage plan for the BESS, it must be clearly demonstrated that the SuDS have been designed in accordance with the appropriate hierarchy of control and best practice for SuDS design. Anglian Water must be identified as a consultee within the DCO requirements for a Surface Water Drainage Management Plan, if SuDS are considered as part of the proposed site drainage system.	No	The Applicant notes that the Scheme is divided into Works Areas (as set out in **ES Chapter 5: The Scheme [APP/6.1]**) does not have a detailed design at this stage; therefore, the **FRA [APP/6.4]** proposes drainage principles. The detailed design of the SuDS network for the Scheme will be provided to the LLFA if the DCO is granted. The **FRA [APP/6.4]** outlines that a formal SuDS, designed for the 1% AEP event plus a 40% uplift for climate change, will serve Work Nos. 2 to 4. The Applicant has included Anglian Water as a consultee within the corresponding DCO Requirement.
	Battery Energy Storage Systems (BESS) Fire Safety	It is noted from other solar farm proposals with BESS installations, that alternative forms of fire suppressant are proposed such as automated fire suppression systems using a clean agent (aerosol) to mitigate the risk of contaminated water filling the BESS container, with the BESS containers spread out to reduce the requirement for cooling water. The consideration of alternative fire suppression methods by the Applicant, should be assessed through the ES.	No	An **outline Battery Safety Management Plan (oBSMP) [APP/7.14]** has been submitted as part of the DCO Application, which includes measures to design the BESS to reduce the risk of fire and manage potential fire events. Should a fire occur, the affected enclosure will be allowed to self-consume until the fire is extinguished through consumption of the combustible materials within the battery container / enclosure. The firefighting procedure may include a suppression system and will involve applying water to adjacent BESS enclosures to keep them cool and further prevent their overheating. As water will not be directly applied to the affected BESS container, there is reduced potential for water to become contaminated, and the volume of water required during a firefighting event is reduced.
	Watercourses	The most appropriate body with regulatory powers to protect the water environment is the Environment Agency, who would consider whether there is an unsatisfactory risk which could lead to groundwater pollution and would therefore recommend the most appropriate controls or mitigation measures.	No	The Applicant confirms that a response to the consultation was received from the Environment Agency and is provided in **Consultation Report Appendix E: Statutory Consultation Under Section 42 of the PA 2008 – Supporting Material [APP/5.2]** along with the Applicant's consideration.
	Watercourses	Foul Water Para 12.6.78 states that a decision will be made prior to the construction stage regarding the storage method for foul water prior to disposal will depend on	No	The Applicant notes these comments. Measures to protect sewer assets are outlined in the **oCEMP [APP/7.6].**

		the number of staff likely to be onsite during the Operational Phase and the frequency of visits. Whilst for the Operational Phase, welfare facilities will drain to a contained cesspit, to be regularly emptied by a licensed contractor, or to a mains sewer connection, meaning and the potential pollution associated with soakaway disposal will not occur. Anglian Water would encourage pre-planning engagement regarding any temporary or permanent connections to our wastewater network, as currently only a rising main runs through the site – as it is a pressurised sewer, no direct connections can be made into this pipe, and a sustainable point of connection to our wastewater network would need to be identified.		
	Watercourses	12.10 Assumptions and Limitations Para 12.10.1 states that foul main adjacent to the A1065 in the east of the CSA has been identified. We agree that the locations of this asset and other Anglian Water assets in the Order Limits, should be confirmed with the Anglian Water post-PEIR, and updated as necessary prior to submission of the ES.	No	The Applicant notes these comments. Measures to protect sewer assets are outlined in the **oCEMP [APP/7.6]**.
	Watercourses	TECHNICAL VOLUME III, APPENDIX 12.2 - FLOOD RISK ASSESSMENT 4. BESS surface water management Para 141 of the FRA identifies a SuDS option that will utilise a piped network to drain the BESS compound to either a contaminated water tank or lined detention basin with infiltration or positive discharge to Anglian Water assets.	No	As outlined in the **FRA [APP/6.4]**, the SuDS strategy at PEIR presented two cases in the event that infiltration testing showed that disposal to ground was not viable. Infiltration testing was undertaken at nine locations onsite and confirmed that infiltration is a viable disposal route for surface water. As such, the **FRA [APP/6.4]** has been updated to confirm the intention to attenuate surface water for the 1% AEP + 40% CC event. The detailed drainage design will be secured by a requirement of the DCO. The Applicant has included Anglian Water as a consultee within the corresponding DCO requirement.
	Watercourses	Anglian Water encourages the Project to follow the drainage hierarchy, to reuse, or discharge through infiltration, a suitable watercourse, or a surface water sewer. Anglian Water has no public surface water sewers in proximity to the Core Site Area - the closest being at the Fakenham Road interchange (A1065/A47). We would encourage the reuse of rainwater that has been attenuated by SuDS features at the BESS to reduce the need for a mains water supply.	No	As outlined in the **FRA [APP/6.4]**, the SuDS strategy at PEIR presented two cases in the event that infiltration testing showed that disposal to ground was not viable. Infiltration testing was undertaken at nine locations onsite and confirmed that infiltration is a viable disposal route for surface water. As such, the **FRA [APP/6.4]** has been updated to confirm the intention to attenuate surface water for the 1% AEP + 40% CC event. The detailed drainage design will be secured by a requirement of the DCO. The Applicant has included Anglian Water as a consultee within the corresponding DCO requirement.
	Battery Energy Storage Systems Fire Safety	4.1 Fire Suppression It is noted that para. 151 refers to 228m3 of water storage for fire suppression at the BESS. The PEIR does not refer to the water resources required to maintain the fire suppression water storage and how	No	There will be two dedicated water supply tanks onsite for use during a firefighting event. Should firefighting appliances require additional water, then this would be provided as a combination of water tankered into the scheme, the existing landowner's supply, and Anglian Water Supply. An **oBSMP [APP/7.14]** has been submitted,

		this will be facilitated. Para 12.5.4 states that water used for the Scheme will not be sourced through a new abstraction and will be sourced offsite. It is not clear how quickly the storage tank for fire suppression needs to be refilled once used, and whether this can be supported by our network. As previously suggested, if a mains water supply is required or water is tankered in, that a pre-development enquiry is submitted to seek advice on any required connection and whether this may require network reinforcement to deliver the required volumes. Unless alternative fire suppression methods are identified to reduce the need for fire suppression water storage.		which includes measures regarding the design of the BESS to reduce the risk of fire and manage any potential fire events.
	Battery Energy Storage Systems Fire Safety	Para. 152 states that the SuDS structures serving the BESS compound will be sized to accommodate the combined volume designed for run-off and the water storage for fire suppression, and this will be sufficient for storing the full fire suppressant volume. As per our comments for Chapter 12 Water Resources, we would consider that SuDS attenuation/detention basins would be unsuitable on chalk aquifer and a suitably sized storage tank should be used to store the spent fire-fighting water until it can be tested and appropriately disposed of.	No	The **FRA [APP/6.4]** commits to the containment of fire suppressant for Work No. 3: Customer Substation and Work No. 4: National Grid Substation via dedicated sumps and tanks (see **ES Chapter 5: The Scheme [APP/6.1]**)
	Battery Energy Storage Systems Fire Safety	Para 158 - the final sentence is not complete: “BESS units will not be flush to the ground and will be elevated from the ground by approximately 300 mm. As such the Scheme will remain safe and operational should (missing concluding remarks of sentence)".	No	Refer to **ES Chapter 5: The Scheme [APP/6.1]** for the full description of the BESS component of the Scheme. **An oBSMP [APP/7.14]** has been submitted, which includes management measures incorporated into the design of the BESS.
	Watercourses Access	Anglian Water supports the use of RSuDS and natural flood management techniques to manage surface water run-off from the core site area. However, the FRA does not appear to address the offsite highway works that might be undertaken at the Fakenham Road interchange (A1065/A47), which could include road widening, and any surface water flood risk implications arising from the construction for example and how this would be mitigated.	No	Road widening is minor and would utilise the existing drainage network.
	Concluding statement	Anglian Water will seek to engage further with the Applicant through the pre-application phase to discuss, amongst other matters: • Impact of construction/operation of the Project on Anglian Water’s water and water recycling assets • The design of the project to minimise interfaces with Anglian Water’s existing and proposed	No	The Applicant welcomes further engagement with Anglian Water and notes the matters outlined.

		assets and specifically to avoid the need for diversions which have carbon costs • The need for water supply connections (including tankering requirements) • Draft Protective Provisions and Requirements – our template Protective Provisions have been sent to the project team for review, and • The preparation of a draft Statement of Common Ground prior to submission.		
	Consultation and engagement	We look forward to continuing discussions with the Project Team on these matters, to ensure these are appropriately addressed in the draft DCO.	No	The Applicant would welcome further discussion with Anglian Water on the matters outlined. The Applicant has included a set of protective provisions for the benefit of Anglian Water in **Schedule 15** to the **draft DCO [APP/3.1]**, and the Applicant welcomes Anglian Water's comments on these.

1.2 Borough Council of King's Lynn and West Norfolk

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Borough Council of King's Lynn and West Norfolk	General comment	Thank you for your recent correspondence on the above scheme, relating to the ongoing seven-week statutory consultation which began on 21 May and runs until 9 July 2025.	No	The Applicant thanks the Borough Council of King's Lynn and West Norfolk for its response.
	General comment	The Droves Solar Farm is currently in pre-application consultation stage of the Development Consent Order Application process. The Borough Council therefore request that the feedback from this consultation is considered prior to the DCO application submission being finalised and are keen to maintain an open dialogue between parties as the details of the scheme are confirmed. The Borough Council request that the below response is considered alongside our previous responses relating to this scheme.	No	The Applicant notes this comment and confirms that the Borough Council's feedback has been considered in the preparation of this DCO Application, as evidenced below.
	General comment	The Borough Council are a neighbouring authority for the NSIP application, the site boundary to which directly adjoins our Borough adjacent to West Acre and through to Castle Acre. Breckland District Council and Norfolk County Council are the host authorities, and the Borough Council will rely on these authorities for the majority of detailed comments – for example on impacts on the highway network, community benefits, archaeology, planning for	No	The Applicant notes this comments and recognises the proximate nature of King's Lynn and West Norfolk Borough Council as a neighbouring authority. The Applicant confirms that detailed comments have been provided by Breckland District Council and Norfolk County Council, as the host authorities, as well as other statutory and non-statutory consultees. These responses and the Applicant's response are provided in **Consultation Report Appendix G: Section**

		minerals and waste, strategic public health, the loss of agricultural land, strategic flood risk and surface water management as these matters are within the purview of the Host Authorities.		**42 – Responses Received and Applicants Responses [APP/5.2].**
	General comment	The Borough Council are content for Breckland District Council and Norfolk County Councils to be the main authorities for detailed discussion of site specifics. However, there are various issues raised by the PEIR submission that the Borough Council consider need attention prior to any further submission.	No	The Applicant notes this comment and confirms that it has maintained ongoing engagement with Breckland District Council and Norfolk County Council. The comments from the Borough Council of Kings Lynn and West Norfolk have been addressed below.
	Scheduled monuments / archaeology / heritage sites Indicative siting zone for Battery Energy Storage Systems, Customer Substation and National Grid Substation	Impacts on Heritage Assets, Landscape Setting: The most harmful element of the scheme as it relates to the historic environment of West Norfolk is the placement of the substations and the grid connection infrastructure in the fields around the Batholemew Hill Plantation. It is clear from the information and visualisations provided that, with certain parts of the infrastructure being up to 13m high and with lighting, fencing and general industrial built form being required, if placed to the north of this wooded area, the views from Castle Acre Priory will be impacted, as will views from Castle Acre Castle and the Conservation Area.	Yes	The Applicant notes these comment and confirms the Customer Substation, National Grid Substation and BESS have been located in Fields 24 and 27 south of Bartholomew's Hill Plantation. Solar PV panels have also been removed entirely from Field 35 and the northern half of Field 33. The Applicant also notes that the PEIR assessed a 'worst case' with regard to the potential height of infrastructure. The management plans and the **Design Principles, Parameters and Commitments [APP/5.8]** submitted as part of the DCO Application provides the principles and maximum and minimum parameters for the detailed design of the Scheme.
	Scheduled monuments / archaeology / heritage sites Indicative siting zone for Battery Energy Storage Systems, Customer Substation and National Grid Substation Grid connection infrastructure	As discussed at the site visit and as part of separate discussions between our Conservation Officer and [redacted] at GHC Heritage, the Borough Council have significant concerns over the siting of the substation and grid connection infrastructure in fields 33, 34 of 35 (see 9485_PM_012 Sheet 2 of 2 and 9485_PM_014 sheet 2 of 2, 'The Drove Chapter 6 Figures').	Yes	The Applicant thanks the Borough Council of King's Lynn & West Norfolk on its engagement and attendance at the Site visit (see Section 5.2 of this **Consultation Report [APP/5.1]**). The Applicant notes these comments and concerns around the impact of the Scheme on visual receptors. The Applicant confirms that the National Grid and Customer Substations and BESS have been located in Fields 24 and 27 south of Bartholomew's Hill Plantation..
	Potential temporary working area for grid connection infrastructure	The potential temporary working area for grid connection infrastructure is also shown to the north of the plantation. The construction phase is expected to last approximately 2 years. Whilst this is a relatively short timescale, the Borough Council do not consider that this would be an appropriate use of this area of land in heritage/landscape terms considering the significance of the landscape as identified in the heritage statement.	No	The Applicant notes that the temporary working to the north of the plantation is required for the temporary diversion of the transmission lines and the potential decommissioning of the existing overhead lines. The temporary working area for the proposed overhead lines is predominately located to the south of the plantation with the exception of where the new alignment joins the existing alignment. The Applicant notes that whilst the Construction Phase is anticipated to take place over across 24 months plus site prep time of up to 6 months beforehand, the final programme will be dependent on the detailed layout design and potential environmental constraints on the timing of

				construction activities. Therefore, some individual works such as that for the temporary diversion of the existing overhead lines are likely to take a much shorter period of time to complete.
	Scheduled monuments / archaeology / heritage sites Indicative siting zone for Battery Energy Storage Systems, Customer Substation and National Grid Substation Landscape and visual impact of the Battery Energy Storage Systems, Customer Substation and National Grid Substation Glint and Glare	As noted throughout Chapter 6, the scale of the effect on visual receptors would reduce if larger elements of the scheme were to be situated south of Bartholomew's Hill Plantation. The Borough Council consider that any intrusion of infrastructure of any scale north of this landscape feature would lead to significant adverse impacts on the setting of Castle Acre and West Acre (and South Acre). This includes glint and glare impacts if solar arrays were proposed in these fields.	Yes	The Applicant notes these comments and concerns around the impact of the Scheme on visual receptors. The Applicant confirms that the National Grid and Customer Substations and BESS have been located in Fields 24 and 27 south of Bartholomew's Hill Plantation. In terms of fields north of Bartholemew's Plantation, solar PV Arrays are only proposed in the southern half of Field 33, which is to the south of the north facing break of slope and in Field 34, which lies on a south facing slope and so will not result in significant impacts to heritage assets located to the north. A full assessment of effects is provided in **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2].** The Applicant also notes that glint and glare effects are assessed in **ES Chapter 16: Other Environmental Matters [APP/6.2]** which concludes no significant effects associated with glint and glare are considered likely when considering the embedded mitigation already proposed as part of the Scheme.
	Scheduled monuments / archaeology / heritage sites	At Paragraph 8.4.14, the relevance of the Historic Environment Record is discussed, with the paragraph concluding that 'although archaeological remains as well as built heritage can be considered non-designated heritage assets, HER monuments recorded within the Site are not considered as such'. The Borough Council disagree with this stance. Although these assets could not be recognised from a statutory point of view; Historic England guidance recognises that the Historic Environment Record is a primary source of information for planning, development control work and land management and can be used to record non-designated heritage assets. The Norfolk Historic Environment Record have furthermore historically requested that Local Planning Authorities maintain and update the HER when non-designated heritage assets are identified during planning applications. The starting point in the Borough Council's opinion is therefore that the records on the HER are non-designated heritage assets, even if their historic significance overall is limited.	Yes	The Applicant notes that not all HER records are non-designated heritage assets. Many HER records relate to find spots of artefacts that have been removed from their location, former monuments that have been destroyed, cropmarks whose veracity as an archaeological site has not been confirmed etc. Therefore, many HER records are an indication of potential rather than representing a non-designated heritage asset. Given the consultation responses, for the purposes of the **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** archaeological remains (both those identified by the HER and those identified by archaeological fieldwork undertaken to inform this study) are considered as potential non-designated heritage assets.
		As noted in para 8.6.5, the wider setting of both the Castle and the Priory encapsulates the surrounding countryside, which serves as a visual representation of the reasoning behind both monuments' intentional design and siting at this location, aiding their	No	The landscape contribution to the understanding of the intentional siting of the Castle and Priory relates to topographic considerations (i.e. relationship with the river valley, access routes such as Peddars Way etc.), rather than land use. In terms of aesthetic contribution, the visible

	Scheduled monuments / archaeology / heritage sites	aesthetic value. The setting of these heritage assets is therefore intrinsically linked to their intensely rural surroundings.		parts of the Site only form a very small part of much wider vistas and are also peripheral to such views. The Applicant notes, therefore, that whilst the surrounding countryside does contribute to the assets' significance that does not mean that all countryside makes the same contribution.
	Scheduled monuments / archaeology / heritage sites	The heritage chapter and associated setting assessment appendix effectively conclude that as the development would only be visible in certain views, the proposal would have a neutral impact on the character of the Conservation Area; and that as the majority of the site would be hidden in views from Castle Acre Castle and Priory, the impacts on significance are limited. The Borough Council strongly disagree with this statement. As mentioned in the reports, the wider landscape is part of what makes the heritage assets significant. Therefore, if the infrastructure will be present in each of the views, even if only limited views are possible overall, then part of the significance of the assets would be eroded. This is particularly important given the harsh industrial nature of the proposal compared to the current rural landscape, which as noted in the various reports, has been largely uninterrupted since the construction of the monuments themselves.	No	In assessing harm to heritage assets, in accordance with current guidance, it is the impact upon the significance of the asset as a whole (encompassing all of its values and its entire setting) that is assessed, not the impact upon one particular view from a discrete part of the asset. Not all elements of an assets setting make an equal contribution to significance and some elements are capable of accommodating change without harming significance. Infrastructure has been removed from the areas that make the greatest contribution to significance, further details of which are set out in **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2].**
	Scheduled monuments / archaeology / heritage sites	The Borough Council's Conservation Officer recommends that the PEIR heritage document is amended before the formal submission to properly consider the impact of the development in this wider landscape. As it stands, the level of impact does not seem to co-ordinate with the importance of the surrounding landscape which is given in the document, in particular where it relates to the wider landscape as the setting to these highly graded heritage assets.	Yes	The Applicant notes that the PEIR is a preliminary assessment, the findings of which have been refined for inclusion in **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]**.
	Scheduled monuments / archaeology / heritage sites Indicative area for solar PV panels Indicative siting zone for the Battery Energy Storage Systems and Customer Substation Indicative siting zone for National Grid Substation Grid connection infrastructure	Irrespective of how the heritage document is amended, the Borough Council are fundamentally against the use of the land parcels to the north of the aforementioned plantation for any of solar farm, including the panels, any associated infrastructure or any construction compounds.	Yes	The Applicant notes that the Customer and National Grid Substations and BESS have been located to the located in Fields 24 and 27, south of Bartholomew's Hill Plantation. Solar PV panels have been removed entirely from Field 35 and the northern extents of Field 33. The Applicant notes that, as set out in **ES Chapter 5: The Scheme [APP/6.1]**, the construction phase is anticipated to take place over up to 24 months. In terms of impacts that would be greater or different during the operational phase, embedded mitigation in the form of positioning of Temporary Construction Compounds and traffic routes will result in these aspects having no indirect impacts on any heritage assets. Indirect impacts during the construction phase are, therefore, considered to be limited to noise levels.

	Temporary construction hub/compounds			
	Inter project Cumulative impact	In-combination effects Your particular attention is drawn to any implications of High Grove Solar Farm to the west of the site where it adjoins Swaffham and potential in-combination effects on adjoining settlements, in particular in relation to the landscape and heritage assets as discussed above.	Yes	The Applicant notes that in combination effects with relation to cultural heritage and archaeology are discussed in **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2].** **ES Chapter 17: In-Combination Effects [APP/6.2]** summarises the in-combination effects of the Scheme.
	Construction impact (general) Construction traffic and impact on roads Noise and vibration – construction	Other matters Noise and Disturbance - Based on Chapter 10, construction traffic is the main noise source which may impact on West Norfolk residents. Based on the assessment work carried out to date and considering the proposed mitigation measures, there will likely be a negligible impact. This will be reviewed at application stage, once the ES becomes available.	No	**ES Chapter 10: Noise and Vibration [APP/6.2]** has assessed construction traffic noise and presents levels of effects based on future traffic during the construction phase, which concludes no significant adverse effects. Refer to Section 10.5 Assessment and Methodology and Section 10.8 Assessment of Likely Effects in **ES Chapter 10: Noise and Vibration [APP/6.2].** An **outline Construction Traffic Management Plan (oCTMP) [APP/7.7]** is included with the DCO Application and a detailed CTMP will be secured by a requirement of the DCO to control the movement of vehicles, access routes, hours of movement, and types of vehicles to and from the Site.
	Health and safety	Fire Service – Norfolk Fire Service provided detailed comments and requested various details of the scheme be considered and conditioned. The comments are attached to this response.	No	The Applicant notes that a response to consultation was received from Norfolk Fire and Rescue Service and is provided in Consultation Report **Appendix G: Section 42 – Responses Received and Applicants Responses [APP/5.2],** alongside the Applicant's response.
	Local policy	New Local Plan - your submission documents refer to the old Local Plan for the Borough. Our Current Local Plan was adopted on 27th March 2025 and the policies listed within various supporting documents should be updated to reflect the new policies wording.	No	The Applicant notes this comment and confirms that the DCO Application, as made, references the adopted King's Lynn and West Norfolk Borough Council Local Plan, as appropriate.
	Ecology Watercourses	Ecology – Chapter 7 sets out that the proposed site boundary is some 0.5km south of the River Nar SSSI. The Construction and Decommissioning Phase has the potential to lead to impacts on this chalk river habitat in particular, through run-off and other pollutants and via hydrological pathways. The Borough Council will assess impacts on protected sites when the Construction Environmental Management Plan and Decommissioning Environmental Management Plan become available.	No	The Applicant notes these comments and confirms that an **oCEMP [APP/7.8]** and **outline Decommissioning Strategy (oDS) [APP/7.10]** form part of the DCO Application. Good construction practice measures to control runoff rates and limit the potential for sedimentation are outlined in the **oCEMP [APP/7.6]**. The Applicant welcomes the Borough Council of King's Lynn and West Norfolk's comments on these documents and would welcome further engagement with regard to the

				measures included to mitigate effects around construction and decommissioning.
	General comment Scheduled monuments / archaeology / heritage sites	The Borough Council have greatly appreciated the opportunity to discuss the scheme and its impacts in detail as the development team have progressed the project. We are keen to maintain an open conversation as the site-specific details become available and we would appreciate continued involvement as the details progress. If there are any matters arising from the above, please get in touch. As it stands, the scheme raises significant concerns as to the harm to our historic landscapes and the surrounding Heritage Assets, The Borough Council are strongly opposed to the use of the land to the north of Batholomew's Hill Plantation and request that this area of land is removed from the scheme.	No	The Applicant welcomes this comment and thanks King's Lynn and West Norfolk Borough Council for discussions to date. The Applicant looks forward to further engagement. The Applicant also notes the concerns raised and has addressed them above.

1.3 Breckland Council

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Breckland Council	General comment Local policy	1.0 Background - 1.1 Breckland District Council declared a climate emergency on 19th September 2019. Since then, the council has committed to reducing the level of greenhouse gases within the district and is striving to achieve net zero as an organisation by 2035. This is also supported within the Breckland Sustainability Policy Statement 2021-2035.	No	The **Planning Statement [APP/5.5]** recognises that the climate crisis has been recognised at a local level, through the declaration of a climate emergency in September 2019.
	General comment Local policy	1.0 Background - 1.2 Policy GEN 01 of the Breckland Local Plan (Adopted 2023) states that development should aim to mitigate and adapt to climate change.	No	The **Policy Compliance Document [APP/5.6]** recognises and assesses Policy GEN 01 of the Breckland Local Plan in full against the established national and locally distinctive sustainable development principles.
	Local policy	1.0 Background - 1.3 Policy ENV10 of the Local Plan supports proposals for new renewable energy and low carbon development, subject to consideration of the impact of the development and whether this can be made acceptable, having regard to the extent to which there are: adverse impacts on the local landscape, townscape or designated and non-designated heritage assets assessed in line with Policies ENV 05, ENV 07 and ENV 08 in the plan; adverse effects on residential amenity by virtue of outlook / overbearing impact, traffic generation, noise, vibration, overshadowing, glare or any other associated detrimental emissions, during construction, operation and decommissioning; an irreversible loss of the	No	Both the **Planning Statement [APP/5.5]** and the **Policy Compliance Document [APP/5.6]** recognise the importance and support Policy ENV 10 of the Breckland Local Plan gives to new renewable energy and low carbon proposals. This support is understandably set against the extent to which there are adverse effects as a result of a proposal. The **Policy Compliance Document [APP/5.6]** assesses the Scheme's compliance with Policy ENV 10 of the Breckland Local Plan as well as Policies ENV 02, ENV 03, ENV 05, ENV 07, ENV 08 as well as any other Local Plan policies which the Applicant considers will be both

		highest quality agricultural land; cumulative impacts of renewable energy development on an area; and adverse impacts upon designated wildlife sites; nature conservation interests; and biodiversity, assessed in line with Policies ENV 02 and ENV 03 in the plan. The Council will consider favourably opportunities for biodiversity enhancements around arrays, the potential for complete restoration of the land and appropriate mitigation such as landscape buffers (trees and hedgerows) where compatible in the context of the Council's Landscape Character Assessment and Settlement Fringe Study.		important and relevant to the Secretary of State's decision (in accordance with Section 104 of the Planning Act 2008. The Applicant's Design Principles and the project level design principles include references to biodiversity mitigation and enhancement and consequently this has been a key consideration of the Scheme's design evolution. The **Design Approach Document [APP/5.7**] provides further information on how opportunities for biodiversity enhancements into the Scheme have been embedded into the Scheme. The **outline Landscape Environmental Management Plan (oLEMP) [APP/7.11]** sets out how the proposed habitats will be managed during the lifespan of the Scheme.
	Landscape and visual (non-specific)	1.0 Background - 1.4 The Council considers that, whilst large scale ground-mounted PV solar farms developments can have a negative impact on the rural environment, particularly in undulating landscapes, the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively.	No	The Applicant notes the position of Breckland District Council. Further, the Applicant has and continues to welcome the ability to positively shape the Scheme with technical comment from Breckland District Council.
	Local policy	1.0 Background - 1.5 The policy seeks to focus solar development on previously developed and non-agricultural land where possible. Where greenfield land is proposed the Council will consider: the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land, where possible; and that the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays.	No	**ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** confirms that, in accordance with Policy ENV 10 of the Breckland Local Plan, the use of previously developed (brownfield) land was considered. The Applicant conducted a review of the brownfield registers maintained by the Borough Council of King's Lynn and West Norfolk Council and Breckland District Council. It was determined that within the brownfield registers of King's Lynn and West Norfolk Council and Breckland Council, no brownfield land met the provision of the 2 - 4 acres per MW, as stated within NPS EN-3 (Paragraph 2.10.17) for a 500 MW utility-scale solar farm in proximity of the Site. **Appendix 1 – Site Evaluation Report** to the **Planning Statement [APP5.5]** confirms how the Applicant's site evaluation involved a balance of factors which included the need to minimise the impact on the best and most versatile agricultural land. The **oLEMP [APP/7.11]** prescribes the management regimes for all grassland to be created within the Scheme, which includes provision for grazing and / or hay cuts where practicable.
	National policy Local policy	1.0 Background - 1.6 The project is considered to be broadly in line with the Government's objectives and targets on renewable energy and net zero emissions. In addition, the Council's own Sustainability Strategy and Local Plan Policies are supportive of renewable	No	The Applicant agrees with Breckland District Council's assessment that the Scheme is in line with the Government's objectives. The Applicant also notes

		energy development subject to acceptable levels of impact on the Breckland environment. However, the proposal, at the current stage of design development, raises a number of strategic concerns to Breckland Council, which it is considered should be addressed prior to DCO submission:		Breckland District Council's Sustainability Strategy and supportive Local Plan policies. The strategic concerns posed by Breckland District Council are addressed below, in turn.
	Indicative area for solar PV panels Indicative siting zone for the Battery Energy Storage System and Customer Substation Indicative siting zone for National Grid Substation	2.0 Masterplan 2.1 Aside from the solar photovoltaic (PV) panels, the most prominent pieces of proposed infrastructure are a Battery Energy Storage System (BESS), a Customer Substation and Grid Connection Infrastructure including a new National Grid Substation.	Yes	The Applicant notes that the Customer and National Grid Substations and BESS have been located in Fields 24 and 27 south of Bartholomew's Hill Plantation. Solar PV Arrays have been removed entirely from Field 35 and Solar PV Arrays are proposed in the southern half of Field 33. A tree belt has also been included along the western and eastern boundaries of Field 27 to filter views of the National Grid and Customer Substations.
	Indicative siting zone for National Grid Substation	2.0 Masterplan 2.2 There is currently no existing grid connection available to the Applicant for the project and the development relies upon a new National Grid Substation to connect the Customer Substation to the National Grid. The National Grid Substation is a critical part of the solar farm's grid connection, allowing the solar farm to transmit power to the national grid. As such, the responsibility for determining the location, design, and scale of the substation has been assumed by National Grid, which has commenced preliminary work. The substation would also be built, owned and operated by National Grid.	No	As part of the grid connection offer from National Grid, the Applicant is required to find and obtain land for, and consent, a new National Grid Substation within their Development Consent Order. This is detailed in the **Grid Connection Statement [APP/7.1],** which explains that the National Grid Substation is to be sited and designed to connect the Scheme to the 400kV transmission network between the existing substations at Necton and Walpole.
	Indicative siting zone for National Grid Substation	2.0 Masterplan 2.3 It is understood that National Grid has confirmed availability of a new Point of Connection (PoC) into the existing overhead line between Walpole and Necton and offered 500MW to the Applicant. The electricity generated by the PV panels is proposed to be exported via a 400kV connection between the Customer Substation and the Point of Connection via the National Grid Substation. The National Grid Substation is proposed to be located within the Order Limits, an approach which is supported. The National Grid Substation is proposed to connect to an existing National Electricity Transmission System (NETS) overhead line that passes through the Site via either underground or overhead cables within the Grid Connection Corridor.	No	As part of the grid connection offer from National Grid, the Applicant is required to find and obtain land for, and consent, a new National Grid Substation within their Development Consent Order. This is detailed in the **Grid Connection Statement [APP/7.1],** which explains that the National Grid Substation is to be sited and designed to connect the Scheme to the 400kV transmission network between the existing substations at Necton and Walpole.

	Indicative siting zone for the Battery Energy Storage System and Customer Substation Indicative siting zone for National Grid Substation	2.0 Masterplan 2.4 The BESS will provide grid balancing services by storing excess energy in the batteries to be exported to the National Grid when required. Excess energy from the grid can also be imported to the batteries.	No	The Applicant notes this comment and confirms the function of the BESS.
	Indicative siting zone for the Battery Energy Storage System and Customer Substation Indicative siting zone for National Grid Substation Grid connection infrastructure	2.0 Masterplan 2.5 Whilst the exact locations of the Customer/National Grid Substations and BESS are not yet known (Applicant noted to be in further discussions with National Grid), options have been depicted in the north-eastern part of the site on the Indicative Masterplan: Customer Substation and BESS - Parcels 24, 26, 27, 33 & 35 National Grid Substation - Parcels 27 & 33 Grid Connection Infrastructure - Parcels 26, 27, 30, 33, 34 & 35"	yes	The Applicant notes this comment and confirms the locations listed were presented as proposed locations during the statutory consultation. The Applicant notes that since the statutory consultation, the proposed locations have been refined. The BESS, National Grid Substation and Customer Substation have been removed from Fields 33, 35 and 26 are now proposed only within Fields 24 and 27, further south of Bartholomew's Hill Plantation.
	Indicative area for solar PV panels Indicative siting zone for the Battery Energy Storage System and Customer Substation Indicative siting zone for National Grid Substation Grid connection infrastructure Additional environmental mitigation, enhancement and protection suggestions Scheduled monuments / archaeology / heritage sites	2.0 Masterplan 2.6 Breckland Council is of the view that the combined parcels of land in the north/north-eastern part of the site (Bartholomew's Plantation, Harringtons Pit, 69, and the section to the extreme north (all to the north of Fincham Drove)) i.e. Parcels 32, 33, 34 & 35 need to be removed from the allocation for solar and associated development and instead allocated for mitigation and enhancement. This is due to the potential for impact upon designated heritage assets (please see Section 5 below for further details) and it is considered that the removal of these parcels would be of significant benefit. As such, it is considered that the Customer/ National Grid Substation, BESS and Grid Connection Infrastructure must be located within Parcels 24, 26, 27 & 30.	Yes	The Applicant also notes that BESS, National Grid Substation and Customer Substation are now proposed in Fields 24 and 27, south of Bartholomew's Hill Plantation. Solar PV panels have been removed entirely from Field 35. The Applicant also notes that solar PV panels are proposed in the southern half of Field 33, which is to the south of the north-facing break of slope and in Field 34, which lies on a south-facing slope and so will not result in significant impacts to heritage assets located to the north. A full assessment of significant effects is provided in **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2].**
	Inter project Cumulative impact	2.0 Masterplan 2.7 It is also considered that development has significant potential to generate cumulative landscape and visual effects with The Highgrove Solar Farm. Subsequently, significant cumulative effects are possible via extending the overall area of development, increasing the loss of agricultural land, and also through potentially increasing the extent of visibility of the two schemes by receptors. The	Yes	The Applicant notes that **ES Chapter 17: In combination effects [APP/6.2]** presents the assessment of cumulative effects. The Applicant has also collaborated with the High Grove Solar Farm team during the pre-application stage and has included measures within the **oLEMP [APP/7.11]** and **oCTMP [APP/7.7]** to inform the detailed design and manage potential cumulative effects.

		cumulative impacts cannot be fully assessed due to the current lack of clarity in terms of key design aspects such as the location of the substations and BESS.		
	Grid connection infrastructure Indicative siting zone for the Battery Energy Storage System and Customer Substation Indicative siting zone for National Grid Substation	2.0 Masterplan 2.8 A crucial aspect of this proposal is ensuring certainty about the grid connection. Given the lack of clarity, primarily regarding location, scale and associated visual and landscape impacts, Breckland Council, and all other consultees, is unable to make any detailed assessment of potential impacts of the substations and BESS upon the environment in response to the statutory consultation.	Yes	The Applicant notes that since the statutory consultation, the BESS, National Grid Substation and Customer Substation have been located in Fields 24 and 27 south of Bartholomew's Hill Plantation. Solar PV Arrays have been removed entirely from Field 35, and solar PV Arrays are now only proposed in the southern half of Field 33. A tree belt has also been included along the western and eastern boundaries of Field 27 to filter views of the National Grid and Customer Substations.
	Local policy Agricultural land use (non-specific)	3.0 Agricultural Land and Soils 3.1 Policy ENV10 of the Local Plan iterates a preference for large scale solar farms to be focussed on previously developed and non-agricultural land. Where a proposal involves greenfield land, the Council must consider: the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land, where possible; and that the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays.	No	**ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** confirms that, in accordance with Policy ENV 10 of the Breckland Local Plan, the use of previously developed (brownfield) land was considered. The Applicant conducted a review of the brownfield registers maintained by the Borough Council of King's Lynn and West Norfolk Council and Breckland District Council. It was determined that within the brownfield registers of King's Lynn and West Norfolk Council and Breckland Council, no brownfield land met the provision of the 2 - 4 acres per MW, as stated within NPS EN-3 (Paragraph 2.10.17) for a 500 MW utility-scale solar farm in proximity of the Site. The **Planning Statement [APP5.5]** confirms that the use of agricultural land has been shown to be necessary. Further, **Appendix 1 – Site Evaluation Report** to the **Planning Statement [APP5.5]** confirms that a key factor in the Applicant's site evaluation was the need to minimise the impact on the best and most versatile agricultural land.
	Agricultural land use Soils Grid connection infrastructure	3.0 Agricultural Land and Soils 3.2 Volume 1, Chapter 11 of the PEIR considers the potential impacts of the proposed development on soils and agricultural land. An Agricultural Land Classification (ALC) Survey has been carried out by the Applicant. The surveyed area extends to 774.3 hectares, encompassing the Draft Order Limits (DRO) other than the area for Grid Connection Infrastructure which has not yet been surveyed (total site area of 825 hectares). It is noted that works in this part of the site would be restricted to enabling works to the existing overhead lines and pylons to facilitate the proposed National Grid Substation.	No	The Applicant confirms that an Agricultural Land Classification (ALC) Survey of the Site is set out in **ES Chapter 11: Soils and Agriculture [APP/6.2].** The ALC Survey was undertaken prior to a revision to the Order limits, which occurred post submission of the Scoping Opinion Request to allow for grid infrastructure works to enable a new National Grid Substation, for Grid Connection Infrastructure. Works in this area are limited to enabling works to the existing overhead lines and pylons to enable connection to a new National Grid Substation. The temporary working area for grid connection infrastructure has not been surveyed.

	Agricultural land use	3.0 Agricultural Land and Soils 3.3 The ACL identifies that 58% of the surveyed site is classified as Best and Most Valuable (BMV – Grades 1-3) quality land, with the remaining 38% of the site non-BMV quality land (not including non-agricultural (30 hectares) and 4% not yet surveyed: (see Table In PDF)	No	The Applicant acknowledges the table included in Breckland Council's response. The Applicant notes that ALC surveys have confirmed that 51.7% of the Order limits comprise BMV land, with further details provided in **ES Chapter 11: Soils and Agriculture [APP/6.2]**. Refer also to **E S Appendix: 11.2: ALC Survey Report [APP/6.4].**
	Agricultural land use	3.0 Agricultural Land and Soils 3.4 The ACL identifies that, broadly speaking, the eastern and western areas are generally moderate or poor-quality land, and the central parts are generally good or very good quality.	No	Soils have been found to be more variable than indicated on the national soil map, and in some fields can vary over short distances, giving rise to several ALC grades within the same field. **ES Chapter 11: Soils and Agriculture [APP/6.2]** outlines the soils and soil types of the Site. The soils found across the Site are described in **ES Appendix: 11.2: ALC Survey Report [APP/6.4].**
	Agricultural land use Impact on local business	3.0 Agricultural Land and Soils 3.5 The site as existing is farmed partly in-hand (i.e. farmed by the owners) and partly on various tenancy arrangements. It is stated that the majority of the site is in use for arable farming purposes, including crops such as wheat, barley, oilseed rape and arable break crops, as well as rye and vining peas. Part of the site is used to grow root crops (potatoes, carrots, parsnips) or onions most years on tenancy agreements. In addition, parts of the site are used for agri-environmental farming uses. The western part of the site is farmed in-hand with vegetables grown under license. There are also four areas of livestock production which are farmed under tenancy agreement. The PEIR assesses that whilst the farming businesses will be adversely affected, they could operate elsewhere and would not be rendered unviable by the proposal. No alternatives appear to have been suggested for the agricultural uses to re-locate to.	No	**ES Chapter 11: Soils and Agriculture [APP/6.2]** outlines the farming circumstances identified within the Site. This section aligns with the information included in the PEIR. **ES Chapter 11: Soils and Agriculture [APP/6.2]** assess the likely significant impacts of the Scheme on farming businesses and enterprises operating in the Site. All are full-time businesses. The enterprises are all related to land within the Site, although all could and do also operate on other land. There are no effects of severance. All the farm enterprises described in the sections outlined above are considered to be of medium or low sensitivity, principally influenced by the tenure of each enterprise. Effects are not considered to be significant. The assessment assumes that relocation, where required, would be possible.
	Agricultural land use Indicative area for solar PV panels	3.0 Agricultural Land and Soils 3.6 It is stated that the proposal has sought to reduce the use of designated Best and Most Versatile land as far as is reasonably practicable. In this regard, it is supported that Parcel 32 (comprised entirely of Grade 1 and Grade 2 land) has been removed from consideration for solar PV panels and associated development. The land under and around the PV panels will be kept in grassland use with potential to be used for sheep grazing or the production of fodder.	Yes	The Applicant notes these comments and confirms that Field 32 was removed from consideration for solar PV Arrays and associated development. **ES Chapter 5: The Scheme [APP/6.1]** notes that the land between and under the arrays will be sown as grassland. Once the elements of the Scheme have been installed, the land may be used for sheep grazing (or otherwise managed grassland). The change of agricultural land management from arable to mixed Solar PV modules and grassland uses is a land management consideration. Land use changes of this nature do not result in an adverse

		Breckland Council encourages such uses in the event consent is granted. However, significant concerns remain regarding the quantum of Grade 1 and Grade 2 land to be utilised across the remainder of the site and the ability to carry out the type of livestock farming currently being carried out on parts of the site such as pig rearing.		effect on agricultural land quality. The effect on agricultural land quality during the Operational Phase is therefore negligible, which is not significant. The Applicant acknowledges that there are currently three fields used for the rearing of free-range pigs. These enterprises are run separately to the principal arable farms. At this stage of the assessment, it is assumed that these enterprises, which are rotated every 2-3 years in any event, will be able to relocate to land outside the Site. The impact on these businesses will be either low or medium, depending upon when works commence and how close to natural relocation the enterprises are at that time. Taking a reasonable worst-case assessment the impacts are considered to be not significant in EIA terms.
	Agricultural land use Soils Biodiversity	3.0 Agricultural Land and Soils 3.7 The solar farm is proposed to be operational for a period of 60 years, following which it will be decommissioned with the majority of the land being able to return to arable agricultural use. As such, the majority of immediate agricultural impacts are considered to be temporary and reversible. It is also noted that the submission states that soil health at the site is likely to improve as result of being taken out of arable use. This could also give rise to likely biodiversity benefits due to grassland conversion for the duration of the scheme.	No	The Applicant confirms that the proposed operational design life of the Scheme is 60 years. When the operation and maintenance phase of the Scheme ends, the Solar PV Site would be decommissioned and the land returned to the landowner, with the exception of the National Grid Substation and Grid Connection Infrastructure which would remain in situ. All PV Panels, Mounting Structures, above ground cabling (not including the Grid Connection Infrastructure), Conversion Units / 33kV Sub-distribution Switch Rooms, BESS and the Customer Substation would be removed from within the Solar PV Site and recycled or disposed of in accordance with good practice and market conditions at that time. This will include the areas of agricultural land where the soil health, quality and structure may have improved, and the established habitats. Foundations and other below ground infrastructure will be cut to 1 m below the surface to enable future ploughing. Any piles would be removed. After the decommissioning the phase, the landowners would choose how the land is to be used and managed within agricultural uses. The Applicant also notes that mandatory Biodiversity Net Gain remains to be implemented (currently anticipated May 2026), albeit the Scheme will deliver over 10% BNG as calculated within the Statutory BNG metric. The **Biodiversity Net Gain Assessment Report [APP/4.7]** has been submitted with the DCO Application.
	Agricultural land use Grid connection infrastructure	3.0 Agricultural Land and Soils 3.8 It is understood that the permanent agricultural land requirement will be for the National Grid Substation and Grid Connection Infrastructure, which is projected to be approximately 4 hectares for the	Yes	The Applicant notes that the National Grid Substation, Customer Substation and BESS have been cited to avoid Grade 1 and 2 ALC, where practicable. **ES Chapter 5: The Scheme [APP/6.1]** confirms that the National Grid Substation is projected to be 4ha and located within Field

		substation. It is not clear how much land is required for the Grid Connection Infrastructure which is likely to include underground and/or overhead lines including construction of new pylons and works to existing pylons. Given the nature of the infrastructure described, it is not considered likely that a significant additional permanent land take would be necessary, however, it is considered clarity is required as part of the DCO submission. Nevertheless, it is considered that permanent infrastructure should be sited on the lowest quality agricultural land within the Order Limits.		27. Field 27 is a mix of Grade 2, 3a and 3b, in a complex pattern. When the operation and maintenance phase of the Scheme ends, the Solar PV Site would be decommissioned and the land returned to the landowner, with the exception of the National Grid Substation which would remain. The impacts of the siting of both the Customer Substation and the National Grid Substation have been assessed as minor adverse and not significant.
	Agricultural land use	3.0 Agricultural Land and Soils 3.9 The PEIR sets out that Norfolk has an estimated area of 479,000ha of agricultural land, with an estimate that 53% of this comprises BMV, which is higher than the national average. It is stated that, on this basis, the site represents 0.15% of BMV land within Norfolk, which the Applicant considers to be "a negligible quantum on a regional basis", resulting in impacts assessed as being "not significant".	No	**ES Chapter 11: Soils and Agriculture [APP/6.2]** also confirms that the Scheme requires 0.18% of the estimated BMV land in the County. This has been assessed as having a negligible effect, which is not considered to be significant.
	Agricultural land use Food security	3.0 Agricultural Land and Soils 3.10 The PEIR states, "The UK Food Security Report (11 December 2024) [Ref 11- 9] concludes that food production levels could be maintained or moderately increased alongside the land use change required to meet our Net Zero and Environmental Act targets and commitments", however, it is not considered this quote provides a full representation of the conclusions of the report. The same paragraph quoted in the PEIR (Pg. 179 of the Food Security Report) states, "For instance, the impact is negligible if it is unproductive land which is taken". It must also be considered that quotation used in the PEIR is precluded, "It is plausible that with continued growth in output and conducive market conditions, that food production levels could be maintained.....".	No	The Applicant notes this comment and confirms that the UK Food Security Report (2024) has been considered in full. The reference is repeated in **ES Chapter 11: Soils and Agriculture [APP/6.2]** and forms part of a wider assessment of agricultural land quality, land use, and food production, which recognises both the context of land-use change in meeting national Net Zero targets and the specific conclusions of the report.
	Agricultural land use Food security	3.0 Agricultural Land and Soils 3.11 Whilst the above is noted and the loss of the majority of agricultural land is considered to be temporary and reversible, Breckland Council wishes to raise significant concerns regarding the quantum of BMV land to be utilised and the associated impact on food security with the land out of agricultural use for a significant period of time (60 years). No figures or assessment as to the impact of the development on	No	The Applicant has considered the cumulative effect on food production and the use of BMV land on a regional scale, in response to the Planning Inspectorate's Scoping Response Report, in **ES Chapter 11: Soils and Agriculture [APP/6.2].** The amount of land within the Site is approximately 0.15% of agricultural land within the County. This is a negligible quantum on a regional basis. The regional impact is therefore considered to be negligible, which is not significant.

		agricultural land across Breckland at a district level has been provided.		Overall, in respect of the Scheme: The use of BMV land involves 455 ha of an estimated 253,000 ha of BMV in Norfolk, or 0.18% of the estimated BMV land within the County. This is a negligible effect, which is not significant; and In respect of food production, the order of magnitude on the country is similar. There are no food security or availability concerns or issues in the UK, and meeting the Governments objectives for solar power will require a small proportion of agricultural land. Production to supply ratios are improving, and overall food production in the UK and world-wide is predicted to increase in the next decade. The overall effect is negligible, which is not significant. **ES Chapter 11: Soils and Agriculture [APP/6.2]** also confirms that the Scheme requires 0.18% of the estimated Best and Most Versatile (BMV) land in the County. This has been assessed as having a negligible effect, which is not considered to be significant.
	Inter project Cumulative impact Agricultural land use	3.0 Agricultural Land and Soils 3.12 It is also considered that the above does not account for the cumulative impact of solar farms across the country and at a more local level. Section 11.9 of the PEIR provides some limited detail regarding cumulative effects, assessing that there are likely to be moderate/major adverse effects when considering the cumulative impacts of the proposal and the High Grove and East Pye Solar Farms. Furthermore, whilst solar farms are in situ nationwide, Breckland Council has significant concerns regarding nationally significant solar farms becoming concentrated in the south and east of England where higher solar irradiance renders solar energy more efficient and economically viable particularly if the generated electricity is siphoned off to outside the region. Over the past few years, Norfolk - and in particular, the Breckland District - appears to have experienced a significant increase in the number, and scale, of solar farm proposals. As such, it is considered that the ES must also include a thorough assessment of the impacts upon agricultural land within Breckland. Breckland Council also deems that a strategic approach to the siting of renewable energy developments, and associated impacts upon agricultural land would be beneficial.	No	The Applicant is aware of other projects which exist and are being proposed in the region. **ES Chapter 17: In-Combination Effects [APP/6.2]** considers the cumulative effects of multiple existing and/or approved developments generating additive effects which together have an increased effect on the receptors presented in **ES Chapters 6 to 16 [APP/6.2].** 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.
	Inter project Cumulative impact Agricultural land use	3.0 Agricultural Land and Soils 3.13 As per the PINS Scoping Opinion, it is considered that the ES should provide a regional assessment of the cumulative loss of BMV land and	No	The Cumulative Effects Assessment presented in **ES Chapter 11: Soils and Agriculture [APP/6.2]** has been undertaken as part of the EIA in accordance with PINS Advice on Cumulative Effects Assessment (September 2024) and has considered cumulative effects, which may

		impact on food production, assessing any significant effects where they are likely to occur. This assessment should also consider the use of BMV land in the wider regional context. Whilst some limited information is included in the PEIR in this regard, it is considered a much more substantial assessment is necessary in the ES.		arise as a result of effects associated with the Scheme combining with effects associated with other development. The Applicant considers the assessment undertaken to be sufficient and in line with all relevant guidance.
	Agricultural land use Soils	3.0 Agricultural Land and Soils 3.14 Breckland Council defers to the advice of Natural England in regard to the technical details of the potential impacts upon agricultural land and soils.	No	The Applicant notes this comment and the confirmation that Breckland District Council defers to Natural regarding the technical details of the potential impacts on agricultural land and soils.
	Local policy	4.0 Arboriculture 4.1 Policy ENV06 of the Local Plan seeks to retain and protect trees and hedgerows wherever possible. Where the loss of such features is demonstrably unavoidable, adequate replacement provision, preferably by native species will be sought.	No	Irreplaceable habitats (ancient and veteran trees) are to be retained within appropriate buffers. Woodland within the Site will be retained within the layout of the Scheme where practicable, with the exception of removals and/or crossings required for new Access Tracks, perimeter fencing and Cabling. Impacts upon these habitats are considered within **ES Chapter 7: Ecology and Biodiversity [APP/6.2].** The **oLEMP [APP/7.11]** and associated appendices also outline the new mitigation planting areas and their proposed indicated native species.
	Ecology	4.0 Arboriculture 4.2 The site as existing is characterised by mature hedgerows and trees, both within (scattered and woodland) and around the boundaries. It is considered that these arboricultural features make a strong contribution to landscape character.	No	The Applicant has sought to retain and enhance the existing network of hedgerows, trees and woodland blocks within the Site. The Green Infrastructure Strategy included within the appendices of the **oLEMP [APP/7.11]** illustrates areas of proposed planting within the Site. The Applicant also notes that further details are provided within the **Design Approach Document [APP/5.7]**.
	Indicative area for mitigation, enhancement and/or retained agricultural buildings	4.0 Arboriculture 4.3 Chapter 7 of the PEIR deals with ecological and biodiversity impacts. It is noted that new planting of trees and hedgerows is proposed across the site for the purposes of screening and ecological enhancement. It is also proposed to enhance existing hedgerows through gapping up. The new planting would consist of native, locally prevalent species, including a mixture of deciduous and evergreen species to provide year round screening. Some proposed mitigation and protection measures are also set out within the PEIR.	No	The Applicant notes that ecological mitigation, protection, and enhancement measures are considered within **ES Chapter 7: Ecology and Biodiversity [APP/6.2].**
	Ecology	4.0 Arboriculture	No	Irreplaceable habitats (ancient and veteran trees) are to be retained within appropriate buffers. Woodland within the

		4.4 The Scoping Opinion confirms that, whilst there is no ancient woodland within the site, there are a number of veteran trees which are irreplaceable habitats. The PEIR sets out that veteran trees will be retained and designed into the scheme. Breckland Council wishes to emphasise Paragraph 10.2 of the Scoping Opinion which sets out, "The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement". Attention is also drawn to paragraph 1939 (c) of the NPPF alongside footnote 70.		Site will be retained within the layout of the Scheme where practicable, with the exception of removals and/or crossings required for new Access Tracks, perimeter fencing and Cabling. Impacts upon these habitats are considered within **ES Chapter 7: Ecology and Biodiversity [APP/6.2].**
	Ecology	4.0 Arboriculture 4.5 No Arboricultural Impact Assessment (AIA) has been provided with the consultation documents. As such, the council is not able to offer full comments regarding arboricultural impacts. Whilst it is noted that the PEIR sets out that a pre-construction Tree Survey and Arboricultural Method Statement would form part of a Construction Environmental Management Plan (CEMP), the Council wishes to emphasise the following comments of the Inspectorate (ID 3210): The Applicant should consider whether an arboriculture study area and arboriculture impact assessment report of the entirety of the site is required to support the ES, with agreement from the relevant consultation bodies, if possible, or alternatively explain in the ES why this is not considered necessary. The Applicant's attention is drawn to the consultation response received from King's Lynn and West Norfolk Borough Council (Appendix 2 of this Opinion) on this matter.	No	The Applicant notes these comments and confirms that an Arboriculture Impact Assessment (AIA) has been undertaken and is presented in **ES Appendix 16.4: Arboriculture Impact Assessment [APP/6.4].** The results of this have been considered, where appropriate, in relation to ecological receptors (in particular, veteran trees). The Applicant further notes that the effects on Agriculture are set out in **ES Chapter 16: Other Environmental Matters [APP/6.2].**
	Indicative area for solar PV panels Additional environmental mitigation, enhancement and protection suggestions	4.0 Arboriculture 4.6 Breckland's Tree and Countryside Officer has carried out a site visit and reviewed the statutory consultation documents. The officer considers the proposals to be broadly acceptable; however, recommends that the following parcels of land Bartholomew's Plantation, Harringtons Pit, Plot 69, and the area north of Fincham Drove - are excluded from the proposed solar allocation and any associated development. The officer considers that these parcels should instead be designated for ecological mitigation and landscape enhancement, in order to protect their environmental value and to support the broader green infrastructure objectives of the scheme.	Ys	The majority of woodland blocks have been removed from the Order limits, with the exception of where the existing overhead lines pass through woodland blocks in order to allow for their potential decommissioning . The Applicant notes that Substations and BESS have been located in Fields 24 and 27 south of Bartholomew's Hill Plantation. Solar PV panels have been removed entirely from Field 35 and the northern half of Field 33.
	Ecology	4.0 Arboriculture	No	The Applicant notes these comments and confirms that an AIA has been undertaken and is presented in **ES**

		4.8 In any formal submission, the officer considers that the Applicant should provide a comprehensive Arboricultural Impact Assessment (AIA), Arboricultural Method Statement (AMS), and Tree Survey, all prepared in accordance with BS 5837:2012 - Trees in Relation to Design, Demolition and Construction Recommendations. Additionally, a site-wide Landscape and Ecological Management Plan (LEMP) should be submitted, which must include detailed planting specifications, species selection, planting densities, and long-term management measures.		**Appendix 16.4: Arboriculture Impact Assessment [APP/6.4].** The results of this have been considered, where appropriate, in relation to ecological receptors (in particular, veteran trees). The Applicant further notes that the effects on Agriculture are set out in **ES Chapter 16: Other Environmental Matters [APP/6.2].** The Applicant also confirms that an **outline Landscape and Ecological Management Plan (oLEMP) [APP/7.11]** has been submitted as part of the DCO Application which sets out a framework for the planting, management and monitoring of landscaping and ecological mitigation and enhancement habitats for the proposed Scheme.
	Local policy	5.0 Heritage 5.1 Policy ENV10 of the Local Plan supports proposals for renewable and low carbon energy development, subject to acceptable impacts upon designated and non-designated heritage assets assessed in line with Policies ENV 07 and ENV 08.	No	Both the **Planning Statement [APP/5.5]** and **Policy Compliance Document [APP/5.6]** assess the Scheme's compliance with all relevant planning policies, including Policy ENV 07 Designated Heritage Assets and Policy ENV 08 Non-Designated Heritage Assets. The Applicant also notes that **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage-related effects expected across the Scheme's construction, operational and decommissioning phases. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** also concludes that there are no significant adverse effects anticipated on non-designated heritage assets.
	Scheduled monuments / archaeology / heritage sites	5.0 Heritage 5.2 The consultation documents set out that there are no designated heritage assets within the site.	No	The Applicant has prepared **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2],** which confirms that there are no designated heritage assets in within the Site or in what could be described as 'close proximity' to the built form of the Scheme, (i.e. no designated heritage assets within c.475m and no high grade assets within c.500m), there are also no non-designated heritage assets in the vicinity that could be considered sensitive to such impacts.
	Scheduled monuments / archaeology / heritage sites	5.0 Heritage 5.3 It is stated that there are 151 designated heritage assets within the respective Study Areas surrounding the site, comprising three Scheduled Monuments, nineteen Grade I listed buildings, seven Grade II* listed buildings, one hundred and eight Grade II listed buildings, one Grade II Registered Park and Garden, and three Conservation Areas.	No	**ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** noted that there are 151 designated heritage assets within the 5km Study Area. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** provides further details about how the Applicant assessed the likely significant effects of the Scheme on Cultural Heritage receptors.

	Scheduled monuments / archaeology / heritage sites	5.0 Heritage 5.4 The Norfolk Historic Environment Record (HER) contains 145 records within a 1km Study Area, consisting of 136 'monuments' and nine 'events'.	No	The Applicant notes this comment and agrees with the figures stated by Breckland District Council (see **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]).**
	Scheduled monuments / archaeology / heritage sites Masterplanning Strategies	5.0 Heritage 5.5 Embedded design mitigation principles are set out such as setbacks, buffers, landscaping, avoiding any sensitive archaeological sites and not siting PV panels in sensitive locations.	No	The Applicant notes that Section 8.7 of **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** outlines the embedded mitigation measures and proposed environmental enhancements which have been incorporated into the Scheme's design during the construction, operation and decommissioning with relation to cultural heritage and archaeology.
	Scheduled monuments / archaeology / heritage sites	5.0 Heritage 5.6 Chapter 8 of the PIER deals with cultural heritage and archaeology, assessing that there is the potential for likely significant effects upon heritage assets. It is assessed that impacts upon designated/non-designated heritage assets would be at their greatest in terms of magnitude and duration during the Operational Phase. The impacts mainly regard changes to settings, 15 heritage assets within the Study Area being considered sensitive to the Scheme, some of which are likely to experience effects considered significant. It is assessed that there would be no significant effects during decommissioning.	No	**ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** discusses the likely significant effects on Cultural Heritage and Archaeology, during the construction, operation and decommissioning phases of the Scheme. The Applicant also acknowledges that 15 heritage assets within the Study Area are considered sensitive to the Scheme. The significance of the impact of the Scheme for each asset is discussed in **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2].** The Applicant further notes that the anticipated impacts during the construction and decommissioning phases would be of a temporary nature and are considered not significant.
	Scheduled monuments / archaeology / heritage sites	5.0 Heritage 5.7 Breckland's Historic Buildings Consultant has carried out a site visit and reviewed the statutory consultation documents, concentrating on matters applicable to designated heritage assets, namely Conservation Areas and Listed buildings.	No	The Applicant notes this comment and thanks Breckland Council's representative for attending the Site visit.
	Scheduled monuments / archaeology / heritage sites Indicative area for solar PV panels Additional environmental mitigation, enhancement and protection suggestions	5.0 Heritage 5.8 Please note the officer has stipulated that the comments below on designated heritage assets are offered on the basis that the following area, the combined parcel of land to the north - Bartholomew's Plantation, Harringtons Pit, 69, and the section to the extreme north (all to the north of Fincham Drove) - will be removed from the allocation for solar and associated development and allocated for mitigation and enhancement instead. Should this land not be removed, it is considered that there would be unacceptable, significant impacts upon the character and setting of said assets: (See Map On PDF)	No	The Applicant notes these comments and confirms that the National Grid Substation, Customer Substation and BESS have been located in Fields 24 and 27 south of Bartholomew's Hill Plantation. Solar PV Arrays have been removed entirely from Field 35. Solar arrays are proposed in the southern half of Field 33, which is to the south of the north-facing break of slope and in Field 34, which lies on a south-facing slope and so will not result in significant impacts to heritage assets located to the north. A full assessment of effects is provided in **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2],** which concludes there would be no significant (EIA terms)

				adverse residual effects associated with the Scheme. The Applicant therefore considered that the changes made since the statutory consultation had reduced their effects to an acceptable level with regard to cultural heritage and archaeology.
	Protected sites Additional environmental mitigation, enhancement and protection suggestions	5.0 Heritage 5.9 South Acre Conservation Area It is considered that the proposal, subject to the removal of the land described above and additional mitigation and enhancement, is not considered to be significantly harmful.	No	South Acre Conservation Area is a medium-sensitivity asset. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that prior to additional mitigation, the magnitude of impact on South Acre Conservation Area, a medium sensitivity receptor, is considered to be negligible, resulting in a neutral effect, which is not significant in EIA terms.
	Scheduled monuments / archaeology / heritage sites	5.0 Heritage 5.10 Little Palgrave Hall The proposal is not considered to be harmful due to separation and existing landscaping.	No	Little Palgrave Hall (Grade II listed building) is an asset of Medium sensitivity, as set out in **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2].**
	Scheduled monuments / archaeology / heritage sites Additional environmental mitigation, enhancement and protection suggestions	5.0 Heritage 5.11 Church of St. George It is considered that the proposal, subject to the removal of the land described above and additional mitigation and enhancement, is not significantly harmful. Reinforcement of the existing screening to the south-west of the churchyard would be beneficial.	No	The Applicant notes that The Church of St George (Grade I Listed Building) is an asset of high sensitivity, as set out in **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2].** The area referred to at the immediate south-west of the churchyard is beyond the Order limits, however, the hedgerow forming the northern boundary of Field 33 will be retained and enhanced.
	Scheduled monuments / archaeology / heritage sites Indicative area for mitigation, enhancement and/or retained agricultural buildings	5.0 Heritage 5.12 Narford Hall (registered park and garden) The proposal is not considered to be harmful due to separation, the existing landscaping and the proposed area allocated for mitigation and enhancement.	No	The Applicant notes these comments and confirms that Narford Hall (Grade II Registered Park and Garden) is an asset of medium sensitivity, as set out in **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2].**
	Scheduled monuments / archaeology / heritage sites Additional environmental mitigation, enhancement and protection suggestions	5.0 Heritage 5.13 Castle Acre Priory, Castle and Church of St. James It is considered that the proposal, subject to the removal of the land described above and additional mitigation and enhancement, is not significantly harmful. The current established pattern of landscape to the south is considered to be prominent visually as an arable landscape with established 20th Century	No	The Applicant notes this assessment and confirms that **ES Chapter 8: Heritage Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage-related effects expected across the Scheme's construction, operational and decommissioning phases. The Applicant agrees with this conclusion.

		farm buildings, electricity pylons with distant views of 20th Century wind turbines.		
	Additional environmental mitigation, enhancement and protection suggestions	5.0 Heritage 5.14 Although not referred to within the documentation, it is suggested that the coloration of the associated equipment and structures is such that it complements the landscape, with no corporate identifiers, or excessive lighting.	No	The Applicant notes this suggestion and asserts that the colour of the Scheme will be determined during the detailed design stage and in accordance with the **Design Principles, Parameters and Commitments [APP/5.8]** document.
	Additional environmental mitigation, enhancement and protection suggestions	5.0 Heritage 5.15 A careful selection of colour would be a continuation of the 18th Century practice of using 'invisible green' for man-made features set within a landscape.	No	A design commitment has been secured to ensure the colour of infrastructure is considered at the detailed design stage.
	Scheduled monuments / archaeology / heritage sites	5.0 Heritage 5.16 Breckland Council defers to the advice of Historic England on matters relating to Scheduled Monuments and Norfolk County Council on assets identified via the Heritage Environment Record (H.E.R).	No	The Applicant notes that Breckland District Council defers to the advice of Historic England on matters relating to Scheduled Monuments and Norfolk County Council on assets identified via the Heritage Environment Record (H.E.R).
	Local policy	6.0 Noise and Vibration 6.1 Policy ENV10 of the Local Plan supports proposals for renewable and low carbon energy development, subject to acceptable impacts upon residential amenity by virtue of outlook / overbearing impact, traffic generation, noise, vibration, overshadowing, glare or any other associated detrimental emissions, during construction, operation and decommissioning.	No	The Applicant notes that **ES Chapter 10: Noise & Vibration [/APP/6.2]** considers the Breckland Council Adopted core strategy and development plan as well as Site-specific policies regarding renewable developments.
	Noise and vibration – construction Noise and vibration – post construction Impact on local amenities / recreational activities (non-specific) Existing public rights of way Existing road infrastructure	6.0 Noise and Vibration 6.2 The development site is located at a rural location, however, there are clusters and isolated residential receptors vulnerable to potential amenity impacts. The Public Rights of Way across and in the vicinity of the site are also considered to be sensitive receptors. It is considered that the main existing sources of noise are those associated with road traffic associated with the A47, and to a lesser extent, the A1065. Intermittent agricultural noise also forms part of the existing soundscape. It is expected that noise and vibration associated with road traffic would increase as a result of the proposal, especially during the construction period. Accordingly, Chapter 10 of the PEIR deals with noise and vibration.	No	The Applicant notes that **ES Chapter 10: Noise and Vibration [APP/6.2]** includes assessment of traffic noise (traffic vibration assessment was scoped out). The existing baseline including agricultural activities was taken into account. Construction Traffic assessment includes noise effects on A1065 and impacts on residential receptors from HGV movement on access route. Assessment shows effects to be negligible and not significant. Traffic noise effects during Operational phase are expected to be negligible and not significant.

	Noise and vibration – construction	6.0 Noise and Vibration 6.3 The PEIR sets out that the main temporary sources of noise and vibration during construction would relate to site preparation, plant installation, cable laying and Horizontal Directional Drilling. Similar activities would create short term noise and vibration during the decommissioning phase. The Council is in agreement in this regard.	No	**ES Chapter 10: Noise and Vibration [APP/6.2]** assesses the main construction activities associated with the Scheme construction and outlines likely effects based on worst-case distances and activity noise levels. Decommissioning noise has been assessed qualitatively with effects expected to be similar or less than construction phase.
	Indicative area for mitigation, enhancement and/or retained agricultural buildings	6.0 Noise and Vibration 6.4 Proposed embedded mitigation measures have been incorporated into the Scheme design, with the distance between the proposed Customer Substation, National Grid Substation and BESS areas and other noise-generating plant and receptors, such as residential properties and PROW being considered, with minimum separation buffers proposed.	No	**ES Chapter 10: Noise and Vibration [APP/6.2]** outlines embedded mitigation for the National Grid Substation / Customer Substation / Battery Energy Storage System area, which includes separation buffers for NSRs and Public Right of Way from the Solar Conversion Units and an acoustic barrier to reduce noise from the Battery Energy Storage System and Customer Substation area. The measures will be outlined within the **oOEMP [APP/7.10]** and secured through a Requirement of the Application.
	Additional environmental mitigation, enhancement and protection suggestions	6.0 Noise and Vibration 6.5 Additional mitigation measures will be implemented as part of a site-specific Noise Management Plan, Construction Environmental Management Plan and Construction Traffic Management Plan.	No	The Applicant notes that the **ES [APP/6.2]** outlines additional mitigation where necessary to reduce effects to non-significant levels, such as, reduced or attenuated Solar Conversion Units near receptors, and management process for night-time works. These measures will be outlined within the outline **oCEMP [APP/7.6]** and outline **oCTMP [APP/7.7]** and secured through a Requirement of the Application.
	Noise and vibration – construction Noise and vibration – post construction	6.0 Noise and Vibration 6.5 The PEIR assesses that almost all receptors are located at large distances to the respective components and site boundary such that they are not expected to be exposed to sound levels above medium magnitude effect from construction activities, with two exceptions, one of which is assessed as having not significant effects, whilst the other is assessed as having moderate short term adverse effects, which is considered significant (Keepers Cottage). Impacts upon PROW are assessed as not significant. Vibration and traffic effects from all construction activities are also assessed as not significant.	No	The Applicant notes that the **ES Chapter 10: Noise and Vibration [APP/6.2]** details assessment of Keepers Cottage and other receptors surrounding the Scheme, effects on PROW are also assessed. Construction vibration and traffic noise also assessed to be not significant.
	Noise and vibration – post construction	6.0 Noise and Vibration 6.6 Operational noise from the BESS, National Grid Substation, Customer Substation and Solar Conversion Units on 4 residential receptors and	No	The Applicant notes this. **ES Chapter 10: Noise and Vibration [APP/6.2]** outlines embedded mitigation and additional mitigation to be implemented during the operational phase of the Scheme; residual effects are assessed to be not significant.

		PROW are assessed as being potentially significant. Traffic effects are assessed as not significant.		
	Decommissioning phase	6.0 Noise and Vibration 6.7 Decommissioning is assessed as being likely to involve activities of similar or reduced intensity as for the Construction Phase and therefore result in comparable noise and vibration effects.	No	The Applicant notes this Decommissioning has been assessed qualitatively in the **ES Chapter 10: Noise and Vibration [APP/6.2]** with noise & vibration effects comparable to the construction phase as a worst-case.
	Additional environmental mitigation, enhancement and protection suggestions	6.0 Noise and Vibration 6.8 It is stated that additional mitigation measures will be required to reduce the level of effects to acceptable levels. It is suggested that this be secured via a DCO Requirement and be further explored in the ES.	No	The Applicant notes that **ES Chapter 10: Noise and Vibration [APP/6.2]** details additional mitigation measures where necessary to achieve the agreed noise limit, the latter to be secured through a Requirement of the DCO Application. The OEMP, CEMP, and CTMP will be prepared as a requirement of the DCO Application and will be based on and include the additional mitigation measures detailed in the outline management plans submitted with the Application.
	General comment	6.0 Noise and Vibration 6.9 The Council's Environmental Health Team has reviewed the statutory consultation documents and commented as follows: Construction and Decommissioning Noise and Vibration	No	The Applicant notes these comments and thanks consultees for their review of the statutory consultation documents.
	Noise and vibration – construction Noise and vibration – post construction	6.0 Noise and Vibration 6.10 It is noted that noise and vibration during the construction and decommissioning phase will be considered in the environmental impact assessment (EIA), but vibration from traffic is scoped out.	No	The Applicant notes that traffic vibration is addressed in the **ES Chapter 10: Noise and Vibration [APP/6.2]**, with justifications based on relevant guidance.
	Noise and vibration – construction Construction impact (general)	6.0 Noise and Vibration 6.11 It is noted that percussive piling may be utilised for the solar panel installation and that HDD drilling may be required in some areas and may need to continue into nighttime hours.	No	The Applicant notes that **ES Chapter 10: Noise and Vibration [APP/6.2]** includes assessment of percussive pilling as well as potential HDD works during night-time. Additional measures have been presented in the ES to reduce impacts to non-significant level of effects. The additional mitigation measure will be outlined in the **oCEMP [APP/7.6]** and secured through a DCO Application Requirement.
	Noise and vibration – construction Noise and vibration – post construction	6.0 Noise and Vibration 6.12 This area of noise is transient and can be mitigated by measures outlined in a robust Construction Environmental Management Plan (CEMP) and Construction Traffic Management Plan (CMP). The officer would be looking to see how Best Practicable Means (BPM) is to be utilised along with	No	The Applicant notes this and refers to **ES Chapter 10: Noise and Vibration [APP/6.2]** which outlines BPM for construction and includes limited working hours for construction and construction traffic, monitoring in the event of complaint, and engagement with local residents to inform of noisy works schedule and duration. Percussive pilling has been assessed as worst-case, however

		traffic routes, phasing of works, methods of work and working hours. Monitoring noise levels at the site boundary near to NSRs would be welcomed. Close noise monitoring and liaison will be required at the most significantly effected NSR, Keepers' cottage. The officer also requests that consideration is given to less intrusive methods of piling, for example press piling.		additional measures include consideration of other less noisy pilling techniques where possible. These measures will be outlined in the **oCEMP [APP/7.6]** and **oCTMP [APP/7.7]** and secured through DCO Requirements.
	Noise and vibration – post construction	6.0 Noise and Vibration (Operational noise) 6.13 The operational noise study is within 1km of site boundary. The area is mainly rural with few residential properties.	No	The Applicant notes this comment and confirms that **ES Chapter 10: Noise and Vibration [APP/6.2]** outlines a Study area of 1km and noise-sensitive receptors within.
	Noise and vibration – post construction	6.0 Noise and Vibration (Operational noise) 6.14 A 14 day background noise study was undertaken in November 2024 at 2 locations. A further 4 shorter measurements were undertaken in areas representative of the closest noise sensitive receptors. Results of baseline noise monitoring look representative of the area and broadly correlate to other baseline noise assessments that have been carried out in the area over recent years.	No	The Applicant notes this comment and confirms details of the noise survey and measurements are provided in **ES Chapter 10: Noise and Vibration [APP/6.2]**.
	Noise and vibration – post construction	6.0 Noise and Vibration (Operational noise) 6.15 The report recognises that the area has low background noise levels, and the proposed development is likely to raise noise levels to above 35dBA at most NSR. A high magnitude of impact is predicted at four NSRs; Glebe Cottages, Finger Hill Cabin, South Acre, and Keepers Cottage, which is associated with major adverse effects and is significant in EIA terms.	No	The Applicant notes this. **ES Chapter 10: Noise and Vibration [APP/6.2]** provides assessment of effects with embedded and additional mitigation measures, residual effects are assessed to be not significant at all receptors.
	Noise and vibration – post construction	6.0 Noise and Vibration (Operational noise) 6.16 An analysis of low frequency noise was carried out and determined that noise levels are not predicted to exceed the threshold values of a Salford assessment, however, the author will be aware that low frequency noise can travel further than expected in certain weather conditions.	No	The Applicant notes that the assessment set out in **ES Chapter 10: Noise and Vibration [APP/6.2]** includes analysis of low frequency noise, for which predictions are based on worst-case weather conditions and account for reduced air absorption at low frequencies.
	Noise and vibration – construction Noise and vibration – post construction	6.0 Noise and Vibration (Mitigation) 6.17 The report acknowledges that further mitigation will be required. Sections 10.7.9 & 10.7.10 read as follows: The design of the Scheme should be developed to generally maximise the distance between the proposed noise-generating equipment and noise sensitive residential receptors wherever	No	The Applicant notes this. **ES Chapter 10: Noise and Vibration [APP/6.2]** outlines embedded measures and additional mitigation, the assessments are based on the BS4142 and PROW criteria are per the comment and agreed in consultation.

		reasonably practicable. Selection of the final mechanical and electrical plant would be made on the basis of different considerations including noise. The detailed design of the Scheme, including final plant locations and selections, can be secured through a requirement of the DCO. This would require total rated noise levels LAr, including the applicable character correction, not to exceed an operational noise limit of 35 dB LAr at residential receptors, as assessed in line with BS 4142. Noise levels on PRoW will also be controlled not to exceed a noise level of 55 dB LAeq. Table 10.5 outlines an example of minimum attenuation requirement for each element of the Scheme, based on the worst-case assumptions described above, calculated to result in rated levels not exceed 35 dB at all residential noise sensitive receptors, resulting in low magnitude impacts at most.		
	Noise and vibration – construction Noise and vibration – post construction Inter project Cumulative impact	6.0 Noise and Vibration (Mitigation) 6.18 The officer believes these noise levels would be acceptable and achievable and should be secured within the DCO. Cumulative effects of the nearby High Grove Solar Farm will also need to be considered. When selecting plant and any acoustic attenuation, consideration must be taken to ensure that it does not result in any tonal elements, or pure tones that could cause standing waves etc.	No	The Applicant notes this. **ES Chapter 10: Noise and Vibration [APP/6.2]** outlines cumulative assessment with combined effects from High Grove Solar Farm. Sound characteristics such as low frequency and tonal components have been taken into consideration in the assessment of effects which were not significant.
	Noise and vibration – construction Noise and vibration – post construction	6.0 Noise and Vibration (Monitoring) 6.19 It is important that on commissioning of the solar farm, compliance with agreed noise limits can be demonstrated. The officer recommends that a compliance monitoring scheme is submitted and approved by the local planning authority by way of a DCO Requirement.	No	Post-commissioning noise monitoring of operational noise will be outlined within the **oOEMP [APP/7.8]**, including protocols and measure for noise monitoring. The final detailed OEMP is secured through a Requirement of the DCO.
	Noise and vibration – construction Noise and vibration – post construction	6.0 Noise and Vibration (Monitoring) 6.20 The officer also recommends that a process for receiving, managing and responding to complaints is prepared. This should include clear details of how the public can make contact, how complaints will be managed, liaison with Breckland's Environmental Protection Team and a compliance monitoring scheme as a result of noise complaint. The complaint process should be reviewed annually and revised as appropriate.	No	The process of complaint management during the operational phase is outlined in the embedded measures described in **ES Chapter 10: Noise and Vibration [APP/6.2]**. These measures will be set out as part of the **oOEMP [APP/7.8]** and developed as part of the final OEMP which will be secured through a Requirement of the DCO.
	Noise and vibration – construction	6.0 Noise and Vibration 6.21 In summary, Breckland Council has concerns regarding noise but considers that impacts can be	No	The Applicant notes that there are no significant concerns raised with the approach proposed subject to suitable mitigation put in place. Embedded and additional mitigation measure have been presented in the **ES Chapter 10:**

	Noise and vibration – post construction	made acceptable with suitable mitigation measures established and agreed by the relevant stakeholders.		**Noise and Vibration [APP/6.2]** to reduce impacts, where necessary, to non-significant level of effects. The measures will be included in the respective outline management plans which will be secured by respective management plans as a Requirement of the DCO Application.
	Local policy	7.0 Landscape and Visual 7.1 Policy ENV10 of the Local Plan supports proposals for renewable and low carbon energy development, subject to any adverse impacts on the local landscape being assesses in line with Policy ENV05 of the Local Plan which seeks to protect and enhance the landscape of the borough.	No	Both the **Planning Statement [APP/5.5]** and **Policy Compliance Document [5.6]** assess the Scheme's compliance with Policies ENV 10 and ENV 05 of the Breckland Local Plan against the critical national priority backdrop that the Scheme is afforded under National Policy Statement EN-1. **ES Chapter 6: Landscape and Visual [APP/6.2]** details potential effects on local landscape character and the subsequent mitigation proposals which aim to temper and limit potentially adverse effects. The mitigation typologies take account for the need to protect and enhance the landscape of the borough.
	Landscape and visual	7.0 Landscape and Visual 7.2 Chapter 6 of the PEIR deals with Landscape and Visual impacts, setting out that there will undoubtedly be character impacts resulting from the siting of solar panels, electrical apparatus, BESS and substations. Landscape character impacts are also said to arise from the introduction of temporary compounds, lighting, stockpiles, machinery and associated fencing topsoil stripping and temporary storage.	No	The Applicant notes these comments and confirms that **ES Chapter 6: Landscape and Visual [APP/6.2]** provides an assessment of the effects of the Scheme on landscape and visual receptors. Whilst some significant adverse effects on landscape and visual, the Applicant considers that these are outweighed by the substantial enhancements that are proposed. Further details are provided **Planning Statement [APP/5.5].**
	General comment	7.0 Landscape and Visual 7.3 The Council's Landscape Consultant (Peter Richards Partnership) has assessed the proposal, commenting as follows:	No	The Applicant notes this and thanks the representative from Breckland District Council for their consultation.
	Landscape and visual	7.0 Landscape and Visual 7.4 A Landscape and Visual Appraisal (dated May 2025), prepared by LDA has been submitted in support of the application. The LVA viewpoints were not agreed prior to the consultation, although it is appreciated these were presented to the Council. Review Approach	No	Viewpoints for the Scheme were presented in **ES Appendix 2.1: EIA Scoping Opinion Request [APP/6.4]**, and agreement on viewpoint locations, methodology and other LVIA matters were sought with the Host Authorities; however, no response was received to the LVIA consultation letter.
	Landscape and visual	7.0 Landscape and Visual 7.5 The review has comprised a desktop review of The Droves Solar Farm Preliminary Environmental Information Report – Volumes I & II Chapter 6: Landscape & Visual (both dated May 2025). A	No	The Applicant notes this review.

		summary of findings of the review of the assessment methodology		
	Landscape and visual	7.0 Landscape and Visual 7.6 It is welcomed that the Applicant recognises the relevance and appropriateness of: 1. Residential Visual Amenity Assessment (RVAA) (page 4) – Vol III App 6.9 2. Amenity and Recreation Assessment (ARA) (page 4)	No	The Applicant welcomes this comment.
	Landscape and visual	7.0 Landscape and Visual 7.7 The LVIA structure and approach is clear and it is considered that, bar the points noted below, the methodology for the LVIA and the supporting studies/work is in accordance with good practice as provided for in Guidelines for Landscape & Visual Assessment, Third Edition (and subsequent Statement of Clarifications). Assumptions & Limitations: Methodology identification & assessment of Local Landscape Character Areas (LLCAs)	No	The Applicant welcomes this comment. The same structure and approach is also included within the **ES Chapter 6: Landscape and Visual [APP/6.2].**
	Landscape and visual	7.0 Landscape and Visual 7.8 There are significant reservations regarding the LVIA relying on just the District Level Landscape Character Areas - (see Table 6.1).	No	The Landscape and Visual Assessment (LVIA) within ES Chapter 6: Landscape and Visual [APP/6.2] focused on district-level landscape character assessments, which are a material consideration and have been subject to public scrutiny. Where appropriate, key characteristics identified of relevance to the Site were supplemented with further information drawn from site observations. In the context of the Scheme and the 3 km Study Area, the assessors agreed that the district landscape character assessments (though dated) were still relevant, noting that GLVIA para 5.13 states that "justification should be provided for any departure from the findings of an existing established LCA." GLVIA para 5.15 continues adding that "existing assessments may need to be reviewed and interpreted to adapt them for use in LVIA - for example by drawing out more clearly the key characteristics that are most relevant to the proposal. Completely new supplementary Landscape Character Assessment work covering the whole Study Area would only be required when there are no existing assessments or when they are available but either have serious limitations that restrict their value or do not provide information at an appropriate level of detail". For the purposes of the Scheme, the assessors do not consider that there are serious limitations with the Breckland Landscape Character Assessment, 2007 or that further detail is required. On the basis of these comments, any additional characteristics specific to the Site and based on

				site observations have been drawn out and emboldened in the text of **ES Chapter 6: Landscape and Visual [APP/6.2].**
	Landscape and visual	7.0 Landscape and Visual 7.9 The Methodology notes at Para 6.3.22: "Paragraphs 5.13-5.15 of GLVIA, 3rd edition indicates that landscape character studies at a national or regional level are best used to "set the scene" and understand the landscape context. It indicates that LPA assessments provide more detail and that these should be used to form the basis of the assessment of effects on landscape character with (appropriately justified) adaptation, Refinement and interpretation where required.	No	Noted and agreed. As referred to in **Section 6.6 Baseline Conditions of ES Chapter 6: Landscape and Visual [APP/6.2],** "Due to the scale of the NCA and the presence of more detailed character areas at a local level, effects on this NCA are not assessed within this LVIA. This NCA has been scoped out from a detailed assessment as agreed with the Planning Inspectorate in the EIA Scoping Opinion".
	Landscape and visual	7.0 Landscape and Visual 7.10 It is considered that the view that this is a disingenuous presentation of GLVIA3 as most importantly the author does not include GLVIA3 Para 5.16. This concluding paragraph on the appropriate level of information to be considered notes: "Even where there are useful and relevant existing Landscape Character Assessments and historic landscape characterisations, it is likely that it will be necessary to carry out specific and more detailed surveys of the site itself and perhaps its immediate setting or surroundings.	No	In accordance with GLVIA para. 5.15, the assessors did carry out specific and more detailed surveys of the Site and immediate surroundings and this is reflected in references to site observations under relevant Landscape Character Types as referred to in response to comment in paragraph 7.8 above. Based on these comments, any additional characteristics specific to the Site and based on site observations have been drawn out and emboldened in the text of **ES Chapter 6: Landscape and Visual [APP/6.2]**.
	Landscape and visual	7.0 Landscape and Visual 7.11 A central tenet of GLVIA3 over earlier publications of GLVIA was the need for proportionality. References include but are not limited to: - Preface, page x, fourth para - Para 1.17 refers to "an approach that is in proportion to the scale of the project that is being assessed and the nature of its likely effects" - Para 1.20 "the approach and methodology adopted are appropriate to the particular circumstances" - Para 3.11 with respect to LVIA scoping notes, fifth bullet point: "the extent and appropriate level of detail for the baseline studies that is reasonably required to assess the landscape and visual effects of the proposed development""	No	As referred to in responses to comments in paragraph 7.8 above, the Breckland Landscape Character Assessment 2007 was at a suitable scale for the LVIA and, as per paragraph 5.15, supplemented with site observations from fieldwork to "draw out more clearly the key characteristics that are more relevant to the proposal."

	Landscape and visual	7.0 Landscape and Visual 7.12 The project is of such a scale and level of importance that it is identified as a “Nationally Significant Infrastructure Project”. Sitting at the higher end of the development scale it is considered that the assessment, to be proportionate and in accordance with landscape industry good practice and guidelines it should include the assessment of Local Landscape Character Areas.	No	The Applicant notes this; however, as defined under the response to the response to comments in paragraph 7.8, the assessors considered that the current and adopted Landscape Character Assessment was suitable for the purposes of the LVIA, with specific site observations where appropriate.
	Landscape and visual	7.0 Landscape and Visual 7.13 This concern and request is reinforced when one considers: 1. It is noted the Applicant involved in the High Grove Solar farm Applicant has from the outset noted their LVIA will assess Local Landscape Character Areas that their assessment has identified. 2. The LVIA methodology Page 14 methodology links levels of “Magnitude of Effect” with extent of anticipated change in relation to the size of the character area (scale uses Limited, Localised, Intermediate & Wide). A strict application of this approach will have the effect of downplaying magnitude of impacts given the District Level character areas are by the very fact they consider character areas across the district are much larger than LLCAs. Assumptions & Limitations: Methodology & Significance of Effects	No	Refer to comments above in paragraph 7.8. In terms of references to page 14 of the LVIA's Methodology, the components of magnitude were not given equal weight with a focus on scale and judgements on extent largely limited or localised. As referred to in Notes and Clarifications on aspects of the 3rd Edition Guidelines on Landscape and Visual Impact Assessment [GLVIA3] Technical Guidance Note LITGN-2024-01 Published August 2024, para 3(3) "the size/scale of effect would be the most important factor, with geographical extent and duration considered as 'slight modifiers' where effects are particularly restricted or widespread; or particularly short in duration." The Technical Guidance Note goes on to state in paragraph 5(11) that "GLVIA3 appears to suggest that geographical extent (and therefore magnitude) would be smaller if the change occurs within a landscape type or character area, and larger if a change is felt across several types or character areas – but this advice is hard to apply to individual receptors i.e. should the magnitude of effect on one LCA be greater simply because other LCAs are also affected? The Panel suggests that geographical extent should reflect the importance of the location and spread of effects, as a ‘slight modifier’ to the scale of effect so that it does not understate the magnitude of effects for extensive receptors such as large character areas or designations. What the decision maker wants to know is where the most important (or ‘significant’ in the case of EIA) effects would arise, and why and to what degree that matters.". The LVIA has sought to follow this advice with the impacts on landscape receptors based at a district scale being largely limited or localised but of a medium to large scale.
	Landscape and visual	7.0 Landscape and Visual 7.14 The LVIA Methodology provides a helpful Diagram of Significance in Diagram 6.1. There is concern that the author provides no supporting text on what is considered to be: - Major significance;	No	The LVIA methodology referred to in **ES Chapter 6: Landscape and Visual [APP/6.2]** does not provide supporting text on the level of significance. Significance is judged to be based on the consideration of the sensitivity and magnitude of change criteria and professional judgement and as such no clear terms should be defined.

		- Major-Moderate significance; - Moderate significance; - Slight significance and - Minimal significance.		
	Landscape and visual	7.0 Landscape and Visual 7.15 There is also concern in that the supporting text in Para 6.2.13 does not clarify which of the above levels of effect is considered Significant and states, “An effect is likely to be assessed as Significant where the sensitivity of the Receptor combined with magnitude of change results in a degree of effect that is towards the higher end of the Moderate range (illustrated in Diagram 6.1 above) and is therefore judged more “likely to influence the eventual decision”.	No	Paragraph 6.2.13 in the PEIR states what levels of effect are considered significant or potentially significant: ‘Effects that are Major or Major-Moderate are considered significant and “likely to influence the eventual decision” whilst those that are Slight or below are judged Not Significant and “of lesser concern” (GLVIA3, para 3.35). Moderate effects are considered to be potentially significant and professional judgment is used to determine whether the effect in question is Significant or Not Significant, with analysis provided to justify the rating. An effect is likely to be assessed as Significant where the sensitivity of the Receptor combined with magnitude of change results in a degree of effect that is towards the higher end of the Moderate range (illustrated in Diagram 6.1 above) and is therefore judged more “likely to influence the eventual decision”. It should be noted that whilst an effect may be assessed as Significant, it does not necessarily mean that such an impact would be unacceptable or should necessarily be regarded as an “undue consequence”’ (GLVIA3, para 5.40).
	Landscape and visual	7.0 Landscape and Visual 7.16 The inclusion of “likely” and “towards” provides no transparent explanation of how the assessor arrives at a concluding judgement. This approach is considered far from the central tenant of GLVIA3 which states in Para 2.24, “there is a need for the judgements that are made to be reasonable and based on clear and transparent methods so that reasoning applied at different stages can be traced and examined by others	No	Noted. The inclusion of the terms "likely" and "towards" are standard and typified in various publications including GLVIA Notes and Clarifications on aspects of the 3rd Edition Guidelines on Landscape and Visual Impact Assessment [GLVIA3] Technical Guidance Note LITGN-2024-01 Published August 2024. Further detail has been provided in the ES as to the judgement made for the assessment of landscape and visual impacts with a supporting narrative.
	Landscape and visual	7.0 Landscape and Visual 7.17 The methodology, and in particular the judgement on resulting effects, is not considered transparent. It is recommended the methodology be revised to remove the ambiguity in Para 6.2.13 and the methodology should provide clear and transparent text on the resulting levels of effect.	No	Please refer to responses to comments above relating to paragraph 7.8 to 7.16. Ongoing engagement is welcomed.
	Landscape and visual	7.0 Landscape and Visual 7.18 Assumptions & Limitations: Supporting Photography (1) Some of the photographs were taken	No	Noted. The winter photography has been constrained by daylight hours; however, these photographs have been lightened slightly to reduce the level of contrast / shadow

		at a time of day and in a direction that has resulted in photographs that do not provide clear views of the landscape as a combination of contrast and shadows effectively screen the landscape detail. Examples include - Representative Viewpoint 16 – left hand side. - Representative Viewpoint 13 – centre & left hand side.		and the images have been supplemented by summer photography from the same viewpoints.
	Landscape and visual	7.0 Landscape and Visual 7.19 Assumptions & Limitations: Supporting Photography (2) The LVA uses late winter photographs for the visual receptors considered. Good practice encourages the use of both winter and summer photographs. This limitation is considered acceptable in the context of the development's proximity to public viewpoints identified and their level of sensitivity.	No	Noted. Summer photography has been taken to support **ES Chapter 6: Landscape and Visual [APP/6.2]** as requested by the PINS in **ES Appendix 2.2: Scoping Opinion Response [APP/6.4]** and both the summer and winter photographs have informed the visual assessment demonstrating seasonal variations in vegetation screening. Both summer and winter photography have been used for the Scheme parameter type 3 visualisations for complete representation.
	Landscape and visual Ecology	7.0 Landscape and Visual 7.20 Assumptions & Limitations: Tree Growth Rates Para 6.2.56 notes growth rates are based on "400mm/year", and this is based on Forestry Commission growth rates. In our experience growth rates will vary considerably depending on: - Age of plant stock used and time of year planted - Ground/Soil conditions - Location Based on earlier work and advice from local arborists 400mm is considered optimistic. The Applicant is requested to obtain local professional advice on this an adjust LVIA accordingly."	No	Comments are noted. The growth rates proposed in the PEIR have been reviewed and revised based on consultation with the Applicant's arboriculturist. Whilst the growth rate stipulated in the PEIR is deemed reasonable and in line with other estimates locally, the growth rates have been adjusted in **ES Chapter 6: Landscape and Visual [APP/6.2]** to err on the side of caution and in line with ISEP's article on Predicting Tree and Hedgerow growth [Ref 6-17]which recommends 300mm per year for Year 1 to 5 and 500mm per year for the next 10 years (adjusted down to 400mm in agreement with the Applicant's arboriculturist).
	Landscape and visual Ecology	7.0 Landscape and Visual 7.21 Assumptions & Limitations: ZTV Figures 6.5a and 6.5b show the same ZTV extents. As Fig 6.5a includes buildings and vegetation some differences would be expected when comparing this drawing/findings with those shown on 6.5b – the bare earth scenario. Clarification requested. A summary of findings of the review of the scope of the assessment.	No	The Applicant notes that there was an error in submitting Figures 6.5a and 6.5b. A "bare earth" ZTV was used to inform the selection of viewpoints alongside an obstructed (within buildings and vegetation) ZTV; however, this was not included in the final figure pack for the PEIR. The presentation of both ZTVs has been resolved for the ES with Figure 6.5 (DTM) illustrating the "bare earth" zone of theoretical visibility and Figure 6.6 (DSM) showing the screening effect of existing intervening vegetation and built form.

	Landscape and visual	7.0 Landscape and Visual 7.22 Scoped out effects: The LVA notes the following effects are scoped out: - Visual receptors outside the study area/ZTV	No	The Applicant notes this comment.
	Landscape and visual Security measures and/or infrastructure	7.0 Landscape and Visual 7.23 Assumptions & Limitations: What is included within the Development Proposals We would suggest the LVA be amended with particular regard to: - Security Fence: Details of construction, colour, form (important given the height is noted as being 3.4m) – no additional information provided in the LVA. A summary of findings of the review of the actual assessment of effects Visual Assessment	No	As described in **ES Chapter 5: The Scheme [APP/6.1]** to assist the assessment and ensure good design, scheme outcomes and Design Principles have been developed to guide (within the parameters) the size, type and colour of elements of the Scheme. Whilst security fencing is likely to be dark green, grey or black the final details would be approved by the relevant planning authority pursuant to the relevant requirements in the **draft DCO [APP/3.1]**. The maximum height of the security fencing, as detailed in **ES Chapter 5: The Scheme [APP/6.1]**, is 3m.
	Landscape and visual Ecology	7.0 Landscape and Visual 7.24 The viewpoint assessment provided visual findings using site work and photographs undertaken at times when the trees were without leaf.	No	The Applicant notes this comment. As discussed above, summer photography has also been taken to support the LVIA, and these photographs, alongside the winter viewpoints, have informed the visual assessment providing in winter photographs a "worst case scenario" and demonstrating seasonal variations for summer views.
	Landscape and visual Ecology	7.0 Landscape and Visual 7.25 There is agreement with the author that this represents the worst case scenario. Given the endemic nature of Ash Die-back it is accepted that it is appropriate for the assessment to note alongside each view the likely change which might be brought about by the decline to most Ash trees within a view.	No	The Applicant's arboriculturist has advised that Ash is present as a minor component of some woodlands across the site, many of which are more recent plantations. Of the 165 number of individual ash trees across the site, just 25 are assessed as category U, and therefore are expected to have under 10 years remaining life expectancy. No woodlands were assessed as being dominated by ash, or featuring ash as a major component of the species mix. None appeared to be in a condition which could be expected to deteriorate significantly as a result of ash dieback. Consideration has been given to the likely negligible change in the view as a consequence of ash dieback and this is reflected in the future baseline and assessment.
	Landscape and visual Construction impact	7.0 Landscape and Visual 7.26 The resulting assessment of resulting visual effects for Construction, Year 1, Year 15 and Cumulative Scenarios is considered reasoned and, other than the issues noted below there are no issues with the resulting visual effects.	No	The Applicant notes this comment.
	Landscape and visual	7.0 Landscape and Visual	No	The Applicant notes this and has addressed the matters raised below.

		7.27 There is largely agreement with the assessment findings bar the following:		
	Landscape and visual	7.0 Landscape and Visual 7.28 Representative Viewpoint Group 1: Central Site area (High-Medium Sensitivity) It is considered that the assessor does not adequately provide a reasoned judgement as to why this receptor group experiencing a Moderate adverse long-term effect is considered not significant (Para 6.5.125). It is also noted that in close up views hedgerows allow filtered winter views and in all likelihood pedestrians in particular would be aware of the PV farms presence. In addition, the assessment should note the introduction of the hedging removes an attractive outlook for users of the rights of way. There is largely agreement with the remaining assessment but it is noted that the assessment has not recorded (provided a judgement on Operational/Short Term effects) Para 6.5.130-132.	No	In terms of Visual Receptor Group 1 (not Representative Viewpoint Group 1 as in the comments) and defined in Figure 6.10 Visual Receptor Groups of the PEIR, the narrative explains that in the long term *"the scale of effect would lessen as new mitigation planting and landscape management regimes provide enhanced visual screening of the Scheme, for nearby receptors".* As a consequence, due to screening of new mitigation planting, effects would not be significant. Reference to a change in outlook for users of the rights of way have been noted in **ES Chapter 6: Landscape and Visual [APP/6.2]** which also recognises the offers / buffers from PRoWs to retain vistas **ES Chapter 6: Landscape and Visual [APP/6.2]** has assessed operational short-term effects.
	Landscape and visual	7.0 Landscape and Visual 7.29 Representative Viewpoint Group 2: Castle Acre view 12 (High-Medium Sensitivity) Largely concur with the assessment but note the assessment has not recorded (provided a judgement on Operational/Short Term effects) Para 6.5.122-123.	No	Reference is made to Visual Receptor Group 2 (not Representative Viewpoint Group 2 as in the comments) and defined in Figure 6.10 Visual Receptor Groups of the PEIR. **ES Chapter 6: Landscape and Visual [APP/6.2]** has assessed operation short-term effects.
	Landscape and visual	7.0 Landscape and Visual 7.30 Representative Viewpoint Group 3: Nar Valley Southern Slope Edge of South Acre (High-Medium Sensitivity) Largely concur with the assessment but note the assessment has not recorded (provided a judgement on Operational/Short Term effects) Para 6.5.126-127.	No	Reference is made to Visual Receptor Group 3 (not Representative Viewpoint Group 3 as in the comments) and defined in Figure 6.10 Visual Receptor Groups of the PEIR. **ES Chapter 6: Landscape and Visual [APP/6.2]** has assessed operation phase short-term effects.
	Landscape and visual	7.0 Landscape and Visual 7.31 Representative Viewpoint Group 4: Great Palgrave (High Sensitivity) Largely concur with the assessment but note the assessment has not recorded (provided a judgement on Operational/Short Term effects) Para 6.5.138-139.	No	Reference is made to Visual Receptor Group 4 (not Representative Viewpoint Group 4 as in the comments) and defined in Figure 6.10 Visual Receptor Groups of the PEIR. **ES Chapter 6: Landscape and Visual [APP/6.2]** has assessed operation phase short-term effects.
	Landscape and visual	7.0 Landscape and Visual 7.32 Representative Viewpoint Group 5: Castle Acre (High Sensitivity) It is considered that the assessor does not adequately explain why this Moderate adverse medium-long term effect is considered not significant (Para 6.5.141).	No	Reference is made to Visual Receptor Group 5 (not Representative Viewpoint Group 5 as in the comments) and defined in Figure 6.10 Visual Receptor Groups of the PEIR. Comments are noted with regards to the siting of the substations with reference to potentially breaking the skyline, plus likely impacts associated with colour,

		Whilst we can concur that the MoC for the PV panels will be 'low' the substations could be sited where they will not have a treed backdrop and they might break the skyline – the text does not acknowledge this. The colour, prominence and possible incongruity of this change needs to be discussed. In addition, the assessment needs to note and make reference to the development being within the sightline to the attractive ruins which do/would draw the eye. We largely concur with the remaining assessment but note the assessment has not recorded (provided a judgement on Operational/Short Term effects) Para 6.5.138-139.		prominence and integrity and the relationship of the substations to a potential sightline associated with the ruins in Castle Acre. The assessment of the impacts on Visual Receptor Group 5 have taken into consideration the above points whilst also recognising that the Scheme design has been refined. The assessment has been updated within this ES to reflect the proposed Scheme parameters, which omits any substation development from fields within the Order limits north of Bartholomew's Hills Plantation. **ES Chapter 6: Landscape and Visual [APP/6.2]** has assessed operational short-term effects.
	Landscape and visual	7.0 Landscape and Visual 7.33 Representative Viewpoint Group 6: West Acre & Nar Valley Northern Slope (High-Medium Sensitivity) Largely concur with the assessment but note the assessment has not recorded (provided a judgement on Operational/Short Term effects) Para 6.5.142-143.	No	Reference is made to Visual Receptor Group 6 (not Representative Viewpoint Group 6 as in the comments) and defined in Figure 6.10 Visual Receptor Groups of the PEIR. **ES Chapter 6: Landscape and Visual [APP/6.2]** has assessed operation phase short-term effects.
	Landscape and visual	7.0 Landscape and Visual 7.34 Representative Viewpoint Group 7: Agricultural land immediately south and west of the Site (High-Medium Sensitivity) Largely concur with the assessment but note the assessment has not recorded (provided a judgement on Operational/Short Term effects) Para 6.5.145-146.	No	Reference is made to Visual Receptor Group 7 (not Representative Viewpoint Group 7 as in the comments) and defined in Figure 6.10 Visual Receptor Groups of the PEIR. **ES Chapter 6: Landscape and Visual [APP/6.2]** has assessed operation phase short-term effects.
	Landscape and visual	7.0 Landscape and Visual 7.35 Roads & Rail: (Low Sensitivity) Largely concur with the assessment but note the assessment has not recorded (provided a judgement on Operational/Short Term effects) Para 6.5.158-159.	No	**ES Chapter 6: Landscape and Visual [APP/6.2]** has assessed operational short-term effects.
	Landscape and visual Public rights of way	7.0 Landscape and Visual 7.36 Local Cycle Routes: (Medium Sensitivity) Largely concur with the assessment but note the assessment has not recorded (provided a judgement on Operational/Short Term effects) Para 6.5.149-150.	No	**ES Chapter 6: Landscape and Visual [APP/6.2]** has assessed operational short-term effects.
	Landscape and visual	7.0 Landscape and Visual 7.37 Additional Mitigation: (Paras 6.4.9-10 & 6.6) It is considered that the assessor should recognise the potential benefits of colour studies to inform the best choice of colours for the substation buildings/structures.	No	The Applicant notes this. As described **in ES Chapter 5: The Scheme [APP/6.1]**, to assist the assessment and ensure good design, scheme outcomes and Design Principles have been developed to guide (within the parameters) the size, type and colour of elements of the Scheme. The colour of proposed buildings and infrastructure would be approved by the relevant planning authority in pursuant to the relevant requirements in the **draft DCO [APP/3.1]**

		Refer Landscape Institute Technical Information Note 04/2018. Landscape Assessment		and this may include post consent the implementation of a colour study in line with Landscape Institute's recommendations in Technical Information Note 04/2018 [Ref 6-19].
	Landscape and visual	7.0 Landscape and Visual 7.38 There are significant reservations about the robustness of the assessment approach as it has not identified Local Landscape Character Areas – see earlier comments. With regards the assessment of the Six District Level Character Areas we are of the view that the findings are generally well reasoned and acceptable with the exception of:	No	The LVIA focused on district level landscape character assessments which are a material consideration and have been subject to public scrutiny. Where appropriate, key characteristics identified of relevance to the Site were supplemented with further information drawn from site observations. In the context of the Scheme and the 3 km Study Area, the assessors agreed that the district landscape character assessments, (though dated) were still relevant noting that GLVIA para 5.13 states that *"justification should be provided for any departure from the findings of an existing established LCA."* The assessors considered that the current and adopted Landscape Character Assessment was suitable for the purposes for the LVIA with specific site observations where appropriate.
	Landscape and visual	7.0 Landscape and Visual 7.39 Effects on the Site & D1: Swaffam Heath LCA: The assessment notes: The worst-case scenario for construction and decommissioning effects on this LCA, following the site, would change from a predominantly undeveloped agricultural landscape to one comprising a construction site he implementation of embedded construction and decommissioning mitigation, would be of medium magnitude, moderate significance and adverse in nature. Given the extensive area of the LCA compared to area of the Site, effects upon the landscape situated within the wider LCA beyond the Site would be not significant and temporary.	No	The response to the effects during construction and decommissioning consider the impacts on the Site itself and beyond. Paragraph 6.5.13 in the PEIR explained that due to the *"tall and mature field boundary vegetation and woodland blocks within the Site"* some containment would be achieved to construction / decommissioning activity limiting the scale of effect beyond the Site. As a result construction / decommissioning effects would not be significant beyond the Site boundary. The supporting narrative in **ES Chapter 6: Landscape and Visual [APP/6.2]** has been refined to make this clearer.
	Landscape and visual	7.0 Landscape and Visual 7.40 Given the assessment notes in 6.5.13 the change would be large scale - total or major alteration to key elements, features, qualities or characteristics, such that post development the baseline will be fundamentally changed the view is that it is not possible to record a “Medium Magnitude” MoC. albeit we concur that the resulting effect is significant (Para 6.5.16).	No	The PEIR demonstrated a variation in effect and significance based on the impact of features within and beyond the Site; the vegetation within and edging the site providing a level of containment. A medium magnitude of effect is correct as included within the PEIR. The LVIA stated in 6.5.14 that “The scale of effect on this LCA would be large scale, over a short-term duration during construction/decommissioning and over a limited extent of the wider LCA.” Using LDA methodology, the effect would be, as stated, medium magnitude. This section of the LVIA has been reviewed further in the ES, following changes to the Scheme since issuing of the PEIR. The supporting narrative in **ES Chapter 6:**

				Landscape and Visual [APP/6.2] has been refined to make this clearer.
	Landscape and visual	7.0 Landscape and Visual 7.41 The assessment findings of significant adverse in Para 6.5.16 are not consistent with “not significant” in Para 6.5.15.	No	This has been reviewed and revised where appropriate in the LVIA (**ES Chapter 6: Landscape and Visual [APP/6.2]**) based on the revised scheme.
	Landscape and visual	7.0 Landscape and Visual 7.42 Effects on the E6 North Pickenham Plateau LCA: No comment	No	The Applicant notes this.
	Landscape and visual	7.0 Landscape and Visual 7.43 Effects on the B7 River Nar Tributary Farmland LCA: No comment	No	The Applicant notes this
	Landscape and visual	7.0 Landscape and Visual 7.44 Effects on the F1 River Nar Valley LCA: No comment	No	The Applicant notes this
	Landscape and visual	7.0 Landscape and Visual 7.45 Effects on the I9 Little Massingham & Castle Acre LCA: No comment	No	The Applicant notes this
	Landscape and visual	7.0 Landscape and Visual 7.46 A summary of findings of the presentation of the assessment With the exception of the LVIA Methodology the assessment is presented with clearly structured text, supporting figures, tables and with reference/regard to supporting computer generated images (photomontages and photos lack annotation).	No	The Applicant notes this. Images and tables are included for the LVIA methodology. Sufficient annotation has also been provided on the viewpoint photopanels and visualisations without detracting from the image themselves.
	Landscape and visual	7.0 Landscape and Visual 7.47 The photomontages methodology appears to be in accordance with the Landscape Institute TGN 06/19.	No	The Applicant notes this
	Landscape and visual	7.0 Landscape and Visual 7.48 The Methodology’s reference to Scale, Extent, Duration (considerations) and Resulting Magnitude of Effect in Diagram 6.2 is not clear/considered transparent and the text within the assessment providing judgements does not clearly explain how	No	Noted. The assessment of effects outlines the sensitivity of the receptor and then makes a judgement, using LDA methodology, on magnitude of effect taking into account the scale, extent and duration of the potential effect. The magnitude and sensitivity of the receptor combine to reach a judgement on significance. This is outlined in full within **ES Chapter 6: Landscape and Visual [APP/6.2]** .

		these considerations come together to arrive at a balanced judgement.		
	Landscape and visual	7.0 Landscape and Visual 7.49 A summary statement by the reviewer in respect of appropriateness, quality, comprehensiveness, compliance and conformity with relevant guidance and regulations In my professional opinion, the appraisal is well structured and the results, excluding the LVIA Methodology, insofar as the matters considered, are clearly and logically presented.	No	The Applicant notes this
	Landscape and visual	7.0 Landscape and Visual 7.50 The LVIA Methodology: In my opinion the assessment should have identified Local Landscape Character Areas which have been acknowledged as relevant and appropriate by the Applicant in a separate application.	No	The Applicant notes this,
	Landscape and visual	7.0 Landscape and Visual 7.51 As noted earlier in this report the central tenant of GLVIA3 stated in Para 2.24 is, “there is a need for the judgements that are made to be reasonable and based on clear and transparent methods so that reasoning applied at different stages can be traced and examined by others”	No	The Applicant notes this
	Landscape and visual	7.0 Landscape and Visual 7.52 The methodology, and in particular the judgement on resulting effects, is not considered transparent. We would recommend the methodology be revised to remove the ambiguity in Para 6.2.13 and the methodology should provide clear and transparent text on the resulting levels of effect. "	No	Noted. The LDA methodology is very clear on the approach to judgements and is transparent on the process with regard to taking account of sensitivity and magnitude. The LDA methodology states in section 6.5 of **ES Chapter 6: Landscape and Visual [APP/6.2]** ***“****The significance ratings indicate a ‘sliding scale’ of the relative importance of the effect, with Major being the most important and Minimal being the least. Effects that are Major or Major-Moderate are considered significant and “likely to influence the eventual decision” whilst those that are Slight or below are judged Not Significant and “of lesser concern” (GLVIA3, para 3.35).”* With regard to moderate effects the methodology states that *“Moderate effects are considered to be potentially significant and professional judgment is used to determine whether the effect in question is Significant or Not Significant, with analysis provided to justify the rating.”* The methodology also states that *“an effect is likely to be assessed as Significant where the sensitivity of the receptor combined with magnitude of change results in a degree of effect that is towards the higher end of the Moderate range (illustrated in* ***Image 6-1 Significance of Effect****) and is therefore judged more “likely to influence the*

				eventual decision". It should be noted that whilst an effect may be assessed as Significant, it does not necessarily mean that such an impact would be unacceptable or should necessarily be regarded as an "undue consequence" (GLVIA3, para 5.40)"
	Landscape and visual	7.0 Landscape and Visual 7.53 Mitigation: We believe the assessor should recognise the potential benefits of colour studies to inform the best choice of colours for the substation buildings/structures. Refer Landscape Institute Technical Information Note 04/2018	No	As described in **ES Chapter 5: The Scheme [APP/6.1]**, to assist the assessment and ensure good design, scheme outcomes and Design Principles have been developed to guide (within the parameters) the size, type and colour of elements of the Scheme. The colour of proposed buildings and infrastructure would be approved by the relevant planning authority in pursuant to the relevant requirements in the **draft DCO [APP/3.1]** and this may include post consent the implementation of a colour study in line with Landscape Institute's recommendations in Technical Information Note 04/2018.
	Landscape and visual	7.0 Landscape and Visual 7.54 Breckland Council considers further landscape and visual impact work is required to inform the ES. Recommendations for further information to be sought (if necessary): - Assessment of Operational/Short Term effects - Assessment of Local Landscape Character Areas - Assessment/Consideration of the Mitigation provided by building colours. - Clarification of Figures 6.5a & 6.5b as to why they appear to show exactly the same ZTV findings - Better photographs where contrast is such that detail is lost within the photographs taken (e.g. Representative Viewpoint 16 – left hand side) - The Forestry Commission Growth Rates are considered over optimistic. A local arborist should be consulted.	No	The Applicant notes responses to the points raised are covered in the above comments.
	Landscape and visual	7.0 Landscape and Visual 7.55 In addition to the above, it is noted that the PEIR assesses there to undoubtedly be a number of significant landscape and visual effects even when accounting for the proposed mitigation measures. It is considered that that further work is needed in this regard to supplement the ES if landscape and visual impacts are to be adequately addressed in the DCO submission.	No	The **ES [APP/6.1- 6.5]** expands on the PEIR narrative, based on a revised Scheme, supporting parameter plans, Scheme outcomes, and Design Principles.

	Local policy Glint and Glare	8.0 Glint and Glare 8.1 Policy ENV10 of the Local Plan supports proposals for renewable and low carbon energy development, subject to acceptable impacts upon residential amenity by virtue of outlook / overbearing impact, traffic generation, noise, vibration, overshadowing, glare or any other associated detrimental emissions, during construction, operation and decommissioning.	No	**ES Chapter 16: Other Environmental Matters [APP/6.2]** and the associated technical appendix contains an assessment of Glint and Glare impacts towards relevant receptors, including dwellings within 1km of the solar PV areas.
	Glint and Glare	8.0 Glint and Glare 8.2 The development site is located at a rural location, however, there are clusters and isolated residential receptors vulnerable to potential amenity impacts arising from glint and glare caused on occasion when direct sunlight reaches the solar panels. The Public Rights of Way across and in the vicinity of the site are also considered to be sensitive receptors.	No	All residential receptors within 1km of the solar PV areas have been assessed for Glint and Glare impacts and no significant impacts are predicted towards residential receptors. Public Rights of Way (PRoW) have been assessed at a high-level within the Glint and Glare Assessment, as any effects would be fleeting and there is a low risk to public safety. Significant impacts are not predicted towards PRoW.
	Glint and Glare	8.0 Glint and Glare 8.3 The Scoping Report assesses that a specific Glint and Glare chapter will not be required in the ES and that glint and glare effects in respect of those matters that are scoped in will be covered in Chapter 15 (Other Environmental Matters) of the ES for receptors identified in Appendix 15.1 of the Scoping Report. A technical appendix which considers glint and glare impacts will also support the assessment provided in Chapter 15 of the ES. It is noted that the Inspectorate, as per the Scoping Opinion, is content that a specific Glint and Glare chapter of the ES is scoped out on this basis. Breckland Council agrees with the Inspectorate's comments on determination of study areas and the requirement for the ES to consider the potential for significant effects during construction and decommissioning, including cumulative effects.	No	The Glint and Glare Assessment considers (see **ES Chapter 16: Other Environmental Matters [APP/6.2]**) primarily the operational phase, as this is when all panels will be in situ and the most significant impacts would be possible. The potential for significant effects during construction and decommissioning have been considered where relevant.
	Glint and Glare	8.0 Glint and Glare 8.4 An officer from the Council's Environmental Protection Team has reviewed the consultation documents, principally Chapter 15 of the PEIR (Other Environmental Matters) and Appendix 15.3 (Glint and Glare Assessment), commenting as follows:	No	The Applicant thanks the officer from Breckland Council's Environmental Protection Team for reviewing the consultation documents and preparing the subsequent comments.
	Glint and Glare Aviation and Airfields	8.0 Glint and Glare 8.5 The officer notes that the developer is yet to confirm whether a fixed south facing or single axis tracking layout will be progressed, and therefore both	No	The Applicant confirms that aspects of the Scheme, including the type and specification of the solar PV Panels, require design flexibility when submitting the DCO Application, so that the detailed design of the Scheme can

		options were assessed in the report. The assessment looked at the potential impact upon road safety, residential amenity, public rights of way, and aviation activity associated with RAF Marham, Great Friars Thornes Farm Airfield, East Winch Airfield, and Great Massingham Airfield. The officer has reviewed the report in relation to residential amenity only. Breckland Council defers to the advice of the relevant organisations such as the Civil Aviation Authority, NCC Highways who should be approached in relation to the potential impact of glint and glare on the receptors not considered by Environment Protection (aviation, roads etc) as they will have specific requirements which need to be met.		be informed by technical considerations, post-consent work, and take advantage of innovations in technology. **Table 5-1** in **ES Chapter 5: The Scheme [APP/6.1]** outlines the parameters used for the ES. The table considers both single axis tracker PV Panels and Fixed South Facing PV Arrays. The Applicant acknowledges the scope of the assessment conducted by the officer.
	Glint and Glare	8.0 Glint and Glare 8.6 The officer notes that the findings of the report are based on the technical information of the fixed south facing solar panels in Table 1 and the technical information of the single axis tracking solar panels in Table 2. The assessment considered solar panels with a surface material of 'smooth glass with an anti reflective coating'. Should any of the technical information for the option chosen by the developer differ from the details in the aforementioned tables and should the type of panel change, the developer should revise the glint and glare report so that the conclusions are valid.	No	The Applicant notes this comment. If any of the technical inputs for the Glint and Glare Assessment were significantly altered, the assessment would be revised to confirm the validity of the results.
	Glint and Glare	8.0 Glint and Glare 8.7 The analysis has considered dwellings that are within a one-kilometre assessment area and have a potential view of the panels. In total, 44 dwelling receptors were assessed. An additional 1.8m height above ground is used in the modelling to simulate the typical viewing height of an observer on the ground floor. The modelling has shown that solar reflections are geometrically possible towards 36 of the 44 assessed dwellings. No significant impact was predicted towards residential amenity and no mitigation has been recommended.	No	The Applicant notes this comment.
	Glint and Glare	8.0 Glint and Glare 8.8 The impact significance determination was based on two key criteria i.e. thresholds of 3 months per year and 60min on any given day. In the absence of official UK guidance on this, the officer considers that it would be helpful to understand how the use of this criteria has worked in practice on completed solar farm projects in terms of predicted impact significance on residents. For instance, is the author able to direct Breckland Council to any studies post-installation	No	The impact significance criteria for Glint and Glare towards residential receptors is based on Pager Power's Glint and Glare Guidance, which was first published in 2017. In the absence of any formal UK guidance, this has been used in over 1,700 Glint and Glare Assessments, including for over a dozen Nationally Significant Infrastructure Projects (NSIPs) in the UK.

		which can give additional confidence in the projected impact based on the two key criteria? Is there any evidence which validates the conclusion that residents exposed to Glint and Glare for less than the thresholds are not significantly impacted?		
	Glint and Glare	8.0 Glint and Glare 8.9 Where solar reflections are geometrically possible, the impact classification on dwelling receptors with a fixed south facing panels scenario shows that no and low impacts are present for dwelling receptors 1-3, 10, 20 and 43-44. Except for receptor 20, the classification of the impact and whether mitigation is recommended appears to be ultimately based on a desk-based review of existing screening. Where solar reflections are geometrically possible, the impact classification on dwelling receptors with single axis tracking panels scenario shows that no and low impact are present for receptors 10, 11, 15-19, 21-33, 43-44, 12-14, 34-42 and 20. As for the other scenario, other than for receptor 20, the classification of the impact and whether mitigation is recommended appears to be ultimately based on a desk-based review of existing screening. This includes receptor 10 which has been assigned 'no impact' and 'no mitigation', despite solar reflections being geometrically possible for more than 3 months per year and more than 60 minutes on any given day. As for other dwelling receptors, screening by existing vegetation was used to determine whether the views of the reflecting panels would be significantly obstructed and no mitigation was recommended for the two scenarios considered. The officer considers that it would be useful to understand if the author has undertaken a site walkover to validate the findings of the desk-study, (if no site walkover, why not?), in particular in relation to vegetation and terrain. For instance, are the trees and hedges seen on satellite imagery still present to provide screening and are these able to provide year-round screening? Are there any breaks/gaps in hedges which need to be addressed to provide sufficient screening? It is considered that these questions need to be assessed and answered as part of the DCO submission.	No	The author of the Glint and Glare Assessment has not undertaken a site survey, but the desk-based review of screening is based upon multiple data sources to provide confidence in the results. Recent site photography and Streetview imagery has been used to confirm the nature of screening observed in the satellite imagery, along with detailed site plans prepared for the application. This is in line with the approach taken for other consented solar NSIPs, and is considered to be robust.
	Glint and Glare	8.0 Glint and Glare 8.10 The officer notes that it doesn't appear that commercial and industrial units within the assessment radius have been considered as receptors in the report. The officer was also unable to see whether any key sensitive receptors with a line of sight such as schools, medical care and care homes etc were within	No	Commercial and industrial units are not typically assessed within a Glint and Glare Assessment, as they are not considered sensitive receptors for Glint and Glare and there are no residential amenity concerns. No sensitive receptors such as schools or care homes were identified within the 1km assessment area and with potential sight of the PV areas.

		that radius. For completeness, it is considered that clarification is required in this regard, even if it is a case of stating that they have carried out a search of the area and none are present.		
	Glint and Glare	8.0 Glint and Glare 8.11 The officer considers clarification is required as to how the average number of hours of sunshine each month was considered, and which Met Office station data was referred as part of the final assessment for the DCO submission.	No	The Glint and Glare Assessment has been carried out using a geometric scenario, which does not consider Met Office data or a realistic weather scenario. The impact significance criteria thresholds have been set in accordance with a geometric scenario, meaning that effects are likely to be significantly overstated as a worst-case scenario.
	Glint and Glare	8.0 Glint and Glare 8.12 The officer considers that the consultation documents do not adequately assess the impacts of Glint and Glare during the construction, operational and decommissioning phases. During the construction phase, it is not clear whether all solar panels will be installed and then be made operational at the same time or whether some sections of the proposed development will be made operational ahead of other sections in phases. The officer considers there to be a possibility that Glint and Glare could be experienced as soon as panels are installed. It is considered that the DCO submission must clarify whether screening such as planting hedgerows will be undertaken prior to the installation of the panels as this would ensure that the plants have time to establish and provide sufficient screening. The officer considers that there is insufficient detail to comment on the impacts of the decommissioning phase at this stage.	No	The Glint and Glare Assessment has primarily considered the operational phase, as this is where the most significant effects are possible as all panels will be in situ. The exception to this would be where proposed planting is being relied upon for mitigation and/or to reduce the impact significance. By the time of decommissioning, all proposed planting would be matured, and this is therefore the least likely phase for significant effects to occur. For dwelling receptors, proposed vegetation planting is not considered within the impact determination for any receptors, as the existing screening and terrain is considered to provide sufficient screening. As such, there will be no significant impacts during the construction or decommissioning phases.
	Glint and Glare Inter project Cumulative impact	8.0 Glint and Glare 8.13 It is noted that cumulative impacts were considered for existing or proposed solar projects within a distance of 1km from the site boundary for dwellings: High Groves Solar – The consultation documents assess that cumulative impacts are possible towards one dwelling receptor, which is predicted to experience residual impacts from the proposed development for both panel configurations and have visibility of High Groves Solar. It is noted that the potential for cumulative impacts will be considered by the Applicant as further details are known regarding the High Grove Solar project, the Applicant noting that additional mitigation may be required to reduce the level of impact. The officer notes that the Scoping	No	Whilst dwellings 21-44 sit within the cumulative assessment zone, no impact is predicted towards these dwellings from the Scheme. As such, any potential impacts towards these receptors would be possible only from High Grove Solar, and would be fully captured within their own Glint and Glare Assessment. Cumulative impacts are only possible for Glint and Glare where solar reflections are geometrically possible from both sites and a receptor has visibility of both sites. This is not the case for dwelling receptors 21-44, and therefore, cumulative impacts are not possible.

		Report for High Grove Solar states that solar panels may be either fixed south facing or east-west single-axis tracking. The Droves consultation report indicates that the worst-case scenario for cumulative impacts would be if the two solar farms shared the same panel technology and angles. The officer therefore considers that a further report will be required once sufficient details are known for both solar farms. Dwelling Receptors 20-44 lie within the cumulative assessment zone which is within 1km of solar panel areas for both solar developments (i.e. High Grove) and solar reflections from The Droves Solar Farm are predicted to be geometrically possible and visible towards the receptor. The report goes on to state, "the only dwelling receptor which is located within the cumulative assessment zone and is predicted to experience residual effects from the proposed development is Dwelling 20. This dwelling is likely to have visibility of both sites, and cumulative impacts are possible. The potential for cumulative impacts will be considered as further details are known regarding the High Grove Solar project. Mitigation may be required to reduce the level of impact". The officer considers that it is not entirely clear how or why dwellings 21-44 were taken out of consideration given that figure 28 shows that dwellings 20-44 all lie within the cumulative assessment zone. Further clarification is required. Burntstalk Solar Park – Noted that no cumulative effects are predicted towards ground-based receptors, as no receptors lie within the cumulative assessment zone, which is within 1km of both developments.		
	Glint and Glare	8.0 Glint and Glare 8.14 As part of the operational management plan, the officer recommends that a process for receiving, managing and responding to complaints is prepared. This should include clear details of how the public can make contact, how complaints will be managed, liaison with Breckland's Environmental Protection Team and Planning Enforcement Team, and a compliance monitoring scheme as a result of complaint. The complaint process should be reviewed annually and revised as appropriate.	No	The Glint and Glare Assessment concludes that no significant impacts are predicted towards dwelling receptors. The Applicant therefore does not believe that a complaints process is required, and this has not been required for other solar DCOs.
	Glint and Glare	8.0 Glint and Glare 8.15 In summary, Breckland Council has concerns regarding Glint and Glare due to the current lack of detailed assessment, lack of clarity regarding	No	The Applicant notes this conclusion and has responded above to provide additional clarity regarding these concerns.

		type/orientation of panels and potential limitations of the methodology used to assess impacts. These concerns will remain until the impacts are thoroughly assessed and understood, with suitable mitigation measures established and agreed by the relevant stakeholders including Breckland Council, Norfolk County Council Highway Authority, and the Civil Aviation Authority.		
	Local policy	9.0 Cumulative Effects 9.1 Policy ENV10 of the Local Plan supports proposals for renewable and low carbon energy development, subject to acceptable cumulative impacts of renewable energy development on an area.	No	Both the **Planning Statement [APP/5.5]** and the **Policy Compliance Document [APP/5.6]** recognise the importance and support of Policy ENV 10 of the Breckland Local Plan. The **Planning Statement [APP/5.5]** recognises that this support is subject to the consideration of the impact of development and whether such an impact can be made acceptable. With regard to cumulative impacts, the **Planning Statement [APP/5.5]** makes clear that the cumulative impacts of renewable energy development in the area do not present unacceptable impacts and thus the Scheme should be supported.
	Inter project Cumulative impact	9.0 Cumulative Effects 9.2 The vast development site is located within a rural area of Breckland. There are other significant consented and emerging nationally significant renewable energy projects in Breckland, including Hornsea Project Three, Norfolk Vanguard, Norfolk Boreas and Droves Solar Farm (including area of overlap with High Grove in the current iterations). Breckland Council is of the opinion that these large-scale energy schemes present a high risk for significant cumulative impacts which must be adequately addressed as part of the ES.	No	The Applicant notes the renewable energy context across Breckland District Council (and Norfolk County Council more broadly). Cumulative effects are assessed in the topic chapters of the **ES [APP/6.1 – 6.5]**. Cumulative effects across all phases of the Scheme are assessed, and a summary of cumulative effects is provided for in **ES Chapter 18: Summary of Effects [APP/6.2]**.
	Inter project Cumulative impact Intra Project Cumulative Impact	9.0 Cumulative Effects 9.3 Chapter 2 of the PEIR sets out that a Cumulative Effects Assessment has been undertaken in accordance with PINS Advice on Cumulative Effects Assessment (September 2024). This encompasses both in combination effects - arising within the proposed development, and inter-project interactions with other schemes in the area.	No	A Cumulative Effects Assessment has been undertaken in the ES, in accordance with PINS Advice on Cumulative Effects Assessment (September 2024). Each of the technical chapters of the **ES (Chapters 6-16) [APP/6.2]** have considered inter-project interactions other schemes in the area, whilst **Chapter 17: In-Combination Effects [APP/6.2]** has considered effects arising from different disciplines in-combination within Scheme.
	Intra Project Cumulative Impact	9.0 Cumulative Effects 9.4 Chapter 16 of the PEIR presents a summary of potential likely in-combination effects, stating that mitigation will be identified within the ES. The following significant in-combination effects are identified: Construction and Decommissioning Phase	No	The Applicant notes that **ES Chapter 17: In-Combination Effects [APP/6.2]** presents an updated in-combination effects assessment for the Scheme.

		noise, vibration, and visual impact on Residential Properties and Public Rights of Way represented by Visual Receptor Groups 1, 2 and 3, as well as The Peddars Way and Norfolk Coastal Path, and Rebellion Way Cycle Route; Operational Phase noise and visual impact in the medium term on Residential Properties represented by Visual Receptor Groups 1 and 3, and Public Rights of Way represented by Visual Receptor Groups 1 and 2 Operational visual impact, cultural heritage, and socio-economic impacts the medium and long term on Castle Acre Priory and Castle Acre Castle Operational long term noise and visual impact on Public Rights of Way represented by Visual Receptor Group 2.		
	Inter project Cumulative impact Intra Project Cumulative Impact	9.0 Cumulative Effects 9.5 The in-combination assessment has identified potential interactions identified for three receptor groups; human residential receptors, users of transport links including users of PRoW, footpaths and cycle network and heritage assets. It is stated that when individual aspect assessments are complete, the assessment of potential in-combination effects on these receptors will be undertaken and the findings reported in the ES. The Applicant has not yet assessed cumulative effects as a result of the proposed development interacting with other schemes. It is stated that the assessment will be included in the ES when further information regarding the proposed and other developments may be available. The Council therefore considers that the assessment is incomplete at this stage and reserves judgement on both the in combination and cumulative impacts.	No	A Cumulative Effects Assessment has been undertaken in the **ES [APP/6.1 – 6.5]**, in accordance with PINS Advice on Cumulative Effects Assessment (September 2024). Each of the technical chapters of the **ES (Chapters 6-16) [APP/6.2]** have considered inter-project interactions other schemes in the area, whilst **ES Chapter 17: In-Combination Effects [APP/6.2]** has considered effects arising from different disciplines in-combination within Scheme.
	Inter project Cumulative impact Intra Project Cumulative Impact	9.0 Cumulative Effects 9.6 The Council supports the comments from the Inspectorate in the Scoping Opinion that recommend considering other developments as part of the cumulative effects assessment, “In addition to the High Grove solar farm proposal, the CEA should consider including the terrestrial components of the Norfolk Vanguard Offshore Wind Farm (OWF) and Norfolk Boreas OWF developments, and other non-solar developments which may have cumulative effects with the Proposed Development”. The Council’s Landscape Consultant is also of the view that the Vanguard & Boreas terrestrial works should be included as the development sites sit within the same Landscape Character Area. The suggestion to consult with local planning authorities and other statutory bodies on the relevant developments is also supported. It is noted and supported that the PEIR	No	The cumulative schemes recommended for inclusion (the terrestrial components of the Norfolk Vanguard Offshore Wind Farm (OWF) and Norfolk Boreas OWF developments, and other non-solar developments which may have cumulative effects with the Proposed Development) have been considered, as appropriate, in the **ES [APP/6.1 – 6.5]**. **ES Appendix 2.3: Cumulative Schemes [APP/6.4]** provides more detail on the schemes chosen for consideration in assessment, as well as the methodology.

		states the full assessments will be carried out in accordance with the guidance received from PINS.		
	Inter project Cumulative impact Intra Project Cumulative Impact	9.0 Cumulative Effects 9.7 At present Breckland Council has concerns regarding both the construction and operation phases, with notable intra-project effects anticipated, particularly concerning potential landscape/visual impacts and the loss of BMV agricultural land, considering that there needs to be further assessment of cumulative agricultural land take with other consented/pipeline projects within Breckland. It is considered that both impacts upon food production and implications for the wider farming community should be robustly assessed.	No	A Cumulative Effects Assessment has been undertaken in the ES, in accordance with PINS Advice on Cumulative Effects Assessment (September 2024). Each of the technical chapters of the **ES [APP/6.1 – 6.5]** have considered inter-project interactions other schemes in the area. This has included, as appropriate, potential landscape/visual impacts and the loss of BMV agricultural land.
	Inter project Cumulative impact Intra Project Cumulative Impact	9.0 Cumulative Effects 9.8 As outlined earlier in this response, Breckland Council has significant concerns regarding cumulative landscape impacts. Whilst indicative options have been provided for the zoning of the substations and BESS, the preferred layout and design of the project is unknown at the time of this statutory consultation. Similarly, the proposed detailed mitigation measures have not been finalised and presented. Furthermore, it is concerning that the project has reached the statutory consultation stage without a preliminary assessment of the cumulative impacts with other major energy projects (e.g. Norfolk Vanguard and Norfolk Boreas substation currently under construction at Necton and the proposed Highgrove Solar Farm along the length of the A47 towards Necton) having being undertaken.	No	A Cumulative Effects Assessment has been undertaken in the ES, in accordance with PINS Advice on Cumulative Effects Assessment (September 2024). Each of the technical chapters of the **ES [APP/6.1 – 6.5]**have considered inter-project interactions other schemes in the area, whilst **ES Chapter 17: In-Combination Effects [APP/6.2]** has considered effects arising from different disciplines in-combination within Scheme.
	Landscape and visual Inter project Cumulative impact Intra Project Cumulative Impact	9.0 Cumulative Effects 9.9 Given the noted potential for extensive landscape impacts, it is considered that a more comprehensive assessment of both direct and cumulative effects is required. A thorough analysis must be detailed within the ES, clearly outlining the mitigation measures necessary to address landscape sensitivities.	No	A Cumulative Effects Assessment has been undertaken in the ES, in accordance with PINS Advice on Cumulative Effects Assessment (September 2024). Each of the technical chapters of the **ES [APP/6.1 – 6.5]** have considered inter-project interactions other schemes in the area.
	Inter project Cumulative impact	9.0 Cumulative Effects 9.10 It is requested that the Examining Authority (ExA) implement a mechanism akin to those used for solar projects in other parts of the country (e.g. western Lincolnshire and the Outer Dowsing offshore wind proposal). This mechanism mandates that the Applicant produces an inter-relationship report at the outset of their examination and update it at each	No	The Applicant notes this comment and will review the requirements ahead of the examination period.

		subsequent deadline. Such a report is expected to enhance understanding of scheme interactions and the cumulative impact of development within the locality.		
	Inter project Cumulative impact Intra Project Cumulative Impact	9.0 Cumulative Effects 9.11 In summary, the cumulative impact assessment remains a key concern, and the Council's overall position cannot be determined until more design details are fixed and a rigorous assessment is undertaken.	No	A Cumulative Effects Assessment has been undertaken in the ES, in accordance with PINS Advice on Cumulative Effects Assessment (September 2024). Each of the technical chapters of the **ES [APP/6.1 – 6.5]**have considered inter-project interactions other schemes in the area, whilst **ES Chapter 17: In-Combination Effects [APP/6.2]** has considered effects arising from different disciplines in-combination within Scheme.
	Community Benefits (non-specific)	10.0 Community Benefits 10.1 The overarching wider scale public benefits of a renewable energy development of this scale are acknowledged and supported in principle by the Council: contributing towards Govt Net Zero targets via 500 MWac (Megawatt Alternating Current) of clean electricity to the national grid (power 115,000 homes); and The battery energy storage system (BESS) component would store surplus energy and supply it to the national grid when needed.	No	The Applicant notes this comment and confirms that **Section 5** of the **Planning Statement [APP/5.5]** summarises the need for and benefits of the Scheme. These benefits extend beyond the Scheme's contribution towards Net Zero.
	Community Benefits (non-specific)	10.0 Community Benefits 10.2 However, it is considered that community benefits at a local level are of upmost importance when considering the scale of the proposals and potential for impacts and upheaval.	No	The **Planning Statement [APP/5.5]** confirms that community benefits at a local level would be realised, should consent be granted for the DCO Application. For example, the **oLEMP [APP/7.11]** establishes how permissive paths proposed as part of the Scheme will be designed and implemented to improve accessibility across the Site. The **outline Employment, Skills and Supply Chain Strategy (OESSCS) [APP/7.15]** sets out proposals to promote local apprenticeships and training schemes, with the aim of enhancing local skills and qualification rates.
	Community benefits – off-site	10.0 Community Benefits 10.3 The consultation documents do not set out any direct benefits to Breckland in regard to the provision of renewable energy to existing/forthcoming dwellings or commercial properties.	No	The **Statement of Need [APP/5.4]** confirms that the Scheme will connect to the National Electricity Transmission System (NETS). The NETS is an existing national infrastructure asset which is designed specifically for the bulk transmission of energy from its point of generation to consumers both nationally and locally (including those in Breckland), through existing connections between the NETS and the local distribution

				grid. Therefore, reducing GB electricity system carbon emissions will reduce local carbon emissions. Further, increasing renewable generation capacity on the grid goes towards ensuring that there is a sufficient provision of renewable energy to "existing/forthcoming dwellings or commercial properties" in Breckland and across Great Britain.
	Community benefits – off-site	10.0 Community Benefits 10.4 Breckland Council is of the view that compensation packages befitting of the level of impact experienced by residents and businesses directly affected by the proposals during construction, operation and decommissioning must be administered. The Council anticipates that the Applicant will engage with the relevant parties, with details to be provided within the ES and across any other relevant sections of the DCO submission.	No	The Applicant notes this comment and confirms that Requirements of the **draft DCO [APP/3.1]** secure the production of detailed management plans that must be substantially in accordance with the outline management plans submitted as part of this DCO Application. The discharge of these Requirements must be approved by Breckland District Council and in some instances refer to consultation with relevant organisations.
	Community benefits – on-site Community benefits – off-site	10.0 Community Benefits 10.5 The consultation documents set out that the project will deliver local benefits via job opportunities, business rates, enhancing the natural environment (e.g. BNG & PRoW) and the provision of a community benefit fund (CBF). Limited information has been provided on the CBF which appears to be at the initial stages of development. The Consultation Information Booklet sets out that initial community consultation events have returned suggestions for community gardens, allotments, electric vehicle chargers, and science, technology, engineering and mathematics sessions. The Statutory Consultation is seeking additional suggestions in this regard. Given that the lifetime of the project is expected to be 60 years, it is considered that a significant financial commitment will be required if lasting benefits are to be realised, especially when accounting for inflation over such a long period of time.	No	The **Planning Statement [APP/5.5]** confirms that the Applicant has committed to providing a Community Benefit Fund. The Community Benefit Fund does not form part of the DCO Application, and this funding is not required to mitigate the impacts of the Scheme. Therefore, it cannot be considered in the decision-making process for determining the DCO Application. However, The Applicant is committed to ensuring that local communities benefit from the Scheme. Community benefits have been consulted on throughout the pre-application process, and ongoing discussions will inform how funding is best distributed
	Community benefits – on-site Community benefits – off-site	10.0 Community Benefits 10.6 It is understood that a CBF, whilst a valuable and welcomed part of infrastructure projects, cannot be formally scoped into an ES in the way that environmental effects or mitigation measures are. A CBF is not a mitigation measure for environmental effects, nor is it a statutory requirement. It is a voluntary socio-economic contribution, and therefore not considered part of the environmental information required in the ES.	No	The Applicant notes that the Community Benefit Fund does not form part of the DCO Application, and this funding is not required to mitigate the impacts of the Scheme.

	Community benefits – on-site Community benefits – off-site	10.0 Community Benefits 10.7 However, it is considered that the CBF can be included as part of the "Commitments Register" ES appendix, which clarifies the Applicant's commitments to address environmental and other benefits. It is considered that this should include details of how the fund will be governed and set up which would provide more certainty and give local communities more confidence in the process at the outset of the DCO process. It is noted that the CBF has not been included in the draft Commitments Register. It is considered that this should be addressed as part of the DCO submission.	No	The Applicant is committed to ensuring that local communities benefit from the Scheme. Community benefits have been consulted on throughout the pre-application process, and ongoing discussions will inform how funding is best distributed. The Community Benefit Fund is addressed through the **Consultation Report [APP/5.1]** and **Planning Statement [APP/5.5]** but does not form part of the DCO Application, and this funding is not required to mitigate the impacts of the Scheme.
	Community benefits – on-site Community benefits – off-site	10.0 Community Benefits 10.8 It is considered that the DCO application should include sufficient detail on the CBF as follows: The Consultation Report, to demonstrate community engagement; The Planning Statement, as part of the wider socio-economic context; As part of the ""Commitments Register"" ES appendix, providing clarification on how it will be secured, discharged and monitored; and A separate Community Benefits Statement, submitted alongside the DCO application (though not a statutory requirement).	No	The Applicant notes that the Community Benefit Fund is addressed through the **Consultation Report [APP/5.1]** and **Planning Statement [APP/5.5] .** The Applicant did not deem it necessary to provide a Community Benefits Statement.
	Community benefits – on-site	10.0 Community Benefits 10.9 Breckland Council is supportive of the proposed enhanced public recreation opportunities, to include new and enhanced footpaths.	No	The Applicant notes this comment.
	Community benefits – on-site Community benefits – off-site	10.0 Community Benefits 10.10 It is noted that responses to the non-statutory consultation have helped shape the community benefit offer thus far. Breckland Council considers that the responses to this statutory consultation should further influence the community benefit offer with evidence detailed within the DCO submission.	No	The Applicant has responded to community benefit suggestions received during the statutory consultation in **Consultation Report Appendix H: Section 47 – Responses Received and Applicants Response [APP/5.2**]. These suggestions have been noted by the Applicant, who will ensure they are part of the consideration for the community benefit fund. Ultimately, whether these initiatives are chosen to benefit from the fund will be independently determined by a local foundation.

	New jobs associated with the Scheme (direct and in-direct)	10.0 Community Benefits 10.11 Chapter 14 of the PEIR addresses the socio-economic impacts of the proposal in terms of the likely effects on the local economy, including skills and employment. It is estimated that "the Construction Phase would support an indicative peak of approximately 740 construction jobs. In total, the Construction Phase would support approximately 1,245 construction jobs. Applying a displacement rate of 50%, it is estimated that there will be approximately 625 net direct jobs created during the Construction Phase". When accounting for indirect and induced jobs, the PEIR estimates approximately 155-310 net direct jobs for residents in Breckland over the Construction Phase which is said to be equivalent to a 0.2%-0.5% uplift on the current baseline positions for residents in construction jobs in Breckland.	No	The Applicant makes note of this comment. As stated **in ES Chapter 14: Socio-Economics [APP/6.2],** taking the net direct and net indirect jobs together, the Scheme is expected to support 1,145 net additional jobs during the construction phase, with between 285 and 575 of these being taken by LCA residents. When accounting for direct jobs, the Scheme is estimated to support approximately 155-310 net direct jobs per annum for residents in the LCA over the construction phase. This is equivalent to a 0.2%-0.5% uplift on the existing baseline positions for residents in construction jobs in the LCA.
	Employment and Skills	10.0 Community Benefits 10.12 A preliminary Employment and Skills Strategy has been included as part of the consultation suite. It is noted and supported that a full Outline Employment and Skills Strategy (OESS) will be submitted with the DCO Application, setting out a refined list of commitments with further detail, along with the steps required to ensure they are effectively secured and implemented. It is considered that the potential for training to lead onto roles at Droves Solar Farm should be investigated, considered and assessed as part of the OESS. Breckland Council is supportive of the employment and skills proposals, however, notes that long term employment benefits will be minimal given the nature of the operational requirements.	No	The **oESSCS [APP/7.15]** builds on the PESS prepared at the PEIR stage. It sets out the Applicant's commitment to promoting competition, innovation and skills within communities surrounding the Scheme, as well as across Breckland, KLWN and the wider county of Norfolk. It also outlines the workforce, skills, equipment and services required to deliver the Scheme, together with measures to engage relevant stakeholders. A final Employment, Skills, and Supply Chain Strategy (fESSCS) will be prepared in accordance with this **oESSCS** and submitted prior to the commencement of construction, as secured by a requirement in the **dDCO [APP/3.1].** The fESSCS will identify specific opportunities relating to skills, supply chain and employment that the Applicant will take forward post-consent, enabling local individuals and businesses to benefit from the employment, training and procurement opportunities generated by the Scheme.
	Inter project Cumulative impact Community benefits – off-site	10.0 Community Benefits 10.13 It is considered that the ES should include an assessment of the wider socio- economic benefits arising from the proposal both in isolation and cumulatively with other major energy projects in the locale. Of particular relevance is the High Grove Solar Farm scheme, given the close proximity (including area of overlap in the current iterations).	No	The Applicant notes this comment and refers to **ES Chapter 14: Socio-Economics [APP/6.2]** which assesses the wider socio economic impacts arising from the proposal both in isolation and cumulatively, including in relation to the High Grove Solar Farm.
	Concluding statement	11.0 Conclusion 11.1 This report is Breckland Council's formal response to the statutory consultation (May 2025)	No	The Applicant notes this comment.

		undertaken by Island Green Power (Applicant) pursuant to the proposed Droves Solar Farm project.		
	Concluding statement Local policy	11.0 Conclusion 11.2 The project is considered to be broadly in line with the Government's objectives and targets on renewable energy and net zero emissions. In addition, the Council's own Sustainability Strategy and Local Plan Policies are supportive of renewable energy development subject to acceptable levels of impact on the Breckland environment. However, the proposal, at the current stage of design development, raises a number of strategic concerns to Breckland Council, which it is considered should be addressed prior to DCO submission.	No	Both the **Planning Statement [APP/5.5]** and **Policy Compliance Document [5.6]** assess the Scheme's compliance with the energy National Policy Statements. National policy establishes a critical national priority for projects such as the Scheme. The **Planning Statement [APP/5.5]** and **Policy Compliance Document [5.6]** also consider Breckland District Council's Local Plan policies and Sustainability Strategy as being other matters which the Secretary of State ought to consider both important and relevant to their decision. The Applicant has used Breckland District Council's strategic concerns to make design amends ahead of submitting this DCO Application.
	Additional environmental mitigation, enhancement and protection suggestions Scheduled monuments / archaeology / heritage sites	11.0 Conclusion 11.3 Breckland Council considers that Parcels 32, 33, 34 & 35 need to be removed from the allocation for solar and associated development and allocated for mitigation and enhancement instead. This is due to the potential for significant adverse impacts upon designated heritage assets. The Council considers that the associated impacts would be unacceptable should the design not be amended in this regard.	No	The Applicant notes these comments and confirms that in response to feedback The Applicant notes that since the statutory consultation, the BESS, National Grid Substation and Customer Substation have been located in Fields 24 and 27 south of Bartholomew's Hill Plantation. Solar PV Arrays have been removed entirely from Field 35, and solar PV Arrays are now only proposed in the southern half of Field 33.
	Indicative siting zone for the Battery Energy Storage Systems and Customer Substation Indicative siting zone for National Grid Substation Grid connection infrastructure Inter project Cumulative impact Landscape and visual	11.0 Conclusion 11.4 Given the lack of clarity regarding the siting of the BESS and the substations required to facilitate grid connection, and the lack of a preliminary cumulative impacts assessment (including both consented and pipeline schemes in the area), Breckland Council has significant concerns regarding the potential of the scheme to generate cumulative landscape or visual effects with The Highgrove Solar Farm (especially given both sites lie with the same Landscape Character Area). These concerns regard both the construction and operation phases, with notable intra-project effects anticipated. Also, the proposed detailed mitigation measures have not been finalised and presented. The cumulative landscape and visual effects of the developments have the potential to bring about significant negative effects, which cannot be fully assessed due to the current lack of clarity.	No	**ES Chapter 6: Landscape and Visual [APP/6.2]** considers the cumulative landscape and visual effects of High Grove Solar, in addition to the Scheme. The Cumulative Effects Assessment has been informed by the Scheme Description for the ES (**ES Chapter 5: Scheme Description [APP/6.1]**), **Works Plan [APP/2.3]**, **Design Principles, Parameters and Commitments [APP/5.8]**, and **Design Approach Document [APP/5.7]** which provide greater certainty to the Scheme's design. Mitigation measures are reflected in **Appendix 1 (Green Infrastructure Plan)** to the **oLEMP [APP/7.11]** which would be revised and finalised following the DCO examination process and receipt of consent.
	Agricultural land use Food security	11.0 Conclusion 11.5 There are significant concerns regarding the loss of BMV agricultural land within Breckland, resultant impacts upon food security and the cumulative	No	The Applicant notes this but disagrees, having considered the cumulative effects associated with agricultural land within **ES Chapter 11: Soils and Agriculture [APP/6.2]**.

	Inter project Cumulative impact	impacts of the proliferation of nationally significant solar farms in the east of England. It is not considered that there has been sufficient assessment of the impacts at a local level.		**Appendix 1 – Site Evaluation Report to the Planning Statement [APP5.5]** confirms how the Applicant's site evaluation involved a balance of factors, which included the need to minimise the impact on the best and most versatile agricultural land.
	Landscape and visual	11.0 Conclusion 11.6 The Council has significant reservations regarding the LVIA relying on just the District Level Landscape Character Areas. The methodology, and in particular the judgement on resulting effects, is not considered transparent. Additional further LVIA work, as described earlier in this report (with particular regard to methodology and mitigation of effects), is considered paramount to support the ES. Given the issues regarding the LVIA methodology, the Council is not in a position to provide full commentary at this stage.	No	The LVIA focused on district level landscape character assessments which are a material consideration and have been subject to public scrutiny. Where appropriate, key characteristics identified of relevance to the Site were supplemented with further information drawn from site observations. In the context of the Scheme and the 3 km Study Area, the assessors agreed that the district landscape character assessments, (though dated) were still relevant noting that GLVIA para 5.13 states that *"justification should be provided for any departure from the findings of an existing established LCA."* GLVIA para 5.15 continues adding that *"existing assessments may need to be reviewed and interpreted to adapt them for use in LVIA - for example by drawing out more clearly the key characteristics that are most relevant to the proposal…….Completely new supplementary Landscape Character Assessment work covering the whole Study Area would only be required when there are no existing assessments or when they are available but either have serious limitations that restrict their value or do not provide information at an appropriate level of detail".* For the purposes of the Scheme, the assessors do not consider that there are serious limitations with the Breckland Landscape Character Assessment, 2007 or that further detail is required. On the basis of these comments, any additional characteristics specific to the Site and based on site observations have been drawn out and emboldened in the text of **ES Chapter 6: Landscape and Visual [APP/6.2]**.
	Glint and Glare	11.0 Conclusion 11.7 Given the lack of certainty on design, layout and associated impacts at this stage, the Council has concerns regarding Glint and Glare impacts upon on fixed ground-based receptors which comprise of local residents, commercial properties and industrial sites. There are also concerns regarding the methodology proposed to identify receptors and measure impacts. Breckland Council would welcome further engagement on this issue to ensure the issue can be appropriately addressed within the ES.	No	The Applicant notes this comment and has provided detailed responses to these queries above.

	Noise and vibration – post construction	11.0 Conclusion 11.8 The Council doesn't have any significant concerns regarding the impact of noise on identified receptors, subject to appropriate mitigation and monitoring being secured as part of the DCO.	No	The Applicant noted this comment and confirms no significant noise effects have been identified.
	Community benefits – on-site Community benefits – off-site	11.0 Conclusion 11.9 The Council is supportive of community benefits being proposed, however, considers the current amount of detail to be limited and feels that more needs to be done at a local level given the forecasted impacts of the scheme on Breckland's residents. It is considered that the provision of renewable energy to existing/forthcoming dwellings or commercial properties to local residents should be considered as part of the DCO submission. Whilst not a statutory requirement/material consideration, it is also considered that the CBF should be included as part of the "Commitments Register" ES appendix. It is considered that this should include details of how the fund will be governed and set up which would provide more certainty and give local communities more confidence in the process at the outset of the DCO process.	No	The **Planning Statement [APP/5.5]** confirms that community benefits at a local level would be realised, should consent be granted for the DCO Application. For example, the **oLEMP [APP/7.11]** establishes how permissive paths proposed as part of the Scheme will be designed and implemented to improve accessibility across the Site. The **oESSCS [APP/7.15]** sets out proposals to promote local apprenticeships and training schemes, with the aim of enhancing local skills and qualification rates. The **Planning Statement [APP/5.5]** confirms that the Applicant has committed to providing a Community Benefit Fund. The Community Benefit Fund does not form part of the DCO Application, and this funding is not required to mitigate the impacts of the Scheme. Therefore, it cannot be considered in the decision-making process for determining the DCO Application. However, it will be available to fund local projects.
	Concluding statement	11.0 Conclusion 11.10 Breckland Council wishes to defer to the advice of alternative, expert statutory consultees for the following topics: Traffic and Transport – Norfolk County Council Local Highways Authority and National Highways; Public Rights of Way - Norfolk County Council Public Rights of Way; Archaeology and Scheduled Monuments – Norfolk County Council Historic Environment Service and Historic England; Glint and Glare (non-fixed ground-based receptors) - Norfolk County Council Local Highways Authority, National Highways, Civil Aviation Authority, Royal Air Force, National Rail; Biodiversity – Natural England; Water Resources and Flood Risk - Norfolk County Council Lead Local Flood Authority and Environment Agency.	No	The Applicant notes this deferral.
	Biodiversity Net Gain	11.0 Conclusion 11.11 Whilst the Council wishes to defer to the advice of Natural England on biodiversity matters, it wishes to highlight the proposed Biodiversity Net Gain figure of 10% is significantly lower than the 50% proposed as part of Statutory Consultation for Highgrove Solar	No	The Scheme incorporates a range of new habitat provision and enhancement measures designed to maximise benefits to biodiversity. The Scheme has 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

		Farm. As such, it is considered that more could and should be done in this regard.		faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme.

1.4 Castle Acre Parish Council

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Castle Acre Parish Council	General comment	Dear Sir/Madam, We, Castle Acre Parish Council, while understanding the need for the UK to reduce its carbon emissions from the continued use of fossil fuels wish to formally object to the proposals for the development of The Droves Solar Farm near Castle Acre, Norfolk, on the grounds of material planning considerations. These include significant and demonstrable harm to heritage assets, archaeology, the historic landscape, ecology, agricultural land use, and visual amenity. We believe the proposal is inconsistent with the National Planning Policy Framework (NPPF), the Castle Acre Neighbourhood Plan, the Castle Acre and adjoining authorities Local Nature Recovery Strategy (as required by the Environment Act 2021) and relevant local development policies.	No	The Applicant thanks Castle Acre Parish Council for its response to the consultation and notes its position on the Scheme. A **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 NPPF and Breckland Local Plan, which the Applicant considers will be both important and relevant to the Secretary of State's decision.
	Local policy	1. Conflict with the Castle Acre Neighbourhood Plan 2022 The Castle Acre Neighbourhood Plan, developed and adopted by the local community, sets out a clear vision to protect and enhance the village's historic character, its rural landscape setting, and its natural environment. Specifically, the Plan emphasises: • Preservation of the unique historic landscape and heritage assets of Castle Acre, including its internationally important Scheduled Monuments and the Conservation Area. • Protection of valued countryside views and rural approaches. • Support for sustainable development that aligns with the community's identity and landscape sensitivity.	Yes	The Applicant acknowledges the Castle Acre Neighbourhood Plan (2022) and its objectives. However, the Applicant notes that the Scheme lies entirely within the administrative areas of Breckland Council and Norfolk County Council. Therefore, the local planning policies relevant to the Scheme comprise the following: • Breckland Local Plan (Adopted September 2023); and • Adopted Norfolk Minerals and Waste Local Plan 2023-2038 (Adopted May 2025). The Applicant has prepared a **Policy Compliance Document [APP/5.6],** which sets out local policies that the Secretary of State may consider to be important and relevant in decision-making. It contains an appraisal of the Scheme's compliance against the relevant local policies. Nevertheless, the Applicant believes that the points emphasised in the Parish's response are addressed below, and the concerns raised have been fully considered throughout this response.

	Scheduled monuments / archaeology / heritage sites	2. Impact on Statutory Heritage Assets and Their Setting The proposed solar farm lies within the setting of multiple designated heritage assets, including: • Castle Acre Priory (Scheduled Monument) • Castle Acre Castle (Scheduled Monument) • Bailey Gate (Scheduled Monument) • St James the Great Church (Grade 1 listed) • The historic route of the Peddars Way (parts of which are a scheduled monument as it was a Roman Road and later used by pilgrims travelling to the medieval shrine at Walsingham. It is now a National Trail). These assets are protected under the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires authorities to preserve their setting.	Yes	The Applicant acknowledges the status of the assets listed by Castle Acre Parish Council and has conducted an assessment of the likely effects on both designated and non-designated heritage assets as part of the DCO Application. **ES Chapter 8: Heritage Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage-related effects expected across the Scheme's construction, operational and decommissioning phases. **ES Chapter 6: Landscape and Visual [APP/6.2]** has assessed the likely effects from the Peddars Way long distance path and concludes there are moderate adverse effects across the construction and decommissioning phases of the Scheme. Over a limited extent only, within and up to 300m from the Site, there are moderate adverse effects across the operational (short and medium term) phase of the Scheme. Mitigation measures that have been applied to reduce these effects are set out in **ES Chapter 6: Landscape and Visual [APP/6.2] .**
	National policy	Paragraphs 199–208 of the NPPF stipulate that "great weight" must be given to conserving heritage assets. Any harm to their setting, even if "less than substantial," must be clearly justified and outweighed by public benefit.	No	**ES Chapter 8: Heritage Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage-related effects expected across the Scheme's construction, operational and decommissioning phases. A **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 NPPF
	Scheduled monuments / archaeology / heritage sites	These heritage assets are important when regarded together. There is a direct archaeological and historical association between the Castle, the 12th century planned settlement and its defences and the Priory (all founded by the de Warennes) above the Roman crossing point of the River Nar.	No	The Applicant notes these comments and confirms that **ES Chapter 8: Heritage Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** considers the setting of assessed heritage assets and the special connections between related assets. There are no significant (in EIA terms) residual adverse heritage-related effects expected across the Scheme's construction, operational and decommissioning phases.
	Scheduled monuments / archaeology / heritage sites	There is also a direct link to the heritage assets of the Nar Valley in the area proposed for the Droves Solar Farm. The Priory at Castle Acre is one of six religious houses sited along the Nar Valley and these were all visited by pilgrims travelling to the medieval shrine at	No	**Section 8** of **ES Chapter 8: Heritage Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** outlines the archaeological and historical context of the Site and the Study Area.

		Walsingham, the second most important religious centre, after Canterbury.		
	Scheduled monuments / archaeology / heritage sites Landscape and visual (non-specific)	The visual and experiential harm caused by the scale, fencing, and infrastructure of the proposed solar farm would be significant and irreversible, compromising the cultural landscape of one of Norfolk's most important heritage clusters.	Yes	The Applicant has considered the impact of the Scheme on the cultural and historical landscape, as set out in **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2],** which concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage-related effects expected across the Scheme's construction, operational and decommissioning phases. **ES Chapter 6: Landscape and Visual [APP/6.2]** assesses the Scheme's impact on landscape and visual receptors. The Scheme's embedded mitigation measures are fully explained in **ES Chapter 6: Landscape and Visual [APP/6.2].** While residual effects are identified, they are not considered capable of being mitigated or compensated further. The **Statement of Need [APP/5.4]** sets 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. The Applicant also notes but disagrees with the comment stating that the effects are irreversible. The Scheme is mostly temporary and reversible in nature. When the operation and maintenance phase of the Scheme ends, the Solar PV Site would be decommissioned and the land returned to the landowner, apart from the National Grid Substation and Grid Connection Infrastructure, which would remain. All PV Panels, Mounting Structures, above ground cabling (not including the Grid Connection Infrastructure), Conversion Units / 33kV Sub-distribution Switch Rooms, the BESS and the Customer Substation would be removed from within the Solar PV Site and recycled or disposed of in accordance with good practice and market conditions at that time. This will include the areas of agricultural land where the soil health, quality and structure may have improved, and the established habitats. Foundations and other below ground infrastructure will be cut to 1 m below the surface to enable future ploughing. Any piles would be removed. After the decommissioning the phase, the landowners would choose how the land is to be used and managed in agricultural use, save for the National Grid Substation and Grid Connection Infrastructure, which is to remain in situ.

	Scheduled monuments / archaeology / heritage sites National policy	3. Threat to Archaeological Significance Castle Acre lies in an area of high archaeological potential, with documented features from Roman, Saxon, and medieval periods. Development of this magnitude risks destroying unrecorded archaeological remains. NPPF Paragraph 210 requires proper archaeological evaluation prior to determination.	No	The Applicant undertook a programme of archaeological trial trenching outlined in **Appendix 8.6: Archaeological Trenching Report (Interim) [APP/6.4]**, which was agreed with the Historic Environment Officer at Norfolk County Council. Oxford Archaeology undertook the work between 13 July and 29 August 2025. The evaluation comprised the excavation of 109 trenches, designed to target anomalies identified by the geophysical survey. Archaeological remains were identified in 73 of the trenches, dating between the prehistoric and Romano-British periods. The Applicant further notes that the **oCEMP [APP/7.6]** describes the design and other mitigation measures to prevent or reduce potential adverse environmental effects, including on cultural heritage and archaeology. Informative trenching will be undertaken in the remaining areas of the Site not subject to previous trenching. The amount and location of the trenches can only be confirmed following detailed design. Precise details of areas that will be subject to full archaeological excavation will be defined following completion of the geophysical survey and informative trenching and finalisation of the location and extent of development impacts. It is known that the Roman period enclosure within Field 27 will be subject to almost complete removal by the installation of the Customer Substation and these remains will, therefore, require full excavation. The option for localised areas of above ground cabling to preserve significant archaeological remains in situ where it is not practicable or desirable to mitigate by archaeological excavation will be available and will be informed by the detailed design and informative trenching. The **Policy Compliance Document [APP/5.6]**, provides detailed evidence of compliance with relevant national and local policy documents, including the NPPF.
	Scheduled monuments / archaeology / heritage sites Landscape and Visual (non-specific) Impact on tourism	4. Harm to the Character and Visual Amenity of the Historic Landscape The proposal would introduce visually intrusive infrastructure into an open, rural landscape that contributes to the village's identity and attracts visitors. Peddars Way and Nar Valley Way users, residents, and tourists would experience industrialisation of a previously tranquil and historic setting. This conflicts with NPPF Paragraphs 187 and 204 and Local Plan policies that seek to safeguard the intrinsic character and beauty of the countryside.	Yes	The Applicant notes that **ES Chapter 6: Landscape and Visual [APP/6.2]** and **ES Chapter 8: Heritage [APP/6.2]** assess effects the landscape character of the area, the impact of the Scheme on users of PRoW as well as amenity and recreation and heritage assets. **ES Chapter 8: Heritage Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage-related effects expected across the Scheme's construction, operational and decommissioning phases. The Scheme demonstrates that the Site can accommodate Solar PV Arrays without causing significant long-term

				visual effects. The embedded mitigation measures limit the adverse visual and recreational impact upon PRoW users within the Site, primarily through the implementation of appropriate vegetation management regimes, offset of new development from PRoW, and the planting of new hedgerow, trees, woodland and scrub. The LVIA acknowledges that there would be moderate significant adverse effects upon landscape character in the long term, but within the Site only. It is judged that there are no significant adverse landscape effects outside the Site in the long term. The Applicant has prepared a **Planning Statement [APP/5.5] and Policy Compliance Document [APP/5.6]**, to provide detailed evidence of compliance with relevant national and local policy documents, including the NPPF and Breckland Local Plan, which the Applicant considers will be both important and relevant to the Secretary of State's (SoS) decision.
	Watercourses Protected sites Ecology Biodiversity	5. Impact on the River Nar SSSI and Local Nature Recovery Goals The site lies within the catchment of the River Nar, a protected chalk stream designated as a Site of Special Scientific Interest (SSSI) supporting a range of important Biodiversity Action Plan habitats, including chalk stream areas, fens, wet meadows and woodlands. One of only 220 chalk streams in the world and described by the Norfolk Rivers Trust as 'arguably Norfolk's most unspoilt and beautiful example' the Nar supports an outstanding assemblage of dragonflies as well as the Biodiversity Action Plan mollusc species, Desmoulins' whorl snail, listed as 'endangered'.	No	The Applicant notes the protected status of the River Nar. Embedded mitigation measures to safeguard the River Nar SSSI and full assessment of potential impacts has been undertaken in **ES Chapter 7: Ecology and Biodiversity [APP/6.2].** Mitigation measures for the Scheme are documented within the: **oCEMP [APP/7.6]**, **oCTMP [APP/7.7]**, **oOEMP [APP/7.8]**, **oDS [APP/7.10]**, and **oLEMP [APP/7.11]** and are secured via requirements of the **dDCO [APP/3.1]**.
	Ecology	As a large-scale solar farm taking up 825 hectares of agricultural land, it risks displacing birds from their natural habitats and is particularly detrimental to ground-nesting birds and species that rely on open fields for foraging such as lapwing, skylark, yellowhammer, corn bunting and turtle dove, all species that are on the Birds of Conservation Concern Red List.	No	Nesting, including ground nesting, and wintering birds are fully considered within **ES Chapter 7: Ecology and Biodiversity [APP/6.2].** Refer to **ES Appendix 7.2: Baseline Ecological Survey Report [APP/6.4]**, and **ES Appendix 7.4: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP/6.4].** The Applicant also notes that following updates to ecological surveys which recorded the presence of breeding Skylark and Curlew, approximately 81 hectares of land to the north of the Site was identified that is suitable for Skylark mitigation, and 8.8 hectares that is suitable for Curlew mitigation. Further details are provided in the **Design Approach Document [APP/5.7]**.

	National policy Ecology Protected sites	Under NPPF Paragraphs 180–182, any development with potential to harm SSSIs or irreplaceable habitats must be avoided or rigorously mitigated. The proposal risks habitat fragmentation, biodiversity loss, and increased surface runoff — all of which are contrary to the Environment Act 2021 and emerging Local Nature Recovery Strategies. The Neighbourhood Plan strongly supports biodiversity enhancement, not degradation.	No	The Applicant has provided detailed evidence of compliance with relevant national and local policy documents, including the NPPF in the **Planning Statement [APP/5.5]** and **Policy Compliance Document [APP/5.6].** The Applicant also notes that mandatory Biodiversity Net Gain remains to be implemented in legislation (currently anticipated May 2026), albeit the Scheme will deliver over 10% BNG as calculated within the Statutory BNG metric and the 10% figure is secured as a minimum commitment via the corresponding requirement in the DCO. The **Biodiversity Net Gain Assessment Report [APP/4.7]** has been submitted with the DCO Application**.** The Applicant also notes that the Scheme has been designed to deliver opportunities identified within the draft Local Nature Recovery Strategy and the Norfolk Green Infrastructure Strategy, whilst these measures will be delivered within the Site, they add value to the delivery of broader initiatives within the local area. Further details are provided in the **Design Approach Document [APP/5.7]**. As set out within **ES Chapter 12: Water Resources [APP/6.2]**, the River Nar SSSI is hydrologically linked to the Site via chalk aquifer baseflow and near-surface water supplies which drain into the River Nar SSSI, with the main source of leached nitrate within the River Nar SSSI arising from agricultural pollution. The Site supports a number of individual ditches, of which all but one was recorded to be dry at the time of initial survey, however these do not appear to represent a connected network leading to the River Nar. Accordingly, no potential surface water flow pathways to the River Nar SSSI are present, and rainwater is anticipated to infiltrate rapidly rather than generate substantial run-off. The **Flood Risk Assessment [APP/6.4]** includes a Surface Water Drainage Strategy, which outlines how surface water runoff from the Site will be managed in accordance with national, regional, and local requirements regarding flood risk and drainage.
	Agricultural land use Food security National policy	6. Loss of Best and Most Versatile Agricultural Land The proposed site includes land likely classified as Grades 2 and 3a, which fall under the government's definition of Best and Most Versatile (BMV) agricultural land — the highest quality for food production. Under NPPF Paragraphs 174 and 180, the loss of such land should be avoided unless absolutely necessary.	No	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, considering the economic and other benefits of the land. The Order limits extend to approximately 840ha. Of this, approximately 455ha is of BMV quality. The ALC surveys have confirmed that approximately 54% of the Order limits comprises BMV land. ALC was an important factor for the Applicant when evaluating the proposed Site. **ES Chapter 4: Reasonable**

				Alternatives and Design Evolution [APP/6.1] provides a summary of the reasonable alternative options that the Applicant has considered for the Scheme, including the initial selection of the Site and throughout the development of the design. Further appraisal of the use of BMV land, and why this is justified, is set out in the **Planning Statement [APP/5.5]**. Although the Scheme does include BMV land, the Applicant has sought to minimise the amount of BMV land by adopting a sequential approach in its site selection (further set out in **Planning Statement [APP/5.5]**) and can justify its inclusion given the significant wider benefits that the Scheme will bring.
	Agricultural land use Food security Site selection (alternatives)	This land plays a vital role in local and national food security, particularly in the context of climate change and rising pressure on domestic food systems. Solar Energy generation should be prioritised on brownfield sites, rooftops, or lower-grade land, not productive farmland.	No	The **Planning Statement [APP/5.5]** and the **Statement of Need [APP/5.4]** outline that the Scheme will deliver a significant amount of low-carbon, low-cost, and UK-located solar electricity generation capacity, connecting to the National Electricity Transmission System, anticipated to be operational from 2033. In addition to meeting the urgent national need for secure and affordable low-carbon energy infrastructure and its associated environmental and societal benefits, the Scheme delivers wider benefits to the environment and the local community. The Scheme is a substantial infrastructure asset, capable of delivering large amounts of secure, affordable low carbon electricity to local and national networks. The overarching need for the Scheme is also set out in in **ES Chapter 1: Introduction [APP/6.1].** **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1],** sets out how previously developed land has been considered in the search for alternative sites for the Scheme through a review of the relevant local brownfield land registers. It concludes that no brownfield land sites are available at a sufficient size to accommodate the Scheme, either individually or in combination with other sites. The Applicant did not consider rooftop solar energy as an alternative to the Scheme because rooftop solar alone will not be able to meet the scale and pace required of new capacity growth to meet the UK's needs. The results of the Agricultural Land Classification Surveys set out 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, considering the economic and other benefits of the land. The Applicant also notes that no fields proposed for Solar PV Arrays within the Order limits are comprised entirely of Grade 1 land. One Field (Field 32) was surveyed as entirely Grade 1 and 2. During Stage 2 design, Field 32 was identified as an area requiring mitigation and

				enhancement. At Stage 3, it was removed from the Order limits to enable its continued agricultural use by the landowner.
	Agricultural land use	Removing this land from agricultural use for decades undermines sustainability goals and conflicts with the Castle Acre Neighbourhood Plan, which supports continued agricultural use and rural character. The development would set a concerning precedent for future loss of the 'best and most versatile' (BMV) land in Norfolk.	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 NPPF and Breckland Local Plan, which the Applicant considers will be both important and relevant to the Secretary of State's decision. 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, considering the economic and other benefits of the land. When the operation and maintenance phase of the Scheme ends, the Solar PV Site would be decommissioned and the land returned to the landowner, with the exception of the National Grid Substation and Grid Connection Infrastructure, which would remain. All PV Panels, Mounting Structures, above ground cabling (not including the Grid Connection Infrastructure), Conversion Units / 33kV Sub-distribution Switch Rooms, BESS and the Customer Substation would be removed from within the Solar PV Site and recycled or disposed of in accordance with good practice and market conditions at that time. This will include the areas of agricultural land where the soil health, quality and structure may have improved, and the established habitats. Foundations and other below ground infrastructure will be cut to 1 m below the surface to enable future ploughing. Any piles would be removed. After the decommissioning the phase, the landowners would choose how the land is to be used and managed in agricultural use, save for the National Grid Substation and Grid Connection Infrastructure, which is to remain in situ. Further details can be found in the **Outline Decommissioning Strategy (oDS) [APP/7.14],** which has been prepared by the Applicant as part of the DCO Application.
	Security measures and/or infrastructure Landscape and visual (non-specific)	7. Impact on Dark Skies Policies Because as a parish council, we have adopted a Dark Sky Policy based on the NPPF's Framework Clause 180c and Norfolk County Council's Environmental Lighting Zones Policy, the impact of operational and security lighting from the proposed solar farm is an additional concern, adversely affecting the quality of our night skies and their value to nocturnal wildlife.	No	The Applicant has provided detailed evidence of compliance with relevant national and local policy documents, including the NPPF, in the **Planning Statement [APP/5.5]** and the **Policy Compliance Document [APP/5.6].** The Applicant notes that the Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation, which would only include motion-sensing lighting to be used only for security and

				maintenance purposes. Further details are set out in **ES Chapter: The Scheme [APP/6.2]**. Lighting impacts on nocturnal wildlife have been considered and assessed within **ES Chapter 7: Ecology and Biodiversity [APP/6.2].** A sensitive lighting strategy to mitigate disturbances on light-sensitive species, such as bats, during construction has been included in the **oCEMP [APP/7.7].**
	Noise pollution – post construction	8. Noise Pollution Though we recognise that the solar panels themselves do not emit noise, the infrastructure surrounding the solar farm will create residual noise, particularly from the sub-station, the battery storage, inverters and fans. In this rural and tranquil landscape, such additional noise will be intrusive, affecting the quality of life of residents and all those using the Public Rights of Way and footpaths on or near the solar installations as well as being damaging to local wildlife.	No	The Applicant notes that **ES Chapter 10: Noise and Vibration [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse noise and vibration-related effects expected across the Scheme's construction, operation and decommissioning phases. **ES Chapter 10: Noise and Vibration [APP/6.2]** identifies and presents measures to address the potential impacts and likely significant effects on Noise and Vibration, during Construction, Operation and Decommissioning Phases. This includes an assessment of the potential effects upon PRoW. Effects on human health as a result of noise are specifically assessed in **ES Chapter 15: Human Health [APP/6.2],** including consideration of the potential effects on vulnerable people such as those with sensory impairments, mental disabilities and those less able to move around or leave their properties. It concludes that no residual significant effects from the Scheme on human health are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** provides an assessment of the likely impacts of noise from the Scheme upon ecological receptors. No significant adverse effects are identified in relation to noise.
	Noise and vibration – construction	With a two -year construction timescale, the noise generated by piling for the panel supports, the installation of associated infrastructure and from construction traffic on local roads is another reason for objecting to the proposed solar farm.	No	The Applicant notes that noise from pilling activities have been assessed in the **ES Chapter 10 Noise & Vibration [APP/6.2]** and mitigation measures have been outlined to reduce noise to below the lowest category construction noise criterion, where necessary. Castle Acre properties and surrounding villages are at sufficient distances to experience noise levels below this threshold even at the closest point of piling within the Scheme boundary and will experience lower levels when piling activity is further within the Scheme.
	Inter project Cumulative impact developments in Norfolk)	9. Cumulative Impact and Policy Precedent With more than 3,800 hectares of solar developments proposed across Norfolk, (including the neighbouring High Grove proposal) the cumulative impact on	No	The Applicant notes these comments and assesses potential in-combination effects on various receptor groups, including heritage assets, habitats and the

	Intra Project Cumulative Impact	landscape character, biodiversity, and heritage must be assessed at a strategic level, considering the legal requirements to: • protect designated and non-designated heritage assets and their setting. • conserve ecological networks and sensitive habitats. • avoid inappropriate development in open countryside and rural landscapes		landscape character in **ES Chapter 17: In-Combination Effects [APP/6.2]** The Applicant has engaged with the High Grove project team throughout the pre-application process, and is committed to continuing this engagement following the submission of the DCO Application.
	Landscape and visual (non-specific)	In conclusion, Castle Acre Parish Council considers that sixty years is a very significant period in people's lives during which the Droves Solar Farm would seriously detract from the landscape character and visual amenity of the parish and its setting alongside what is one of the main gateway routes to North Norfolk.	No	The Applicant notes this comment, but disagrees with conclusion that the Scheme would seriously detract from the landscape charter and visual amenity. The scope of **ES Chapter 6: Landscape and Visual [APP/6.2]** assesses all phases of the Scheme and considers both landscape components and landscape character. With the critical and urgent need for the Scheme enshrined in national and local policy, it is considered that the adverse landscape and visual effects identified in **ES Chapter 6: Landscape and Visual [APP/6.2]** are demonstrably outweighed by the Scheme's benefits, which include: the delivery of a significant level of low carbon energy generation; BNG; other benefits such as the provision of permissive paths and the identification of a significant beneficial residual landscape and visual effects, as set out in the **Planning Statement [APP/5.5].**
	General comment	We believe 'The Droves Solar Farm' proposal is incompatible with Castle Acre's heritage status, ecological importance, and some community-led planning objectives. It represents a form of unsustainable development that would cause long-term and unjustified harm to an irreplaceable historic and natural environment.	No	The Applicant notes these comments but disagrees with the conclusion that the Scheme is incompatible with Castle Acre's heritage status. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** confirms there are no significant effects (in EIA terms) associated with the Scheme and embedded mitigation in the form of landscaping initiatives will serve to minimise impacts on views of the Scheme from heritage assets. The Applicant also notes that mandatory Biodiversity Net Gain remains to be implemented (currently anticipated May 2026), albeit the Scheme will deliver over 10% BNG as calculated within the Statutory BNG Metric and the 10% figure is secured as a minimum commitment via the corresponding requirement in the DCO. The **Biodiversity Net Gain Assessment Report [APP/4.7]** has been submitted with the DCO Application. The **Policy Compliance Document [APP/5.6]** sets out compliance sets out compliance with relevant planning policies. The relevant National Policy Statements form the primary basis for decision-making on applications for

				development consent; however, 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 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. The **Statement of Need [APP/5.4]** also provides the justification for the Scheme, outlining its role in supporting the UK's renewable energy and net zero objectives. The Applicant further notes that when the operation and maintenance phase of the Scheme ends, the Solar PV Site would be decommissioned and the land returned to the landowner, with the exception of the National Grid Substation and Grid connection Infrastructure, which would remain. All PV Panels, Mounting Structures, above ground cabling (not including the Grid Connection Infrastructure), Conversion Units / 33kV Sub-distribution Switch Rooms, BESS and the Customer Substation would be removed from within the Solar PV Site and recycled or disposed of in accordance with good practice and market conditions at that time. This will include the areas of agricultural land where the soil health, quality and structure may have improved, and the established habitats. Foundations and other below ground infrastructure will be cut to 1 m below the surface to enable future ploughing. Any piles would be removed. After the decommissioning the phase, the landowners would choose how the land is to be used and managed in agricultural use, save for the National Grid Substation and Grid Connection Infrastructure, which is to remain in situ.
	General comment	We will therefore be strongly urging the planning authority to refuse this future application in line with national policy, local plans, and the Castle Acre Neighbourhood Plan when it is eventually submitted.	No	The Applicant notes these comments but maintains the Scheme is compliant with relevant planning policies, as set out in the **Policy Compliance Document [APP/5.6]**. The Applicant thanks Castle Acre Parish Council for its response and welcomes future engagement.

1.5 Narstate Ltd. (S42(d))

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
	Impact on local business	Thank you both for your time today to meet with myself, [redacted] to discuss the proposals for The Droves Solar Farm.	No	The Applicant notes this comment and welcomes it. The Applicant is open to further engagement regarding the Scheme.

		We are eager to continue our conversations with you both and grow a positive relationship moving forward. As you can appreciate the scale of this project is going to massively impact our farming enterprise moving into the future and these conversations are key for our future planning. We are invested in Narstate Ltd land by the passage of time as a life long commitment to farming. The [redacted] have been good to us and we continue to have a positive relationship with them. As mentioned we are open to all conversations in relation to any possibilities for future land management of the site and it would be great to be able to discuss this in further detail. We look forward to hearing from you soon. Have a nice weekend. Kind regards		
	Impact on local business	Thank you for your email I have attached a new map, the field with red hatching is not under my management The other land covered on the map is under my management through a contract farming agreement in conjunction with the land owners Narstate Ltd not a tenancy The estate has some more land to the north of the proposed Droves which is under the same management structure this land is not on the attached map To help you understand the full picture of the land to help meaningful future discussion the area proposed under the Droves scheme would reduce my contract farmed area by 2/3 which would be catastrophic for maintaining my current fixed cost structure which is based on farming the area as a whole, which would make my business as it is un viable. I/we as a family business are very keen to explore any opportunities, should this scheme become reality, that will help us future proof our business going forward for another 50 plus years, otherwise we are looking at the end of what we have know for 2/3 generations The type of things that were discussed briefly being Agrivoltics and potential sheep grazing	No	The Applicant notes these comments and is grateful for the information provided. During the operation and maintenance phase, arable activities will likely need to cease altogether due to the introduction of solar PV Arrays. There is potential for alternative agricultural activity such as sheep grazing under and around the solar panels, and overall, the quantum of agricultural labour is not expected to change significantly due to the shift from arable production to sheep-based enterprises (if this were to occur). The Applicant is open to discussing this matter further. The Applicant would also note that the utilised agricultural area (UAA) in the UK was 16.8 million hectares in 2024. The agricultural land taken for the Scheme represents less than 0.01% of the UAA and is not expected to have a significant impact on national food production and security. Further to this, the Applicant notes the **Policy Compliance Document [APP/5.6]**, which confirms that the use of BMV land as part of the Scheme is justified, considering the economic and other benefits of the land. With regard to the sensitive equipment referenced, the Applicant notes the presence of the cables and water main. The Applicant thanks the respondent for providing the plans.

		My trading name is [redacted] Currently there are 2 pig tenants on this land which i manage for Narstate Ltd The land is used for growing crops for food and with nature stewardship land parcels which are in the "mid tier and sustainable farming incentive scheme" Sensitive equipment; We have ; under ground and over ground power cables Under ground Irrigation water main All within the mapped area I have also included the infrastructure documents for the area Best wishes		
	Impact on local business	Following The Droves Solar Farm - Webinar 2, we are emailing to officially register our interest as a contractor to work alongside the project as this was advised. We have included a brief summary of our connection to the area and a few suggested ways in which we believe we could work with the project. However, it would be great to understand if there is any specific information you require which we may not have provided below. For context, I am the contract farmer who has farmed the majority of the area impacted by this scheme for the last 60 years. We are invested in Narstate Ltd land by the passage of time as a lifelong commitment to farming. Our involvement in the local area has enabled us to fully understand the nature of the land and gain invaluable information on its characteristics and management methods. We have also been involved in the Countryside stewardship implementation and management for over 18 years over the land. The Environment is a key value for our farming enterprise and at the forefront of what we do.	No	The Applicant notes this comment and thanks the representative from Narstate Ltd. for attending the webinar. The Applicant also acknowledges that the environment is of key value for the respondent's farming enterprise.
	Impact on local business New jobs associated with the Scheme (direct and in-direct)	Following the webinar we have briefly summarised some ways in which we would be interested to work alongside the solar project and it's future management, however this is not an exhausted list and we would be open to discuss any other opportunities not listed below;	No	The Applicant thanks the respondent for their engagement following the webinar and for setting out the ways in which they may wish to be involved in the future management of the Site. The Applicant notes that construction works will be undertaken by the appointed contractor in accordance with the CEMP, which will be developed in substantial accordance with the **oCEMP [APP/7.6]**. Land

		Land preparation works for the Solar Project Grass drilling Grassland management - cutting, sheep/livestock grazing. Hedgerow management Droves management Agrivoltaics – there is an extensive irrigation main which runs through the farm and we would like to discuss options in which this could be utilised to allow for the irrigation system to be used and not see this infrastructure go to waste. Crops: Growing crops like vegetables, fruits, or berries under solar panels. Pollinator Support: Integrating pollinator habitats alongside crops can enhance biodiversity and crop pollination. We have already met with [redacted] on the 30th May 2025 to discuss our involvement over the land and the proposals for the Droves Solar Farm. We felt the meeting was productive with some commitment shown from both [redacted] to work with us throughout the different stages of this project. Therefore, we hope this email will aid with our continued communication throughout the duration of the project. As mentioned we are open to all conversations in relation to any possibilities for future land management of the site and it would be great to be able to discuss this in further detail. We look forward to hearing from you soon, please ensure to respond including all within the email.		management opportunities during operation, including sheep grazing, may be appropriate. The Applicant also notes the suggestions relating to grassland management, hedgerow management, and the management of the droves. Planting and habitat creation will take place in accordance with the **oLEMP [APP/7.11]**. The Applicant is not currently considering agrivoltaics or the planting of crops as part of the Scheme, but would welcome further engagement regarding the matter. With regard to the planting of pollinator habitat, the Applicant confirms that such measures will be delivered in line with the **oLEMP.** The strategy for existing and proposed green infrastructure throughout the Site is detailed within **Appendix 1: Green Infrastructure Strategy Plans to the oLEMP [APP/7.11].** New planting and maintenance regimes outlined within the **oLEMP [APP/7.11]**.

1.6 East Cambridge District Council

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or Applicant's evidence?	Applicant response

East Cambridge District Council	General comment	Thank you for your consultation on the above. At this stage, the Council does not wish to provide any comments in response to the consultation.	No	The Applicant thanks East Cambridgeshire District Council for responding to the consultation and continue to welcome further engagement, if required.

1.7 Environment Agency

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Environment Agency	Introduction Summary	Thank you for consulting us on your proposals for The Droves Solar Farm. We have reviewed the consultation documents that have been published on your website and can offer the following advice: The key issues identified are: A lack of detail has been provided around the baseline groundwater impacts. The impact magnitude matrix provided is inconsistent with projects of a similar nature. Flood risks associated with the proposed BESS and climate change allowances need further consideration. Our detailed advice on these matters is provided below. We trust this advice is useful.	No	The Applicant notes this and thanks the Environment Agency for responding to the consultation and has responded to the key issues raised below.
	Ecology Biodiversity	EAFBG001 – Existing onsite ponds PEIR Volume I, Chapter 7: Ecology and Biodiversity. Table 7.9. Issue: Clarity needed regarding management of the ten ponds on site. Impact: Potential missed opportunity to deliver biodiversity gains associated with ponds and under valuation of ecological feature. Solution: Ensure consistent and justified valuation of pond habitats. It is recommended that the proposed Landscape & Ecological Management Plan includes a focus on delivering habitat improvements to the ponds. Given game management is mentioned as a reason for poor condition, would an improved management regime for ponds including the exclusion of game would be possible, or alternatively could provision of new ponds could be included within proposals? This could make a significant improvement in the biodiversity at the site	No	The Applicant notes that the specific management of existing ponds will be undertaken as detailed within the outline **Landscape and Ecological Management Plan (oLEMP) [APP/7.11].** The Applicant also notes that the **Design Principles, Parameters and Commitments [APP/5.8]** document, which forms part of the DCO Application, sets out the Design Principles which seek to retain and enhance the Marl Pits and ponds within the Site.

		and potentially deliver to wider ecosystem services/ benefits. If proposals emerge that directly affect ponds, further aquatic focused surveys, such as Predictive System for Multimetrics, would be expected. Additional comments: The ten ponds present at the site have been assigned a 'Site' level importance in Chapter 7, but within the baseline (Vol III, Chapter 7: Appendix 7.2) they are detailed to be of local importance. No survey has been undertaken of the surveys beyond high level / terrestrially focused UKHab / Phase 1 and great crested newt surveys to evidence the assessment. The ponds are detailed to be in relatively poor condition due to game management but are likely to be of some importance / potential importance to biodiversity locally. It is understood that ponds are to be retained with a ten-metre buffer during development. Outline proposals for habitat creation and enhancement (7.5.12) include 'Proposals are made for selective thinning and management of vegetation associated with ponds and ditches', but do not include any provision of new aquatic habitat or management of game issues that are identified as a primary driver of poor condition pond habitat. Outline proposals for habitat management (7.5.15) do not mention management of ponds.		
	Watercourses, Hydrology and Flood risk	EAGWCL001 – Significant groundwater receptors PEIR Volume I, Chapter 12: Water Resources. Table 12.2 Issue: Potentially significant groundwater receptors have been excluded from the list of sensitive receptors. Impact: Impacts to these receptors may be overlooked. Solution: Amend the table to ensure that all potentially relevant groundwater receptors are considered. Additional comments: The following receptor types should be considered and assigned sensitivity values: Groundwater Source Protection Zones; Principal and Secondary aquifer designations; Private groundwater abstractions known or potentially used for potable purposes; and Groundwater Dependent Terrestrial Ecosystems; and	Yes	The Applicant notes this comment and confirms that the sensitivity tables within **ES Chapter 12: Water Resources [APP/6.2]** have been updated to reflect the attributes of the receptors identified by the Environment Agency. The Applicant further notes that no Groundwater Dependent Terrestrial Ecosystems communities were identified during the Phase 1 habitat survey. Whilst the River Nar SSSI is classed as a GWDTE, no aspect of the CSA is located in an area classed as a GWDTE. Regardless, sensitivity tables have been updated to reflect the sensitivity of receptors as part of the **ES [APP/6.1 – 6.5].**

		Surface water features such as ponds, springs, etc.		
	Watercourses, Hydrology and Flood risk	EAGWCL002 – Impact magnitude classification PEIR Volume I, Chapter 12: Water Resources. Table 12.3. Issue: The degree of change to an EA water quality classification used in the table to define 'high' and 'medium' impact magnitude is greater than we consider appropriate and differs from best practice methods seen in similar applications. Impact: The magnitude of change required to qualify as 'high' impact is unacceptably high. Solution: You should provide justification for adopting a less conservative impact magnitude than that established in best practice. Additional comments: In impact assessments for similar development types, any reduction in water body WFD classification is typically assessed as a 'major adverse' impact.	No	The Applicant notes this comment; however, it maintains that the criteria for assigning magnitude based on Water Framework Directive (WFD) degradation is a well-established method for EIA assessment and has been used on several consented DCO solar sites, including Cleve Hill and Mallard Pass, in which both the Examining Authority and Secretary of State were content with the approach adopted in the assessment methodology. Both High and Medium magnitude of effects are significant in EIA terms and therefore would be an unacceptable effect. Therefore, no degradation of chemical or ecological status of water receptors should occur which would constitute a downgrading of WFD status.
	Watercourses, Hydrology and Flood risk	EAGWCL002 – Impact magnitude classification PEIR Volume I, Chapter 12: Water Resources. Table 12.4. Issue: The values assigned in the impact significance matrix represent a less conservative approach than that used for similar schemes and presented in best practice guidance. Impact: Impact magnitudes could be underestimated for sensitive groundwater receptors. Solution: You should review the impact significance values presented in the matrix and provide suitable justification if these are proposed to be retained as is. Note that this may affect the determination of impact significance throughout Chapter 12. Additional comments: In the table a 'High' magnitude impact on a 'Medium' sensitivity receptor or 'Medium magnitude impact on a 'High' sensitivity receptor is determined to have a 'Moderate' significance. This differs from the typical, more conservative, approach we see in similar reports for equivalent schemes, whereby this combination is assessed as having a 'Major' significance.	Yes	The Applicant notes this comment and confirms that the significance tables within **ES Chapter 12: Water Resources [APP/6.2]** have been updated to reflect the approach taken on the Cleve Hill Solar Park DCO, in which both the Examining Authority and Secretary of State were content with the approach adopted in the assessment methodology.

		Given the high value and sensitivity of groundwater resources on this site, it is of particular importance that a suitably precautionary approach to assessing risks is adopted. You should provide suitable justification for adopting a less conservative approach to impact assessment than is presented in best practice guidance and adopted for similar developments. Please also consider whether the correct approach has been taken in other chapters.		
	Watercourses, Hydrology and Flood risk	EAGWCL003 – Private water abstractions PEIR Volume I, Chapter 12: Water Resources. Table 12.5. Issue: Private water abstractions are assessed as being of 'Medium' sensitivity. Impact: The sensitivity of private potable water supply boreholes may be underestimated. Solution: You should consider all potable water supply abstractions to be of 'High' sensitivity and duly reassess impact significance. Additional comments: Private water abstraction boreholes known or potentially for potable use are assigned a nominative 50m Source Protection Zone 1 (SPZ1), which defines an area considered highly vulnerable to pollution. Potential impacts to public water supply and private water supply boreholes during the construction and operational phases should be considered. There are currently no mitigation measures in place for potentially derogated protected rights, or for groundwater contamination. The principal chalk aquifer is unconfined in large parts of the site and can be highly sensitive to contamination. We would want to see mitigation measures outlined regarding these points.	No	The Application notes that the assignation of Medium sensitivity to Private Water Supplies (PWS) is consistent with the methodology and approach of the EIA for the Cleve Hill DCO in which both the Examining Authority and Secretary of State were content with the approach adopted in the assessment methodology and the Great North Road DCO, for which the EA were content with the approach adopted in the assessment methodology. It should be noted that all PWS identified within the Water Supplies Study Area are supplied by boreholes which abstract from groundwater, which is assigned a High level of sensitivity, and therefore the correct level of sensitivity is assessed in **ES Chapter 12: Water Resources [APP/6.2]**.
	Watercourses, Hydrology and Flood risk	EAGWCL003 – Private groundwater abstractions PEIR Volume I, Chapter 12: Water Resources. Tables 12.7 and 12.8. Issue: Potential for aspects of the development to lie within Source Protection Zone 1 areas protecting private groundwater abstractions if these are located sufficiently close to the Proposed Development boundary, as accurate records not obtained. Impact: Risk to private groundwater abstractions.	No	The Applicant notes that the Borough Council of King's Lynn & West Norfolk were contacted to provide more accurate locations of PWS records provided at the PEIR stage. The Borough Council of King's Lynn & West Norfolk responded stating "I can confirm that the Council holds this information. This information is exempt under Section [sic] Section 40 of the Freedom of Information Act 2000. This is because provision of more detailed information, could identify a property and potentially an individual. Having considered the public interest, the Council's decision is to withhold the information." As such, the partial postcodes

		Solution: More accurate positional information for these private abstractions should be made available if possible. If not, the Applicant should seek confirmation from Borough Council of King's Lynn & West Norfolk of whether any of the identified abstractions fall within 50m of the Core Study Area. Additional comments: Table 12.7 shows three private water supplies (springs and a borehole) for single domestic use at Pentney and West Acre and one borehole for large/commercial use at Castle Acre. No positional information is given beyond a partial postcode and presumed closest population centre. Assuming as a worst-case scenario that these are all used for potable water supply, these would be assigned a 50m SPZ1. Table 12.8 presents a list of abstractions identified to the Applicant by Breckland Council. Many of these are stated to have identical reference numbers despite being indicated to be different distances from the Core Study Area. This discrepancy should be resolved.		provided at PEIR have been used within this assessment. It should be noted that due to the partial postcodes given, none will be within 50m of the Core Study Area.
	Watercourses, Hydrology and Flood risk Contamination	EAGWCL004 - Potential sources of land contamination PEIR Volume 1, Chapter 12: Water Resources. Paragraphs 12.4.37 and 12.4.38. Issue: Not all anticipated potential sources of land contamination have been accounted for. Impact: Sources of land contamination may not be identified and suitably managed by mitigation proposals. Solution: Include potential infill materials in historic mineral extraction pits as a potential localised source of contamination. Additional comments: The Desk Based Assessment has established that there are numerous historic mineral extraction pits, primarily marl pits, across the CSA. These are reported mainly to be filled with water, but the potential remains that some may have been infilled with materials from an unknown source, and as such could act as a localised source of mobile contamination. As stated in our EIA Scoping Consultation response, we recommend that the site walkover (also referred to as Site Reconnaissance) is carried out in accordance with our LCRM guidance and BS10175:2011+A2:2017, in particular to establish any visible evidence of infilling of historic mineral extraction pits.	No	The Applicant notes that Marl Pits have been buffered by 10m in the design of the Scheme and as such, there should be sufficient distance between works and any local migration of contaminants (if contaminants are indeed present in the infill material). An updated assessment of the potential for contaminated land to be transferred to the hydrological environment is presented in **ES Chapter 12: Water Resources [APP/6.2]**, which includes the provision for testing in proximity to the marl pits and appropriate action taken (if required) in accordance with The Environmental Protection Act 1990.

	Watercourses, Hydrology and Flood risk	PEIR Volume 1, Chapter 12: Water Resources. Paragraph 12.4.47 Issue: This section contradicts paragraphs 12.4.48 and 12.4.50 regarding the Flood Zones. Impact: Minor impact. Minor reporting error. Solution: In the final Environmental Statement please ensure that the Flood Zone classification within the core study area refers to the latest Flood Map for Planning dataset. Additional comments: This section notes that the core study area (CSA) is located entirely within Flood Zone 1. Paragraphs 12.4.48 and 12.4.50 then go on to note that there are areas of Flood Zone 2 and 3 in the eastern section of the CSA. We note that in the latest updated Flood Map for Planning (March 2025) the CSA is within Flood Zone 1.	Yes	The Applicant notes that the Core Study Area **(ES Chapter 12: Water Resources [APP/6.2]**) includes some land classed as Flood Zones 2 and 3. This area is demarcated for skylark and curlew mitigation only and no infrastructure proposed. Updated figures showing flood zones and the Scheme are provided in **ES Appendix 12.2 Flood Risk Assessment [APP/12.2].**
	Watercourses, Hydrology and Flood risk	EAGWCL005 – Potential piling impacts PEIR Volume 1, Chapter 12: Water Resources. Paragraph 12.6.13. PEIR Volume 3, Chapter 12: Water Resources. Appendix 12.3: Water Framework Directive Assessment. Table 4. Issue: It is stated within the PEIR that "the Mounting Structure poles for the solar PV modules will be piled into the ground at a superficial level". The WFD assessment incorrectly states that subsurface infrastructure depth (i.e. PV racking depth and foundations for above ground structures) will be too shallow to interact with groundwater. Impact: The depth of potential piling impact is ambiguous and potentially misleading. Potential for residual effects on groundwater supply to have been underestimated. Solution: You should clearly describe the maximum anticipated extent of piling - this is stated to be 1-4m bgl elsewhere in the report. The WFD Assessment should include consideration of the impact of potential piled foundations at the BESS and Substation Compounds. Additional comments: The Applicant states that there will be limited potential for pollutants to be released into groundwater as the groundwater levels in the underlying Lewes Nodular, Seaford, Newhaven and Culver Chalk	Yes	The Applicant notes this comment and confirms that **ES Appendix 12.3 Water Framework Directive Assessment [APP/12.3]** has been updated to confirm the maximum depth of piled Mounting Structures and the potential for piled foundations to be used at Work No 2: BESS Compound. **ES Chapter 12: Water Resources [APP/6.2]** provides triangulated analysis of long-term maximum and minimum groundwater levels compared to surface elevation at the Order limits and informs the assessment of potential effects from foundations on the hydrogeological resource.

		Formations rests at approximately 40m below ground level (m bgl). We have reviewed the following British Geological Survey borehole logs within the CSA and surrounding area (https://mapapps2.bgs.ac.uk/geoindex/home): • TF81SW2 • TF81SW12 • TF81SW1 • TF71SE3 • TF71SE2 • TF71SE68 • TF71SE69 • TF7SE74 • TF71SE1 These show a variety of groundwater rest levels within the Chalk deposits, with reported groundwater rest levels ranging from approximately 9.7m bgl to 41.34 m bgl. Although these logs do not indicate groundwater rest levels are likely to be encountered within the proposed 4m maximum PV support frame pile penetration depth, they do not show a consistent groundwater rest level of approximately 40m bgl as stated in the report and we do not consider that there is sufficient evidence currently available to conclude that these structures would not interact with groundwater. We would expect monitoring to be carried out across the CSA over a period of time sufficient to account for seasonal variation, and groundwater contour maps to be produced showing the maximum groundwater levels. If dewatering is required, equations / calculations showing the derivation of dewatering volumes should be provided. The foundations for the BESS Compound, Customer Substation and National Grid Substation could potentially be piled to depths of up to 12m below ground level (m bgl), greater than the minimum recorded groundwater depth of 9.7m bgl. Cable installation by horizontal directional drilling (HDD) methods may also extend locally into groundwater.		

	Watercourses, Hydrology and Flood risk	EAGWCL006 – Groundwater impact matrix PEIR Volume 1, Chapter 12: Water Resources. Sections 12.6.16 to 12.6.19, 12.6.51 to 12.6.55 & 12.6.56 to 12.6.60. Issue: The report concludes that impact of pollutants from the Scheme on groundwater, groundwater abstractions and associated SPZs, and to private and public water supplies, are of negligible magnitude and anticipated to have a negligible significance of impact and thus not significant. We are concerned that sufficient evidence to support this assessment has not been provided, which has been based on a potentially flawed impact matrix. The potential for significant groundwater quality impacts to occur from trenchless cable installation activities has not been suitably considered. Impact: Potential that the assessed impact significance has been underestimated, and thus potentially significant impacts have been discounted. Solution: The Applicant should revise the impact assessment matrix used for impacts to groundwater quality and consider potential impacts from piled foundation construction and trenchless cable installation methods. Additional comments: The report does not consider impacts from any trenchless cable installation activities, which may extend into groundwater, or from potential impacts from piling at the National Grid Substation, Customer Substation or BESS Compound developments. The Applicant states that “The National Grid Substation and Customer Substation and the BESS are the only Scheme infrastructure during the Construction Phase which has any potential to impact the groundwater resource…”. Should areas of contamination associated with infilled historic ground workings or other (likely highly localised) sources of existing contamination such as spills or leaks from agricultural equipment, these could potentially be mobilised via piling of PV foundations and / or cable installation activities. In Section 12.6.17 the report states that “Due to the underlying groundwater at depths likely to be greater than 2m…groundwater is unlikely to be present near the surface…” This appears to be stated in the context of the potential for groundwater to be impacted by concrete foundation construction at the BESS, National Grid Substation and Customer Substation	Yes	The Applicant notes this comment and confirms that **ES Chapter 12: Water Resources [APP/6.2]** has been updated to include infrastructure identified in the Environment Agency’s response. The Applicant also notes that Groundwater levels have been updated following triangulation of long-term records surrounding the Central Study Area (CSA) The **oCEMP [APP/7.8]** includes a section on breakout fluid containment in the event that HDD is used as a method for cable installation. A Foundation Works Risk Assessment will likely be required once the detailed design of the Scheme has been undertaken to ensure piled foundations, do not create additional contaminant pathways and any potential impacts on the underlying aquifers, such as turbidity, are managed. This would be completed once construction methods are confirmed and ground investigation data are available.

		developments, however Table 5.2 of the PEIR indicates that piled foundations to 12m bgl may be required for these structures. Based on available BGS records, these could potentially encounter groundwater within the Chalk bedrock. Section 12.6.52 states that "…the borehole is anticipated to abstract from a depth of between 9 and 40 m bgl associated with groundwater from the chalk units…" In the absence of a significant low permeability confining layer and on the basis of the information available we do not consider that impact to existing groundwater abstractions from the Chalk Principal aquifer can be discounted. We note that this also contradicts a statement in 12.6.13 where the Applicant indicates groundwater is present at over 40m depth. Section 5.2.34 states that "There may be a requirement for trenchless technology such as horizontal directional drilling (HDD) within the Site, for example to cross beneath existing underground utilities". This could potentially extend to depths at which groundwater would be encountered. Due to the high sensitivity of groundwater across the Proposed Development, a Foundation Works Risk Assessment should be carried out for all foundation structures. Any trenchless crossings should be supported by a hydrogeological risk assessment where these may interact with Principal or Secondary A aquifers or pass beneath surface watercourses or sensitive ecological receptors. A drilling fluid breakout plan should also be developed for all trenchless crossings. If Horizontal Directional Drilling is proposed to cross watercourses the Applicant would need to assess whether this would affect local licenced or unlicenced abstractions by carrying out a Water Feature Survey.		
	Battery Energy Storage System Safety Watercourses, Hydrology, and Flood risk	EAGWCL007 – Impact from BESS PEIR Volume 1.Chapter 12 Water Resources. Volume III Appendix 12.2 & Appendix 12.3. Issue: The impact magnitude on watercourses, drainage ditches from chemical pollution arising from a battery fire at the BESS compound has been assessed as not significant. We do not agree with this conclusion based on the information currently available.	No	The Applicant notes the comments but disagrees with the conclusion for the reasons set out below. The Applicant would be open to further discussions regarding the matters raised. The **FRA [APP/12.2]** identified that in the event that infiltration testing showed that disposal of surface water to ground was viable then a Sustainable Drainage Systems (SuDS) system would need to have the ability to drain to a sealed tank to contain potentially contaminated water in the unlikely event of a battery fire, and not drain to the infiltration component of the SuDS system.

		The report is considering the use of an infiltration SuDS drainage solution for surface water management at the BESS. The WFD report states that fire suppressant at the BESS would be captured in a SuDS system at the BESS in the event of a fire, resulting in negligible potential for contaminants to interact with groundwater. The report does not detail the proposed pollution mitigation measures to be incorporated into the drainage system for the Customer Substation and National Grid Substations, either for typical operational conditions or if fire suppression is needed. Impact: We consider that the significance of impact from BESS fires has been underestimated. The use of an infiltration SuDS system at the BESS poses a potentially significant risk of pollution to the underlying Principal aquifer, Source Protection Zone and public water supply abstraction as this could result in potentially contaminated water entering groundwater from spills and leaks within the BESS compound. Solution: The proposals should revisit the impact matrix used to inform the impact assessment. The proposed use of an infiltration drainage solution would introduce a potential direct migration pathway for firefighting run-off and other operational pollution releases from the BESS to impact the underlying SPZs. Additional information about the proposed surface water drainage strategy at the BESS compound, National Grid Substation and Customer Substation developments is required to demonstrate that firefighting water and operational drainage would not pose a significant risk to groundwater quality and groundwater-dependent receptors. The WFD Assessment should consider the risk from infiltration of potentially contaminated operational runoff from the BESS Compound, and from the proposed National Grid Substation and Customer Substations. Additional comments: We are pleased to see that an outline Fire Safety Management Plan (oFSMP) and outline Battery Safety Management Plan (oBSMP) will be submitted in support of the DCO Application. The Applicant notes that contact between cooling water for adjacent BESS units and battery fire smoke could create hydrochloric acid. The Applicant should note that firefighting run-off from BESS fires can contain a range of other pollutants including elevated concentrations of heavy metals.	The Applicant notes that because infiltration testing has confirmed that infiltration at the BESS is possible, **ES Appendix 12.2: Flood Risk Assessment [APP/12.2]** clarifies that a dedicated contaminated water tank will be incorporated in the final drainage design, with an automated penstock fitted on the upstream manhole of the detention basin. Details of the BESS compound and associated infrastructure drainage strategy will be contained in **ES Appendix 12.2 Flood Risk Assessment [APP/12.2**] An **outline Battery Safety Management Plan (oBSMP) [APP/7.14]** has been submitted in support of this DCO Application and sets out the safety measures proposed to be installed to reduce fire risk as well as fire protection measures. The **oBSMP [APP/7.14]** will reflect this strategy. The Applicant further notes that the use of an automated penstock on a containment tank is common practice at BESS site located in environmentally sensitive areas. The tank(s) will therefore be designed such that it also acts as an interceptor to allow for the operation spills and losses articulated in the Environment Agency's comments.	

		Section 12.6.75 states that spent firefighting water will be captured within a dedicated contaminated water tank or, if infiltration is not feasible at the BESS area the SuDS attenuation structures for surface water runoff will be sized to accommodate the anticipated runoff volumes. The report indicates in Section 12.2.9 that an infiltration-based Sustainable Drainage System (SuDS) solution for surface water drainage for the Customer Substation and BESS are being investigated for the potential for causing dissolution of the underlying chalk bedrock. Sections 141 and 153 of the FRA state that a contaminated water tank sealed with an automative penstock valve would be used to hold runoff in the event of a fire suppression event if an infiltration drainage solution were in place. This would remain closed until captured water had been sampled pending off-site removal or discharge subject to Environment Agency agreement. This would not prevent contaminants released during normal operation, e.g. from spills and leaks, from infiltrating into the Principal Aquifer. We would recommend objecting to a BESS in this development unless there is a sealed drainage system in place to adequately contain and manage any fire-fighting effluent or contaminated surface waters generated by a fire at the site, to ensure that there isno discharge of polluted water to ground or surface water bodies. The adoption of an infiltration solution for surface water drainage at the BESS, Customer Substation and National Grid Substation would not be acceptable. The BESS compound and Substation compounds should furthermore be preferentially sited away from sensitive controlled water receptors, including areas of high groundwater vulnerability. The site is underlain by a Principal aquifer used to supply public water abstraction (with the entire site and surrounding area comprising SPZ 1 or 2). BGS mapping and borehole records indicate this to directly underlie the site or be covered by a thin superficial layer. Due to the high sensitivity of the groundwater receptor and the risk of contaminative impact by spills or leaks, and infiltration of fire water, we urge the Applicant to position the BESS away from SPZ1 and preferably on the relatively low permeability Lowestoft Formation deposits present in the central and north-eastern parts of the site. Section 36 of the Flood Risk Assessment identifies that although most of the CSA is located outside areas classified as at risk of groundwater flooding, parts of the		

		indicative siting zone for the Customer Substation and BESS (Field 35) have a <25% risk of groundwater flooding. Section 2.2.3 of the FRA also indicates that sections of the BESS Compound are located within an area modelled to be at risk of pluvial flooding for the 1% AEP + CC to a depth of 0.15m. Confirmation is therefore also requested that the mitigation proposed to be implemented at the BESS would be sufficient to prevent impacts on groundwater quality in the reasonable worst-case event of a combined flood event and catastrophic BESS fire. See also the following Guidance from National Fire Chief's Council (NFCC) Grid Scale Battery Energy Storage System planning –Guidance for FRS.		
	Battery Energy Storage System Safety Watercourses, Hydrology, and Flood risk	Overcoming our objection The Applicant should submit a proposed development plan confirming that the BESS compound, customer Substation and National Grid Substation will not be positioned within Zone 1 of a Groundwater Source Protection Zone and preferably are sited on superficial Lowestoft Formation Diamicton deposits, as far as practicable from the Marnham public water supply abstraction. A figure showing the indicative siting zones for the Customer Substation, National Grid Substation and BESS in context of mapped superficial geology would be beneficial. We recommend that micro-siting of these compounds is carried out based on ground investigation data, to ensure a maximum thickness of low permeability deposits is present beneath these features. The Applicant should provide a detailed drainage plan for the site. This information must satisfactorily demonstrate to the local planning authority that the risks to controlled waters have been fully understood and can be addressed through appropriate measures. This information should include, but not be limited to: A detailed drainage plan which demonstrates, in the event of an emergency, that contaminated firewater can be adequately contained within the site to ensure that there is no discharge of polluted water to ground or surface water bodies. The scheme should include an impermeable base or layer beneath the battery unit compound to ensure infiltration beneath the site can be controlled. Any system for the storage of contaminated firewater should have sufficient capacity/headroom for the	No	The Applicant notes these comments and confirms that a **Location Plan [APP/2.1]** forms part of the DCO Application. As confirmed in a meeting with the EA in September 2025, Work No. 2: BESS, Work No. 3: Customer Substation and Work No. 4: National Grid substation are not located in SPZ 1 and this is shown in **Figure 12-5** of **ES Chapter 12: Water Resources [APP/6.2]**. The **FRA [APP/6.4]** outlines that the containment volume for fire suppressant has headroom for the 1% AEP event plus the NFCC volume. Therefore the mitigation proposed to be implemented at the BESS would be sufficient to prevent impacts on groundwater quality in the reasonable worst-case event of a combined flood event and BESS fire.

		volumes expected in the event of a fire, even during periods of intense rainfall. The system for containing firefighting effluent should be automatic with a backup system in place in case of power failure. Due to the sensitivity of ground and surface waters on the site, a sentinel water pollution monitoring system should be established to provide early warning of any spills or leaks from the BESS and Substation drainage systems which may affect water quality under normal operation.		
	Watercourses, Hydrology, and Flood risk	EAGWCL008 – Cables left in-situ PEIR Volume 1.Chapter 12 Water Resources: Sections 12.6.92 to 12.6.94 Issue: The report indicates that decommissioning would involve the removal of ground mounted PV Modules, possible foundations and hardstanding. The report does not discuss the fate of buried cables. Impact: Potential for buried cables left in-situ following decommissioning to pose an ongoing pollution risk to Controlled Waters. Solution: Confirmation of whether buried cables would be removed as part of the decommissioning activities and, if these are to be retained, demonstrate that they would not pose a significant risk to Controlled Waters via degradation and/or damage from future agricultural activities. Additional comments: Following decommissioning, any electrical cables present within potential ploughing depth on future agricultural land would be at risk of mechanical damage. This could result in the accelerated release of pollutants including microplastics into the environment from these cables and may cause damage to agricultural equipment.	No	As outlined in **ES Chapter 5: Scheme Description [APP/6.1]** cables will either be removed and recycled / disposed of (depending on technology at the time) or be left in situ. The Applicant notes that due to the composition of modern cables (XLPE (cross-linked polyethylene with no fluids or hydrocarbons) should cables be left in situ the risk to the hydrogeological environment through degradation is minimal. Cabling will also be installed to a depth of up to 1.2m and therefore should not interact with typical ploughing techniques.
	Watercourses, Hydrology, and Flood risk	EAGWCL009 – Unexpected contamination PEIR Volume V. Commitments Register: Table 1-1 Issue: The report does not currently commit to incorporating an unexpected contamination discovery protocol into the outline CEMP and DEMP. The	No	The Applicant notes this comment and confirms that both a CEMP will be prepared for the Scheme. The **oCEMP [APP/7.8]** forms part of the DCO Application. The oCEMP [APP/7.6] commits to a procedure for dealing with suspected contaminated land in accordance with the requirement s of the Environmental Protection Act 1990.

		Commitments Register also does not clearly commit to the production of a DEMP (or equivalent). Impact: There is limited potential for unexpected contamination to be encountered associated with historic infilling of mineral extraction pits and/or agricultural land use. There is currently no clear mechanism to secure the production of a DEMP (or equivalent). Solution: Commitment to be made to the preparation of an unexpected contamination protocol in the outline CEMP and DEMP (or equivalent). Additional comments: Where possible, temporary construction compounds should be located outside Source Protection Zones to limit the potential for spills and leaks of stored fuels, oils and chemicals from impacting potable groundwater abstractions. As the entire site lies within SPZ 1 and SPZ 2, we encourage the Applicant to avoid siting any temporary construction compounds within an SPZ1. Preferably these should be sited on low permeability superficial strata as far from the abstraction point as possible.		In addition, temporary construction compounds will, where possible, be located outside Source Protection Zone 1 (SPZ1).
	Contamination	EAGWCL010 - Unidentified contamination PEIR Volume 1. Chapter 12: Section 12.4.1 Issue: The report refers to a desk-based study undertaken in September 2024 and updated in February 2025 to provide an overview of the Baseline Conditions for water resources and ground conditions within the CSA, and the undertaking of site walkovers on the CSA on 1st October 2024. This report has not been made available for review at either the Scoping or PEIR stages, and the information sources used to define the baseline conditions are unclear. Impact: Potential for sources of current and historic land contamination within the Proposed Development to remain unidentified. Solution: The Applicant should present the Desk-Based Study used to define the Baseline Condition of the CSA and clearly identify the information sources used. Additional comments: We expect land contamination assessments to follow the tiered approach laid out in our Land Contamination Risk Management (LCRM) guidance. The preliminary risk assessment (PRA) should include historical plans of the site, an appraisal of the environmental setting (including geology,	No	The Applicant notes that **ES Chapter 12: Water Resources [APP/6.2]** states the current and previous agricultural land use do not indicate the presence of contaminated land within the CSA. The KLWN Contaminated land register states that “No sites to date have been formerly determined as contaminated in our borough. So there are no sites on our contaminated land register”. Observations from site walkovers indicate that the marl pits have not been infilled and BGS reports do not indicate the disposal of waste water into the pits. The Applicant further notes that the design of the Scheme has incorporated a 10m buffer from the marl pits from the siting of infrastructure, meaning there is limited potential for the Scheme to interact with material from the marl pits.

		hydrogeology, groundwater and surface water receptors, potential contaminants of concern and source areas), an initial conceptual site model (CSM) describing possible pollutant linkages for controlled waters, and identification of potentially unacceptable risks. Land contamination investigations should be undertaken by suitably qualified and experienced professionals and in accordance with BS 5930: Code of practice for ground investigations and BS 10175: Investigation of potentially contaminated sites – code of practice. Soil and water analysis should be fully MCERTS accredited. Investigation, demolition, remediation, or construction works must not create new pathways or linkages to controlled waters. Clean drilling techniques may be required for boreholes that penetrate contaminated ground.		
	Watercourses, Hydrology, and Flood risk Contamination	PEIR Volume 1. Chapter 12: Section 12.2.13. Issue: Although the report states that "the sensitivity of the Baseline Conditions…will be assessed in line with best practice guidance, legislation, statutory designations and/or professional judgment, these are not directly identified or cited. Impact: Potential for aspects of the proposed site investigation and assessment methods to fall outside current guidance and best practice. Solution: The report should clearly identify that existing groundwater land contamination risks would be determined in accordance with legislation and current best practice guidance, including BS5930, BS10175 and the Environment Agency's Land Contamination Risk Management (LCRM) guidance.	No	A list of the Guidance and Legislation which informed the PEIR assessment has been updated to reflect the EA's recommendations, and **ES Appendix 12.1: Consultation and Legislation, Planning Policy and Guidance [APP/6.4]** has been updated.
	Watercourses, Hydrology, and Flood risk	Flood Risk EAFR001 – BESS flood design PEIR Volume 1, Chapter 12: Water Resources. Paragraph 60. Issue: The FRA confirms that the BESS units will be located to avoid areas where pluvial flood depths exceed 0.4m, with units raised 0.1m above ground level. This raising is insufficient as mitigation for pluvial flooding.	No	The Applicant notes that the design of the Scheme has been refined since the submission of the Flood Risk Assessment at the PEIR stage and the maximum depth of pluvial flooding within the revised indicative zone for the BESS is 0.19m. Should BESS units be located within this area at the detailed design stage then they would be raised 300mm from above the localised flood depth. It should be noted that there is a commitment in the **FRA [APP/12.2]** to a SuDS system for Work Nos. 2 to 4 which will be designed to the 1 % AEP plus 40 % climate change allowance event, meaning that the current pluvial pathway

		Impact: As currently proposed, BESS units may remain at risk of flooding where pluvial flood depths exceed 0.1m. Solution: Flood mitigation design for the BESS units should be confirmed to include appropriate raising above ground level. We would require raising to a minimum 300mm above localised flood depths.		would enter the drainage system, rather than flow across the surface of the Scheme.
	Watercourses, Hydrology, and Flood risk	EAFR002 – Culverts PEIR Volume 1, Chapter 12: Water Resources. Paragraphs 12.6.28 and 12.6.29. Issue: Mitigation measures such as wide box or arch culverts are likely to prevent impediments to flow. Impact: Flood risk could be increased if crossings are not designed appropriately. Solution: Please note we would object to any culverting of Main Rivers and would recommend against culverts for crossings over other Ordinary Watercourses. We prefer the use of open-span structures such as bridges. Any proposed crossings should be designed so that the soffit level of any bridges sits above the design flood level. The design flood level for permanent crossings in this case would be the 1% (1 in 100) annual exceedance probability (AEP) plus higher central climate change scenario. For temporary crossings as part of the construction phase of the scheme the present day (without climate change) 1% (1 in 100) AEP scenario can be used. Additional comments: The direct rainfall hydraulic modelling may be helpful in determining sizing of any new crossings (particularly soffit levels) such that they do not impede flows. If the direct rainfall model grid resolution limits the degree to which crossing size can be informed for smaller channels, then simple hand calculations, for example using the Mannings equation, could be used in the case of open span crossings. Where culverts are used the CIRIA Culvert Screen and outfall manual (C786) may be a useful reference to help determine appropriate sizing. For crossings over ephemeral watercourses and agricultural drainage ditches more qualitative methods might be appropriate.	No	The Applicant notes this comment and confirms that no culverting of Main Rivers is proposed as part of the Scheme. Should Access Tracks cross the ephemeral drainage ditches onsite then culverts will be designed to convey the 1% AEP event plus 40% climate change and therefore the soffit of the crossing will be located above the design flood event, as outlined in Section 3.8 of the **oCEMP [APP/7.8]**, and this is secured through a requirement of the DCO.
	Watercourses, Hydrology, and Flood risk	PEIR Volume 1, Chapter 12: Water Resources. Paragraph 12.4.47 Issue: It is noted that the core study area (CSA) is located entirely within Flood Zone 1. Paragraph 12.4.48	No	The Applicant notes these comments but confirms that the Order Limits, which form the CSA, have evolved since the PEIR submission. As a result, only a small area in the northern part of the CSA now falls within Flood Zones 2 and 3, and this land is allocated solely for skylark and curlew

		and 12.4.50 then go on to note that there are areas of Flood Zone 2 and 3 in the eastern section of the CSA. These statements appear contradictory. We note that in the latest updated Flood Map for Planning (March 2025) the CSA is within Flood Zone 1. Impact: Minor impact. Minor reporting error. Solution: In the final Environmental Statement documentation please make sure that the Flood Zone classification within the core study area refers to the latest Flood Map for Planning Dataset.		mitigation. The remainder of the Scheme falls within Flood Zone 1. The Applicant further confirms that no infrastructure is located in this area, as shown on **Figure A12-1-1** of the **FRA [APP/6.4].**
	Watercourses, Hydrology, and Flood risk	EAFR003 - Climate change allowance PEIR Volume 1, Chapter 12: Water Resources. Appendix 12.2, Section 1.2.2.1. Issue: Paragraph 11 states that as the development is classed as Essential Infrastructure a higher central allowance will be used for climate change. The 33% allowance which reflects the 2080's epoch higher central allowance for the North Norfolk management catchment is being taken forward. This is reasonable and reflective of the fluvial design event although a Credible Maximum Scenario has not been considered. Impact: Sensitive infrastructure could be at risk if climate change exceeds higher central estimates. Solution: Please note that as the development is classed as essential infrastructure it will also be important to understand the impact of an upper climate change scenario on the development site in line with guidance on climate change allowances for flood risk assessment available online at: Flood risk assessments: climate change allowances - GOV.UK. For the North West Norfolk management catchment the upper climate change allowance is 57%. Additional comments: It may be possible to refer to the existing River Nar 0.1% (1 in 1000) annual exceedance probability extent as a suitable proxy for the Credible Maximum scenario given the scaling between the 1% (1 in 100) and 0.1% (1 in 1000) Annual Exceedance Probability(AEP) scenarios for this watercourse. For the Ordinary Watercourses and drains which run near to or bisect the development area, the Credible Maximum scenario could be determined by applying an	No	The Applicant notes that flows used within the River Nar model are 56% higher for the 0.1% Annual Exceedance Probability (AEP) than the 1% AEP and, therefore, in the absence of a scenario showing the 57% AEP of CC required for the 2080's Upper allowance for the North West Norfolk Management Catchment peak river flow, the 0.1% AEP has been used as a proxy. The extents of the 0.1% AEP event do not encroach upon the areas allocated for above ground infrastructure, such a Work Nos.s 1 to 4. The only aspect of the Scheme within the 0.1% AEP event outline is an area allocated for skylark and curlew mitigation, which will be retained for agricultural use.

		uplift of 40% to the rainfall within the direct rainfall modelling.		
	Watercourses, Hydrology, and Flood risk	EAFR004 – Rainfall modelling PEIR Volume 1, Chapter 12: Water Resources. Appendix 12.2, Table 1. Issue: This table includes some of the model parameters used for the direct rainfall modelling. These are useful however there are some parameters which are missing which would be important to include within the final Flood Risk Assessment. Impact: It is difficult to appraise the direct rainfall modelling approach without additional details. Solution: In the final Flood Risk Assessment please confirm the grid reference of the catchment outlet or point which was used to generate the rainfall hyetograph data. Please also confirm the approach which was taken for rainfall losses (for example ReFH2 losses model or losses based on land use) and whether the FEH13 or FEH22 rainfall depth duration frequency (DDF) model was used in the assessment. FEH22 data should be used unless FEH13 provides more conservative rainfall depths or can be shown to be similar to FEH22 rainfall depth data. In addition, please test the impact of a Credible Maximum scenario (+40%) on model results. This is particularly important given the presence of the substation and Battery Energy Storage System (BESS) near the areas shown to be at risk of flooding in the design event as illustrated in plate 12. Depending on the placement of above ground infrastructure with respect to the design flood extent it may be necessary to undertake “with development” modelling to understand the impact of any impediment to flow or loss of floodplain storage, particularly for the Battery Energy Storage System (BESS) and substation. Additional comments: In section 1.7 paragraph 29 on page 1-7 it is stated that the Environment Agency pluvial flood depth datasets do not apply climate change. For reference, the updated Risk of Flooding from Surface Water mapping (January 2025) does also include the effects of climate change for the 2050’s epoch. This won’t affect the outcomes of this assessment as more detailed direct rainfall modelling has been undertaken but please bear this is mind for future reference.	No	Full details, including active areas, rainfall profiles and losses, of the direct rainfall model are provided in **Annex F** of the **FRA [APP/12.2].**

		Other Environmental Matters EAW001 – Waste Classification PEIR Volume I, Chapter 15: Other Environmental Matters. Issue: Waste classification has not been mentioned in the document. Impact: Waste may be improperly classified which may lead to inappropriate process controls, recovery treatments or disposal locations. Without a full waste assessment of each waste component, the risk of harm to the environment is increased, as waste may end up somewhere without appropriate controls. Solution: All waste must be appropriately classified in accordance with WM3 before a suitable route for recovery or disposal can be identified. Proper disposal or recycling is critical to avoid environmental contamination. See: Waste_classification_technical_guidance_WM3.pdf.		The Applicant has appropriately considered likely construction waste from packaging and excess materials within the assessment of waste effects. Soil from earthworks is anticipated to be used onsite wherever practicable to reduce outward soil waste. Soil waste is anticipated only to be removed from site where required due to contamination. This is procedurally set out in the **oCEMP [APP/7.7]** and **outline Soil Management Plan (oSMP) [APP/7.14].** HGV trips associated with the removal of waste at construction, during operation, and at decommissioning have been included in the assessments of air quality (Section 6.8 of **ES Chapter 16: Other Environmental Matters [APP/6.2]**), noise (**ES Chapter 10: Noise and Vibration [APP/6.2]**) and transport (**ES Chapter 9: Transport and Access [APP/6.2]**). Mitigation measures with respect to dust, noise and traffic are set out in the embedded and additional mitigation measures set out in each of the respective chapters or assessment sections. With respect to mitigating impacts from storm damage, **ES Chapter 13: Climate Change [APP/6.2]** sets out future baseline expectations for extreme weather events. The mounting structures and PV panels should be sourced and designed to withstand the anticipated 1 in 100-year storm conditions to reduce the likelihood of weather-related damage during construction and operation. With respect to response to storm events, damaged infrastructure would be considered waste where it can not be reused and would be replaced as required. In the event of wide-scale damage event, waste procedures for damaged solar panels would be enacted as is planned for the wide-scale replacement scenario, as secured through the **oEMP [APP/7.9].** The Applicant confirms that the decommissioning of all onsite infrastructure is considered in the assessment of waste outcomes.
	Waste management	Waste must be transferred with appropriate documentation, which must be retained in accordance with legal requirements (see Waste Duty of Care Code of Practice). Additional comments: During the construction phase, there will be waste from packaging materials, offcuts of materials used for mounting structures, excess concrete, and soil from earthworks. Where soils are being processed/treated a Waste Permit may be required and this will likely include mobile machinery Waste: environmental permits - GOV.UK . Consideration and plans need to be submitted to deal with dust mitigation, noise and traffic to and from the site in relation to any waste activities. Solar panels have a lifespan of about 25-30 years although they have quoted 40 years in this document. Once they reach the end of their life, they become waste. Solar panels contain materials such as lead, cadmium, and other heavy metals, which classify them as hazardous waste in some contexts. Currently, recycling solar panels can be expensive or not economically viable, leading to concerns about these panels ending up in landfills, potentially leaking toxins into the soil or groundwater. The report states that there will be greater opportunities for PV panel recycling in the future, however the panels will still be considered waste	No	

		at end of life or if broken and must be classified accordingly even if being recycled. There is also the consideration if panels are damaged across large areas of the installation, creating waste. This has been seen in Porth Wen (190 acres) during Storm Darragh recently where hundreds of solar panels were blown off their mountings and some were torn apart in the storm. How would the site deal with an incident such as this? When a solar farm is decommissioned, not only do the panels need managing, but also other infrastructure like frames, cables, inverters, and batteries (if used for energy storage).		
	Decommissioning phase	EAW002 – Decommissioning PEIR Volume I, Chapter 15: Other Environmental Matters. Issue: After decommissioning, the land must be restored to its previous condition or a suitable alternative use. This involves managing any residual waste or contamination that might have occurred during the operational life of the solar farm. Impact: A lack of clear plans to manage residual waste or contamination can lead to wastes being abandoned. Unrectified contamination can mean the land is no longer suitable for restoration to its original use. Solution: You must demonstrate in your application how you will restore the land to how it was before the installation. Please see Planning and aftercare advice for reclaiming land to agricultural use - GOV.UK.	No	An **outline Decommissioning Strategy (oDS) [APP/7.10]** forms part of the DCO Application and confirms that Waste Duty of Care will be ensured with respect to all waste generated within the Order limits. All waste to be removed from the Order limits will be undertaken by fully licensed waste carriers and taken to suitably licensed waste management facilities and managed in line with relevant requirements. A discovery and inspection strategy would also be put in place which details the requirements and procedures for encountering land contamination, should contaminated land be encountered. Post-decommissioning, the landowners would choose how the land is to be used and managed; the landowner may return all of the land to agricultural use, although it is likely that established habitats such as hedgerows and woodland would be retained, given their potential benefits to agricultural land and the wider farming estate.
	Watercourses, Hydrology, and Flood risk Contamination Protected sites	Advice for Applicant Groundwater and Contaminated Land Section 4.3.9 references environmental constraints which have been considered in the site selection process. The list is not presented as exhaustive but notably does not include groundwater Source Protection Zones (SPZs) - these are however discussed in Chapter 12. The site lies wholly within a groundwater SPZ, with the westernmost portion falling within SPZ 1 (Inner) and the remainder within SPZ 2 (Outer) designations. With superficial deposits largely absent across the site and bedrock across the site comprising Chalk, these are particularly vulnerable to pollution.	No	The Applicant notes these comments and confirms that Groundwater Source Protection Zones were considered at an early stage in the Site selection and design process, whereby the BESS, Customer Substation, and National Grid Substation were sited to avoid SPZ 1. This is shown on **Figure 12-5: Water Resources [APP/6.2].**

	Watercourses, Hydrology, and Flood risk	The report states that "the metal frames upon which the PV panels will be mounted will be pile driven or screw mounted into the ground to a maximum depth of 4m, subject to ground conditions and further environmental assessment". This is greater than the maximum depth of 3.5m stated in the Scoping Report. Increasing the maximum depth of the PV panel mounting frame foundation means the 'worst case scenario' used for the Scoping report is inaccurate and raises the possibility that there may be other deviations from the previously stated 'worst case' design parameters. Any design changes which may result in increased likelihood or severity of impact as the design of the proposed development is progressed toward DCO application should be clearly identified.	No	The Applicant notes that the assessment in **ES Chapter 12: Water Resources [APP/6.2]** and the accompanying Appendices assume a 4m depth of pile for the Mounting Structures, as described **in ES Chapter 5: Scheme Description [APP/**6.1], meaning a worst-case scenario for interaction with the water environment has been assessed.
	Watercourses, Hydrology, and Flood risk	It does not appear that groundwater level monitoring infrastructure has been installed across the site or provided groundwater level information from the site or surrounding area beyond that available in BGS records. We would expect level data in the form of hydrographs covering a sufficient period to show seasonal groundwater level trends. Knowing the levels in and around the perimeter of the site would aid in determining if dewatering would be required, and whether an abstraction licence is likely to be needed.	No	The Applicant notes these comments; however, due to the availability of groundwater level data from DEFRA's Hydrology Data Explorer across a spatial region which the Scheme is located, new groundwater monitoring locations were not installed, as there are long-term records of groundwater levels. **ES Chapter 12: Water Resources [APP/6.2]** provides triangulated analysis of long-term maximum and minimum groundwater levels compared to surface elevation at the Order limits.
	Watercourses, Hydrology, and Flood risk	We recommend that the Applicant produces a Hydrogeological Impact Assessment (HIA) specifically to consider dewatering impacts. This should take account of groundwater levels based on a suitable quantity of monitoring data, the anticipated maximum depths of piled and other deep foundation installation activities, and the results of a comprehensive Water Features Survey.	No	The Applicant notes these comments; however, due to the availability of groundwater level data from DEFRA's Hydrology Data Explorer across a spatial region which the Scheme is located, new groundwater monitoring locations were not installed, as there are long-term records of groundwater levels. **ES Chapter 12: Water Resources [APP/6.2]** provides triangulated analysis of long-term maximum and minimum groundwater levels compared to surface elevation at the Order limits.
	Watercourses, Hydrology, and Flood risk	The report states that the search area buffer used for the Water Supplies Study Area (WSSA) is set at 1km based on Paragraph 2.15 of guidance issued by the Scottish Environmental Protection Agency (SEPA) in the absence of equivalent guidance from the Environment Agency or British Geological Survey. The	No	The Applicant notes these comments and confirms that Chapter references within **ES Chapter 12: Water Resources [APP/6.2]** have been updated to include the SEPA guidance.

		SEPA guidance document is not identified in the chapter text or reference section, making it difficult to confirm that the cited guidance is accurate.		
	Watercourses, Hydrology, and Flood risk	The Core Study Area (CSA) for the Water Resources chapter is defined as the Order Limits area. Section 12.4.37 and 12.4.38 state that only the CSA has been considered regarding potential land contamination sources, principally authorised and historic landfill sites. Landfill sites have the potential to cause contaminative impact via migration of leachate and hazardous ground gases significantly beyond their defined boundaries. To consider only the Order Limits area poses a risk of viable off-site contamination sources being discounted. In the case of the Proposed Development site however, we do not hold any records of historic or authorised landfill sites within 250m of the CSA.	No	The Applicant notes that the closest historical landfill site to the Order limits is approximately 1km south west of the Highway Works to the north of Swaffham. Similarly, there are no Permitted Waste Sites within 1km of the Order limits. As such, there is unlikely to be leachate in proximity to the Scheme.
	Watercourses, Hydrology, and Flood risk	The Applicant should be aware that although there are no currently designated Priority Habitat Chalk Rivers present within the draft Order Limits, the River Nar, situated within 1km of the northern Order Limits, and an unnamed tributary of the River Nar located approximately 150m north-east of the site are designated as Priority Habitat Chalk Rivers: Chalk Rivers (England).	Yes	The Applicant notes these comments and has updated the designations section of **ES Chapter 12: Water Resources [APP/6.2]** has been updated to reflect that the River Nar is a Priority Habitat Chalk river. Additionally, due to the updates to the Order limits, the unnamed tributary of the River Nar now runs parallel to Work No. 11 – Skylark and Cerlew Mitigation Area which are not proposed for development and allow continued agricultural use and associated access.
	Watercourses, Hydrology, and Flood risk Protected sites	A comprehensive Water Features Survey does not appear to have been undertaken. Although designated conservation areas such as the River Nar SSSI have been considered, protected rights such as licenced abstractions, GWDTEs and other surface water features such as ponds have not been taken into account.	No	The Applicant notes that ponds within former Marl Pits have been buffered to a distance of 10m as set out in **ES Chapter 5: Scheme Description [APP/6.1].** Images and descriptions of water features, based on site observations, are provided in **Section 12.6 of ES Chapter 12: Water Resources [APP/6.2].** Whilst the River Nar SSSI is classed as a GWDTE, no aspect of the CSA is located in an areas classed as a GWDTE. Regardless, sensitivity tables have been updated to reflect the sensitivity of receptors. As also outlined in **ES Chapter 6: Ecology [APP/6.1],** no Groundwater Dependent Terrestrial Ecosystems (GWDTE) communities have been identified during the Phase 1 survey. Licenced groundwater abstractions were requested from the Environment Agency and are outlined in **ES Chapter 12: Water Resources [APP/6.2].**

	Watercourses, Hydrology, and Flood risk Battery Energy Storage System Safety Emergency Access	The report states that water used for the Scheme will not be sourced through a new abstraction and will be sourced offsite. The Applicant should consider the source of supply for emergency firefighting purposes in the event of a fire at the BESS compound.	Yes	The Applicant notes that these comments and confirms that supply of water for firefighting would be from two tanks onsite. Should firefighting appliances require additional water then this would be provided as a combination of water tankered into the Scheme, the existing landowner's supply, and Anglian Water supply.
	Watercourses, Hydrology, and Flood risk	The Environment Agency regulates the abstraction of water from surface water and underground sources. An abstraction licence is not needed to install and test a borehole solely for the purpose of firefighting (including training and testing). It is recommended the operator of the site obtains a groundwater investigation consent (under section 32/3 of the Water Resources Act 1991) so they can find out whether there is adequate water available. See https://www.gov.uk/government/publications/apply-for-consent-to-investigate-a-groundwater-source/apply-for-consent-to-investigate-a-groundwater-source for further information.	No	The Applicant notes these comments and confirms that, based on the water consumption of the Scheme, it is not anticipated that an abstraction licence will be required.
	Materials	We strongly recommend that all solar panels are Per- and polyfluoroalkyl substances (PFAS) free. Some solar panels are treated with a PFAS coating. PFAS is not mentioned in the PEIR. If panels containing PFAS are used, we suggest that there is consideration of this in the Operational Environmental Management Plan (OEMP) and Decommissioning Environmental Management Plan (DEMP). For example, if PFAS coating is damaged there is a risk of persistent chemicals entering the natural environment during heavy rainfall, washing, maintenance, and removal. The OEMP should also incorporate measures to minimise the risk of panel coatings becoming damaged via 'thermal shock' such as if cleaned whilst at a high temperature due to prolonged exposure to sunlight.	No	The Applicant notes these comments; however, suggests that as evidenced in Chapter 12 of the PEIR, even in the event of solar PV panels becoming damaged there is limited potential to transfer chemicals to the hydrological environment. This is supported by the Solar Energy Industries Association (SEIA) who conclude that even in the event of the glass breaking and being left unrepaired, it would take years to extract any type of substance from the broken panels. The Applicant further notes that a NREL [Ref 12-1] study suggests that only microcracks are created when exposing warm or hot solar PV panels to water of colder temperature, further suggesting that there would be limited potential for transfer of chemicals from the Scheme to the hydrological environment in the absence of measures outlined in the **oEMP [APP/7.8],** such as restricting the cleaning of the solar PV panels when temperatures exceed the limit which could give rise to thermal shock.
	Watercourses, Hydrology, and Flood risk	Water Quality Table 12.2 Framework for Determining Sensitivity of Receptors. 'High' sensitivity receptors previously included 'A watercourse or water body with a Water Framework Directive (WFD) Overall Water Body classification of 'High' and 'Good' in the EIA scoping	Yes	The Applicant notes these comments and confirms that sensitivity tables have been updated in **ES Chapter 12: Water Resources [APP/6.2]** to include watercourses of 'High' Overall Water Body classification.

		report. However, in the PEIR, Water body with WFD classification of 'High' is missing. This could lead to highly sensitive watercourses being insufficiently assessed, please reinstate Water body of 'High' WFD classification as part of the 'High' sensitivity receptors.		
	Watercourses, Hydrology, and Flood risk Construction impact	Section 12.6.33. The potential requirement of Environmental Permitting Regulations (EPR) permits for the discharge activities of construction dewatering to watercourses or ground was not mentioned. This could lead to breach of the Environmental Permit Regulation 2018, pollution of the receiving environment and may cause delays during the construction. A bespoke EPR permit maybe required, unless the activity could meet the criteria of the Regulatory Position Statement (RPS) 261 (construction dewatering of uncontaminated water for less than 3 months) or a Standard Permit.	No	The Applicant notes this comment and confirms that the volume of dewatering is likely to exceed the limit outlined in RPS 261 then permits for dewatering will be applied for by the Construction Contractor.
	Watercourses, Hydrology, and Flood risk Construction impact	Section 12.6.33. Insufficient silt removal prior to discharge. It is stated that "Silty water generated during the construction phase will be subject to a settlement process through drainage mitigation measures such as silt traps, silt fencing etc and channelled into vegetated area to allow the settlement of solids." This could lead to silt blinding of the ground at the discharge location and cause water to runoff along the surface of the ground and entering watercourses or drainage ditches nearby. It may cause pollution of the watercourses. Silt fencing should not be used as primary settlement method for construction dewatering. It should be considered as last line of defence against silt mobilisation. Instead, settlement ponds/lagoons, mechanical removal, such as the use of Siltbuster, should be used prior to discharging to ground. This should sufficiently prevent silt blinding of the discharge location.	No	The Applicant notes that the process for silt removal, should dewatering be required, is outlined in Section 3.8 of the **oCEMP [APP/7.6]** and includes the use of lined settlement lagoons and Siltbuster (or similar manufacturer) units prior to discharging to vegetated ground.
	Watercourses, Hydrology, and Flood risk Construction impact	Section 12.6.58. The regular placement and signposting of spillage/absorbent kit around the construction site was not mentioned. This could lead to potential seepage of any accidental spill into the ground and polluting the groundwater. Spillage kits should be regularly placed and clearly signposted around the construction site to clean up any accidental spillage. The refuelling points and bunds for storage should be impermeably lined for containment to prevent discharge of pollutant to groundwater.	Yes	The Applicant notes these comments and confirms that the signposting of spill kits and the procedure for refuelling in designated areas, which are lined with impermeable membranes, is outlined in the **oCEMP [APP/7.6].**

1.8 Fenland District Council

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Fenland District Council	General comment	In response to this consultation the Local Planning Authority, Fenland District Council, has no comment to make.	No	The Applicant thanks Fenland District Council for responding to the consultation and continues to welcome further engagement, if required.

1.9 Forestry Commission

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Forestry Commission	Ecology	Thank you for consulting the Forestry Commission on this proposal. As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland. We note there are no ancient woodlands either within or adjacent to the site, that some veteran trees have been identified and that there are several small fragmented areas of mixed deciduous woodland both within and adjacent to the site.	No	The Applicant notes these comments and thanks the Foresty Commission for responding to the consultation. The Applicant also notes that the Landscape Designations within the Site are set out in **ES Chapter 3: Order limits and context [APP/6.1]**.
	National policy Ecology	Potential Impacts and relevant policy: Ancient and veteran trees: Ancient and veteran trees are irreplaceable habitats. Section 5.4.53 of EN1 – The Overarching National Policy Statement for Energy states: "The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran	No	The Applicant recognises the important policy protections afforded to ancient woodland, ancient trees, veteran trees and other irreplaceable habitats under Paragraph 5.4.53 of NPS EN-1, in particular. **Policy Compliance Document [APP/5.6]** demonstrates the Scheme's compliance with the policies established for these habitats under NPS EN-1 and, as applicable, NPS EN-3 and NPS EN-5.

		trees unless there are wholly exceptional reasons and a suitable compensation strategy exists."		
	Ecology	We would particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland – plus supporting Assessment Guide and "Keepers of Time" – Ancient and Native Woodland and Trees Policy in England.	No	The Applicant notes this advice and can confirm this has been followed.
	Ecology	The Joint NE/FC Standing Advice states that for ancient or veteran trees the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area.	No	The Applicant notes advice and confirms that irreplaceable habitats (ancient and veteran trees) are to be retained within appropriate buffers (of at least 15 times the tree's diameter) as set out in **Table 5.2 of ES Chapter 5: Scheme Description [APP/6.**1], and **Table 7.11 ES Chapter 7: Ecology and Biodiversity [APP/6.2].** Woodland will be retained within the layout of the Scheme where practicable, with the exception of removals and/or crossings required for new Access Tracks, perimeter fencing and Cabling. Impacts are considered within **ES Chapter 7: Ecology and Biodiversity [APP/6.2]**.
	Ecology	The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy. Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals).	No	The Applicant notes that this requirement and confirms that irreplaceable habitats (ancient and veteran trees) are to be retained with appropriate buffers (of at least 15 times the tree's diameter) as set out in **Table 5.2 of ES Chapter 5: Scheme Description [APP/6.1]**, and **Table 7.11 ES Chapter 7: Ecology and Biodiversity [APP/6.2]** . This will ensure the roots of these trees will be adequately protected as construction traffic will not be tracking across the roots. Similarly, appropriate buffer zones will be maintained to other hedgerows with trees, tree lines, individual trees and tree groups, including a minimum of 10m (unless specified by an Arboricultural Consultant) as set out in **Table 7.11 ES Chapter 7: Ecology and Biodiversity [APP/6.2]** which will therefore ensure that the Root Protection Zones (as specified in British Standard 5837) remain adequately protected
	Ecology	Due to the irreplaceable nature of ancient woodland and ancient and veteran trees, most temporary effects will result in irreplaceable damage. The RPA should be avoided and protected, especially in the cases where there is likely to be frequent construction traffic where roots are particularly vulnerable to compaction. Any effect from the incursion into RPA's of veteran trees may not become immediately apparent and will need to be extensively monitored, even after construction.	No	The Applicant notes this comment and confirms that irreplaceable habitats (ancient and veteran trees) are to be retained with appropriate buffers (of at least 15 times the tree's diameter) as set out in **Table 5.2 of ES Chapter 5: Scheme Description [APP/6.1]**, and **Table 7.11 ES Chapter 7: Ecology and Biodiversity [APP/6.2]**. This will ensure the roots of these trees will be adequately protected as construction traffic will not be tracking across the roots, such that no incursion into RPA's will be required.

	Indicative area for solar PV panels Ecology	Priority Habitat: There are several isolated fragmented areas of mixed deciduous woodland within the order area for solar PV installation. Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England).	No	The Applicant notes this comment and confirms that the impacts of the Scheme on Priority Habitats have been fully considered within **ES Chapter 7: Ecology and Biodiversity [APP/6.2],** which concludes there are no significant adverse effects.
	Ecology Biodiversity	They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".	No	The Applicant notes this comment and confirms that the impacts of the Scheme on Priority Habitats have been fully considered within **ES Chapter 7: Ecology and Biodiversity [APP/6.2],** which concludes there are no significant adverse effects.
	National policy Ecology	Paragraph 187b of the NPPF (Dec 2024) states: "Planning policies and decisions should contribute to and enhance the natural environment recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland."	No	The Policy Compliance Document [APP/5.67] demonstrates the Scheme's compliance with Paragraph 187 of the NPPF, as well as the wider policies established under the NPPF. The Applicant also notes that the impacts of the Scheme on Priority Habitats have been fully considered **within ES Chapter 7: Ecology and Biodiversity [APP/6.2],** which concludes there are no significant adverse effects.
	Ecology	Fragmentation is one of the greatest threats to mixed deciduous woodland. Loss of habitat connectivity is a particular concern where the woodland would become isolated in its landscape and surrounded by development on several sides.	No	The Applicant notes this comment and confirms that the impacts of the Scheme on Priority Habitats have been fully considered within **ES Chapter 7: Ecology and Biodiversity [APP/6.2],** which concludes there are no significant adverse effects.
	Ecology Soils Construction impact	These woodlands can also suffer loss or deterioration from nearby development through damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic and dust, particularly during the construction phase of a development.	No	The Applicant notes this comment and confirms that the (Aspect Ecology) impacts of the Scheme on Priority Habitats have been fully considered within **ES Chapter 7: Ecology and Biodiversity [APP/6.2].**

	Indicative area for mitigation, enhancement and/or retained agricultural buildings Ecology	Mitigation: The concept masterplan shows indicative areas for mitigation and enhancement, although does not specify what this enhancement will consist of. It is stated at hedgerows will be strengthened between woodlands.	No	The Applicant notes this comment and confirms that habitats will be maintained and managed in line with the **outline Landscape and Ecological Management Plan (oLEMP) [APP/7.11]** and subsequent LEMP, secured by requirement of the DCO Application.
	National policy Ecology	Paragraph 4.3.20 of the Overarching National Policy Statement for Energy (EN-1) states: "The Government has set 13 legally binding targets for England under the Environment Act 2021, covering the areas of: biodiversity; air quality; water; resource efficiency and waste reduction; tree and woodland cover; and Marine Protected Areas. Meeting the legally binding targets will be a shared endeavour that will require a whole of government approach to delivery. The Secretary of State have regard to the ambitions, goals and targets set out in the Government's Environmental Improvement Plan 2023 for improving the natural environment and heritage. This includes having regard to the achievement of statutory targets set under the Environment Act."	No	In accordance with Paragraph 4.3.20 of NPS EN-1, the Applicant recognises that the Secretary of State should have regard to the ambitions, goals and targets set out in the government's Environmental Improvement Plan for improving the natural environment and heritage, including achievement of statutory targets set under the Environment Act 2021. The **Policy Compliance Document [APP/5.7]** demonstrates the Scheme's compliance with this Paragraph of NPS EN-1. The Applicant also notes that mandatory Biodiversity Net Gain remains to be implemented (currently anticipated May 2026), albeit the Scheme will deliver over 10% BNG as calculated within the Statutory BNG metric. The **Biodiversity Net Gain Assessment Report [APP/4.7]** has been submitted with the DCO Application.
	Additional environmental mitigation, enhancement and protection suggestions Ecology	It is important that woodland creation is not just used as screening at strategic locations and ensures habitat connectivity throughout the landscape. Ideally, we would like to see woodland creation carried out in 5ha blocks, or that connecting planting with existing woodlands should create blocks of at least 5ha. Connectivity across the site could be improved and enhanced with larger blocks of woodland creation and woodland edge. There is certainly the possibility of linking several of the isolated woodlands within the site.	No	The Applicant notes these comments and confirms that habitats will be maintained and managed in line with the **oLEMP [APP/7.11]** and subsequent LEMP, secured by a requirement of the DCO. Connectivity within the site will be enhanced in particular through hedgerow enhancement and associated corridors, however in keeping with other ecological priorities at the site, habitat creation will focus on creation and enhancement of grassland habitats in order to benefit wildlife, whilst substantial additional woodland creation is not proposed.
	Additional environmental mitigation, enhancement and protection suggestions Ecology Biodiversity	Avoiding impacts and good landscape design: To meet planning policy and Government guidance, we would recommend: Robust adherence to the Standing Advice, especially regarding buffer zones, to rule out loss or deterioration to ancient and veteran trees. Maintain and where possible improve woodland condition.	No	The Applicant welcomes these recommendations and confirms adherence with the advice regarding buffer zones regarding ancient and veteran trees, as evidenced **Table 5.2 of ES Chapter 5: Scheme Description [APP/6.1]**, and **Table 7.11 ES Chapter 7: Ecology and Biodiversity [APP/6.2].** The Applicant also confirms that woodland will be entirely retained within the Scheme, with these areas maintained and enhancements proposed, as detailed within the **Biodiversity Net Gain Assessment Report [APP/7.4].**

		Utilise biodiversity gains as part of avoiding woodland and tree impacts (especially ancient/veteran) which can also maximise biodiversity benefits by embracing irreplaceable and high priority habitats – for example focussing on ecological enhancements/creation of woodland edges. Woodland creation and improvements to ecological connectivity. For example, there are potential opportunities to link fragmented woodland habitats across the site, which will increase habitat connectivity, making woodlands more resilient and benefitting biodiversity across the project area. Overall increase in the tree canopy cover to contribute to the Government's target to increase tree and canopy cover to 16.5% of land area in England by 2050. A UK Forestry Standard compliant woodland management plan, including deer and squirrel control, is created to ensure the long term maintenance of all new and existing woodland within the site.		The Applicant confirms that irreplaceable habitats and those of a higher distinctiveness are entirely retained within the Scheme, with ecological enhancements also proposed with regard to these habitats. With regard to connectivity, as noted above, the Applicant can confirm connectivity across the site will be enhanced through the Scheme through the enhancement of the hedgerow network and other proposed planting. Mandatory Biodiversity Net Gain remains to be implemented (currently anticipated May 2026), albeit the Scheme will deliver substantially over 10% BNG as calculated within the Statutory BNG metric. The **Biodiversity Net Gain Assessment Report [APP/7.4]** has been submitted with the DCO Application. The Applicant further notes that habitats will be maintained and managed in line with the **oLEMP [APP/7.11]** and subsequent LEMP, secured by a requirement of the DCO. Accordingly, detailed management actions for habitats within the site, including woodland will be identified at the relevant stage, including taking into account the guidance set out with regard to any requirements for control of pest species such as squirrel or deer (whilst balancing the need for faunal considerations).
	Concluding statement	We hope these comments have been useful to you. If you require any further information, please don't hesitate to contact me.	No	The Applicant thanks the Forestry Commission for responding to the consultation and would continue to welcome further engagement, if required.

1.10 GTC Pipelines Limited

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
GTC Pipelines Limited	General comment	I have checked our maps by eye, it looks as though no GTC assets are in your planned works vicinity.	No	The Applicant notes this confirmation and thanks GTC Pipelines Limited for its response.

1.11 Indigo Networks

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response

Indigo Networks	General comment	I can confirm we have no utilities in this location. Should any further information or assistance be required, please don't hesitate to ask.	No	The Applicant notes this confirmation and thanks Indigo Networks for its response.

1.12 Mid Suffolk District Council

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Mid Suffolk District Council	Inter project Cumulative impact Construction traffic and impact on roads Potential temporary working area for grid connection infrastructure	Mid Suffolk District Council would like to raise concerns around two matters identified within the Environmental Statement, relating to traffic routing and accommodation for the workforce. In both circumstances, concerns arise from cumulative impacts with a vast number of Nationally Significant Infrastructure Projects and major renewable projects in the region.	No	The Applicant thanks Mid Suffolk District Council for responding to the consultation and confirms its response to these concerns is set out below.
	Inter project Cumulative impact Construction traffic and impact on roads Access to, and maintenance of, the solar PV panels and associated infrastructure	There is a lack of information regarding which port the solar panels will be routed from. There are many Nationally Significant Infrastructure Projects and major renewable projects in the region and the cumulative development of a number for these simultaneously could result in significant disruption along the A14 and A140 within the Mid Suffolk if there is a lack of coordination and consideration is not given to the full routing early on in the process. Mid Suffolk would like to see that the full route is considered and that it is demonstrated this routing will not adversely affect the key strategic transport network in the district.	No	The Applicant notes that at this stage it is not yet possible to confirm from which location the materials will arrive. In any case, any abnormal load deliveries will be managed in consultation with National Highways to ensure that the impacts can be suitably accommodated and will be coordinated alongside the impacted local highway authorities through the Electronic Service Delivery for Abnormal Loads (ESDAL2) database. Outside of abnormal loads, all other deliveries will primarily use the A47, with a nominal amount arriving from the north via the A1065. The cumulative impacts are inherently assessed within **ES Chapter 9: Transport and Access [APP/6.2]**, which concludes there are no significant effects. Through the mitigation measures in the **oCTMP [APP/7.7],** which includes restrictions on deliveries to avoid peak hours and restrictions on routing, it is not considered that there will be a material impact to the operation of the strategic network.
	Potential temporary working area for grid connection infrastructure Inter project Cumulative impact Impact on tourism Impact on local business	In addition, Mid Suffolk falls within the Labour Catchment Area and the need for temporary accommodation for the workforce is of concern. This is again owing to the cumulative impacts from the need for temporary accommodation across this area to support the delivery of other Nationally Significant Infrastructure Projects and major renewable projects in the region. It needs to be clearly demonstrated that the potential cumulative impacts on accommodation, both in terms of tourism and private rentals within Mid Suffolk have been taken into account and sufficiently mitigated.	Yes	The Applicant notes these comments and confirms that **ES Chapter 14: Socio-economics [APP/6.2]** presents the findings of the analysis of the availability of temporary accommodation for construction workers and tests different scenarios across varying travel times. To ensure robustness, the Applicant further confirms that the analysis first considered the wider labour catchment area, reflecting the full geography from which workers could realistically travel. It then focused specifically on the Borough Council of King's Lynn & West Norfolk and Breckland District Council, as these Local Authority Districts are closest to the Site and therefore the most reasonable locations for construction workers to seek accommodation. This narrower

				geographic focus provides a more conservative assessment of potential pressures on local visitor accommodation. The Applicant also notes this comment in relation to cumulative effects. The cumulative impacts are considered and presented within the cumulative effects assessment in Section 14.11 that **ES Chapter 14: Socio-economics [APP/6.2].**

1.13 Ministry of Defence

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Ministry of Defence	Introduction	Please find attached my letter, confirming the safeguarding position of the Ministry of Defence, in respect of the above statutory pre-application consultation. Thank you for your help and engagement, and apologies for the timescales involved in the MOD response.	No	The Applicant thanks the Ministry of Defence for providing comment in the attached letter which confirms the safeguarding position of the Ministry of Defence in respect of the Scheme.
	Introduction	I am writing to confirm the statutory safeguarding position of the Ministry of Defence (MOD) with respect to the above development proposal. This proposal is to build, operate and decommission a new solar farm capable of generating over 50Megawatts (MW) Alternating Current (AC) of electricity, consisting of arrays of ground mounted photovoltaic (PV) panels with associated inverters, battery storage facilities, electrical substations, cable and grid connections and other associated infrastructure as well as environmental mitigation and enhancement.	No	Please refer to **ES Chapter 5: Scheme Description [APP/6.1]** for a full description of the Scheme's components.
	Introduction	The proposed development will be located south of South Acre, West Acre and Castle Acre, West Norfolk. The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System. This objective is supported by the provisions of Paragraph 102 of the National Planning Policy Framework (December 2024) and the Town and Country Planning (Safeguarded aerodromes,	No	**ES Chapter 3: Order limits and Context [APP/6.1]** provides the locational context for the Scheme. The Applicant acknowledges the DIO Safeguarding Team's role as a representative of the MOD. The **Policy Compliance Document [APP/5.6]** assesses the Scheme's compliance with Paragraph 102 of the NPPF. Meanwhile, the **Planning Statement [APP/5.5]** confirms that (with Paragraph 4.2.15 of NPS EN-1 in mind) there are no residual impacts as a result of the Scheme which would outweigh the need, nor are there any residual impacts which present an unacceptable risk to, or unacceptable interference with defence interests.

		technical sites and military explosives storage areas) Direction 2002.		
	Consultation and engagement	It is understood that the current consultation is being carried out in accordance with the requirements of section 42 of the Planning Act 2008 (as amended) and forms part of the pre-application procedure leading toward an application for an order granting development consent. At this point in time, based upon the plans and information submitted in support of this proposal the MOD has the following observations and safeguarding requirements.	No	The Applicant confirms that this consultation was undertaken in accordance with Section 42 of the PA 2008.
	Aviation and Airfields	The development area identified occupies statutory height, technical and birdstrike safeguarding zones that surround RAF Marham.	No	The Applicant recognises the Scheme's partial placement within the safeguarding zones that surround RAF Marham.
	Aviation and Airfields	Aerodrome height safeguarding zones The aerodrome height safeguarding zones are designed to ensure that new development does not introduce an obstruction in the critical airspace encompassing the aerodrome in which aircraft undertake landing, take-off or circuiting manoeuvres.	No	The Applicant appreciates the role and purpose of aerodrome height safeguarding zones.
	Aviation and Airfields	The development area is located approximately 5.6km from the centreline of runway 05/23 and occupies an area where the MOD must be consulted upon development with a height of, or exceeding, 15.2m above ground level.	No	The Applicant agrees that the nearest extent of the Scheme is located approximately 5.6km from the centreline of runway 05/23.
	Aviation and Airfields	Based upon the information provided regarding the general layout and scale of the proposed development, it is not anticipated that it will cause any physical impacts upon aerodrome height safeguarding requirements.	No	The Applicant notes this comment and agrees that physical impacts are not anticipated.
	Aviation and Airfields Construction impact Decommissioning phase	However, the possible use of cranes, high reaching plant equipment or temporal structures that may be used during the construction and decommissioning phases of the proposed development may introduce physical obstruction hazards to aerodrome operations. Therefore, this will need to be taken into account in the preparation of this development proposal.	No	The Applicant notes this comment. The MOD will be consulted on any crane use or high reaching plant equipment, should the Scheme be granted development consent.
	Aviation and Airfields Glint and Glare	Aerodrome Safeguarding- Potential Glint and Glare Effects The introduction of solar PV development, as proposed, close to RAF Marham has the potential to	No	The Applicant notes this comment and has considered and assessed the glint and glare effects of the Scheme as part of **ES Chapter 16: Other Environmental Matters [APP/6.2]** and concludes there are no likely significant effects.

		have an impact on aviation safety through glint and glare effects.		
	General comment	The Preliminary Environmental Information Report (PEIR) considers the likely significant effects arising from the construction, operation and decommissioning phases of the proposed development.	No	The Applicant agrees with this comment.
	Aviation and Airfields Glint and Glare	RAF Marham has been included as a receptor within the report. Glare with 'potential for temporary after-image' (yellow) is predicted towards the approach path for runways 01 and 05 and potential for temporary after-image'(yellow) is also predicted to be geometrically possible towards the Air Traffic Control (ATC) tower for fixed panels	No	The Applicant notes this comment and has considered and assessed the glint and glare effects of the Scheme as part of **ES Chapter 16: Other Environmental Matters [APP/6.2]** and concludes there are no likely significant effects.
	Inter project Cumulative impact Aviation and Airfields	The report also notes that cumulative impacts from the High Grove Solar areas are possible towards aviation receptors, and this will continue to be considered as further details emerge regarding the High Grove Solar Farm project. Whilst we acknowledge that RAF Marham has been considered as a receptor for glint and glare in the report, only the main runway and ATC tower have been assessed.	No	The Applicant is cognisant of other projects being proposed in the area and has undertaken assessments to consider the potential cumulative effect of this. Cumulative effects are considered in both landscape and visual terms within **ES Chapter 6: Landscape and Visual [APP/6.2]**. The potential glint and glare effects of the Scheme are considered and assessed the glint and glare effects of the Scheme as part of **ES Chapter 16: Other Environmental Matters [APP/6.2]** and concludes there are no likely significant effects.
	Aviation and Airfields	At present, the MOD has insufficient information to determine if the proposed solar PV farm will affect aircraft operating in and out of RAF Marham.	No	The Applicant notes that additional information has been prepared and submitted in support of the DCO Application and would welcome ongoing engagement with the MOD.
	Aviation and Airfields Glint and Glare	The MOD therefore require the submission of an updated aviation glint and glare assessment of the proposed solar PV farm to identify any emissions that may impact upon the air traffic control tower, the air traffic approaches to runways (Rwys) 23/05 and 01/19, associated air traffic circuit patterns and other procedures used at RAF Marham. This would need to include • Rwys 23/05 being assessed for a 2.5 and 3 degree glidepath; and for Rwy 01/19 a 3 degree glidepath • Visual circuits for Rwy 23, Rwy 05 and Rwy 19 / 01 and; • the Vertical Landing (VL) Pads sited at RAF Marham will need to be taken into account.	No	This request has been received by the Applicant and details of the requested receptors were received from the MOD on 16 October 2025. Additional modelling is being undertaken for these receptors and the results will be shared with the MOD when available. The Applicant also notes that s set out in **ES Appendix 2.1: EIA Scoping Opinion Request [APP/6.4]** and agreed by PINS in **ES Appendix 2.2: Scoping Opinion [APP/6.4]**), an individual glint and glare chapter is not required. However, glint and glare effects in respect of those matters that are scoped in are covered **in ES Chapter 16: Other Environmental Matter [APP/6.2]**.

	Glint and Glare Consultation and engagement	The Applicant will require MOD engagement prior to updating the glint and glare assessment.	No	The Applicant notes this comment and confirms that pre-application engagement has taken place with the MOD, further details of which are provided as part of **ES Chapter 16: Other Environmental Matters [APP/6.2].**
	Aviation and Airfields	The MOD would object to any impacts identified that are deemed incompatible with the need to maintain aviation safety at the aerodrome.	No	The Applicant notes these grounds for objection.
	Aviation and Airfields	Technical site safeguarding zones Technical safeguarding zones are designed to ensure that new development will not impact upon the effective operation of technical assets (which include communication and air navigation transmitter/receiver systems). The performance of these technical assets may be impacted by the physical attributes of a solar farm development such as their position, massing, and the materials they feature. In addition, electrical infrastructure featured in solar farms can also produce electro-magnetic fields or electrical noise emissions that may impact upon technical sites.	No	This Applicant notes these comments and the role of technical site safeguarding zones.
	Indicative area for solar PV panels Aviation and Airfields	There are indicative areas for the Solar PV site identified within the drawing titled 'Concept Masterplan, Document Volume III, PIER Appendix 5.1'. Parts of the indicative areas numbered 1, 2, 3, 6, 7 and 8 within this drawing occupy statutory technical safeguarding zones surrounding communication, surveillance and navigational equipment at RAF Marham, including the Precision Approach Radar (PAR) in which the MOD must be consulted on any development or change of land use. It has been identified that these areas of the proposed development will physically impact upon the effective operation of the PAR installations deployed at RAF Marham. Therefore, it will be necessary for those parts of the proposed development that occupy the all development consultation zone forming part of the technical safeguarding zone for the PAR to be removed.	No	The Applicant notes that further information has been requested regarding the PAR, in order to conduct its own analysis and identify whether there may be feasible mitigation options which can avoid the removal of solar PV areas from the entirety of the technical safeguarding zone for the PAR. The Applicant is still awaiting this information, and will conduct the analysis once received. The Applicant will continue to engage with the MOD regarding this concern and seek to work towards an acceptable form of mitigation.
	Aviation and Airfields	The MOD would object to any application that would impact upon the safe and effective operation of the PAR or other navigational aids.	No	The Applicant notes this.
	Aviation and Airfields Ecology	Birdstrike safeguarding zone The proposed development is within the statutory birdstrike safeguarding zone surrounding RAF Marham. Within this zone, the principal concern of the MOD relates to the creation of new habitats which	No	The Applicant notes this comment and acknowledges that the Site lies within the statutory birdstrike safeguarding zone for RAF Marham, but does not consider that the measures proposed would increase birdstrike risk or attract large flocking bird species.

		may attract and support populations of large and/or flocking bird species hazardous to air traffic.		he strategy for existing and proposed green infrastructure throughout the Site is detailed within **Appendix 1: Green Infrastructure Strategy Plans** to the **oLEMP [APP/7.11]**. New planting and maintenance regimes outlined within the **oLEMP [APP/7.11]**.
	Aviation and Airfields Ecology Indicative area for mitigation, enhancement and/or retained agricultural buildings	The design of any drainage basins, landscaping and planting that may be included in the development, should be undertaken to minimise the attractants that are afforded to bird species considered hazardous to aviation in proximity to this aerodrome.	No	The Applicant notes this comment and acknowledges that the Site lies within the statutory birdstrike safeguarding zone for RAF Marham, but does not consider that the measures proposed would increase birdstrike risk or attract large flocking bird species. The strategy for existing and proposed green infrastructure throughout the Site is detailed within **Appendix 1: Green Infrastructure Strategy Plans** to the **oLEMP [APP/7.11]**. New planting and maintenance regimes outlined within the **oLEMP [APP/7.11]**
	Aviation and Airfields	In summary, areas of the proposed development, will cause an infringement of the PAR technical installation sited at RAF Marham and therefore the proposal, in its current form, is not compatible with MOD's safeguarding requirements. Additionally, the proposed development could have a potential impact on aviation safety through glint and glare effects. The MOD will require an updated aviation glint and glare assessment of the proposed solar PV farm. These affects will need to be taken into account in the preparation of this development proposal. Provisions will also need to be made to manage the temporal deployment of cranes or high reaching construction equipment or temporal structures in the vicinity of RAF Marham during the life of the proposed development.	No	The Applicant notes this comment and welcomes further engagement to address the concerns of the MOD, including with regard to the Scheme's compatibility with the MOD's safeguarding requirements. The Applicant also notes that as set out in **ES Appendix 2.1: EIA Scoping Opinion Request [APP/6.4]** and agreed by PINS in **ES Appendix 2.2: Scoping Opinion [APP/6.4]**), an individual glint and glare chapter is not required. However, glint and glare effects in respect of those matters that are scoped in are covered **in ES Chapter 16: Other Environmental Matter [APP/6.2]**.
	Aviation and Airfields	The above concerns will need to be addressed in the preparation of any application relating to this proposal and the MOD should be consulted, via the above multiuser email address at all future application stages of this proposal to allow further detailed safeguarding assessments to be completed.	No	The Applicant notes this and confirms that the email address provided will be used for future consultation. The Applicant also notes the engagement that was undertaken following the statutory consultation.
	Aviation and Airfields	The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed on the The Droves Solar Farm website for this application as of the date of this letter. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should	No	The Applicant notes this comment. The Applicant also notes that further information was shared with the MOD as part of the targeted consultation, as detailed in this **Consultation Report [APP/5.1]**.

		be consulted and provided with adequate time to carry out assessments and provide a formal response.		
	Concluding statement	Should you wish to submit further information or provide any updated proposals, the MOD will gladly review these and advise of our safeguarding position. I trust this is clear however should you have any questions please do not hesitate to contact me.	No	The Applicant thanks the MOD for responding to the consultation and welcomes ongoing engagement, The Applicant also notes that ongoing communication by email with the MOD, the most recent being the 16th of October, when details were shared for the additional Glint & Glare receptors. The Applicant notes that it is awaiting further information from the MOD which is required to proceed with the assessment.

1.14 MUA Group

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
MUA Group	General comment	We have the attached in the PE37 area, we don't have any assets at the moment in the PE32 area. These are subject to change as we are adopting assets weekly and could end up with assets in the area when this project gets off the ground so would be best to check whilst construction is underway.	No	The Applicant thanks the MUA Group for its confirmation regarding assets and confirms that it will, in advance of construction, liaise with all utility providers with assets in the area (which, as stated in the MUA Group's response, may include them at that time) in regard to construction timelines, activities, proximity to assets and construction management measures as set out in the **oCMEP [APP/7.6].**

1.15 Sporle with Palgrave Parish Council

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Sporle with Palgrave Parish Council	Executive Summary	EXECUTIVE SUMMARY The Parish Council of Sporle with Palgrave is opposed to the development for the following reasons: 1. The size of the proposed development and the proposed area of solar development within the parish. 2. The cumulative effects of all the other proposed solar developments within the locality. 3. The high use of Best or Most Versatile Land (BMV) in the development.	No	The points raised in the Parish Council's Executive Summary are noted by the Applicant and responded to below.

		4. The impact on visual amenity and landscape. 5. The impact on local businesses and tourism. 6. The semi-permanent nature of the changes, if not permanent changes, to the area. 7. Impact on existing wildlife and biodiversity. 8. Long term disruption caused by this and other developments during construction. 9. The impact on mental health and wellbeing of residents living in the area.		
	Introduction	The Parish Council, their objections to this development notwithstanding, are keen to work with the Applicant to obtain the best outcome for the parish, the area and minimise and mitigate the effects of this development. To that end detailed and more general responses and requests are included. Detailed responses include: Cumulative impacts on landscape and views Positioning of customer and National Grid sub stations Connections to National Grid overhead lines Positioning of BESS units Mitigation of impact on landscape views from solar arrays to the east of Fincham Drove General responses include: The need for a deer management plan Hedge and tree planting, ponds, grassland and buffer strips Guarantees on operational management BESS fire and safety Use of Tracker panels Glint and Glare Community liaison Community fun.	No	The Applicant notes this comment.
	Introduction	Sporle with Palgrave is situated to the east of the Droves solar development. It is noted that the	No	Cumulative effects across all phases of the Scheme are assessed, and a summary of cumulative effects is provided in **ES Chapter 18: Summary of Effects [APP/6.2]**, which

	Inter project Cumulative impact	development includes an area within the parish boundary. Notwithstanding the need for renewable sources of energy and the government's target of Net Zero by 2050, the parish council (PC) considers the extent of both the proposed High Grove development in its totality and the Droves development, in particular the areas within the parish, are of such a size that it will have a highly significant and adverse impact on it and the area between RAF Marham and Dereham.		concludes that there are both significant adverse and beneficial effects. The Applicant is considered that cumulative effects should be afforded neutral weight in the planning balance, as set out in the **Planning Statement [APP/5.5].**
	Inter project Cumulative impact	The level of adverse impact on this parish is only compounded by the likely cumulative effects of other nearby renewable energy projects planned or nearly completed including: The High Groves solar development of which there is at least 1000 acres within the parish The JAFA solar development to the west of Little and Great Dunhams and north east of Sporle The two National Grid substations at Necton and associated cable corridors from the offshore wind farms off the Norfolk coast A third National Grid substation which has not been sited as yet for the High Grove solar development and other connections that may be required The Necton Greener Grid Park Shipdham airfield battery park and solar development Beeston solar development	No	Cumulative effects are assessed in the topic chapters of the **ES [APP/6.1 – 6.5].** Cumulative effects across all phases of the Scheme are assessed, and a summary of cumulative effects is provided for in **ES Chapter 18: Summary of Effects [APP/6.2]**.
	Inter project Cumulative impact	We wish to put on note that there is already significant renewable energy generated in the locality such as: North Pickenham airfield wind farm Large wind turbines on the edge of Swaffham and the parish alongside the A47 Burnstalk's Solar Farm Great Friar's Thornes Farm Anaerobic Digester	No	The need for the Scheme is set out in the **Statement of Need [APP/5.4].** The Scheme will contribute to keeping the UK on track with the government's clean power ambitions.
	General objection	In principle the PC is opposed to this development for the following reasons: 1. The size of the proposed development in relationship to the area and particularly the area of	No	Justification for the size of the development can be found in the **Statement of Need [APP/5.4].** **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** details how the assessment of sites and design alternatives has been undertaken, detailing the

		land to be taken up with solar development within the parish boundary. 2. The cumulative effects of all the above-mentioned developments		factors that have been considered and the main reasons for discounting alternatives. [The need for the Scheme is set out in the **Statement of Need [APP/5.4].** The Scheme will contribute to keeping the UK on track with the government's clean power ambitions.
	General comment Inter project Cumulative impact	It should be noted that this response does not use the title of 'solar farm' to address this or other proposed solar developments. This is not farming but the industrialisation of a large section of Norfolk countryside and its communities.	No	The Applicant notes this comment.
	Agricultural land use	3. The high use of Best or most Versatile Land (BMV) in the development The Scoping Report showed an extract of Natural England's Predictive BMV for the site which showed that only a small area within the parish boundary as showing a high likelihood of BMV land. However, it appears from the soil survey undertaken as part of the PEIR, that of the 774Ha of the total site, an area of 455Ha (58% of the total) is classified as either grades 1, 2 or 3a agricultural land classification, which is regarded as BMV land. (Ref PEIR figure 11.3 and Table 11.4).	No	**ES Chapter 11: Soils and Agriculture [APP/6.2]** provides an assessment of the significance of impact of the Scheme on Soils and Agriculture**.** The chapter is supported by an Agricultural Land Classification (ALC) Survey of the Site (**ES Appendix 11-2: Agricultural Land Classification Survey [APP/6.4]**), carried out by the Applicant.
	Agricultural land use Food security	By far the biggest concern that parishioners have regarding these large solar developments is the take up of good farming land that should be used to grow food in a time when people and government are concerned by food security, particularly with the current geopolitical climate.	No	Food security is not specifically addressed within the suite of Energy NPSs, the NPPF, or Local Plan policies. However, it is acknowledged as a topic of national discussion and has been raised during the consultation process. The 2024 Written Ministerial Statement highlights that food security constitutes an important element of national security. In the absence of a specific policy requirement, no further assessment of this matter is provided.
	Inter project Cumulative impact Agricultural land use Food security	The PEIR quotes that this development will take up 0.15% of the land within Norfolk. However, our concern is the cumulative effects of this and other developments within the county. There is also a failure to recognise the other impacts on land use; with more land required for housing, rewilding and other environmental improvements. There are nearly 100,000 acres of arable land lost annually in the UK and we import 46% of our food. A UK government food security report published in 2021 states that climate change could reduce the amount of BMV land available considerably. Surely it makes	No	**Section 11.11** of **ES Chapter 1: Soils and Agriculture [APP/6.2]** assess the cumulative impact of the Scheme on Soils and Agriculture. With regards to the point on food security, as highlighted in the response above there is no specific policy requirement for addressing food security, therefore no further assessment is provided.

		sense to conserve and protect the best land for food production in the light of these pressures on land use?		
	National policy Agricultural land use Food security	The overarching National Policy Statement (NPS) for Energy (EN-1) 2024 states in para 5.11.34 that the Secretary of State (SoS) should ensure that Applicants do not site their scheme on BMV agricultural land without justification and where they are sited on BMV agricultural land the SoS should take into account the economic and other benefits of that land. Where it is demonstrated it is necessary to use agricultural land, areas of poorer quality land should be preferred to those of higher quality. It is recognised that the accessibility of National Grid infrastructure makes this an easy site to accommodate a development of this nature but at the expense of BMV land. Yet it is the case that currently solar developments are disproportionally sited on higher quality land rather than poorer land. Land that should be used for food production.	No	The **Policy Compliance Document [APP/5.6]** confirms that in accordance with NPS EN-1 Paragraph 5.11.34, the use of BMV land as part of the Scheme is justified, considering the economic and other benefits of the land. **ES Chapter 11: Soils and Agriculture [APP/6.3]** provides an assessment of the impact of the scheme on Soils and Agriculture, including BMV land. The Scheme will be decommissioned following the Scheme's 60-year operational lifespan, upon which, all but 4.0ha of the Site will be fully restored on decommissioning to the original ALC grade. Furthermore, paragraphs 11.8.95 to 11.8.101 of **ES Chapter 11: Soils and Agriculture [APP/6.3]** assess the economic and other benefits of the Scheme which include an economic benefit of £100,000 per year and an incremental benefit to food production.
	Agricultural land use	It is understood that the development is largely under a single ownership and that this has undoubtably led to the large uptake of land. We recognise that landowners see this as a long-term business opportunity but it is the Applicant's responsibility to see that the impact on BMV land is minimised and the detriment to parishioners of Sporle with Palgrave and other parishes affected is also minimised.	No	Section 11.7 and 11.9 of **ES Chapter 11: Soils and Agriculture [APP/6.2]** set out the embedded and additional mitigation measures which have been incorporated into the Scheme respectively. An **Outline Soil Management Plan (oSMP) [APP/7.13]** has been prepared as part of this application and includes mitigation measures for avoiding and/or minimising the impact on BMV land during each phase of the Droves (from construction through to decommissioning).
	Impact on local business Impact on tourism	5. Impact on local businesses and tourism The loss of land for food production will affect the many local businesses linked to agriculture. Local tourism will be affected by the change of land use, particularly Swaffham and places like Castle Acre and the local pubs and restaurants who rely on trade from those who stay locally or pass through on their way to the Norfolk Coast; put off by the destruction of landscape character.	No	**ES Chapter 14: Socio-Economics [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse socio-economic related effects expected across the Scheme's construction, operational and decommissioning phases. There is a significant beneficial effect anticipated on the provision of education, skills, training and supply chain as a result of the Scheme's construction, operational and decommissioning phases.
	Scheme lifespan	6. The semi-permanent nature of the changes, if not permanent changes	No	**ES Chapter 5: Scheme Description [APP/6.1]** confirms that the Scheme will be decommissioned after the 60-year design life in 2093 and highlights that post-

		The development is supposedly designed for a sixty-year life and then to be dismantled. However, it is highly possible that the changes to the area and the parish will be permanent as it is impossible to see how the energy it produces will not still be needed in sixty years' time, all be it with updated technology. Additionally, there is the possibility that the long period used for solar arrays will constitute a planning 'change of use' and enable other development to take place. This will mean a permanent blight on this beautiful part of Norfolk.		decommissioning, the landowner will choose how the land is to be used and managed.
	Ecology Biodiversity	7. Impact on existing wildlife and biodiversity The PC is not at all convinced that the assurances given of potential biodiversity net gain (BNG) with this development will occur. The Applicant has yet to do a full BNG assessment, so it is not possible to have any certainty of the levels of existing biodiversity and possible BNG.	No	The Scheme incorporates a range of new habitat provision and enhancement measures which have been designed to maximise benefits to biodiversity. The Scheme has 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
	Construction impact Biodiversity	The construction phase is likely to cause a loss of biodiversity which will take time to restore, if at all possible, once into the operational phase.	No	Mandatory Biodiversity Net Gain remains to be implemented (currently anticipated May 2026), albeit the Scheme will deliver over 10% BNG as calculated within the Statutory BNG metric. The Biodiversity Net Gain Assessment Report has been submitted with the DCO Application.
	Biodiversity	There is little evidence, so far, for the biodiversity gains that are being claimed for these industrial-style developments which are still in the early stages of their development and operation. There is a requirement within the planning legislation for developers to show that they can achieve BNG but what studies there are show much depends on the particular site and management regime to achieve any BNG. (Natural England Evidence review of the impact of solar farms on birds, bats and general ecology 2017; https://www.rspb.org.uk/whats-happening/news/solar-farms-managed-for-nature-boost-birdnumbers-and-biodiversity).	No	The Scheme incorporates a range of new habitat provision and enhancement measures which have been designed to maximise benefits to biodiversity. The Scheme has 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
	Construction phase Operation phase	Therefore, much will depend on the management of the development both during construction and operation which will be difficult to achieve over the whole of such a large development and such a long period.	No	The Scheme has 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
	Intra-project cumulative impact	8. Long term disruption As the developments listed, plus probably others yet to come to light, are put in train, there will be a continuing period of disruption to the whole area as one project follows another. This will have adverse impacts on wildlife, traffic and peoples' mental health and wellbeing.	No	Cumulative effects are assessed in the topic chapters of the **ES [APP/6.1 – 6.5]**. Cumulative effects across all phases of the Scheme are assessed, and a summary of cumulative effects is provided for in **ES Chapter 18: Summary of Effects [APP/6.2]**.
	Mental health and wellbeing	9. The impact on mental health and wellbeing of residents living in the area We are concerned about the impact on people's mental health as the existing natural environment will be replaced with a built environment and it will no longer offer the benefits to wellbeing that it currently does. The tranquillity, landscape, PRoW, proximity to other beautiful parts of Norfolk are some of the many reasons why people choose to live in and visit the area and the presence of an industrialised landscape will have an adverse impact on residents' wellbeing. It should be noted that the surrounding landscape and PRoW were of great benefit during the Covid Pandemic.	No	The Applicant makes note of this comment. Paragraph 15.5.5 and 15.5.6 of **ES Chapter 15: Human Health** [**APP/6.2**] set out the approach to assessing well-being impacts within this chapter for those effects scoped into the assessment. **ES Appendix 2.1: Scoping Report [APP/6.4]** provides the justification for scoping out effects on the built environment from this assessment as agreed with PINS and should be referred to for further detail.
	Mental health and wellbeing	Scientific studies have shown time spent in the natural environment can: Reduce stress, improve mood, boost cognitive function, enhance the immune system, lower blood pressure and heart rate, promote better sleep and increased creativity. This industrialisation of the landscape will not help.	No	The Applicant makes note of this comment. Paragraph 15.6.24 of **ES Chapter 15: Human Health [APP/6.2]** outlines the evidence linking the natural environment with improved mental and physical well-being, including reductions in blood pressure and stress levels. This provides the context for assessing the Scheme's effects on physical activity and well-being. The assessment of physical activity is set out in Section 15.8 of **ES Chapter 15: Human Health [APP/6.2],** while the wider approach to assessing well-being impacts is described in **Paragraphs 15.5.5** and **15.5.6** of **ES Chapter 15: Human Health [APP/6.2].**
	Impact on local business Mental health and wellbeing	In addition, this industrialisation will lead to the loss of agriculturally related employment and its subsequent impact on wellbeing. (Although the suicide rate amongst farmers is well known it is double that rate amongst farm workers.) The main impact will be on the ancillary services such as on lorry drivers and other support businesses to agriculture.	No	The overall loss of employment is expected to be negligible and, as agreed with PINS at scoping, has therefore not been included within the assessment. In addition, mental health impacts relating to employment are considered as part of **ES Chapter 15: Human Health [APP/6.2]**.

	New jobs associated with the Scheme (direct and in-direct) Impact on local business	Although there may be some temporary local benefits in employment locally during the construction phase, we expect an overall a loss of employment in the area.	No	The overall loss of employment arising from the conversion of agricultural land is expected to be negligible. An assessment by Kernon Countryside Consultants concluded that the numbers of workers on-site is somewhere in the range of 10-15 Full Time Equivalent (FTE) jobs. During the Operation and Maintenance phase, arable activities will likely need to cease altogether due to the introduction of solar panels. There is potential for alternative agricultural activity such as sheep grazing under and around the solar panels, and overall, the quantum of agricultural labour is not expected to change significantly due to the shift from arable production to sheep-based enterprises (if this were to occur). On this basis, the net effect on employment is considered to be low, and as agreed with PINS at scoping, has not been included within the assessment.
	Consultation and engagement	The Parish Council, their objections to this development notwithstanding, realise the likelihood of this development being approved by the DCO route as a National Significant Infrastructure Project (NSIP) and therefore are keen to work with the Applicant to obtain the best outcome for the parish, the area and minimise and mitigate the effects of this development. To this end the following items are their detailed responses to the PEIR and plans submitted for the statutory consultation.	No	The Applicant thanks Sporle with Palgrave Parish Council for responding to the consultation and will continue to welcome further engagement.
	Inter project Cumulative impact Indicative layout	Detailed concerns and requests 1. Cumulative impacts on landscape and views We are concerned by the cumulative impact of both the High Grove and the Droves developments on the western side of the parish. To this end we have requested the removal of three fields of solar arrays from the northern edge of area C03 of the Central Area of the High Groves development. (See figure 1 below) This is an area of open sloping landscape with hedgerows and woodland areas but with long views in between, as seen in the photomontage below.	No	**ES Chapter 6: Landscape and Visual [APP/6.2]** has assessed the likely landscape and visual impacts of the Scheme upon receptors within the Study Area, particularly to the east which includes Visual Receptor Group 4: Great Palgrave and Little Palgrave. The LVIA acknowledges that there would be moderate significant adverse effects upon landscape character in the long term, but within the Site only. There are judged to be no significant adverse landscape effects outside of the Site, in the long term. With regard to cumulative effects, the Scheme would be partly visible during the Construction, Decommissioning and Operation Phases from PRoW and roads within Visual Receptor Group (VRG) 4: Great Palgrave and Little Palgrave. Existing woodland blocks, vegetated field boundaries and local undulations within the landscape to the north and north-east of Swaffham, serve to break up views towards both the Scheme and High Grove Solar Farm for many of the receptors within VRG 4, particularly along South Acre Road. The only receptor within this VRG that could experience potentially significant visual effects are PRoW users of PRoW Sporle with Palgrave BR5,

				shown on **ES Figure 6.8: Amenity and Recreation Facilities [APP/6.3].** Potential significant cumulative visual effects on this VRG would be over a limited extent. In the long term, for receptors within VRG 4, the **ES Chapter 6: Landscape and Visual [APP/6.2]** concludes that there would be no significant cumulative visual effects as a result of both the Scheme and High Grove Solar Farm.
	Public Rights of Way Scheduled monuments / archaeology / heritage sites	The National footpath, the Peddars Way, passes alongside both developments, it passes the old medieval village site of Great Palgrave and down Southacre Road to cross the A1065. These panel areas will impact adversely the view as shown from the path at VP46 (as shown on High Grove PEIR Figure 10.15) and VP8 (Droves representative view point shown on their PEIR Figure 6.5a and their photomontage –representative viewpoint 8 in their PEIR Figure 6.8).	No	No impacts upon the Scheduled Monument of the Deserted medieval village at Great Palgrave have been identified, as set out in **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2].**
	Local policy	The PC is currently engaged in producing a Neighbourhood Plan to protect the parish's character and against adverse developments within it. As part of the plan the identification of characteristic landscape views that are important to the parish and its residents should be identified. The Peddars Way, at this point, is part of a circular walk greatly used by residents and consequently the viewpoint VP46 is shown as view 4 in the Sporle Neighbourhood Plan Views Assessment and included below.	No	The Applicant notes this comment.
	Inter project Cumulative impact Landscape and visual Indicative area for solar PV panels	The adverse cumulative impact on the landscape from both the Droves and High Grove developments as shown by the viewpoints VP46, VP8, and L1 which show areas of panel visible from both developments at these points.	No	**ES Chapter 6: Landscape and Visual [APP/6.2]** demonstrates that the Site can accommodate Solar PV Arrays without causing significant long-term visual effects. While the Applicant acknowledges there would be moderate significant adverse effects upon landscape character in the long term, this would be within the Site only. There are judged to be no significant adverse landscape effects outside of the Site, in the long term.
	Landscape and visual Indicative siting zone for Battery Energy Storage Systems and Customer Substation Indicative siting zone for National Grid Substation	The viewpoints VP4 (as shown on High Grove PEIR Figure 10.15) and L2-L7 all show views across these three panel areas in the near distance and views onto the likely battery areas and substation on the Droves development. In addition, they will impact views from Castle Acre castle which is shown as representative view VP6 in High Grove PEIR Figure 10.15.	Nm	**ES Chapter 6: Landscape and Visual [APP/6.2]** has undertaken a visual impact assessment giving consideration to likely effects from Castle Acre reflected in **Representative Viewpoint 14** and in : • **ES Figure 6.12 (PM6, PM8, PM12 and PM14): Parameter Based Winter Photowires APP/6.3]** • **Figure 6.13 (PM6, PM8, PM12 and PM14): Parameter Based Summer Photowires APP/6.3]** • **ES Figure 6.14 (PM8, PM12 and PM14): Winter Photomontages: Illustrative Scheme APP/6.3]**

				• **ES Figure 6.15 (PM8, PM12 and PM14) APP/6.3]** • **Summer Photomontages: Illustrative Scheme [APP/6.3] .**
	Public Rights of Way Landscape and visual	Use of footpaths with high hedges both sides reduce the enjoyment and amenity value of the paths particularly without gaps. However, even with gaps, 3.5m high solar arrays blocking your view does not improve things. The bridle way BR5 has currently several gaps along it to the north and north west with wide open views towards Castleacre.	No	In terms of the Scheme, measures have been taken to achieve good design and scheme outcomes through **Design Approach Document [APP/5.7]** including connectivity and accessibility. Consideration has also been given to the landscape and visual context of rights of way with a minimum offset of 15m prescribed to retain views; these are detailed in **Table 5.1** of **ES Chapter 5: Scheme Description [APP/6.1]**. Comments with regards to Bridleway BR 5 are noted. However, BR 5 lies outside of the Droves Order limits and as such no mitigation is suggested.
	Public Rights of Way Ecology Agricultural land use	These fields plus the field along the side of the Peddars Way designated for bird mitigation are all BMV land.	No	**Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP/6.4]** sets out the proposed mitigation and compensation package in relation to ground-nesting bird species is appropriate and proportionate in regard to legislative and planning policy requirements relating to the proposed Scheme. It notes that the land would be managed within the wider landholding in order to reflect appropriate cropping rotations.
	Indicative area for mitigation, enhancement and/or retained agricultural buildings Landscape and visual Inter project Cumulative impact	Attempted mitigation to hide the solar panels with tree shelter belts along the existing northern and western boundary dOL lines of the High Grove Development will not mitigate the adverse impacts on the views on these sloping fields towards the Droves development.	No	Comments are noted. Whilst these comments are directed at proposals associated with High Grove Solar, consideration has been given to the visual impacts of High Grove Solar in addition to the Scheme in the cumulative effects assessment. Cumulative effects across all phases of the Scheme are assessed, and a summary of cumulative effects is provided in **ES Chapter 18: Summary of Effects [APP/6.2]**, which concludes that there are both significant adverse and beneficial effects.
	Additional environmental mitigation, enhancement and protection suggestions Landscape and visual	Removal of these areas of panels will reduce the impact on the views from Fincham Drove towards Palgrave.	No	Comments are noted. Whilst these comments are directed at proposals associated with High Grove Solar, consideration has been given to the visual impacts of High Grove Solar in addition to the Scheme in the cumulative effects assessment. Cumulative effects across all phases of the Scheme are assessed, and a summary of cumulative effects is provided in **ES Chapter 18: Summary of Effects [APP/6.2]**, which concludes that there are both significant adverse and beneficial effects.

	Landscape and visual	Further impacts on landscape and views PEIR figure 6.5a shows that there is a ZTV (Zone of Theoretical Visibility) from Newton Road and from the footpath at Hungry Hill to the west of Little Palgrave Hall. The currently developing Neighbourhood Plan shows a view 7 along Newton Road which shows impact on the view from the Droves as also further viewpoints along Newton Road and Hungry Hill show as per below, (positions shown on figure 2).	No	Comments are noted. The ZTV shows the extent of theoretical visibility and it is agreed there would be theoretical visibility from the positions shown on figure 2 in the Parish Council's response. **ES Chapter 6: Landscape and Visual [APP/6.2]** has assessed the visual impacts of the Scheme and for views indicated on figure 2 in the Parish Council's response these would be assessed under Visual Receptor Group 4: Great Palgrave and Little Palgrave. While the Applicant acknowledges there would be moderate significant adverse effects upon landscape character in the long term, this would be within the Site only. It is judged that there are no significant adverse landscape effects outside the Site in the long term.
	Indicative siting zone for National Grid Substation Indicative siting zone for Battery Energy Storage Systems and Customer Substation	Positioning of National Grid and Customer substations (See figure 3) Possible positioning of the National Grid substation is shown in either field numbers 27 and 33. (PEIR figure 4.4) Possible positioning of the customer substation is shown in field numbers 24, 26, 27, 33 and 35. (PEIR figure 4.4) The PEIR paragraphs 5.2.18 & 22 state that the indicative area to be covered by each of the substations is 4Ha with a maximum height of 13m. We are concerned that the siting of theses substations will have an adverse impact on the landscape and views as mentioned in the item above. However, we recognise that there will be a severe adverse impact on the residents of Southacre and Castle Acre if these are placed in fields 33 and 35 to the north of Bartholomew Hills Plantation on significantly higher ground unless significant wooded shelter belt is planted along the north side.	Yes	Substations and BESS have been located in Fields 24 and 27 south of Bartholomew's Hill Plantation. Solar Array have been removed entirely from Field 35 and the northern extents of Field 33.
	Indicative siting zone for National Grid Substation Indicative siting zone for Battery Energy Storage Systems and Customer Substation Landscape and visual	However, we would request that if the substations are positioned to the south of Bartholomew Hills Plantation in fields 26 and 27, that they are positioned at the bottom of the slope as shown in photos below alongside the Byway from the A1065 and Fincham Drove. This would be to hide the substations as much as possible into the landscape.	Yes	Substations and BESS have been located to the located in Fields 24 and 27 south of Bartholomew's Hill Plantation. Solar Array have been removed entirely from Field 35 and the northern extents of Field 33. The location of the National Grid and Customer Substations would be sited within Field 27 as illustrated in **ES Figure 5.1: Concept Masterplan [APP/6.3]**. The exact location would be confirmed post consent to allow flexibility in design. Mitigation measures have been introduced as

				presented in **Appendix 1 (Green Infrastructure Plan)** to the **oLEMP [APP/7.11],** illustrating the gapping up / strengthening of hedgerows with hedgerow trees and proposed woodland belts to provide screening.
	Additional environmental mitigation, enhancement and protection suggestions	We would request that a 20m wide wooded shelter belt be planted to additionally hide the substations.	Yes	A woodland belt is proposed along the western and eastern boundaries of Field 27. A 10m wide woodland belt is proposed on either side of Field 27 to provide screening to the substations in addition to the gapping up / strengthening of hedgerows with hedgerow trees. This approach is judged to be sufficient in filtering and screening short to mid distance views of the substations from the east and west, in the long term, once established. Measures relating to trees and planting are reflected in **Figure 5.8 Green infrastructure Parameter Plan** and detailed in the **oLEMP [APP/7.11]** and include the introduction of additional hedgerow trees and woodland belts to provide screening to the solar panels.
	Grid connection infrastructure	Connections to National Grid overhead lines (See figure 3) It is stated in the PEIR chapter 5 that there are two methods of connection being considered, both of which suggest the building of up to 5 new pylons with one option (Double Turn In) offering the possibility of up to 5 existing pylons being decommissioned and dismantled.	Yes	The Applicant has removed the National Grid Substation from Field 33, and is seeking flexibility for either a double turn in or a single turn solution for the National Grid Substation located in Field 27. As a result of ongoing design work the Scheme allows for up to 10 new pylons.
	Grid connection infrastructure	It is noted that additional land has been added to the dOL on the east side of the A1065 to enable these connection options.	No	The Applicant acknowledges this comment.
	Grid connection infrastructure	Although current views have the pylons, we would request that there is not a doubling up or increase in the overall number of pylons when considering the connection options and thereby adversely impacting the landscape.	Yes	The Applicant's preferred design is for a double turn which would allow for the existing OHL to be decommissioned, avoiding a double line of pylons. Further information on the Applicants preferred design can be found in the **Grid Connection Statement [APP/7.1]** and the **Design Approach Document [APP/5.7].** As described in **ES Chapter 5: Scheme Description [APP/6.1]**, the Scheme proposes diverting the existing dual circuit 400kV overhead line (OHL) into a newly constructed double busbar substation (the National Grid Substation).T he Applicant, however, wishes to retain an element of optionality in keeping the existing line of pylons and the new diversion as presented in **ES Figure 5.1: Concept Masterplan [APP/6.3]** so that the detailed design of the Scheme can be informed by technical considerations, post-

				consent work, and take advantage of innovations in technology. **The ES Chapter 6: Landscape and Visual [APP/6.2**] as such considers a worst-case scenario with both the existing line of pylons and new diversion and these are presented in **Figures 6.14** and **6.15 (PM8, PM12 and PM14): Photomontages Illustrative Scheme [APP/6.3]**.
	Indicative siting zone for Battery Energy Storage Systems and Customer Substation	Positioning of BESS units (See figure 3) PEIR figure 4.4 shows field numbers 24,26,27,33 & 35 selected as possible siting for the BESS units (batteries). The PEIR states that the area required for these as up to10.5Ha (paragraph 5.2.37).	Yes	The BESS has been located in Fields 24 and 27 south of Bartholomew's Hill Plantation.
	Indicative siting zone for Battery Energy Storage Systems and Customer Substation Additional environmental mitigation, enhancement and protection suggestions	If these are sited north of Bartholomew Hills Plantation in fields 33 and 35 it will be necessary for these to be successful with hedging and wooded shelter belt Otherwise they should be sited as low as possible in field 25, again hidden with wooded shelter belt.	Yes	Substations and BESS have been located in Fields 24 and 27 south of Bartholomew's Hill Plantation. Solar Array have been removed entirely from Field 35 and the northern extents of Field 33.
	Emergency Access	Both these possible positions would be easily accessed by the fire service	No	There are two points of access from differing compass points into the BESS compound. Outline details are contained within the **oBSMP [APP/7.14]**.
	Additional environmental mitigation, enhancement and protection suggestions	We would request that the BESS, Invertor and Switchgear containers should be coloured to ensure blending with the landscape and surrounding vegetation and to hide them as much as possible. Use of dark colours such as Olive Green (RAL 6003) or Juniper Green (RAL160 50 20) should be considered.	Yes	The Applicant has included a Design Commitment that the colour will be considered at the detailed design stage as set out in the **Design Principles, Parameters and Commitment [APP/5.8]** document.
	Additional environmental mitigation, enhancement and protection suggestions	Mitigation of impact on landscape views from solar arrays to the east of Fincham Drove. (See figure 3) Taking into account above: • Views in the photomontages - Figures 1 & 2 • Description of the cumulative effects on the landscape from both the Droves and High Groves developments in item 1.	No	The Applicant notes these comments. The existing hedgerow edging Fields 26, 25 and 21 would be gapped up, and this alongside new woodland planting and hedgerows would provide further screening of the Solar PV Site, Customer Substation and National Grid Substation; refer to **Appendix 1 (Green Infrastructure Plan)** to the **oLEMP [APP/7.11]**. A cumulative landscape and visual effects assessment has been undertaken in **ES Chapter 6: Landscape and Visual [APP/6.2]**.

	Additional environmental mitigation, enhancement and protection suggestions	We would request a 20m wooded shelter belt along the A1065 alongside fields 26, 25 and 21. This would partially hide the solar arrays on the ground sloping up from the A1065 towards Fincham Drove.	No	A 20m woodland belt aligning the A1065 would not be in keeping with the character of this route. The mitigation proposed within the Scheme includes extensive gapping up of existing hedgerow, management of hedgerow to a height of at least 3metres and also the planting of many new trees along this hedgerow. This approach is in-keeping with the character of this route and also serves to filter views from rights of way to the east of the Site and screens views into the Site from the A1065.
	Additional environmental mitigation, enhancement and protection suggestions	An additional wooded shelter belt along the eastern edge of field 24 would then continue to hide the solar arrays on sloping ground.	No	The mitigation proposed within the Scheme along part of the eastern edge of Field 24 includes extensive gapping of the existing hedgerow, management of the hedgerow to a height of at least 3 metres, and the planting of many new trees along this hedgerow. This approach is in-keeping with the character of this part of the Site and would filter and break up views of Solar PV Arrays from rights of way to the east of the Site. Measures relating to trees and planting are reflected in **Figure 5.8 Green infrastructure Parameter Plan** and detailed in the **oLEMP [APP/7.11]** and include the introduction of additional hedgerow trees and woodland belts to provide screening to the solar panels.
	Ecology	General responses 7. Deer Management There has been no thought given to proper deer management within the scheme. Totally enclosing approximately 800Ha of habitat and feeding ground for wild deer (muntjac, Chinese water deer, Roe and Red deer and possibly Fallow too) will lead to increased road traffic accidents, vehicle insurance claims and in the increased biodiversity impact on adjacent unfenced habitats.	No	The Scheme will be enclosed within perimeter fencing (as set out in **ES Chapter 5: The Scheme [APP/5.1]**); however, dispersal impacts are not anticipated owing to the incorporation of above ground clearances and mammal gates. Further, the perimeter fencing will be set back from the boundary habitats, which are retained and enhanced as part of the embedded mitigation, providing movement corridors for deer.
	Ecology Fencing	It is widely agreed there are 2 million deer in the UK and that this is likely to increase as there are no natural predators and that culling is not at such a level that the numbers are likely to keep increasing for the foreseeable future. The enclosing of the solar panel areas will mean that the damage caused by the deer will be concentrated in the intervening areas.	No	The Scheme will be enclosed within perimeter fencing (as set out in **ES Chapter 5: The Scheme [APP/5.1])**; however, dispersal impacts are not anticipated owing to the incorporation of above ground clearances and mammal gates. Further, the perimeter fencing will be set back from the boundary habitats, which are retained and enhanced as part of the embedded mitigation, providing movement corridors for deer.
	Ecology	A response to such developments by the Forestry Commission says: ‘Where the proposals include fencing the site, this is likely to increase herbivore browsing and grazing to	No	The Solar PV Panels will be enclosed within perimeter fencing(as set out in **ES Chapter 5: The Scheme [APP/5.1])**; however, dispersal impacts are not anticipated owing to the incorporation of above ground clearances and

		areas in close proximity to these sites, and impacts are likely to increase in surrounding woodlands, and the wider landscape where hedgerows, stewardship schemes are likely to be impacted upon with the associated impact to species reliant in these areas. Recommendation would be to increase culls in this area prior to the project commencement to help mitigate this and to continue deer management. There is also the potential of herbivores gaining access to within the site and impacting any biodiversity measures requested as part of the planning process so this would need to be regularly monitored.		mammal gates. Further, the perimeter fencing will be set back from the boundary habitats retained as part of the embedded mitigation. As such, the habitats the deer currently browse naturally, will remain accessible and therefore no increased browsing pressure is anticipated.
	Ecology Fencing	In addition, large scale fencing is going to change how deer move through the landscape, and this may increase the numbers of deer crossing local roads. Deer vehicle collisions increase as deer crossings increase. We already have high risk of deer collisions in the area, and an assessment of this risk increasing should occur. If culls occur prior to commencement the risks should reduce.'	No	The Scheme will be enclosed within perimeter fencing(as set out in **ES Chapter 5: The Scheme [APP/5.1]**); however, dispersal impacts are not anticipated owing to the incorporation of above ground clearances and mammal gates. Further, the perimeter fencing will be set back from the boundary habitats retained as part of the embedded mitigation.
	Ecology	It has been recognised locally in the Broads national park that deer numbers are higher than the landscape can accommodate. This could be the case in the area covered by the development but no survey has been undertaken.	No	The Scheme will be enclosed within perimeter fencing(as set out in **ES Chapter 5: The Scheme [APP/5.1]**); however, dispersal impacts are not anticipated owing to the incorporation of above ground clearances and mammal gates. Further, the perimeter fencing will be set back from the boundary habitats retained as part of the embedded mitigation.
	Ecology Fencing Impact on local amenities/recreational activities	Deer are transitory creatures and move through the landscape. It is important that there are wide corridors between the solar panel areas. Our concerns are that narrow corridors between panel areas will only concentrate deer movements and likely to cause accidents on the A1065 and A47 as well as local smaller roads. Accounts of deer panicking when encountering walkers on the Peddars Way along Procession Lane in Sporle where the land owner has deer-fenced both sides already reveals there is a problem.	No	The Scheme will be enclosed within perimeter fencing(as set out in **ES Chapter 5: The Scheme [APP/5.1]**); however, dispersal impacts are not anticipated owing to the incorporation of above ground clearances and mammal gates. Further, the perimeter fencing will be set back from the boundary habitats retained as part of the embedded mitigation.
	Ecology	We would ask that the Applicant does further work to provide the complete scheme with a deer management plan engaging surrounding landowners who would be affected and adjusts the design of the scheme accordingly not only to facilitate deer and other wildlife movement through the dOL but also in	No	The Solar PV Panels will be enclosed within perimeter fencing(as set out in **ES Chapter 5: The Scheme [APP/5.1]**); however, dispersal impacts are not anticipated owing to the incorporation of above ground clearances and mammal gates. Further, the perimeter fencing will be set back from the boundary habitats retained as part of the embedded mitigation. As such, the habitats the deer currently browse naturally, will remain accessible and

		the wider landscape. It will be particularly important to work with the High Groves development.		therefore no increased browsing pressure is anticipated. An approach which appears consistent within the High Grove development.
	Ecology Biodiversity	Biodiversity and wildlife The PC request that they will have the results of further survey work and assessment on the impact of the development on biodiversity and wildlife by the project and the detailed BNG likely. This is so that we can comment and suggest further mitigation.	No	The survey work undertaken to inform the assessment of impacts on ecology and biodiversity has been provided in the **Ecology and Biodiversity Appendices** in **Volume 4** of the **ES [APP6.1 – 6.4]**.
	Ecology	Hedges and Trees It is recognised that existing hedgerows and trees will be largely retained and gaps filled and hedges taken out during construction will be replaced. However, it is recognised that mature diseased trees particular from Ash dieback will need to be removed.	No	Where ash trees or other trees require removal for safety reasons or due to confirmed disease, works will be undertaken in accordance with best practice and relevant ecological and arboricultural guidance. Details of new planting and management are provided within the **oLEMP [APP/7.11].**
	Ecology	The PC wants to emphasise the need for hedges to be allowed to thicken out at the base to 3.5-6m wide to allow not only thick dense material to shield panels from view in winter but also to create good wildlife corridors for nesting birds and small mammals. The hedges should be allowed to grow to at least 3.5m with a domed top using native sourced plants. Maintenance should be minimal in terms of trimming but recognise they will need managing with a full maintenance plan covering the full establishment, mulching and weeding of plants.	No	Details of new planting and management are provided within the **oLEMP [APP/7.11]**, with the shrubby element of the hedgerows maintained to an optimum height of 4-5m tall and bushy growth encouraged.
	Ecology	Shelter belts of mixed native woodland should be 20m thick to provide a dense barrier from solar arrays and particularly around individual residences. These should be principally coppicing species of native trees and shrubs (min 2000 plants/ha) to grow a buffer belt with a diverse understorey structure.	No	Proposed woodland belt planting includes a mix of native species, including coppicing species, and are typically 10m wide. The full details of new planting and management are provided within the **oLEMP [APP/7.11]**.
	Ecology Additional environmental mitigation, enhancement and protection suggestions	We would welcome planting of native species individual hedge standard trees into existing and new hedges where appropriate, recognising the plans to recreate the historic nature of the drove routes through the site.	No	The Applicant notes this comment and is pleased to confirm this will be provided within the Scheme. The details of new planting and management are provided within the **oLEMP [APP/7.11]**.
	Ecology Fencing	Separate fencing and protection of Ancient, Semi-natural woodland, new woodland belts and hedgerows must be considered on a site-by-site basis particularly in light of possible sheep grazing and browsing wild-deer populations.	No	The Applicant notes this comment and can confirm protection of these habitats is provided through fencing of the Solar PV areas (the only areas subject to grazing), with the full details of appropriate buffers provided within the **ES Chapter 7: Ecology and Biodiversity [APP/6.2]**. Further, given the retention, widening and enhancement of the

	Additional environmental mitigation, enhancement and protection suggestions			boundary habitats, which comprise those currently most suitable for deer, increased browsing in these areas is not anticipated.
	Ecology	Grassland We are concerned that the grassland proposed under and around the solar panels is well and actively managed over the operational phase of the project. Of particular concern is the possibility of invasive species taking over, such as ragwort and thistles and the need for a programme of selective weed control.	No	The Applicant notes this comment and can confirm the grassland under the solar panels will be well and actively managed, with the full details of new planting and proposed management provided within the **oLEMP [APP/7.11]**.
	Ecology	It is important that areas are sown with native wildflower mix with seed of UK provenance and site appropriate to reflect soil type and fertility, if we are to see improved habitat for insects and pollinators, ground nesting birds, bats, owls and raptors and small mammals.	No	The Applicant notes this comment and can confirm the wildflower mixes will be of UK provenance and appropriate for the site conditions. For full details of new planting and management please refer to the **oLEMP [APP/7.11]**.
	Sheep grazing	If sheep grazing is to be encouraged, grazing should be particularly, but not exclusively, after summer flowering and seed-setting.	No	The Applicant notes this comment and can confirm the timing of grazing and / or cutting of the grassland will be appropriately timed and will be of an appropriate frequency.
	Ecology Biodiversity	Ponds The PC would want to encourage the improvement of the existing ponds across the development but would ask that, where possible, new ponds be created to encourage wildlife and biodiversity as well as provide drainage.	No	Consideration in regard to pond habitat is included in **ES Chapter 7: Ecology and Biodiversity [APP/6.2]**. No evident ghost ponds have been identified within the Site as a result of the survey work undertaken to inform the DCO Application. Specific management of existing ponds within wider green corridors will be undertaken as detailed within the **oLEMP [APP/7.11]** .
	Ecology Additional environmental mitigation, enhancement and protection suggestions	There appears to be no survey of possible 'ghost' ponds (former ponds that have been filled in) in the dOL area which could be restored. This should be undertaken and a plan made to restore those that can be.	No	Consideration of pond habitat is included in **ES Chapter 7: Ecology and Biodiversity [APP/6.2]**. No evident ghost ponds have been identified within the Site as a result of the survey work undertaken to inform the DCO Application. Specific management of existing ponds within wider green corridors will be undertaken as detailed within the **oLEMP [APP/7.11].**
	Ecology Biodiversity	It is important that the existing ponds are linked up with the existing and created wildlife corridors so that this allows wildlife access to water and facilitates movement through the landscape.	No	The Applicant notes this comment and can confirm the specific management of existing ponds within wider green corridors will be undertaken as detailed within the **oLEMP [APP/7.11]** .
	Additional environmental mitigation, enhancement and protection suggestions	Buffer strips It is noted that the PEIR states that buffer strips between PV panels and hedges will be 8mwith a 4m minimum gap between individual panels and surrounding fencing. We would request that there is a clear 12m strip between fences and hedges and tree	No	Consideration of buffer strip widths and their suitability, in combination with habitat provision, is set out within this response, including references to faunal species groups.

		lines. Similar width buffer strips should also be made around ponds. This is for the following reasons:		
	Fencing Ecology	We are concerned that with the erection of 2m high deer fencing this is not a large enough gap to provide adequate wildlife corridors	No	Consideration of buffer strip widths and their suitability, in combination with habitat provision, is set out below, including references to faunal species groups.
	Public Rights of Way Additional environmental mitigation, enhancement and protection suggestions	Wider buffer strips will ensure that foot paths are not dominated by hedge or trees one side and PV panels the other side ensuring a more pleasant walk for users	No	Consideration of buffer strip widths and their suitability, in combination with habitat provision, is set out below, including references to faunal species groups.
	Access to, and maintenance of, the solar PV panels and associated infrastructure	Management of panel areas No outline management plans have been put in place for the operation of the site. We are concerned that the length of the operational phase will mean that over time management of the site will not be as tight with resulting problems:	No	An **oLEMP [APP/7.11]** has been prepared which details the management measures to be implemented for the lifetime of the Scheme, to be further refined and detailed in the LEMP, secured via requirement of the DCO. An **oOEMP [APP/7.8]**, in addition to supplementary outline management plans relating to the operational phase, will be submitted to form part of the DCO Application. The **oOEMP [APP/7.8]** will identify how commitments made in the EIA will be translated into actions during the operation phase and will include a process for implementing the actions through the allocation of key roles and responsibilities. Any additional licences, permits or approvals that are required will be listed in the detailed OEMP(s), including any environmental information submitted in respect of them. The detailed OEMP(s) will be a live document updated throughout the operation phase as required, for example to reflect changes in legislation or contact details. The **oOEMP [APP/7.8]** has been designed to comply with relevant environmental legislation and the mitigation measures set out in the **ES [APP/6.1–6.4]**. The key elements of the **oOEMP [APP/7.8]** include: • An overview of the Scheme and associated operational programme • Prior assessment of environmental impacts (through the EIA process) • Proposed design and other mitigation measures to prevent or reduce potential adverse environment effects • Monitoring and reporting of effectiveness of mitigation measures; and • Links to other complementary plans and procedures.
	Ecology Biodiversity	Loss of biodiversity and detrimental effects on wildlife Poor maintenance of the species-rich grassland proposed under the solar arrays that lead to bare	No	The Applicant notes this comment and is pleased to confirm that the **oLEMP [APP/7.11]** which has been prepared details the management measures to be implemented for the lifetime of the Scheme, to be further

	Soils	patches causing soil erosion and sediment build up in the drainage system Poor maintenance of the species-rich grassland proposed under the solar arrays that lead to increased fire risk in times of drought		refined and detailed in the LEMP, secured via requirement of the DCO. This specifies that conservation management of the grasslands will be undertaken, for example through appropriate timing and frequency of grazing and/or cutting, and specific prescriptions for the different habitat types will be provided within the LEMP when prepared.
	Maintenance	We would wish to have reassurance that the site will be managed correctly and the plans put in place.	No	The Scheme would be subject to an **oCMEP [APP/7.6]**, **oOEMP [APP/7.8]** and **oDS [APP/7.10],** in addition to supplementary management plans which form part of the DCO Application. Such management plans and procedures aim to demonstrate how the mitigation measures relevant to the construction, operational and decommissioning phase activities included in the **ES [APP/6.1.– 6.4]** will be implemented. It also sets out the monitoring and auditing activities designed to ensure that such mitigation measures are carried out and are effective. Appointed contractor(s) will be responsible for working in accordance with the environmental controls documented in the **oCMEP [APP/7.6]**, **oOEMP [APP/7.8]** and **oDS [APP/7.10],** pursuant to the DCO Application. The overall responsibility for implementing the detailed suite of management plans will lie with the appointed Contractor, as a contractual responsibility to the Applicant, as the Applicant is ultimately responsible for compliance with Requirement 13 of the **dDCO [APP/3.1]**.
	Battery Energy Storage Systems Safety	Fire and battery safety We note that the all the BESS units will be in one location. We would request that there be a complete outline Battery Safety Management Plan (oBSMP) made available as soon as possible.	No	The Applicant notes that an **oBSMP [APP/7.14]** forms an element of the Planning Application. There is a single BESS compound at this site; the BESS units are not dispersed around the site.
	Battery Energy Storage Systems Safety	We are concerned that: There will be adequate water supplies available on site to counter any fire outbreak, noting that the water is for cooling surrounding areas rather than putting out any battery container that might catch fire There will be sufficient management of surrounding vegetation to ensure any fire does not spread to surrounding panel areas The local fire services will have adequate resources to be able to contain battery fires with the large number of proposed developments.	No	Emergency Water Supply, be this a fixed tank or a fire hydrant, will form an element of the Site design and is a recommendation in NFCC Planning Guidance for BESS. The areas around the BESS units will be clear of vegetation to minimise fire paths. An **oBSMP [APP/7.14]** sets out safety measures including fire suppression methods and water management.

	Battery Energy Storage Systems Safety	We note that the battery containers will be separated from each other and surrounding infrastructure by a minimum distance that complies with any relevant National Fire Chief's Council (NFCC) and / or the National Fire Protection Association (NFPA) guidelines at the time of detailed design.	No	The Applicant notes that the minimum separation between BESS units will be 2.4m as per the standard test method (stated in ASTM E119) noted in the **oBSMP [APP/7.14].**
	Indicative area for solar PV panels	Tracker panels The PEIR states that the design of the solar panel areas could use both fixed panels or tracker panels. The 4.5m maximum tracker panel height quoted in PEIR table 5.2 is of concern as the panels move during the sun's transit from east to west. We request that we are made aware where these will be used within the scheme so that we can ensure that sufficient hedge and tree planting can be undertaken to ensure these panels are fully hidden. We note that 5m high weather masts maybe included although these were not mentioned in the PEIR. If these are used, we would want to see those positioned so they are not visible.	No	The Solar PV Site could contain either Fixed South Facing PV Arrays or Singe Axis Trackers. The choice of panel technology is a matter for the detailed design stage, which will occur post-consent of the DCO. The visual mitigation strategy has been developed based on the worst-case scenario, which assumes the maximum panel height of 4.5m at greatest inclination. There are no weather masts proposed as part of the Scheme.
	Glint and Glare	Additionally, we would request that full surveys are done to ensure there is no possibility of glint and glare as per below.	No	**ES Chapter 16: Other Environmental Matters, Glint and Glare [APP/6.2]** concludes there are no significant effects associated with the Scheme with regard to glint & glare.
	Glint and Glare Indicative area for solar PV panels Inter project Cumulative impact	Glint and glare Appendix 15.3 in the PEIR states in its conclusions that there will be possible cumulative impacts in relationship to the High Grove solar development in terms of glint and glare. We note this would be particularly so if tracker panels are used where they will face east in the early part of the day. However, there is also a likelihood with fixed panels where they are orientated east to west over sloping ground.	No	**ES Chapter 16: Other Environmental Matters, Glint and Glare [APP/6.2]** has considered cumulative impacts from the High Grove Solar Farm, and cumulative impacts are only possible towards one dwelling receptor. The potential for cumulative impacts is considered not significant, as reflections would not be visible from both solar farms simultaneously.
	Glint and Glare Additional environmental mitigation, enhancement and protection suggestions	We would hope that the shelter belts suggested above would mitigate against glint and glare observed by the residential receptor mentioned in the appendix and also users on the Peddars Way and Southacre road. We request that further assessment work is done to ensure that appropriate mitigation is in place.	No	The Applicant notes **ES Chapter 16: Other Environmental Matters, Glint and Glare [APP/6.2]** concludes that there will be no significant impacts towards any receptors and no further additional mitigation is required beyond that of the embedded mitigation designed into the Scheme
	Consultation and engagement	Community liaison The PC is concerned that there will be sufficient consultation with it and the community; particularly as the parish is producing a Neighbourhood Plan and wishes to have continued dialogue as the DCO	No	The Applicant notes this comment and welcomes further engagement throughout the DCO process.

		application process proceeds so it can inform their plans and vice versa.		
	Consultation and engagement	The DCO process requires Norfolk County Council and Borough Council of King's Lynn and West Norfolk to be consulted on various aspects of the ES and DCO application. We hope that the PC will also be consulted, if not informed, in regard to particulars of the development generally and as they relate to Sporle with Palgrave, as it could be the case that neither of these councils will exist beyond 2028 with other authorities, within redrawn boundaries, in their place.	No	The Applicant notes these comments and confirms that it has kept Sporle with Palgrave Parish Council informed regarding consultation and Scheme updates.
	Consultation and engagement	Similarly, the PC would wish to be informed of further engagement with other consultees and stakeholders where matters are discussed that will affect the parish.	No	The Applicant notes that Sporle with Palgrave Parish Council were informed of the targeted consultation (set out in the **Consultation Report [APP/5.1]** and the Applicant welcomes opportunities to discuss the Scheme further.
	Consultation and engagement	We would request that formal arrangements are made to create a liaison group made up of parish council representatives across the whole development.	No	The Applicant is open to discussion regarding a liaison group with Sporle with Palgrave Parish Council.
	Consultation and engagement	Community fund The PC notes that there are various commitments made by the Applicant in terms of community involvement in its commitments register, however there is no mention of a fund for community facilities as offered by other schemes. We would request that this be included.	No	The Applicant notes these comments and remains committed to ongoing dialogue with the local community throughout all stages to ensure that the benefits of the Scheme are realised locally. Community benefits have been consulted on throughout the pre-application process, and ongoing discussions will inform how funding is best distributed.
	Supply chain	Modern slavery and sustainable sources of supply At present the exact manufacturer and models of products to be used in the development have not been identified. However, the PC is concerned at the problematic nature of obtaining products from China in the current geopolitical climate. The PC needs to see that PV panels and other product are not produced under poor labour conditions amounting to modern slavery and that they do not pose a security threat to the UK energy system. Nor product using materials, such as so called 'rare earths', that come from unsustainable sources which will be extracted in a way that damages the environment in other parts of the world.	No	Any procurement of supplies internationally will comply with both national and international law, and all policy and safety measures will be adhered to in the transportation of supplies. Risk assessments will be produced when required and will be strictly followed by all in that particular supply chain. All international suppliers will be held to a minimum quality with regard to environmental, professional and ethical working practices (including but not limited to the banning of suppliers or manufacturers that engage in slavery or forced labour) as agreed by the members of Solar Energy UK.

1.16 National Grid Electricity Transmission PLC

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
National Grid Electricity Transmission PLC	Introduction	I refer to your notice dated 15th May 2025 regarding the Proposed Development. This is a response on behalf of National Grid Electricity Transmission PLC (NGET). Due to the proximity of some of our existing or future assets, NGET wishes to express their interest in further consultation while the impact on our assets is still being assessed.	No	The Applicant thanks National Grid Electricity Transmission PLC (NGET) for responding to the consultation.
	Consultation and engagement	Where the Promoter intends to acquire land, extinguish rights, or interfere with or work within close proximity to any of NGET's apparatus and land, this will require appropriate protection and further discussion on the impact to its apparatus and rights.	No	The Applicant intends to include negotiate with NGET regarding the form of protective provisions to be included, once agreed, in the **draft DCO [APP/3.1]** in order to ensure appropriate protections for NGET.
	Consultation and engagement	NGET assets form an essential part of the electricity transmission network in England and Wales. Please continue to consult NGET in regards to this development.	No	The Applicant notes that engagement with NGET has been ongoing and will continue throughout the examination of the DCO Application.
	Protective Provisions	NGET will require an adequate form of Protective Provisions included within the Order	No	The Applicant intends to negotiate with NGET regarding the form of include protective provisions to be included, once agreed, in **draft DCO [APP/3.1]** in order to ensure appropriate protections for NGET.
	Supporting documents	Existing Infrastructure Overhead Lines 4VV 400 kV OHL NORWICH MAIN - WALPOLE 1 NORWICH MAIN - WALPOLE 2 I enclose a plan showing the location of NGET's apparatus in the scoping area.	No	The Applicant thanks NGET for providing this plan.
	Guidance	New Infrastructure Please refer to the Holistic Network Design (HND) and the National Grid ESO website to view the strategic	No	The Applicant notes this comment. Given the Scheme's proximity to a number of offshore wind farms in Norfolk, the Applicant has reviewed the HND and referenced as relevant in the **Planning Statement [APP/5.5]**.

		vision for the UK's ever growing electricity transmission network.		
	Indicative siting zone for National Grid Substation	Proposed New Onshore Infrastructure It is expected that a new substation will be required to facilitate future customer connections along the Norwich Main to Walpole 400 kV Overhead Line. The location and details of a potential new substation are not determined at this stage.	No	Please refer to the **ES Chapter 5: The Scheme [APP/6.1]**, which sets out that Work No. 4 of **Schedule 1** of the **draft DCO [APP/3.1]** makes provision for the new National Grid Substation located within Field 27.
	Consultation and engagement	NGET requests that all existing and future assets are given due consideration given their criticality to distribution of energy across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.	No	The Applicant notes this request and welcomes further discussion to ensure that NGET's interests are appropriately considered and, where possible, that a positive outcome for all parties is achieved.
	Consultation and engagement	The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. https://www.nationalgrid.com/electricity-transmission/network-andinfrastructure/infrastructure-projects. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.	No	The Applicant notes this request welcomes further discussion with NGET.
	General comment	These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.	No	The Applicant agrees with this comment.
	National Grid assets	Electricity Infrastructure: National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset.	No	The Applicant notes this comment.

	Overhead lines	Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 5 (2019)”, which publicly available.	Under consideration	The Applicant notes this requirement and is taking the comment into consideration.
	Overhead lines	If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.	Under consideration	The Applicant notes this requirement and is taking the comment into consideration.
	Guidance	The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive’s (www.hse.gov.uk) Guidance Note GS 6 “Avoidance of Danger from Overhead Electric Lines” and all relevant site staff should make sure that they are both aware of and understand this guidance.	No	The Applicant notes this guidance.
	Installation of proposed infrastructure	Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained using the contact details above.	Under consideration	The Applicant notes this requirement and is taking the comment into consideration.
	Ecology	If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.	Under consideration	The Applicant notes this requirement and is taking the comment into consideration.
	Construction	Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of	Under consideration	The Applicant notes this requirement and is taking the comment into consideration.

		support") drawings can be obtained using the contact details above.		
	National Grid assets	National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.	Under consideration	The Applicant notes this comment and is taking the comment into consideration. The Applicant is open to further discussing the matter with NGET.
	National Grid assets	Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.	Under consideration	The Applicant notes this comment and is taking the comment into consideration. The Applicant also notes it is open to further discussing the matter further with NGET.
	Consultation and engagement	NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com	No	The Applicant notes that engagement with NGET has been ongoing and will continue throughout the examination of the DCO Application.

1.17 National Highways

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
National Highways	Introduction National policy	On behalf of the Secretary of State for Transport, National Highways is responsible for managing and operating a safe and efficient Strategic Road Network	No	The Applicant notes the responsibilities of National Highways and thanks it for responding to the consultation.

		(SRN) under the provisions of the Infrastructure Act 2015 and is the highway authority for the SRN. The Department for Transport (DfT) Circular 01/2022 (Strategic road network and the delivery of sustainable development) sets out how National Highways will work with developers to ensure that specific tests are met when promoting a scheme. This includes ensuring the transport impact is understood, any mitigation (or other infrastructure) is designed in accordance with the relevant standards and that environmental impacts are appraised and mitigated accordingly. In addition, National Highways is responsible for ensuring the SRN serves its purpose as a part of a national system for through traffic in accordance with Section 10 of the Highways Act 1980, and to satisfy the reasonable requirements of road safety.		
	Introduction	Whilst National Highways does not object to the principle of the development, it is important to identify areas of concern that will need to be addressed to the satisfaction of National Highways as the scheme progresses towards submission of the DCO application.	No	The Applicant notes this comment and addresses each concern below. The Applicant also notes it is open to discussing the points further and welcomes future engagement, if required.
	Construction traffic and impact on roads	National Highways is concerned that the project could have significant implications for the SRN during construction, most notably on the A47. It is, however, considered unlikely that once The Droves Solar Farm is complete there will be any impact upon the SRN, except for maintenance access.	No	The Applicant notes this comment and addresses the concerns relating to the Strategic Road Network (SRN) below.
	Construction traffic and impact on roads Transport and Access	National Highways is keen to work collaboratively with the Applicant to consider and address the potential impacts of the proposal and ensure the SRN is not adversely affected, particularly during the construction period. It is anticipated that these issues (not exhaustive) will inform future discussions and form the basis of a Statement of Common Ground between National Highways and the Applicant. The Statement of Common Ground will then reflect progress made and clarify outstanding issues for resolution.	No	The Applicant welcomes future discissions with National Highways and confirms that it will prepare a Statement of Common Ground in consultation with National Highways.
	Transport and Access	Due to the proximity of the project to, and interactions with, the A47, National Highways seeks to continue active engagement and discussions with the developer of the scheme to overcome potential issues and areas of concern that need to be resolved in advance of the DCO application being submitted	No	The Applicant notes this comment and confirms that it will prepare a Statement of Common Ground in consultation with National Highways. .

	Transport and Access	Preliminary Environmental Impact Report (PEIR) 2.1.The PEIR provides an initial understanding of the potential likely significant effects of the scheme, both positive and negative, and a final assessment will be set out within the submission version of the Environmental Statement. National Highways has reviewed the Traffic and Transport chapter which covers the effects of the scheme during construction. National Highways recommends the inclusion of the Circular 01/2022 'Strategic road network and the delivery of sustainable development' within the review of relevant guidance. The approach and assumptions described are generally acceptable to National Highways. Further assessment will be undertaken within the Environmental Statement, which will be reviewed by National Highways at the appropriate stage.	No	The Applicant notes that the PEIR methodology was deemed acceptable by National Highways and that there would be final comments on receipt of the final **ES [APP/6.1- 6.5].**
	Transport and Access	Traffic and Transport 3.1.Chapter 9 of the PEIR provides an overview of the Traffic and Transport impacts of the proposed scheme. 3.2.Section 9.3 and Figure 9.2 set out the study area for the assessment for Transport and Access which has been defined based on the area where there are likely to be transport effects resulting from the construction of the project. This approach is considered appropriate by National Highways.	No	The Applicant notes that the approach is deemed accepted by National Highways.
	Transport and Access Construction traffic and impact on roads	National Highways recommends the Study Area is extended to any SRN junctions have been identified as likely to experience an uplift in traffic during construction in the AM and PM peaks. National Highways requires junction impact assessments to be undertaken on junctions experiencing an increase of 30 additional trips during the peak periods. National Highways recommends the Applicant seeks to agree the scope with us of junction modelling in each of these locations.	No	The Study Area has been based on the likely junctions that will be impacted by construction traffic based on the potential routes to/from the Scheme for construction vehicles. Through the restrictions on delivery timings for construction traffic as set out above in response to NCC Highways, there will not be any junctions during the construction phase of the Scheme which exceed the threshold of 30 two-way vehicle trips during a peak hour. On this basis the extent of the Study Area as detailed within this **ES Chapter 9: Transport and Access [APP/6.2]** is considered sufficient as the threshold of 30 two-way vehicles during a peak hour set by National Highways is not met on any of the SRN junctions along the A47. The Study Area for the Transport and Access assessment is shown at **ES Figure 9.2: Transport and Access Study Area [APP/6.3]**. Further details on the restrictions on the timings of deliveries during the Construction Phase of the Scheme are included within the **oCTMP [APP/7.7]**. As there will be

				no deliveries during the AM and PM peak hours it is not considered that modelling is required.
	Human health and safety Transport and Access	Section 9.6.28 sets out the scope for the personal injury collisions (PIC) within the study area, which is understood to be agreed with NCC, and is in principle acceptable. National Highways would recommend obtaining the accident data from the local highway authorities based on the study area and include the relevant junctions linking to the SRN. The data should be inclusive of the full STATS-19 dataset including locations, timings and causation, and it is important to note that the assessment year of 2020 (this includes the period from March 2020 until August 2021 (inclusive)) will not be accepted as representative due to the COVID-19 pandemic.	No	The Applicant notes that the accident data included within **ES Appendix 9.2: Traffic Assessment [APP/6.4]** has been agreed with Norfolk County Council as the relevant highway authority. The data is for the latest three-year period available (2022-2024), which excludes the periods impacted by COVID-19 in **ES Appendix 9.2: Traffic Assessment [APP/6.4]** has been agreed with Norfolk County Council.
	Transport and Access	National Highways is not currently aware of the project's requirements for Abnormal Indivisible Loads (AILs). Should the project require AIL deliveries, it should be noted that National Highways follows a government Water Preferred Policy, which means we would expect the loads to arrive via the nearest suitable port of entry. National Highways will need to agree the routeing of any AILs that intended to use the SRN. further guidance can be found at https://nationalhighways.co.uk/road-safety/abnormal-loads-and-the-esdal-system/. National Highways recommends discussing this matter before a decision is made on the proposed route to agree a workable and acceptable strategy in principle.	No	The Applicant notes that here will be a number of AIL movements associated with the construction of the Scheme, with initial details and swept path analysis of the expected vehicles included within **ES Appendix 9.2: Traffic Assessment [APP/6.4].** The details on the requirements for the abnormal load deliveries will be confirmed within the CTMP, secured by way of requirement on the Development Consent Order (DCO), once the abnormal load deliveries are confirmed. Any abnormal load deliveries will be managed in consultation with National Highways to ensure that the impacts can be suitably accommodated and will be coordinated alongside the impacted local highway authorities through the Electronic Service Delivery for Abnormal Loads (ESDAL2) database. The Applicant notes that it is open to further engagement regarding this matter.
	Transport and Access Construction traffic and impact on roads	Section 9.5 identifies a number of embedded mitigation requirements to be integrated as part of the scheme. Examples include Construction Access Routes, highway improvements and the use of a staff shuttle. The embedded mitigation is considered to offset the impact of the development.	No	The Applicant notes this comment and confirms that embedded mitigation will be secured through the CTMP by way of a requirement in the DCO.
	Transport and Access	Table 9.6 of the Transport and Access chapter of the PEIR sets out the anticipated Construction Traffic Data for the project. The impact on other specific junctions, including on the A47 are currently unknown, and therefore National Highways requires additional assessments of the junctions required to	Yes	The Applicant notes this comment and confirms that through the restrictions on deliveries secured through the CTMP, there will be no impact on the AM or PM peak hours so no further junctions are required to be assessed.

		understand the impact the project may have and if any physical mitigation is required.		
	Transport and Access	Draft Outline Construction Traffic Management Plan 4.1. It is recognised that an Outline Construction Traffic Management Plan will be prepared and submitted in support of the DCO application, setting out management, mitigation and monitoring strategy for construction traffic for the scheme.	No	The Applicant confirms that an **oCTMP [APP/7.7]** has been prepared and supports 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.
	Transport and Access Construction traffic and impact on roads	As part of this process, National Highways will need to understand the impact of the development would have on the A47 during the construction period of the development and measures to manage and monitor the impact. National Highways recommends consultation regarding the Outline Construction Traffic Management Plan and the proposed measures to ensure these are suitable for the A47.	No	The Applicant notes this recommendation and is open to further consultation regarding the matter. The Applicant also notes that the impact on the A47 will be managed through the measures detailed in the **oCTMP [APP/7.7]**, such as the restrictions on delivery hours and use of prescribed routes.
	Transport and Access	In addition, National Highways will need to be satisfied that there are sufficient processes in place to ensure enforcement of the measures and the action that will be taken if these prove to be unsuccessful in ensuring forecast traffic numbers are not exceeded.	No	The Applicant notes this comment The Applicant also notes that the mitigation measures detailed in the CTMP will be secured by way of a requirement in the DCO.
	Transport and Access Construction traffic and impact on roads	It should be noted that the signage strategy for the Construction Route is yet to be agreed. National Highways will need to agree any proposed signage to be located on the SRN.	No	The Applicant notes this comment and confirms it will seek National Highway's agreement on the signage strategy. The Applicant also notes that details on signage will be secured through future iterations of the CTMP, secured by way of requirement on the DCO.
	Transport and Access Construction traffic and impact on roads	Outline Travel Plan 5.1. It is recognised that an Outline Travel Plan will be prepared and submitted in support of the DCO application, setting out the strategy to reduce the vehicular impact of construction staff trips on the highway network.	No	The Applicant notes this comment and confirms that the Travel Plan will be secured as part of the Final CTMP that is secured by way of requirement through the DCO, with the framework measures detailed in the **oCTMP [APP/7.7]**.
	Transport and Access Construction traffic and impact on roads	It is anticipated that the outline Travel Plan will include measures to encourage construction staff to travel to and from site by sustainable modes. National Highways agree in principle with this method, however, National Highways will need to understand the impact that the development would have on the A47 during the construction period of the development and measures to manage and monitor the impact. National Highways recommends consultation regarding the Outline Travel Plan and	No	The Applicant notes these comments and confirms that the Travel Plan will detail the measures to encourage staff to travel by sustainable modes and is secured through the Final CTMP that is secured by way of a requirement on the DCO, which will be subject to consultation with National Highways. The Applicant further confirms that there will be opportunity to comment on the measures proposed. An overview of the measures to be incorporated in the future Travel Plan are provided in the **oCTMP [APP/7.7]**.

		the proposed measures to ensure these are suitable for the A47.		
	Transport and Access Construction traffic and impact on roads	In addition, National Highways will need to be satisfied that there are sufficient processes in place to ensure enforcement of the measures and the action that will be taken if these prove to be unsuccessful in ensuring forecast traffic numbers are not exceeded.	No	The Applicant notes this comment and confirms that mitigation measures for construction traffic will be secured through the CTMP, that is secured by way of a requirement in the DCO Application. Failure to comply with the requirements of the DCO is a criminal offence.
	Transport and Access Construction traffic and impact on roads	Draft Outline Construction Environmental Management Plan 6.1.It is recognised that an Outline Construction Environmental Management Plan will be prepared and submitted in support of the DCO application. The plan will seek to set out how mitigation measures and monitoring requirements that are identified within the Environmental Impact Assessment are implemented during the construction of the proposed development.	No	The Applicant confirms that an **oCEMP [APP/7.6]** has been prepared and supports this DCO Application. The **oCEMP [APP/7.6]** establishes the traffic measures to be implemented during the construction phase.
	Transport and Access	Please note that any proposals for monitoring equipment and measures that need to be implemented along the SRN will need to be agreed with National Highways. National Highways will need to be satisfied that there are sufficient processes in place to ensure enforcement of the measures and the action that will be taken if these prove to be unsuccessful in ensuring forecast traffic numbers are not exceeded.	No	The Applicant notes this comment and confirms that the Final CTMP that needs to be provided prior to commencement, secured by way of a requirement in the DCO, will detail measures for enforcement and contact details in the event that the CTMP is not followed by the appointed contractor. The Applicant further notes that National Highways will be a consultee on the Final CTMP and there will be scope to ensure that the mitigation measures are sufficient. The outline measures are initially detailed within the **oCTMP [APP/7.7]** that accompanies the DCO Application.
	Traffic and Access Decommissioning phase	Decommissioning Strategy and Decommissioning Traffic Management Plan 7.1.It is understood an Outline Decommissioning Management Plan will be submitted as part of the DCO application which will provide an overview to address how mitigation measures and monitoring requirements are implemented during the decommissioning phase of the proposed development.	No	A Decommissioning Traffic Management Plan (DTMP) will be secured as part of the Decommissioning Strategy. The DTMP will be prepared once details of the decommissioning phase are available and will set out the expected traffic impacts and the measures to manage them. The DTMP will be approved by Breckland District Council, in consultation with Norfolk County Council and National Highways, prior to the commencement of the Decommissioning Phase. The Applicant also notes that the DTMP will include measures to mitigate the transport impacts of workers during the Decommissioning Phase. In advance of the detailed Decommissioning Strategy being prepared, an **oDS [APP/7.10]** has been submitted with the DCO Application. This document sets out the

				overarching principles for how the Decommissioning Phase will be managed and mitigated.
	Traffic and Access Decommissioning phase	More details on the decommissioning activities and methods should be provided within the Decommissioning Environmental Management Plan prior to the decommissioning phase commencing addressing the impacts on the A47. It is expected that this will be developed in consultation with the Local Planning Authorities. National Highways requests to be consulted prior to decommissioning.	No	The Applicant notes these comments and confirms that an overview of the decommissioning activities and methods are initially provided within the **oDS [APP/7.10]** that is submitted with the DCO Application. The Decommissioning Strategy will be secured by way of a requirement through the DCO. The Decommissioning Strategy will be approved by Breckland District Council in consultation with both Norfolk County Council and National Highways. The Applicant therefore notes that there will be scope for further engagement and collaboration on any mitigation required to mitigate against the impact to the Strategic Road Network and National Highways assets.
	Traffic and Access Inter project Cumulative impact Intra Project Cumulative impact	Cumulative Effects 8.1.Chapter 16 In-Combination Effects of the PEIR presents the preliminary interproject and intra-project cumulative effects assessment for the Project. This considers the potential significant cumulative effects that may arise from the Project in combination with other developments in the area.	No	The Applicant notes this comment on cumulative considerations.
	Traffic and Access Inter project Cumulative impact Intra Project Cumulative impact	National Highways welcomes this approach to consider the cumulative impact of other projects within the draft order limits and zone of influence. National Highways will be particularly concerned around the cumulative impact of projects on the SRN, notably the A47.	No	The Applicant notes that this concern with relation to cumulative impacts. The future baseline is discussed within Section 9.6 and the approach to cumulative assessment within Section 9.11 of **ES Chapter 9: Transport and Access [APP/6.2]**.
	Traffic and Access	General Preliminary Design 9.1.Please note that any works along the SRN are to be subject to Walking, Cycling and Horse-Riding Assessment and Review (WCHAR), Road Safety Audit (RSA) in strict accordance with GG119 and environmental audits as detailed in the DMRB. The RSA 1 should not commence until the end of the preliminary design stage, when the design has been accepted in principle by us. The draft RSA brief should be shared with National Highways and the RSA should be undertaken before the DCO application is submitted, in line with DMRB requirements.	No	The Applicant notes this guidance but confirms no permanent works to the Strategic Road Network are proposed. The only works may be required during the abnormal loads delivery though this would be managed through the Electronic Service Delivery for Abnormal Loads (ESDAL2) as part of the standalone abnormal loads permit.

	Human health and safety Traffic and Access	Any design hazards are to be assessed with a Safety Risk Assessment (SRA), prepared in accordance with DMRB GG104, with the view to eliminating the risk, where possible, or, if unavoidable, reducing it to as low as reasonably practicable.	No	The Applicant notes this guidance but confirms that no permanent changes are proposed to the National Highways network.
	Historic Railways Estate	Historic Railways Estate 10.1. National Highways, on behalf of the Department for Transport, is responsible for the management of Historic Railways Estate (HRE). The HRE is a collection of over 3,100 structures and assets which were once part of the rail network.	No	The Applicant notes the responsibilities of National Highways.
	Historic Railways Estate	The location of HRE structures can be found on the following GIS map (linked)	No	The Applicant notes this and thanks National Highways for sharing the relevant link.
	Historic Railways Estate	The map identifies HRE assets within the study area for the proposed development. Further consideration of the proposal and associated development, such as construction traffic routes and cabling and must ensure the protection of these structures.	No	The Applicant has reviewed the Historic Railways Estate (HRE) mapping and notes that there appear to be no HRE assets within the construction routes proposed within the **oCTMP [APP/7.7]** or that would be impacted by any construction works associated with the Scheme, with the closest HRE asset identified as being located on West Acre Road adjacent to the junction with Bears Lane. In any case, the Applicant will ensure that any works required will not harm the HRE structures and will work with National Highways to ensure these are considered throughout the construction, operational and decommissioning phases of the Scheme.
	Historic Railways Estate	National Highways recommends further consultation regarding this matter to ensure that assets can be appropriately considered.	No	The Applicant notes this comment and is open to further consultation to ensure to that any assets are appropriately considered.
	Land Acquisition	Land Acquisition 11.1. National Highways will object to the compulsory acquisition of any of its land to safeguard our interests and the safety and integrity of the SRN. Further discussion regarding land requirements is recommended prior to submission of the DCO application.	No	The Applicant notes this comment and is open to further discussing the matter with National Highways.
	Protective Provisions	Draft Development Consent Order and Protective Provisions 12.1. National Highways would welcome early discussions with the Applicant to work together to reach agreement on Protective Provisions. A copy of the National Highways' current standard Protective Provisions, which we would expect to be included on	No	The Applicant notes this comment and is open to further discussing the matter with National Highways. A form of protective provisions for the benefit of National Highways is included in the **draft DCO [APP/3.1]**.

		the face of the Order, is appended to this letter for your information. National Highways reserves the right to expand, amend or clarify the protective provisions during the progressing of the Development Consent Order.		
	Concluding statement	Concluding Remarks 13.1. Whilst National Highways remains supportive of the principle of the development, we would object to this scheme for the reasons given above should those matters not be resolved satisfactorily. National Highways reserves the right to expand, amend or clarify any of the issues in this Section 42 Consultation Response, and to produce additional grounds of objection to an Examining Authority during the Relevant Representations submission.	No	The Applicant notes this comment.
	Concluding statement	We trust our response provides clarification of our concerns and identifies matters which we consider need to be addressed. However, if you have any questions or comments regarding the contents of the letter then please do not hesitate to contact me on the details provided. National Highways looks forward to continuing positive engagement with the Applicant as the project progresses.	No	The Applicant thanks National Highways for responding to the consultation and welcomes continued engagement up to and beyond the making of this DCO Application.

1.18 NATS Safeguarding

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
NATS Safeguarding	General comment	The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.	No	The Applicant notes this confirmation and thanks NATS Safeguarding for its response.
	General comment	However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en-route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.	No	The Applicant notes this comment.

	General comment	If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.	No	The Applicant notes this comment and confirms that in such an event the Applicant would consult NATS in its capacity as a statutory consultee.

1.19 Natural England

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Natural England	Introduction	Overview: Consultation in accordance with Section 42 of the Planning Act 2008: The Droves Solar Farm Location: Land north of Swaffham and south of Castle Acre, West Norfolk Thank you for your consultation on the above dated 8 May 2025, which was received by Natural England on the same date. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.	No	The Applicant thanks Natural England for its response to the statutory consultation.
	Introduction	In responding to your consultation, we have reviewed only those chapters that we consider to be most relevant to our statutory purpose. Therefore, our response is based on the following sections of the Preliminary Environmental Impact Report (PEIR): • Chapter 1: Introduction • Chapter 3: Site Context and Description • Chapter 5: Scheme Description • Chapter 6: Landscape and Visual • Chapter 7: Ecology and Biodiversity • Chapter 9: Traffic and Transport • Chapter 11: Soils and Agriculture • Chapter 12: Water Resources • Volume II, Chapter 4: Reasonable Alternatives and Design Evolution	No	The Applicant notes that the chapters reviewed by Natural England are relevant to its statutory purpose.

		• Volume II, Chapter 7: Ecology and Biodiversity, Figures 7.1 to 7.2 • Volume II, Champer 9: Transport and Access, Figures 9.1 to 9.3 • Volume III, Chapter 7: Ecology and Biodiversity. Appendix 7.2 Ecological Habitat Survey • Volume III, Chapter 11: Soils and Agriculture. Appendix 11.2 Agricultural Land Classification Survey.		
	Introduction	Table 1 below provides a summary of our advice. Our detailed advice is provided in Annex 1. Please note that issues currently marked as amber have the potential to become red if not addressed.	No	The Applicant acknowledges receipt of this table and confirms that it has been reviewed and that the advice has been followed.
	Introduction	For any further advice on this consultation please contact the case officer [redacted]@naturalengland.org.uk and copy to consultations@naturalengland.org.uk. Yours sincerely [redacted] Higher Officer, Norfolk and Suffolk Sustainable Development Team	No	The Applicant acknowledges the supplied case officer contact details and thanks the officer for supporting Natural England's response to this consultation.
	Ecology Protected sites	1. Conservation of Habitats & Species Regulation 2017 (As Amended) 1.1. Internationally designated sites 1.1.1. The internationally designated sites relevant to this application are: • Breckland Special Protection Area (SPA) • Norfolk Valley Fens Special Area of Conservation (SAC)	No	The Applicant confirms the relevance of the listed Designations for this Application.
	Ecology Protected sites	1.1.2. The application site is in close proximity to European designated sites (also commonly referred to as Natura 2000 sites) and therefore has the potential to affect their interest features. European sites are afforded protection under the Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitats Regulations').	No	The Applicant notes that the Scheme may affect the interest features of Designation sites. In response, the Applicant has prepared **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2].** This chapter of the ES includes an assessment of the potential effects upon designated and non-designated heritage assets during the construction, operation and decommissioning phases.

	Ecology Protected sites	1.2. Breckland SPA 1.2.1. In our EIA scoping response (dated 3 December 2024, our ref: 493290), Natural England advised that air quality impacts from construction traffic on the structure and function of the habitats that support the features of Breckland SPA are further assessed.	No	The Applicant notes this response and can confirm this has been undertaken within Section 7.8 of **ES Chapter 7: Ecology and Biodiversity [APP/6.2].**
	Ecology Protected sites	1.2.2. Chapter 7 of the PEIR (Ecology and Biodiversity) has identified that the proposed designated construction and material transit routes do not pass through or immediately adjacent to Breckland SPA and therefore consider the air quality impact on Breckland SPA as not significant. Natural England advise that should the transit routes change, the impact should be reassessed. We would advise using Natural England's guidance on the assessment of road traffic emissions under the Habitats Regulations1.	No	The Applicant can confirm that Natural England's guidance on the assessment of road traffic emissions under the Habitats Regulations has been considered and applied where relevant.
	Ecology Protected sites Construction traffic and impact	1.3. Norfolk Valley Fens SAC 1.3.1. It is noted in Chapter 7 of the PEIR that air quality impacts to Norfolk Valley Fens SAC have been determined as not significant. Potter & Scarning Fens, East Dereham SSSI is a component of Norfolk Valley Fens SAC and lies within 200m of the A47. Therefore, it could be affected by impacts to air quality from construction traffic. We note that paragraph 9.2.24 in Chapter 9: Transport and Access of the PEIR states that the worst-case scenario is 96 HGV movements per day. This figure is below the threshold of 200 heavy duty vehicles (HDV) annual average daily traffic flow (AADT) as detailed in Natural England's guidance on the assessment of road traffic emissions under the Habitats Regulations1 and concur with the conclusion that the impact is unlikely to be significant, alone.	No	The Applicant notes this comment and confirms that the expected level of Heavy Goods Vehicle (HGV) traffic generated by the Scheme, totalling 86 two-way HGV trips per day, falls below the 200 daily HGV threshold, and therefore no further assessment is required.
	Construction impact – air quality	1.3.2. Natural England highlights that the assessment has not considered the impacts to air quality from construction traffic in combination with other plans or projects. Natural England advise that this is given further consideration and refers the Applicant to the document, Natural England's guidance on the assessment of road traffic emissions under the Habitats Regulations1 for further guidance.	No	Consideration of air quality impacts from construction traffic is set out in **ES Chapter 16: Other Environmental Matters [APP/6.2]**, with reference to the relevant chapter on transport and highways. In addition, consideration of the potential for likely significant effects on European designations, including the Norfolk Valley Fens SAC, is provided within the **Shadow Habitats Regulations Assessment [APP/7.3]**.

	Ecology Protected sites	2. Wildlife and Countryside Act 2.1. Nationally Designated Sites 2.1.1. The nationally designated sites relevant to this application are: • Breckland Forest Site of Special Scientific Interest (SSSI) • River Nar SSSI	No	The Applicant confirms the relevance of the listed Designations for this Application.
	Ecology Biodiversity Protected sites	2.1.2. It is noted that the nationally designated sites listed above have been referenced in the biodiversity chapter of the PEIR. Natural England advise that the Environmental Statement (ES) should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.	No	The Applicant notes this response and can confirm this has been undertaken within Section 7.8 of **ES Chapter 7: Ecology and Biodiversity [APP/6.2].**
	Ecology Biodiversity Protected sites	2.2. Breckland Forest SSSI 2.2.1. Chapter 7 of the PEIR identifies Breckland Forest SSSI 2.7km from the proposed development and based on the information presented in the PEIR, Natural England concurs with the conclusion that there will be no significant adverse effects on the site. However, should the transit routes change, as per our advice for Breckland SPA (section 1.2 of this letter), we would advise reassessing air quality impacts on the site's designated features.	No	The Applicant notes that Natural England agrees with the assessment of Breckland Forest SSSI within the PEIR. The Applicant also notes the caution raised regarding changes in transit routes; however, the expected level of Heavy Goods Vehicle (HGV) traffic generated by the Scheme, which is a total of 86 two-way HGV trips, falls below the 200 daily HGV threshold, and thus no further assessment is required.
	Watercourses Protected sites Construction impact – air quality	2.3. River Nar SSSI 2.3.1. Due to the proximity of the transit routes being less than 200m from the River Nar SSSI, Natural England concurs with the decision to scope in the assessment of impacts to air quality from construction traffic on the River Nar SSSI, as detailed in Chapter 7 of the PEIR.	No	The Applicant notes Natural England's agreement.
	Construction traffic and impact Protected sites	2.3.2. We note that paragraph 9.2.24 in Chapter 9 of the PEIR states that the worst-case scenario is 96 HGV movements per day. Whilst the River Nar SSSI is not a European designated site, the advice provided in Natural England's guidance on the assessment of road traffic emissions under the Habitats Regulations1 can be used to determine if there will be a significant impact to a designated site. Taking account of this guidance and based on the information presented in the PEIR, the number of HGVs used in the construction of the proposed development will be	No	The Applicant also notes the caution raised regarding changes in transit routes; however, the expected level of Heavy Goods Vehicle (HGV) traffic generated by the Scheme, which is a total of 86 two-way HGV trips, falls below the 200 daily HGV threshold, and thus no further assessment is required.

		below the threshold of 200 heavy duty vehicles (HDV) annual average daily traffic flow (AADT) when considered alone.		
	Construction traffic and impact	2.3.3. Natural England advise that should there be significant changes to the traffic plans, then impacts from road traffic emissions should be reviewed Consideration should also begiven to air quality impacts in combination with other relevant plans or projects.	No	The Applicant also notes the caution raised regarding changes in transit routes; however, the expected level of Heavy Goods Vehicle (HGV) traffic generated by the Scheme, which is a total of 86 two-way HGV trips, falls below the 200 daily HGV threshold, and thus no further assessment is required. In addition, the potential for a cumulative impact with other plans and projects has been reviewed and given the likely timing and traffic routing of construction traffic, it is considered unlikely that the DMRB criteria would be exceeded in combination on any one route within 200m of a sensitive ecological site.
	Watercourses Protected sites	2.3.4. Chapter 7 of the PEIR states that a hydrological link to the River Nar SSSI from the proposed development site has been identified. It is proposed that without mitigation measures in place, there is the potential for chemical spills and contaminated surface runoff to reach the SSSI site. Natural England advise that the ES includes a detailed description of the potential sources of chemical spills and/or contaminated surface runoff, and to record the proposed mitigation measures in the relevant management plan, such as the Construction Environmental Management Plan (CEMP), Operational Environmental Management Plan (OEMP) or Decommissioning Environmental Management Plan (DEMP) submitted with the ES.	No	The Applicant notes this comment and confirms that an **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **oLEMP [APP/7.11]**, and **oDS [APP/7.10]** form part of the DCO Application. . Further detail will be provided in the subsequent CEMP, OEMP, LEMP, and DS, which will be secured by a Requirement of the DCO.
	Protected sites	2.4. Potter & Scarning Fens, East Dereham SSSI 2.4.1. Please refer to our comments in section 1.3 of this letter.	No	The Applicant notes this and confirms the reference was made to the comment provided by Natural England.
	Agricultural land use	3. Agricultural Land and Soils 3.1. ALC Survey 3.1.1. In Chapter 11 of the PEIR it states that the Agricultural Land Classification (ALC) survey of the site used a survey density of one auger sample per hectare. Natural England welcomes this, and it follows the advice we provided in the Environment Impact Assessment (EIA) scoping consultation (3 December 2024, our ref. 493290).	No	The Applicant notes this comment and confirms that the land quality has been assessed at a density of one auger sample per hectare, as set out in **ES Chapter 11: Soils and Agriculture [APP/6.2]**.
	Agricultural land use	3.1.2. We note that the ALC survey (appendix 11.2) states that an area of 774.3 hectares was assessed. However, the site description in Chapter 3 of the PEIR	No	The Applicant notes this comment and confirms an ALC surveys have been undertaken.

		states the development area to be 825 hectares. It is noted in Chapter 11 that the ALC survey was undertaken before the draft order limits were revised to allow for grid infrastructure, which may account for some or all of the difference in area. Natural England ask for clarity for the difference in area and advise that an ALC survey is undertaken to cover all areas of the draft order limits with the results presented in the ES.		The Order limits extend to approximately 840ha. Of this, approximately 455ha is of BMV quality. The ALC surveys within **ES Chapter 11: Soils and Agriculture [APP/6.2]** have confirmed that approximately 54% of the Order's limits comprise BMV land. ALC was an important factor for the Applicant when evaluating the proposed Site. **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** describes the consideration of reasonable alternatives carried out by the Applicant in relation to the Site for the Scheme, the layouts, and the choice of technology. It is supported by **Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]**, which provides an appraisal of alternative sites and demonstrates consideration of relevant policy and its applicability to the site evaluation process undertaken by the Applicant.
	Agricultural land use Indicative siting zone for Battery Energy Storage Systems and Customer Substation	3.1.3. Reviewing figure 4.4, which shows the site boundary and layout, and the ALC grade map in Appendix 6 of the ALC Survey Report (Appendix 11.2), it appears that the substation and BESS are proposed to be sited on an area of best and most versatile (BMV) land, including grade 1 agricultural land. Natural England advise that the siting of this infrastructure is reconsidered. We advise that the survey results are used to inform micro-siting of infrastructure, such as the proposed substation infrastructure, to avoid BMV land as much as is practicable prior to submission.	Yes	The Applicant notes this comment and confirms that the flexibility within the Scheme regarding the location of the National Grid Substation, Customer Substation, and BESS has been reduced. The National Grid Substation is sited within Field 27 along with the Customer Substation. The BESS has been located within Field 27 and/or Field 24. The location of these elements of the Scheme is shown on the **Works Plan [APP/2.3]**. The Applicant notes that this siting avoids Grade 1 ALC land. Further details on the surveys undertaken and the effects of the Scheme on ALC land are provided in **ES Chapter 11: Soils and Agriculture [APP/6.2]**. The effects with regard to the National Grid Substation, Customer Substation and BESS are summarised as follows: • Customer Substation: minor adverse, not significant in EIA terms • National Grid Substation: minor adverse, not significant in EIA terms; and • BESS: minor adverse, not significant in EIA terms.
	Agricultural land use	3.1.4. We advise that the results of the ALC surveys are presented within the ES. This should include a breakdown of the ALC grades (area and percentage) in relation to all relevant areas within the application site boundary. Areas of permanent land take (e.g. substations, access roads etc), areas of temporary land take (e.g. underground cabling) and areas of habitat enhancement should be clearly presented and assessed (broken down by ALC grade).	No	The Applicant notes this comment and confirms that **ES Chapter 11: Soils and Agriculture [APP/6.2]** provides a breakdown of ALC grades across the Site and considers areas of permanent and temporary land take, as well as green infrastructure and habitat management.
	Agricultural land use	3.1.5. Natural England advise that the ALC survey data should be used to ensure the soil is restored to	No	The Applicant notes this comment and confirms that an **oSMP [APP/7.13]** forms part of the DCO Application and

	Soils	its baseline condition (i.e. the soil profile as described during the ALC survey). Soil data collected as part of an ALC survey should also be used to inform the soil resource and management plan as set out in the Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites.		has been prepared with reference to relevant guidance, including Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites.
	Agricultural land use Soils	3.2. Soil Resources Management Plan (SRMP) 3.2.1. Natural England notes and supports the Applicant's commitments to providing an outline Soil Management Plan (oSMP) as part of the development consent order (DCO)application and a SMP being a requirement of the DCO. The ES and associated oSMP needs to clearly demonstrate how the ALC Grades and soil types will inform soil handling and restoration, setting out the site-specific mitigation measures with reference to the best practice guidance. The oSMP should recognise the exact area and percentage of BMV land that has been identified in the ALC report.	No	The Applicant notes this comment and confirms that an **oSMP [APP/7.13]** forms part of the DCO Application. The Applicant confirms the management methodologies outlined in the **oSMP [APP/7.13]** as follows: • Soil handling methods (stripping, stockpiling and reinstatement) for any soils that will be disturbed by the construction of the Scheme; • Monitoring procedures required for all soils (disturbed or those left in situ) during the construction of the Scheme, including details of roles and responsibilities; • Restoration methods for land that is disturbed temporarily during construction and subsequently returned to agricultural use for the operation of the Scheme; • Any measures required to ameliorate soils to ensure the original land quality is achieved upon reinstatement; and • Monitoring required during the operation of the Scheme. The Applicant further confirms that the measures outlined in the **oSMP [APP/7.13]** have been informed by the results of the ALC surveys undertaken, as set out in that **ES Chapter 11: Soils and Agriculture [APP/6.2]**.
	Agricultural land use Soils	3.2.2. Natural England advise that the oSMP should include the following: i. The assessment of agricultural land and soil resource of the site that has been undertaken before work commences (as per Natural England's Guide to assessing development proposals on agricultural land3) which is considered to represent UK good practice. ii. Mitigation should include reference to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. The Institute of Quarrying's Good Practice Guide for handling soils in mineral workings4is also a good reference for best practice methods for soil handling. iii. The methods by which the Applicant intends to restore appropriate affected areas to agricultural use	Yes	The Applicant notes this comment and considers that the advice has been adequately addressed within the **oSMP [APP/7.13].**

		after works including excavations and restoration has finished. iv. An aftercare programme which would enable a satisfactory standard of agricultural after-use to be reached, with regards to cultivating, reseeding, draining or irrigating, applying fertiliser, or cutting and grazing the site. "		
	Agricultural land use Soils	3.2.3. Handling soils in adverse weather conditions can cause damage to soil structure. It is noted in Chapter 3, paragraph 11.5.2. of the PEIR that the oSMP will include a methodology for determining the suitability of soils to be handled and measures to minimise impacts to soils, which Natural England welcomes. We advise including rainfall criteria for handling soils, which includes 'stop work' criteria.	Yes	The Applicant notes this comment and confirms that the **oSMP [APP/7.13]** includes measures relating to good practice for handling soils, as well as provisions for a rainfall protocol in accordance with the Institute of Quarrying's Good Practice Guide for Handling Soils in Mineral Workings (2021).
	Air quality	4. Air Quality 4.1. Natural England has provided comment in section 1 and 2 of this letter on the designated sites that could potentially be affected by air quality impacts from the proposed development. Based on the traffic strategy presented in Chapter 9 of the PEIR, Natural England concurs with the conclusions that impacts from the proposed development are not considered significant. However, we would advise that consideration is given to air quality impacts in combination with other relevant plans or projects. We would also advise reassessing the impacts should the traffic strategy change. We would advise applying the advice provided in Natural England's guidance on the assessment of road traffic emissions under the Habitats Regulations1in this assessment.	No	The Applicant also notes the caution raised regarding changes in transit routes; however, the expected level of HGV traffic generated by the Scheme, which is a total of 86 two-way HGV trips, falls below the 200 daily HGV threshold, and thus no further assessment is required. In addition, the potential for a cumulative impact with other plans and projects has been reviewed and given the likely timing and traffic routing of construction traffic, it is considered unlikely that the DMRB criteria would be exceeded in combination on any one route within 200m of a sensitive ecological site.
	Ecology	5. Protected Species 5.1. As advised in Natural England's EIA Scoping response, Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures.	No	The Applicant notes this response and can confirm that standing advice has been followed.
	Ecology	5.2. It is acknowledged in Chapter 7 of the PEIR that protected species licences from Natural England or Defra may be required. Applicants should refer to the guidance at Wildlife licences: when you need to apply5 to check to see if a mitigation licence is required. Via our discretionary advice service (DAS), Natural England can review a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being	No	The Applicant notes this response and can confirm this advice has been followed.

		granted in the future should the DCO be issued. See Annex C – Natural England and the Planning Inspectorate6 for details of the LONI process.		
	Ecology	6. Ancient woodland and veteran trees 6.1. Having reviewed the Natural England Ancient Woodland Inventory data, there does not appear to be any recorded ancient woodland within or adjacent to the draft order limits of the proposed development. However, a tree survey of the proposed development has yet to be completed and this may identify trees that meet the criteria of ancient or veteran. Ancient woodland and ancient and veteran trees are considered irreplaceable habitat and are protected in the National Planning Policy Framework.	No	An arboriculture survey (**ES Appendix 16.4: Arboricultural Impact Assessment [APP/6.4])** has been undertaken, and veteran trees are confirmed to be present on the Site. These are entirely retained within the Scheme, along with appropriate buffers.
	Ecology	6.1.1. Natural England advise securing appropriate measures in the LEMP and CEMP to mitigate adverse impacts to any ancient and/or veteran trees the tree survey may identify, within or adjacent to the draft order limits. We would advise the Applicant to refer to the standing advice7 produced by Natural England and the Forestry Commission for planning authorities in relation to working around ancient woodland and ancient and veteran trees when preparing their mitigation measures.	No	The Applicant notes this response and confirms that a LEMP and CEMP will be prepared at detailed design, with an **oLEMP [APP/7.11]** and **oCEMP [APP/7.6]** submitted as part of the DCO Application and secured as a Requiremnt of the DCO
	Biodiversity	7. Biodiversity Net Gain (BNG) 7.1. Since our previous advice was provided, there is a live consultation seeking views on the implementation of BNG for NSIPs (deadline 24 June 2025). This details that the proposed introduction of BNG for NSIPs has now moved to May 2026. We reiterate that Natural England would encourage the Applicant to commit to at least 10% BNG across habitat, river and hedgerow units.	No	The Applicant also notes that mandatory Biodiversity Net Gain remains to be implemented (currently anticipated May 2026), albeit the Scheme will deliver over 10% BNG as calculated within the Statutory BNG metric. The **Biodiversity Net Gain Assessment Report [APP/7.4]** has been submitted with the DCO Application.
	Biodiversity	7.2. We note in Chapter 7 of the PEIR that a full Biodiversity Net Gain (BNG) assessment will be conducted and submitted with the ES. We recommend that the Applicant uses the latest version of the Defra biodiversity metric to calculate BNG and adhere to the rules and principles set out within the metric guidance.	No	The Applicant notes this response and can confirm this has been undertaken.
	Ecology Biodiversity	7.3. Natural England advise that the Local Nature Recovery Strategies (LNRS), a new mandatory system of spatial strategies for nature established by the Environment Act 2021, could provide opportunities not only for enhancing biodiversity in the locality, but also to create and enhance ecological	No	The Applicant notes this response and can confirm that the Norfolk draft LNRS has been reviewed. Further details are provided within the **Design Approach Document [APP/5.7]**.

		connectivity in the area, contributing to the Nature Recovery Network and climate change resilience.		
	Ecology	8. Management Pans 8.1. Several management plans have been referenced in the PEIR documents, including a Landscape Ecological Management Plan (LEMP), Construction Environmental Management Plan (CEMP) and SMP. However, no management plans, outline or otherwise, have been submitted as part of this consultation. Chapter 5 of the PEIR details a number of management plans that will be developed and submitted as part of the DCO application. Natural England will provide comment on the relevant management plans when they are available to review.	No	The Applicant notes this response and welcomes review of the management plans which have been submitted as part of the DCO Application.
	Ecology	8.2. Natural England advise that the mitigation measures included in these plans should be assessed in the HRA, where relevant to internationally designated sites. Should the requirement for an appropriate assessment be identified, we advise that it should assess the effectiveness of all relevant mitigation measures and demonstrate how the impact will be completely avoided or reduced to an acceptable level.	No	The Applicant notes this and confirms a HRH has been prepared.

1.20 Norfolk Constabulary

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Norfolk Constabulary	Introduction	Introduction Norfolk Constabulary is responding to the Notice given by The Droves Solar Farm Ltd (DSF) concerning a proposed application for a Development Consent Order (DCO) to construct, operate, maintain and decommission a solar photovoltaic (PV) generating station with a generating capacity of more than 50 megawatts on land north of Swaffham and south of Castle Acre in West Norfolk.	No	The Applicant thanks the Norfolk Constabulary for its response.

	Introduction	Norfolk Constabulary (NC) is the relevant Police Authority and a 'Prescribed Consultee' in this DCO process, pursuant to The Infrastructure Planning (Applications: Prescribed Forms & Procedure) Regulations 2009, and submits this representation in response to the DSF statutory consultation.	No	The Applicant notes the status of the Norfolk Constabulary.
	Introduction	NC raise a number of areas of 'Project Interest and Concern' as follows; Highways & abnormal indivisible loads; Population increase – community safety, cohesion & policing; Blue Light Partner joint working - Transport, Community Safety & Cohesion Working Group.	No	The Applicant notes these topics and addresses them in turn below.
	Emergency services Access	These areas warrant further consideration as they may adversely impact on the operational capacity and effectiveness of the Swaffham Community Policing Team (SCPT) and specialist officer support such as the Roads Policing Team (RPT), and ought to be addressed in the documentation in support of the DCO Application.	No	The Applicant notes this request and is considering them as part of the finalisation of documentation in support of the DCO Application. The Applicant would further note that it has continued engagement with Norfolk Constabulary since the statutory consultation and will prepare a Statement of Common Ground following submission of the DCO Application.
	General comment	A summary of the Scheme Description for the Project is included in Annex 1 below, for information.	No	A full description of the proposed Scheme is provided in **ES Chapter 5: The Scheme [APP/6.1].**
	Consultation and engagement	Project Impacts The documents accompanying the Statutory Consultation, including the DSF Preliminary Environmental Information Report (PEIR) have been reviewed, and NC consider that its areas of Project Interest and Concern have not been adequately dealt with to date.	Under consideration	The Applicant notes this comment and confirms that the Norfolk Constabulary's feedback has been considered in the preparation of documentation in support of the DCO Application. The Applicant would further note that it has continued engagement with Norfolk Constabulary since the statutory consultation and will prepare a Statement of Common Ground following submission of the DCO Application.
	Consultation and engagement	NC would therefore welcome engagement with DSF to address these matters- with a view to reaching agreement on a suitable range of mitigation and management measures to reduce the Project impacts,	No	The Applicant notes this comment and confirms that it will prepare a Statement of Common Ground, in consultation with

		increase operational capacity within the SCPT as supported by the RPT, and provide for effective information sharing about the Project with its Blue Light Partners (Norfolk Fire & Rescue Service/ East of England Ambulance Service NHS Trust)		the Norfolk Constabulary to reach agreement on the relevant matters raised.
	Consultation and engagement	NC consider that a Statement of Common Ground process may be an appropriate route to devising suitable parameters for a DCO Requirement(s) and/ or a planning obligation to address the likely impacts arising to the SCPT, the RPT and its Blue Light Partners, incorporating a communications strategy through a Working Group.	No	The Applicant notes this comment response is noted and confirms that it will prepare a Statement of Common Ground , in consultation with the Norfolk Constabulary to reach agreement on the relevant matters raised by the Norfolk Constabulary.
	Additional environmental mitigation, enhancement and protection suggestion	A 'without prejudice' list of mitigation and management measures are outlined in the Parameters Table below.	No	The Applicant notes this list.
	Introduction to table	Swaffham Community Policing Team & Roads Policing Team Mitigation & Management Measures – Parameters Table	No	The Applicant notes this table..
	Traffic and Access	<u>Area of Project Interest & Concern</u> Abnormal Indivisible Load origin/ destination routing strategy, movement type, numbers & timing requiring police escort *1. <u>Mitigation & Management Measure</u> Recruitment of AIL trained officers to meet project demand over construction period 2031-33 *2. <u>Notes</u> Funding agreed for other NSIP's based on bespoke solutions modelled from data provided by the promoters/ developers – Note: advanced notice of AIL movements to the Police *3 is insufficient as a proposed measure in its own right & does not provide additional capacity.	No	The Applicant notes these areas of concern. The delivery of any Abnormal Indivisible Loads (AILs) will be agreed with National Highways in advance through the Electronic Service Delivery for Abnormal Loads (ESDAL) system, which will notify Norfolk Constabulary and other relevant parties ahead of any movements. The Applicant acknowledges Norfolk Constabulary's advice that advance notice alone is not sufficient and would be open to further discussions on this matter as part of the preparation of a Statement of Common Ground, to be agreed following submission of the DCO Application. With regard to the recruitment of AIL-trained officers to meet project demand, the Applicant would also be open to discussions regarding potential funding arrangements.
	Construction impact	<u>Area of Project Interest & Concern</u> Population increase – construction workers	No	The Applicant notes this comment and refers to **ES Chapter 14: Socio-Economics [APP/6.2],** which confirms that the Construction Phase would support approximately 1,245 construction jobs. It is estimated that between 50%-75% of construction workers would be from the Labour Catchment

		Mitigation & Management Measure Construction worker profile/ identification, communication, reporting, welfare & management information & procedures. Notes A schedule of home - based & non home - based workers, along with appropriate supporting information may be required *4.		Area. **ES Chapter 14: Socio-Economics [APP/6.2]** presents an indicative schedule of construction workers.
	Traffic and Access	Area of Project Interest & Concern Transport, Community Safety & Cohesion Working Group (TCS&CWG) Mitigation & Management Measure TCS&CWG to be established with DSF & Blue Light Partners to agree Terms of Reference for receiving Project updates during the construction phase & notifications concerning any on & off-site incidents & accidents & reviewing best practice protocol for construction workers. Notes Information sharing between DSF & the Norfolk Blue Light Partners (Norfolk Constabulary, Norfolk Fire & Rescue Service & the East of England Ambulance Service NHS Trust) is advised.	No	The Construction Traffic Management Plan (CTMP), secured by way of a requirement in the DCO and to be substantially in accordance with the **oCTMP [APP/7.7]** submitted as part of the DCO Application, will include details of the future working groups, including the Norfolk Constabulary, who will be engaged throughout construction to ensure there are no significant impacts associated with construction traffic.
	Additional information	Notes *1 The proposed Outline Construction Traffic & Management Plan should include information on the likely AIL led resources required for the Project including haulage vehicle specifications (weight/ length/ width) - NC note that for construction phase purposes, converter station/ substation/ cable route infrastructure generate transformer & cable drum deliveries requiring HGV specifications ranging from 75m length (transformers) to 25m+ length (cable drums).	No	The details on the requirements for the abnormal load deliveries will be confirmed within the CTMP, secured by way of a requirement on in the DCO and to be substantially in accordance with the **oCTMP [APP/7.7]** submitted as part of the DCO Application, once the abnormal load deliveries are confirmed.
	Additional information	*2 NC move abnormal indivisible loads (AIL) through the use of trained Roads Policing Officers on overtime - capacity is therefore limited & shared out in an equitable manner with all users of this service. Unless it is agreed with a developer that a bespoke solution for AIL requirements is needed, & in a timely manner allowing for the additional resources to be stood-up, AIL	No	The details on the requirements for the abnormal load deliveries will be confirmed within the CTMP, secured by way of a requirement on in the DCO and to be substantially in accordance with the **oCTMP [APP/7.7]** submitted as part of the DCO Application, once the abnormal load deliveries are confirmed.

		loads will be moved on a business as usual basis i.e. as & when availability allows through NC baseline resources: For information, an AIL Team consists of four officers, based on the Nationally recognised National Police Chief Council rates, at an annualised cost of circa £560,000.		
	Additional information	*3 Future reference in the Outline Construction Traffic & Management Plan (once AIL movements are finalised) to a Special Order request being submitted 10 weeks prior to the scheduled move with 5 days' Notice being given to the Police & Road & Bridge Authorities would be insufficient.	No	The details on the requirements for the abnormal load deliveries will be confirmed within the CTMP, secured by way of a requirement on in the DCO and to be substantially in accordance with the **oCTMP [APP/7.7]** submitted as part of the DCO Application, once the abnormal load deliveries are confirmed.
	Additional information	*4 The PEIR Chapter 14 - Socio-economics & Human Health (May 2025) states a total of 1,245 construction workers (740 @ monthly peak) are required on site over the construction period (2031 - 2033). 50-75% of the workforce would be located outside the 1-hour travel time 'Labour Catchment Area' & would therefore be 'non – home based' & accommodated within the private rental sector locally.	No	The Applicant notes this comment and refers to ES Chapter 14: Socio-economics [APP/6.2], which confirms that the construction phase of the Scheme would support approximately 1,245 construction jobs. It is estimated that between 50% and 75% of these workers would be drawn from the Labour Catchment Area (LCA). **ES Chapter 14: Socio-Economics [APP/6.2]** also presents an indicative schedule of construction employment and assesses the potential impacts associated with temporary accommodation, which construction workers would be expected to use during the construction phase.
	Consultation and engagement.	We trust this is of assistance and look forward to working with The Droves Solar Farm Ltd to satisfactorily address the points raised in advance of the Examination.	No	The Applicant notes this comment and welcomes future engagement with the Norfolk Constabulary.
	Scheme description	ANNEX 1 The Droves Solar Farm – Scheme Description The Scheme comprises the construction, operation, maintenance and decommissioning of a solar photovoltaic (PV) electricity generation station and associated development, including a Battery Energy Storage System (BESS), a Customer Substation and Grid Connection Infrastructure including a National Grid Substation.	No	A full description of the proposed Scheme is provided in **ES Chapter 5: The Scheme [APP/6.1].**
	Scheme description	The Scheme would allow for the generation and export of over 50MW Alternating Current (AC) of renewable energy, connecting into the National Electricity	No	A full description of the proposed Scheme is provided in **ES Chapter 5: The Scheme [APP/6.1].**

		Transmission System (NETS) overhead line that passes through the 825 ha Site.		
	Scheme description	The Scheme comprises the following components, incorporating the Nationally Significant Infrastructure Project and Associated Development; PV panels fixed to mounting structures (including both Single Axis Trackers & Fixed South Facing orientation) forming Solar PV Arrays; Conversion Units – incorporating Inverters, Transformers & Switchgear; Customer Substation; National Grid Substation - & associated electrical infrastructure & other Ancillary Infrastructure & Associated Development required to facilitate the export of electricity from the Scheme to the National Grid; Battery Energy Storage Scheme (BESS); Ancillary infrastructure including enclosure, security, drainage, earthworks, & access; Access tracks, Highway works; Cabling – underground cabling within the Scheme which transmit electricity between PV Panels to Conversion Units & from there to the Customer Substation & BESS; Grid Connection Corridor – cabling connecting the Customer Substation to the Point of Connection, which may be underground or overhead lines; Grid Connection Infrastructure – underground or overhead lines, including new pylons between the National Grid Substation & the Point of Connection; Green infrastructure; Proposed mitigation & enhancement areas; Construction Hub; Temporary Construction Compounds;	No	A full description of the proposed Scheme is provided in **ES Chapter 5: The Scheme [APP/6.1]**.

		A Concept Masterplan shows the indicative layout of The Scheme.		

1.21 Norfolk County Council

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Norfolk County Council Covering Report	Introduction	The Droves Solar Farm Limited have published their Preliminary Environmental Information Report (PEIR) for consultation relating to the proposed Droves Solar Farm project. The project comprises: a major Solar Farm located on land north of Swaffham and south of Castle Acre (see Appendix 1 – Location and Site Maps). The site extends to approximately 825 hectares (ha) with the Solar Farm capable of generating up 500 MW of electricity, which is enough to provide power for approximately 115,000 homes annually. The Project will involve: the construction, operation, maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station and associated development including a Battery Energy Storage System (BESS), a Customer Substation and Grid Connection Infrastructure including a new on-site National Grid Substation.	N/a	The Applicant notes this introduction. Please refer to **ES Chapter 5: The Scheme [APP/6.1]** for a full description of the Scheme's components.
	Introduction	The Project will also include environmental mitigation and enhancement. The design of the Solar Farm has yet to be fully developed. A Concept Masterplan has been submitted with the PEIR, which shows the site covering 35 fields (see Appendix 1 Site Maps). The Indicative area for the Solar PV Site includes fields 1 to 31 and 33 to 35, with Field 32 retained as an indicative area for environmental mitigation, enhancement and/or retained agricultural land/buildings. There is an indicative zone for the Grid Connection Infrastructure including a National Grid Substation in Fields 27 and 33 and an indicative zone to house a Customer Substation and Battery Energy Storage System (BESS) in Fields 24, 26, 27, 33 and 35.	Yes	The Applicant acknowledges this introductory comment and affirms that the details of the Concept Masterplan were accurate at the time of the statutory consultation. Since the statutory consultation, the Applicant confirms that the Customer Substation, National Grid Substation and BESS have been located in Fields 24 and 27 south of Bartholomew's Hill Plantation. Solar PV panels have also been removed entirely from Field 35 and the northern half of Field 33. Please refer to **ES Chapter 5: The Scheme [APP/6.1]** for a full description of the Scheme.
	Introduction Grid connection infrastructure	The point of connection (the PoC) for the Project to the National Electricity Transmission System (NETS) would be at the new National Grid Substation, which will be connected to the existing overhead line that passes through the north-eastern side of the site either through underground or overhead cables within a Grid Connection Corridor. The proposed location of	No	The Applicant notes these comments. The undergrounding of either the existing or the proposed 400kV line has not been explored as an option, as the Site is not within a National Landscape, and there are no significant effects arising from the proposed new OHL reported within the **ES [APP/ 6.1-6.5]**.

		the Grid Connection Corridor within the Site is under consideration and will be refined through the ongoing environmental assessment process. To facilitate the connection to the existing 400kV OHLs, up to 5 new pylons would need to be constructed, if developed as an overhead cable connection. The County Council would have strong concerns to any new pylons being introduced into this sensitive location and wish to see the grid connection elements undergrounded.		
	Introduction	The PEIR states that there are currently two options for the PV panels which are being considered; either fixed south facing PV Arrays that would be installed at between 15 and 35 degrees with a maximum height of 3.5m or single axis tracker arrays that would be orientated north/south and would operate between 60 degrees from the horizontal (facing east in the morning) moving toward 0 degrees (horizontal) at midday, and up to 60 degrees from the horizontal (facing west in the evening), that would have a maximum height of 4.5m.	No	The Applicant notes these comments. **ES Chapter 5: The Scheme [APP/6.1]** sets out the parameters assessed in this ES.
	Inter project cumulative impact	The Droves Solar Farm would located immediately adjacent to the proposed High Grove Solar Farm (part), which extends to almost 1,700 hectares. As such there is substantial concern about the cumulative construction and operations impacts arising from the two proposals.	No	Cumulative effects, which include consideration of High Grove Solar Farm, are assessed in the topic chapters of the **ES [APP/6.1 – 6.4]**. A summary of cumulative effects across all phases of the Scheme is provided in **ES Chapter 18: Summary of Effects [APP/6.2]**, which concludes that there are both significant adverse and significant beneficial effects as a result of the Scheme. The Applicant notes that it therefore considers that cumulative effects should be afforded neutral weight in the planning balance, as set out in the **Planning Statement [APP/5.5]**
	National policy	The Droves Solar Farm Project will, be taken forward under the 2008 Planning Act as a Nationally Significant Infrastructure Project (NSIP) and will be determined Secretary of State for Energy Security and Net Zero.	No	The Applicant notes this comment and confirms this to be true.
	Consultation length	Given the tight timescale to respond to this statutory consultation it has not been possible to take this consultation through the normal Committee process; and instead the decision will need to be made by the responsible Director (Chris Starkie Director of Growth and Investment) in consultation with the Deputy Leader and the Cabinet Members for Highways, Transport & Infrastructure, and for Environment and Waste in line with the Norfolk Constitution.	No	The Applicant notes that the statutory consultation was held in accordance with the requirements of PA 2008 and exceeded the statutory minimum of 28 days. The Applicant further notes the procedure by which Norfolk County Council has responded to the statutory consultation.

	National policy Local policy	The project is considered to be broadly in line with the Government's objectives and targets on renewable energy and net zero emissions. Furthermore, the County Council's own Climate Change and Economic Strategies are supportive of low carbon energy subject to there not being any demonstrable impacts on Norfolk's sensitive environment. Notwithstanding the above, the project at this stage raises a number of strategic concerns to the County Council, which will need to be addressed, and these include:	No	Both the **Planning Statement [APP/5.5]** and **Policy Compliance Document [APP/5.6]** assess the Scheme's compliance with the government's objectives and targets on renewable energy and Net Zero, as established under the energy National Policy Statements. National policy establishes a critical national priority for projects such as the Scheme. The **Planning Statement [APP/5.5]** recognises Norfolk County Council's commitment to tackling climate change and achieving a net-zero Norfolk through the measures outlined in its Climate Strategy. Both the **Planning Statement [APP/5.5]** and **Policy Compliance Document [APP/5.6]** provide an assessment and conclude that the Scheme would not give rise to demonstrable adverse impacts on Norfolk's sensitive environment.
	Grid connection infrastructure	(1) The Grid connection infrastructure should be undergrounded to avoid any additional pylons in close proximity to the sensitive Nar Valley and historic environment at Castle Acre;	No	Undergrounding of either the existing or the proposed 400kV line has not been explored as an option, as the Site is not within a National Landscape, and there are no significant effects arising from the proposed new OHL reported within the **ES [APP/6.1 - 6.5]**.
	Indicative area for solar PV panels Indicative siting zone for Battery Energy Storage Systems and Customer Substation Indicative siting zone for National Grid Substation	(2) There are concerns regarding the potential use of tracking solar panels given their height and concerns regarding the uncertainty as to the exact location, design and scale of the new Substations connecting to the wider transmission network;	No	The Applicant notes these concerns and addresses them in more detail below.
	Inter project Cumulative impact Impact on local business	(3) Agricultural land loss – there needs to be further consideration about the loss of agricultural land taken cumulatively with other planned projects across Norfolk both in terms of the potential loss in food production and implications for the wider farming community;	No	The Applicant notes these and confirms that an assessment of likely cumulative effects is provided in **ES Chapter 11: Soils and Agriculture [APP/6.2]**, which concludes that, with embedded and additional mitigation measures in place, the Scheme would not result in any significant adverse effects on soil or agricultural land resources throughout its lifecycle. The Applicant further notes that the utilised agricultural area (UAA) in the UK was 16.8 million hectares in 2024. The agricultural land taken for the Scheme represents less than 0.01% of the UAA and is not expected to have a significant impact on national food production and security. The **Policy Compliance Document [APP/5.6]** also confirms that the use of BMV land as part of the Scheme is justified, considering the economic and other benefits of the land.

				Cumulative effects associated with the Scheme are summarised in **ES Chapter 18: Summary of Effects [APP/6.2]**.
	Inter project Cumulative impact Glint and Glare	(4) The Highway Authority is concerned about the cumulative impact of the Project in combination with the proposed adjacent High Grove Solar Farm; and potential impacts arising from glint and glare from the panels;	Yes	The Glint and Glare Assessment within **ES Chapter 16: Other Environmental Matters [APP/6.2]** has considered cumulative impacts from High Grove Solar Farm. Glare towards road receptors on the A1065 will be significantly screened by proposed planting along the site boundary, and as such, no impact is predicted for receptors within the cumulative assessment zone.
	Inter project Cumulative impact Landscape and visual	(5) There are Landscape Impact concerns regarding the cumulative landscape and visual impact of the Project in combination with the proposed adjacent High Grove Solar Farm;	No	The Applicant notes these and confirms that an assessment of likely cumulative effects is provided in **ES Chapter 6: Landscape and Visual [APP/6.2],** which concludes the following significant residual adverse impacts: • E6: North Pickenham Plateau LCA: there are significant adverse effects across all phases of the Scheme with High Grove Solar; and • VRG4: Great Palgrave and Little Palgrave: there are significant adverse effect for users of PRoW Sporle with Palgrave BR5 across the construction and decommissioning phases of the Scheme with High Grove Solar. While the Applicant acknowledges these effects, it considers that **ES Chapter 6: Landscape and Visual [APP/6.2]** demonstrates that the Site can accommodate Solar PV Arrays without causing significant long-term visual effects. Cumulative effects associated with the Scheme are summarised in **ES Chapter 18: Summary of Effects [APP/6.2]**.
	Scheduled monuments / archaeology / heritage sites	(6) There are particular concerns regarding the potential impact on the historic environment relating to Castle Acre (Castle and Priory);	Yes	The Applicant notes that **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage-related effects expected across the Scheme's construction, operational, and decommissioning phases, including with relation to Castle Acre. The Applicant also confirms that in response to feedback regarding heritage impacts, among other factors, the Customer Substation, National Grid Substation, and BESS have been located in Fields 24 and 27 south of Bartholomew's Hill Plantation. Solar PV panels have also been removed entirely from Field 35 and the northern half of Field 33.

	Community benefits – off-site	(7) Energy Generation – the County Council would expect to see energy generated from the Project capable of being used locally to support housing and employment growth;	No	The **Statement of Need [APP/5.4]** confirms that the Scheme will connect to the National Electricity Transmission System (NETS). The NETS is an existing national infrastructure asset designed specifically for the bulk transmission of energy from its point of generation to consumers, both nationally and locally, through existing connections between the NETS and the local distribution grid. This includes the provision of low-carbon energy, which goes toward meeting any increase in demand arising from local housing and employment growth. (Note: I only added a comma for clarity and corrected the spacing.)
	Financial compensation	(8) Compensation – there needs to be appropriate compensation for those households; communities and businesses affected by the proposed Solar Farm; and	No	The **Planning Statement [APP/5.5]** confirms that community benefits would be realised at a local level, should consent be granted for the DCO Application. For example, the **outline LEMP [APP/7.11]** establishes how permissive paths proposed as part of the Scheme will be designed and implemented to improve accessibility across the Site. The **oESSCS [APP/7.15]** sets out proposals to promote local apprenticeships and training schemes, with the aim of enhancing local skills and qualification rates. The Applicant does; however, note that whilst direct monetary compensation is not being considered as part of the Scheme, options to contribute to a community fund are being explored.
	Community benefits – off-site	(9) Community Benefit Fund – the County Council would expect the Applicant to set up a Community Benefit Fund.	No	The **Planning Statement [APP/5.5]** confirms that the Applicant has committed to providing a Community Benefit Fund. The Community Benefit Fund does not form part of the DCO Application, and this funding is not required to mitigate the impacts of the Scheme. Therefore, it cannot be considered in the decision-making process for determining the DCO Application. However, it will be available to fund local projects.
	General comment	Recommendations: The Director of Growth and Investment is recommended to inform the Applicant (The Droves Solar Farm Ltd) that Norfolk County Council: 1. Has strategic concerns to the Project at this stage for the reasons set out below;	No	The Applicant notes the recommendations which follow this comment.
	Grid connection infrastructure	2. Has serious concerns to the potential for new overhead lines and pylons being introduced into this	No	The Applicant notes this concern. Taking into account the existing pylon route and the siting of new pylons and

		sensitive Nar Valley landscape as part of any grid connection infrastructure needed;		overhead lines, there are no significant effects arising from the proposed new OHL reported in the **ES [APP/6.1 – 6.5]**.
	Inter project Cumulative impact	3. Has concerns regarding the cumulative impacts of the Project on Norfolk's environment; and local communities and businesses taken together with other major infrastructure proposed in this area;	No	The Applicant notes this comment and confirms that the cumulative impacts on local businesses and communities are considered and presented within the cumulative effects assessment in **ES Chapter 14: Socio-Economics [APP/6.2]**. The Applicant notes that there are three significant beneficial effects across all phases of the Scheme, cumulatively with High Grove Solar Farm, associated with the provision of education, skills and training. No significant adverse effects are identified. The cumulative impacts on the local environment are considered and presented within the cumulative effects assessment within each chapter of the **ES [APP/6.1 – 6.5]**.
	Agricultural land use	4. Has strategic concerns regarding the loss of high-quality agricultural land;	No	The utilised agricultural area (UAA) in the UK was 16.8 million hectares in 2024. The agricultural land taken for the Scheme represents less than 0.01% of the UAA and is not expected to have a significant impact on national food production and security. Furthermore, the Applicant notes the **Policy Compliance Document [APP/5.6]**, which confirms that the use of BMV land for the Scheme is justified, considering the economic and other benefits of the land.
	Human Health and Safety Glint and Glare Impact on local amenities / recreational activities Public Rights of Way	5. Has a number of safety concerns regarding the potential for glint and glare arising from the solar panels in relation to highway users; aviation; and impacts on those using Public Rights of Way;	No	The Applicant notes this comment but confirms that **Chapter 16: Other Environmental Matters [APP/6.2]** considers the effects of the Scheme associated with glint and glare and concludes there are no significant adverse effects.
	Scheduled monuments / archaeology / heritage sites Landscape and visual	6. Has concerns regarding the impact the Project will have on the historic assets in this area particularly on Castle Acre (the Castle and the Priory); and on the wider Nar Valley landscape;	Yes	**Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage-related effects expected across the Scheme's construction, operational and decommissioning phases. The Applicant also notes that the National Grid and Customer substations, and the BESS, have been located in Fields 24 and 27 south of Bartholomew's Hill Plantation.
	Indicative area for solar PV panels Landscape and visual	7. Favours fixed solar panels with a lower height (3 metres) and therefore less visual and landscape impacts than tracking panels (up to 4.5 metres);	No	The Applicant notes this but retains some flexibility. The Scheme Parameters used for the **ES [APP/6.1 – 6.5]** are set out in **ES Chapter 5: The Scheme [APP/6.1]**.

				The **Design Principles, Parameters and Principles [APP/5.8]** secures the maximum heights of Single Axis Trackers and Fixed Panels.
	Community benefits – off-site	8. Would like to see energy generated by this project being connected into the local distribution network to enable planned housing and employment growth in the County;	No	The **Statement of Need [APP/5.4]** confirms that the Scheme will connect to the National Electricity Transmission System (NETS). The NETS is an existing national infrastructure asset which is designed specifically for the bulk transmission of energy from its point of generation to consumers both nationally and locally, through existing connections between the NETS and the local distribution grid. This includes the provision of low carbon energy which goes toward meeting any increase in demand arising from planned housing and employment growth in the County.
	Financial compensation	9. Would expect to see appropriate compensation for those affected by the Project;	No	The Applicant does, however, note that whilst direct monetary compensation is not being considered as part of the Scheme, options to contribute to a community fund are being explored. The Applicant is committed to 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, will determine how best to distribute funding.
	Community benefits – off-site	10. Would expect to see a voluntary community benefits fund being established; and	No	The **Planning Statement [APP/5.5]** confirms that the Applicant has committed to providing a Community Benefit Fund. The Community Benefit Fund does not form part of the DCO Application, and this funding is not required to mitigate the impacts of the Scheme. Therefore, it cannot be considered in the decision-making process for determining the DCO Application. However, it will be available to fund local projects.
	General comment	11. Has a number of detailed technical comments to the Solar Farm Project which are set out in this Report and in the accompanying Appendices 2 and 3	No	The Applicant notes this comment and confirms that the contents of the Appendices referenced are included in this response table.
	General comment	1. Background and Purpose 1.1 The purpose of this Report is to assess the proposed Project by The Droves Solar Farm Limited for their Droves Solar Farm and agree the County Council's response to this statutory consultation under Section 42 of the Planning Act 2008. The technical officer-level comments below and in Appendices 2 and 3 are made on a without prejudice basis and the County Council reserves the right to make further comments at the subsequent Submission Stage and throughout the Examination	N/a	The Applicant notes this comment and thanks Norfolk County Council for providing a response to the consultation. The Applicant also thanks Norfolk County Council for continued engagement up to the submission of this DCO Application.

		process. The County Council welcomes the opportunity to comment on the Preliminary Environmental Information Report (PEIR) which has been prepared in support of the proposed Droves Solar Farm.		
	General comment	Nationally Significant Infrastructure Projects 1.2 Given the scale of the Project (see Section 2 below) it will be taken forward as a Nationally Significant Infrastructure Project (NSIP) under the 2008 Planning Act and will be determined by the Secretary of State (SoS) for Energy Security and Net Zero. This is a formal pre-application consultation by The Droves Solar Farm Limited under Section 42 of the above Act. It is important to note that the County Council as a statutory consultee will also have an opportunity to formally comment and make relevant representations on the submitted Development Consent Order (DCO) application (under Section 56 of the above Act).	N/a	The Applicant notes this comment and welcomes Norfolk County Council to make relevant representations on the DCO Application.
	General comment	1.3 The above consultation rounds will be followed by a six-month Public Examination period led by the Examining Authority (ExA) appointed by the Planning Inspectorate (PINS). During this period the County Council will have an opportunity to comment and submit its Local Impact Report (LIR). There will also be opportunities to submit Statements of Common Ground (SoCG) with the Applicant.	n/a	The Applicant will continue to work together with Norfolk County Council through the Examination period to develop iterations of a Statement of Common Ground, with the intent of having a signed Final Statement of Common Ground at the end of the Examination.
	National policy	Context and National Policy National Policy Statements (NPSs) 1.4 At the end of 2023 the Government published a series of updated NPSs, the most relevant for solar farms being: EN-1 (Overarching National Policy Statement for Energy); EN-3 (Renewable Energy Infrastructure); and EN5 (NPS for Electricity networks Infrastructure). EN-1 recognises the importance of solar in delivering a secure, reliable, affordable and net zero energy system by 2050.	No	The Applicant notes this comment and confirms that the **Planning Statement [APP/5.5]** also considers the 2025 revisions to the energy NPSs, which were published for consultation in April 2025. The Applicant considers that the Draft NPSs are important and relevant matters to the SoS's decision under section 104(2)(d) of the PA 2008.
	National policy	1.5 EN-1 specifically recognises that there is a Critical National Priority (CNP) for the provision of significant low carbon infrastructure stating: "Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the	No	The **Planning Statement [APP/5.5]** and **Policy Compliance Document [APP/5.6]** assess the Scheme's compliance with the energy National Policy Statements. As noted by Norfolk County Council, National policy establishes a critical national priority for projects such as the Scheme.

		mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible". The government has stated that low-carbon infrastructure, including solar farms, is a critical national priority, aiming to streamline the consenting regime and increase the likelihood of achieving 70GW of solar capacity by 2035.		
	National policy	1.6 In the Government's consultation on new Energy Infrastructure (April 2025) covering NPSs 1,3 and 5, it has indicated that Projects relevant for Clean Power 2030 (See Clean Power 2030 Action Plan below) can be deemed Critical National Priority (CNP), with a presumption in favour of consent.		The **Statement of Need [APP/5.4]** provides detail on the government's Clean Power 2030 Action Plan and the April 2025 draft NPSs. The Clean Power 2030 Action Plan establishes a capacity range for solar of 45-47GW by 2030 and 45-69GW by 2035, implying a consistent rate of deployment with that described in the currently designated energy NPSs and supporting the urgent and enduring need for new low carbon generation facilities to come forward to meet future electricity demand. The draft energy NPSs include Capacity Ranges to support the achievement of government's Clean Power target but clarify that these Capacity Ranges are not intended to propose limits on any new infrastructure that can be consented. As part of the ongoing Connections Reform process, the Applicant has submitted evidence of its readiness to NESO to demonstrate its relevance to the aims of the Clean Power 2030 Action Plan and to inform its position in a reordered connections queue.
	National policy	1.7 NPS EN-3 provides guidance and advice on the location of solar farms; and reiterates the Government's commitment to the growth in solar capacity in order to meet its net zero emissions target by 2050. "As such solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector" (Paragraph 2.10.9).	No	The **Planning Statement [APP/5.5]** and **Policy Compliance Document [APP/5.6]** assess the Scheme's compliance with the relevant policies established under NPS EN-3.
	National policy	1.8 Government is supportive of solar that is co-located with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use" (Paragraph 2.10.10)	No	**ES Chapter 5: The Scheme [APP/6.1]** confirms that 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.
	National policy	1.9 The NPS recognises that "Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation".	No	The **Planning Statement [APP/5.5]** and **Policy Compliance Document [APP/5.6]** recognise this text as originating from NPS EN-3.
	General comment	1.10 Solar farm Projects are currently likely to consist of solar panel arrays, mounting structures, inverters,	No	**ES Chapter 5: The Scheme [APP/6.1]** provides a description of the physical characteristics of the Scheme

		transformers; cables; and grid connection (Substation 132 kV or 400kV). There may also be the need for ancillary infrastructure including: battery storage; flood defence; fencing; lighting and surveillance.		and the activities that would be undertaken during the construction, operation, and decommissioning phases.
	National policy	1.11 EN-3 while covering all renewable technologies, makes clear the importance of solar as a key part of the Government's strategy for: decarbonisation of the energy sector; delivering the Government's goals for greater energy independence; and energy security. It refers to the Powering up Britain - Energy Security Plan stating that the Government seeks large scale ground mounted solar deployment across the UK: "…looking for development mainly on brownfield, industrial and low and medium grade agricultural land" (para 2.10.11). It goes on to indicate: "…. that solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land and encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement" (paragraph 2.10.11).	No	The Applicant welcomes Norfolk County Council's drawing down of the strong policy position in support of solar development in NPS EN-3. The **Planning Statement [APP/5.5]**, **Policy Compliance Document [APP/5.6]** and **Statement of Need [APP/5.4]** describes how and why the Scheme addresses all relevant aspects of government policy.
	National policy	Strategic Spatial Energy Plan (SSEP) 1.12 The Government has asked the National Energy System Operator (NESO), a new body created under the Energy Act 2023, to produce a 'Strategic Spatial Energy Plan' (SSEP) by 2026, with a methodology for producing it to be published by the end of this year (2025). This is likely to result in a new set of NPSs being produced once the SSEP is published.	No	The Applicant notes this comment and the forthcoming nature of the SSEP. As outlined in the **Planning Statement [APP/5.5]**, **Policy Compliance Document [APP/5.6]** and **Statement of Need [APP/5.4]**, the Scheme is compliant with the relevant policies in the current draft NPSs. Should the draft NPSs and SSEP be adopted after the acceptance of this DCO Application, the Applicant is committed to reviewing revisions to the policy. The **Statement of Need [APP/5.4]** provides detail on the government's Clean Power 2030 Action Plan and the April 2025 draft NPSs. The Clean Power 2030 Action Plan establishes a capacity range for solar of 45-47GW by 2030 and 45-69GW by 2035, implying a consistent rate of deployment with that described in the currently designated energy NPSs and supporting the urgent and enduring need for new low carbon generation facilities to come forward to meet future electricity demand. The draft energy NPSs include Capacity Ranges to support the achievement of government's Clean Power target but clarify that these Capacity Ranges are not intended to propose limits on any new infrastructure that can be consented. As part of the ongoing Connections Reform process, the Applicant has submitted evidence of its readiness to NESO to demonstrate its relevance to the aims of the Clean Power 2030 Action Plan and to inform its position in a reordered connections queue.
	National policy	1.13 The SSEP 'will assess the optimal locations, quantities, and types of energy infrastructure required, across a range of plausible futures, to meet	No	The Applicant notes this comment.

		future energy demand with the clean, affordable, and secure supply that we need'.		
	National policy	1.14 The purpose of the SSEP is not to make site-specific recommendations nor prescribe or authorise specific projects but is to offer a guide to spatial characteristics, and maps are expected to be produced.	No	The Applicant notes this comment.
	National policy	1.15 This should help with projects waiting for grid connections, as it will allow better forward planning of enhancements to the electricity grid. It will also allow a more strategic approach to land use, although the document will not be in place until 2026. In the meantime, NESO have produced a Clean Power 2030 document providing advice on achieving clean power for Great Britain by 2030 in line with the Government's Clean Power 2030 Action Plan (see below).		The **Statement of Need [APP/5.4]** explains that the Scheme's proposed location is an appropriate location for large-scale solar because of the existence of grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme to local and national customers in the timeframes indicated, coupled with sufficient solar irradiance, and a suitable area of secured land for the solar and BESS. Further, the Applicant has submitted evidence of its readiness to NESO to demonstrate its relevance against the aims of the Clean Power 2030 Action Plan and to inform its position in a reordered connections queue. The **Statement of Need [APP/5.4]** provides evidence that the Scheme is a viable proposal, which, subject to the ongoing Connection Reform process, has an agreement to connect to the NETS in 2033. During the operation phase, the Scheme will deliver significant carbon reduction benefits through the deployment of a proven, low-cost technology at an appropriate location. As such, the Scheme possesses exactly those attributes identified as being required to deliver material carbon reductions in the UK electricity sector in timelines consistent with those set out in the Clean Power 2030 Action Plan.
	National policy	Clean Power 2030 Action Plan (CPAP) 1.16 The key objectives of the UK's Clean Power 2030 Action Plan are to achieve a fully clean electricity system by 2030, reduce greenhouse gas emissions, and enhance energy security and affordability. This involves a significant shift to renewable energy sources and a reduction in reliance on fossil fuels.	No	The Applicant notes this comment. **The Statement of Need [APP/5.4]** summarises the Clean Power 2030 Action Plan and recognises that the requirement for new low-carbon electricity generation will continue beyond 2030. The Action Plan establishes a capacity range for solar of 45–47 GW by 2030 and 45–69 GW by 2035, demonstrating the urgent and ongoing need for new renewable generation to support future electricity demand, decarbonisation, and energy security. The Applicant also notes that Government anticipates a continued increase in planning applications for renewable energy infrastructure as part of meeting the Clean Power 2030 target.

	National policy	Planning and Infrastructure Bill (March 2025) 1.17 The Planning and Infrastructure Bill: • Commits to NPSs being updated at least every five years; • Places a new duty on Local Planning Authorities and statutory consultees on engaging with NSIPs; • Proposes to take out the PEIR (Section 42) consultation stage for future NSIPs and thereby speed up the planning process; and • Further streamlining the Judicial Review process for Development Consent Orders (DCO)	No	The Applicant notes this comment. The **Planning Statement [APP/5.5]** details the status, at the time of submitting this DCO Application, of the Planning and Infrastructure Bill.
	Local policy	County Council Strategies 1.18 Norfolk's Climate Strategy - While the Strategy clearly encourages the use of renewable energy; and recognises the opportunities for promoting a green economy, this support is tempered by any Projects needing to be "appropriate" in terms of scale and location. It also supports the upgrading of onshore transmission infrastructure where this provides appropriate benefits to Norfolk's residents and businesses and helps in delivering clean energy for housing and employment growth in Norfolk. As such it would be difficult for the County Council to support a renewable energy project which would have a demonstrable impact on Norfolk's environment and with no immediate local benefits.	No	The **Planning Statement [APP/5.5]** recognises Norfolk County Council's commitment to tackling climate change and achieving a net-zero Norfolk through the measures outlined in its Climate Strategy. The Applicant recognises the need for this delivery to be "appropriate". Both the **Planning Statement [APP/5.5]** and **Policy Compliance Document [5.6]** provide assessment and conclude that the Scheme would not give rise to demonstrable adverse impacts on Norfolk's sensitive environment. Meanwhile, section 5 of the **Planning Statement [APP/5.5]** outlines the benefits of the Scheme. Many of these benefits would be realised at a local level.
	Local policy	1.19 Economic Strategy - Local Growth Plan – the plan while supporting the UK's transition to Net Zero and aspiration to be a UK leader in offshore clean energy through the use of renewable energy; recognising the need to protect Norfolk's natural environment, improve biodiversity and invest in natural capital. The focus of support is in the established offshore windfarm sector, which benefits Norfolk in terms of developing renewable energy supply chains; improving skills in this sector; and supporting the Clean Energy Coast initiative. The Strategy also indicates that the County Council will also lobby for access to power that currently bypasses Norfolk, via the grid, benefitting local communities and businesses.	No	The Applicant notes this comment and confirms that the **oESSCS [APP/7.15]** recognises Norfolk County Council's commitment in supporting the UK transition to Net Zero and developing renewable energy supply chains, improving skills in these sectors. The **oESSCS [APP/7.15] also** sets out the Applicant's commitment to promoting competition, innovation and skills within communities surrounding the Scheme, as well as across Breckland, KLWN and the wider county of Norfolk. It also outlines the workforce, skills, equipment and services required to deliver the Scheme, together with measures to engage relevant stakeholders. The Scheme incorporates a range of new habitat provision and enhancement measures which have been designed to maximise benefits to biodiversity. The Scheme has 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/7.4**], and provides a number of faunal enhancement measures, together

				resulting in a betterment for biodiversity as a result of the Scheme. The Applicant is committed to 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, will determine how best to distribute funding.
	Local policy	1.20 Norfolk and Suffolk Energy Plan – the County Council is in the process of developing a county-wide Energy Plan. The Plan will need to have regard to other County Council strategies as well as emerging / updated National Policy Statements (NPSs); advice and guidance coming forward from the National Energy Systems Operator (NESO) and their emerging Strategic Spatial Energy Plan (SSEP); and to any Regional Energy Strategic Planning (RESP) advice.		The Applicant notes the ongoing development of the Norfolk and Suffolk Energy Plan and its proposed completion in March 2026.
	Scheme description	2. Project and Timetable (a) Overview 2.1 The Project comprises the construction, operation, maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station and associated development including a Battery Energy Storage System (BESS), a Customer Substation and Grid Connection Infrastructure including a new National Grid Substation. The Project would allow for the generation and export of up to 500MW of renewable energy, connecting into the National Electricity Transmission System (NETS) overhead line that passes through the Site.	No	**ES Chapter 5: The Scheme [APP/6.1]** confirms that 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.
	Scheme description	2.2 As the Project would have a generating capacity in excess of 50MW, it is considered to be a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008.	No	The Applicant notes this comment and agrees.
	Scheme description	(b) The Project 2.3 The Project comprises the following: The solar array sites, which will include solar panels, conversion units and inverters; A Customer Substation, which comprises electrical infrastructure such as transformers, switchgear and metering equipment required to facilitate the export of electricity up to 400kV (kilovolt) from The Droves Solar Farm to the National Grid Substation;	No	The Applicant notes this comment and confirms the information is correct as presented at the PEIR stage. The Applicant notes that **ES Chapter 5: The Scheme [APP/6.1]** provides an updated description and the parameters for which the assessments presented in the **ES [APP/6.1 – 6.5]** have been undertaken.

		A 400kV National Grid Substation operated by National Grid Electricity Transmission (NGET); associated electrical infrastructure; and other ancillary works required to facilitate the export of electricity from the Droves Solar Farm to the National Grid, which may be underground or overhead lines (see below); A Battery Energy Storage System (BESS) area; Associated infrastructure, mitigation and enhancement measures and other ancillary works, for example, enclosures and fencing, security, drainage, earthworks, highways and access works, mitigation and enhancement measures, temporary work compounds and work sites; Cable Route Corridor - underground cabling connecting the solar array sites and Conversion Units to the BESS and the Customer Substation. Grid Connection Corridor - cabling connecting the Customer Substation to the National Grid Substation point of connection to transfer the energy generated to the National Grid system, which may be underground or overhead lines. Grid Connection Infrastructure - Underground and/or overhead lines including the construction of new pylons between the National Grid Substation and the point of connection.		
	Scheme description	2.4 The proposed DCO will, among other things, authorise: Overhead 400kV power lines. Grid Connection Infrastructure - Underground and/or overhead lines including the construction of new pylons between the National Grid Substation and the point of connection; and Construction, operation, maintenance and decommissioning of the solar PV electricity generating station and associated development including grid connection and energy storage facility;	No	The Applicant notes that **ES Chapter 5: The Scheme [APP/6.1]** provides an updated description and the parameters for which the assessments presented in the **ES [APP/6.1 – 6.5]** have been undertaken.
	Scheme lifespan	2.5 It is understood that the design life of the project is up to 60 years and will include regular maintenance activities. Decommissioning is anticipated to take 12-24 months.	No	The Applicant notes that **ES Chapter 5: The Scheme [APP/6.1]** provides an updated description and the parameters for which the assessments presented in the **ES [APP/6.1 – 6.5]** have been undertaken.

	Scheme description Grid connection infrastructure	(c) The Grid Connection 2.6 The PoC for the Project to connect to the NETS would be at the new National Grid Substation, which is proposed to be located within fields 27-33 (see Appendix 1). The National Grid Substation will be connected to the existing NETS overhead line that passes through the Site via either underground or overhead cables within the Grid Connection Corridor. The proposed location of the Grid Connection Corridor within the Site is under consideration and will be refined through ongoing environmental assessments, discussions with National Grid, landowner negotiations and consultation input.	No	The Applicant notes that **ES Chapter 5: The Scheme [APP/6.1]** provides an updated description and the parameters for which the assessments presented in the **ES [APP/6.1 – 6.5]** have been undertaken.
	Grid connection infrastructure	2.7 Cables, ranging in voltages from 11kV to 400kV, will be necessary to facilitate the Project within the Site. Cable trenches, with widths typically varying between 1m to 7m, will accommodate the cable circuits, and there will be instances where multiple cables run along the same route and separation distances between them will be required. The width and spacing of the cable trenches may differ depending on environmental constraints, engineering requirements, or if crossing third-party apparatus (e.g., utilities) so a working width of 50m has been allowed for at this stage.	No	The Applicant notes that **ES Chapter 5: The Scheme [APP/6.1]** provides an updated description and the parameters for which the assessments presented in the **ES [APP/6.1 – 6.5]** have been undertaken.
	Development Consent Order process	(d) Timetable 2.3 The project is currently at the pre-application stage and it is expected to be submitted as a DCO application in late 2025. Applications for DCOs are examined independently by an Examining Authority (ExA) appointed by the Planning Inspectorate (PINS). Following an Examination of the project, which typically takes place over a six-month period, the ExA will make a recommendation to the Secretary of State for the Department for Energy Security and Net Zero, who will decide whether or not to grant the DCO.	No	The Applicant notes that **ES Chapter 5: The Scheme [APP/6.1]** provides an updated description and the parameters for which the assessments presented in the **ES [APP/6.1 – 6.5]** have been undertaken.
	General comment	3. Impact of the Proposed Project – Assessment and Strategic Comments 3.1 Set out below are the key strategic comments and are accompanied with detailed technical comments are set out in the Appendices 2 and 3.	No	The Applicant notes this comment and confirms the contents of the Appendices referenced are included in this response table.
	Scheme description	(a) Overarching Strategic Comments 3.2 The Droves Solar Farm renewable Solar Farm will deliver up to 500 MW of electricity, which will be	No	The Applicant notes that **ES Chapter 5: The Scheme [APP/6.1]** provides an updated description and the

		sufficient to provide power for approximately 115,000 homes annually. It will cover approximately 825 hectares (ha) of countryside and require not only solar panels; but significant supporting infrastructure including battery storage; transformers and convertors; and a grid connection to the existing 400kV overhead lines that run through the site.		parameters for which the assessments presented in the **ES [APP/6.1 – 6.5]** have been undertaken. .
	National policy	3.3 National Policies as set out above are generally supportive of renewable energy and other low-carbon energy projects, which includes solar farms. These policies define renewable energy projects as a critical national priority, integral to meeting the Government's targets on achieving net zero emissions. As such this Project is consistent with National Policies and will make a significant contribution to the delivery of national policy targets for decarbonisation, including meeting Net Zero targets, energy security and ensuring affordability of energy supply.	No	The Applicant notes this comment and confirms that the Scheme, under the policies of NPS EN-1, NPS EN-3 and NPS EN-5, is defined as a critical national priority. The assessments drawn out in the **Planning Statement [APP/5.5]** and the **Policy Compliance Document [APP/5.6]** demonstrate how the Scheme complies with the relevant National Policies.
	Inter project Cumulative impact	3.4 While recognising the sustainable benefits of this project in terms of delivering on national targets on low-carbon energy, the County Council is concerned about the cumulative impacts of this proposal sitting alongside other approved and proposed NSIPs in Breckland. This includes the major grid connection works being carried out at Necton associated with the consented Norfolk Vanguard and Norfolk Boreas offshore wind farms; and the proposed new High Grove Solar Farm nearby. The County Council is also concerned at the lack of a strategic approach to the siting solar farms across the County and the cumulative impacts associated with multiple large scale solar farms will have on Norfolk's environment; and local communities and businesses affected.	No	The **Statement of Need [APP/5.4]** explains that the Scheme's proposed location is an appropriate location for large-scale solar because of the existence of grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme to local and national customers in the timeframes indicated, coupled with sufficient solar irradiance, and a suitable area of secured land for the Scheme. **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** and **Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]** describe the detailed site evaluation and assessment of alternatives process undertaken by the Applicant. As set out in these documents, the location and design of the Scheme is the result of a comprehensive site selection process that was environmentally, technically, and planning-led to avoid and minimise the potential impacts of the Scheme as early as possible.
	Grid connection infrastructure	Grid Connection Comments 3.5 As indicated above a 400 kV Substation is needed for the project to connect into National Grid's 400 kV transmission network. It is proposed that this would be located on the north-eastern side of the site, close to the existing NETS overhead line, although the precise location and design of the Substation and the grid connection has yet to be determined. The Applicant has indicated that grid connection from the Substation could involve either new overhead lines	No	**Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]** presents the reasoning for why the Scheme is located in the Site's particular location, which includes the siting of the proposed new National Grid Substation. As part of the grid connection offer from National Grid, the Applicant is required to find and obtain land for, and consent, a new National Grid Substation within the DCO. This is detailed in the **Grid Connection Statement [APP/7.1]**, which explains that the National Grid Substation is to be sited and designed to connect the

		and up to five new pylons; or be an underground connection to the Substation. Given the close proximity of the Nar River Valley which is a Site of Special Scientific Interest (SSSI) (comprising the River Nar SSSI and the Castle Acre Common SSSI) to the immediate north of site and the proximity to the Scheduled Ancient Monuments at Castle Acre (the Castle and the Priory) it is recommended that the County Council seek to secure the use of underground cables and makes it clear that it would have serious concerns to any new Pylons in the area. In addition there needs to be further detail on the proposed Substation and the landscape mitigation needed to accompany this element of the Project.		Scheme to the 400kV transmission network between the existing substations at Necton and Walpole. The undergrounding of either the existing or the proposed 400kV line has not been explored as an option, as the Site is not within a National Landscape, and there are no significant effects arising from the proposed new OHL reported within the **ES [APP/ 6.1-6.5]**
	Indicative area for solar PV panels	PV Panel Options 3.6 The PEIR states that there are currently two options for the PV panels which are being considered; either fixed south facing PV Arrays that would be installed at between 15 and 35 degrees which a maximum hight of 3.5 or single axis tracker arrays that would be orientated north/south and would operate between 60 degrees from the horizontal (facing east in the morning) moving toward 0 degrees (horizontal) at midday, and up to 60 degrees from the horizontal (facing west in the evening) that would have a maximum height of 4.5m. The County Council would favour the option with the least visual and landscape impact (i.e. the fixed panels). However, it is accepted that through further design work and appropriate mitigation there may be opportunities for combining both fixed and tracking arrays in different parts of the 825-ha site.	No	The Applicant notes those comments and confirms that the panel type will be confirmed during the detailed design phase. **ES Chapter 5: The Scheme [APP/6.1]** provides a description of the physical characteristics of the Scheme and the activities that would be undertaken during the construction, operation, and decommissioning phase.
	Use of agricultural land	Agricultural Land Loss 3.6 It is understood that the project will cover around 825 ha of Norfolk's countryside. Of this 774.3 ha has been surveyed with the Applicant's assessment of agricultural land classification (ALC) showing that 61.5% (473 ha) of the land take (covered in solar panels) will be on the best and most versatile (BMV) agricultural land (i.e. Grade 3a or above) as set out below: Grade 1 – (Excellent quality) 27ha (3.5%) Grade 2 – (Very good quality) 297 ha (38.6%); Grade 3a – (Good quality) 149 ha (19.4%). Grade 3b – (Moderate quality) 269 ha (34.7%);		The Applicant confirms that Order limits extend to approximately 840ha. Of this, approximately 455ha is of BMV quality. The ALC surveys within **ES Chapter 11: Soils and Agriculture [APP/6.2]** have confirmed that approximately 54% of the Order's limits comprise BMV land. ALC was an important factor for the Applicant when evaluating the proposed Site. The Applicant notes updated ALC surveys are provided in **ES Chapter 11: Soils and Agriculture [APP6.2]**.

		Grade 4 – (Poor quality) 20 ha (2.6%) and Non-agricultural land – 30 ha (3.9%).		
	Agricultural land use Construction impact Access to, and maintenance of, the solar PV panels and associated infrastructure Access to, and maintenance of, Battery Energy Storage Systems and Customer Substation Access to, and maintenance of, National Grid Substation Sheep grazing	3.7 This loss of Best and Most Versatile (BMV) land (i.e. loss of productive agricultural land) raises concerns particularly in the context of other Projects for similarly large-scale solar farms within Breckland and South Norfolk. While the operational lifetime of the project is up to 60 years and the works are therefore temporary and reversible; this still raises issues regarding the immediate loss of BMV land over a sustained period of time. Moreover, the PEIR identifies that up to 4ha of land will be required for each of the two Substations and up to 10.5 ha for the BESS compound, plus additional land for access tracks. Effects during the Construction Phase in relation to construction of the access tracks, the Customer Substation, National Grid Substation, BESS and electrical infrastructure could collectively impact on more than 50 ha of Best and Most Versatile Land, although the PIER identifies that that the area under the Solar PV Arrays will be kept in grassland use and potentially farmed by the grazing of sheep or the production of fodder.	No	The Order limits extend to approximately 840ha. Of this, approximately 455ha is of BMV quality. The ALC surveys within **ES Chapter 11: Soils and Agriculture [APP/6.2]** have confirmed that approximately 54% of the Order limits comprises of BMV land. ALC was an important factor for the Applicant when evaluating the proposed Site. Although the Scheme does include land with potential arable value, the Applicant has sought to minimise the amount of BMV land by adopting a sequential approach in its site selection and can justify its inclusion given the significant wider benefits that the Scheme will bring. **Appendix 1 – Site Evaluation Report** to the **Planning Statement [APP5.5]** confirms how the Applicant's site evaluation involved a balance of factors, which included the need to minimise the impact on the best and most versatile agricultural land. **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** also provides a summary of the reasonable alternative options that the Applicant has considered for the Scheme, including the initial selection of the Site and throughout the development of the design. Further appraisal of the use of BMV land, and why this is justified, is set out in the **Planning Statement [APP/5.5]**.
	Inter project Cumulative impact Agricultural land use Food security	3.8 Notwithstanding the temporary nature of the proposed development and the potential benefits to the soils and biodiversity, there are concerns at the cumulative impacts of solar farm developments across the County and the lack of a strategic approach to the siting of renewable projects to minimise the impact on BMV land. There are also concerns that this could result in the loss of more traditional patterns of farming leading to reduced food security.	No	The utilised agricultural area (UAA) in the UK was 16.8 million hectares in 2024. The agricultural land taken for the Scheme represents less than 0.01% of the UAA and is not expected to have a significant impact on national food production and security. The Applicant further notes, and as set out in **ES Chapter 11: Soils and Agriculture [APP/6.2]**, due to the temporary nature of the Scheme, and the measures in place to restore the land to its original use and condition as far as practicable after the Scheme is decommissioned, there are no significant residual effects anticipated with relation to soils and agriculture. Further, by leaving the land undisturbed under long-term grassland, soil health, quality and structure within the Solar PV Sites are likely to improve during the lifetime of the Scheme. There will be beneficial impacts on soils resulting from long-term resting from arable production
	Glint and Glare Human Health and Safety	Glint and Gare – Safety Concerns 3.8 The Applicant has undertaken a preliminary glint and glare assessment relating to the potential impact on road safety, residential amenity, public rights of way, and aviation activity associated with RAF	No	The Applicant notes this and confirms that **ES Chapter 16: Other Environmental Matters [APP/6.2]** considers effects relating to glare and glare on road safety, residential amenity, PRoW and aviation.

		Marham, Great Friars Thornes Farm Airfield, East Winch Airfield, and Great Massingham Airfield. Cumulative impacts have also been considered.		The Applicant also notes engagement has been undertaken with the Defence Infrastructure Organisation, as detailed in the **Consultation Report [APP/5.1].**
	Glint and Glare Aviation and Airfields	3.9 The preliminary assessment identifies that solar reflections are geometrically possible from fixed south facing panels towards the Air Traffic Control (ATC) tower at RAF Marham. The Applicant should therefore be advised that consultation is recommended with RAF Marham to confirm if views of the site will be possible. Glare with 'potential for temporary after-image is also predicted towards the approach paths at RAF Marham, and consultation is recommended with RAF Marham to understand their position towards the proposed development.	No	The Applicant notes this and confirms engagement with the Defence Infrastructure Organisation.
	Glint and Glare Aviation and Airfields	3.10 A moderate impact is also predicted for Great Friar Thornes Farm Airfield, as solar reflections with intensities of 'potential for temporary after-image' predicted. Consultation with the airfield operator is recommended to confirm this.	No	The Applicant confirms that Great Friar Thornes Farm Airfield was scoped into the assessment of glint and glare, as presented **in ES Chapter 16: Other Environmental Matters [APP/6.2]**, and confirms that no significant (in EIA terms) adverse effects are identified as a result of the Scheme.
	Glint and Glare Inter project Cumulative impact	3.11 No significant impacts are predicted towards road receptors, once proposed vegetation planting and enhancement has matured. Cumulative impacts may be possible in combination with the proposed High Grove Solar Farm, although it is understood that this will continue to be considered as further details of the High Grove Solar Farm become available. No significant impact is predicted towards residential amenity so that no mitigation is currently recommended.	No	The Applicant confirms the assessment provided in **ES Chapter 6: Landscape and Visual [APP/6.2]**, which identifies no significant adverse effects on road receptors once proposed vegetation planting and enhancement has matured. The Applicant also notes that cumulative effects with the High Grove Solar Farm have been considered to the extent possible at this stage, and will continue to be kept under review as further information becomes available. No significant adverse effects on residential amenity are predicted, and therefore no additional mitigation is required.
	Glint and Glare Aviation and Airfields Public Rights of Way	3.12 No significant impacts are predicted on aviation activity associated with East Winch Airfield or Great Massingham Airfield, or Public Rights of Way.	No	The Applicant notes this and confirms that **ES Chapter 6: Landscape and Visual [APP/6.2]** concludes that there are no significant adverse effects predicted.
	Glint and Glare Aviation and Airfields	3.10 Therefore at this stage given the lack of certainty on the potential impacts on aviation, there are concerns arising from the possible glint and glare arising from the Project.	No	The Applicant notes this concern
	Glint and Glare	3.11 The County Council would also expect the impacts on the other receptors to be thoroughly considered and suitable mitigation measures taken forward as part of the DCO application process. As such there are concerns regarding glint and glare	No	The Applicant notes that consultation is being undertaken regarding Glint and Glare with stakeholders, including the MOD, to understand their position and agree on appropriate measures where relevant.

		until such time as the impacts are fully understood and appropriate mitigation measures are put forward; tested; and agreed by stakeholders including the Ministry of Defence and the Civil Aviation Authority, but also potentially the Highway Authority and National Highways.		
	Landscape and visual Inter project Cumulative impact	Landscape Impact 3.12 The PEIR acknowledges that there will be impacts on visual amenity arising from the presence during the construction and decommissioning phases of involving vehicles moving on the Site and in and around the surrounding area and also of other associated activities. This potentially includes the presence of workers' accommodation, stockpiles of materials, lighting of specific areas, the presence and operation of construction compounds, and during the operation phase of the National Grid and Customer Substations and Grid Connection Infrastructure, BESS and PV panels. As such there will need to be appropriate mitigation put in place to screen not only the solar panels but also the supporting infrastructure. At this stage the precise layout and design of the project is not known, nor the detailed mitigation measures proposed. The cumulative impacts with other projects in the area has been assessed and identifies other NSIPs, most notably the proposed High Grove Solar Farm that would be immediately adjacent to the south of The Droves Solar Farm site to the North of Swaffham.	No	The Applicant notes this and confirms an updated assessment regarding landscape and visual impact is provided in **ES Chapter 6: Landscape and Visual [APP/6.2]**.
	Landscape and visual Inter project Cumulative impact	3.13 Given the likely visual impacts arising from this Project over an extensive area, there needs to be rigorous assessment of the impacts and cumulative impacts as well as a clear indication of the mitigation measures needed as part of the Environmental Impact Assessment (EIA). Therefore, at this stage there are significant landscape concerns with the proposed development.	No	The Applicant notes this concern and considers the assessment of landscape and visual impacts presented in **ES Chapter 6: Landscape and Visual [APP/6.2]** to be sufficient.
	Scheduled monuments / archaeology / heritage sites	Historic Environment 3.13 There are no designated heritage assets within the Site boundary, so that there would be no direct impacts on any designated heritage assets. The PEIR nevertheless identifies that there are 151 designated heritage assets in the surrounding area, comprising three Scheduled Monuments, nineteen Grade I listed buildings, seven Grade II* listed buildings, one hundred and eight Grade II listed buildings, one Grade II Registered Park and Garden, and three Conservation Areas. The most significant of these include Castle Acre Castle and Castle Acre	No	The Applicant notes this and confirms **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** considers designated and non-designated heritage assets.

		Priory, which are both located approximately 1km north of the site. In addition the Norfolk Historic Environment Record (HER) contains 145 records within a 1km. There is therefore consider potential for impacts on the historic environment.		
	Scheduled monuments / archaeology / heritage sites	3.15 The PEIR identifies that there is potential for likely significant effects on the historic environment (i.e. impact on designated heritage assets) through changes to their settings during all Phases of the project; and in particular for there to be residual significant adverse cultural heritage effects on Castle Acre Castle and Castle Acre Priory. These will need to be assessed in the Environmental Statement (ES) once the detailed design of the project is further developed. In addition, a programme of archaeological trial trenching will need to be undertaken to inform the archaeological assessment within the ES. Therefore at this stage pending further design and mitigation works being undertaken, there are concerns regarding the impact on the historic assets in this area particularly on Castle Acre (the Castle and the Priory).	Yes	The Applicant notes that **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** has assessed the identified setting impacts and undertaken a programme of trial trench evaluation. The assessment has led to the positioning of the National Grid and Customer substations and BESS in Fields 24 and 27 south of Bartholomew's Hill Plantation. In terms of fields north of Bartholemew's Plantation, solar PV panels are only proposed in the southern half of Field 33, which is to the south of the north facing break of slope and in Field 34, which lies on a south facing slope and so will not result in significant impacts to heritage assets located to the north. An assessment of significant effects is provided in **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2].**
	Community benefits – off-site	Energy Generation Issues 3.14 While acknowledging the wider strategic need for energy security and the move away from fossil fuels, the Project set out by Droves Solar Farm Limited does not bring any direct or immediate benefit to Norfolk in terms of providing clean energy to existing or planned homes and businesses. As currently set out, the Project would see the electricity generated going direct into National Grid's 400 kV network and not into the immediate local distribution network.	No	The **Statement of Need [APP/5.4]** confirms that the Scheme will connect to the National Electricity Transmission System (NETS). The NETS is an existing national infrastructure asset which is designed specifically for the bulk transmission of energy from its point of generation to consumers both nationally and locally, through existing connections between the NETS and the local distribution grid. This includes the provision of low carbon energy which goes toward providing clean energy to existing or planned homes and businesses.
	Local policy	3.15 The County has significant planned housing and employment growth and as such consideration should be made by Droves Solar Farm Limited, National Grid and UKPN at this early stage in the NSIP process as to how Norfolk could potentially benefit from any new electricity infrastructure in terms of clean energy supplies in line with the County Council's Climate and Economic Strategies.	No	The **Statement of Need [APP/5.4]** confirms that the Scheme will connect to the National Electricity Transmission System (NETS). The NETS is an existing national infrastructure asset which is designed specifically for the bulk transmission of energy from its point of generation to consumers both nationally and locally, through existing connections between the NETS and the local distribution grid. This includes the provision of low carbon energy which goes toward providing clean energy to consumers in Norfolk. The Applicant has submitted evidence of its readiness to NESO to demonstrate its relevance against the aims of the

				Clean Power 2030 Action Plan and to inform its position in a reordered connections queue. The Applicant notes the ongoing development of the Norfolk and Suffolk Energy Plan and its proposed completion in March 2026.
	Consultation and engagement	3.16 Droves Solar Farm Limited need to actively engage with Norfolk County Council and other key stakeholders, including National Grid and UKPN, to explore and provide clarity as to how the above strategic benefits for the County can be realised.	No	The Applicant notes this and is open to continued engagement with Norfolk County Council regarding the matters raised.
	New jobs associated with the Scheme (direct and in-direct)	Socio-economic 3.17 The Applicant has estimated, taking the net direct and net indirect jobs together, that the Project is expected to support 1,145 net additional jobs during the Construction Phase (extending over a twenty-four-month period), with between 285 and 575 of these being taken by local residents.	No	The Applicant notes this comment. The Scheme is still expected to support approximately 1,145 net additional jobs over the twenty-four-month construction period, with 285-575 of these anticipated to be taken by local residents in the Labour Catchment Area, as set out in **ES Chapter 14: Socio-Economics [APP/6.2]**
	Employment and Skills Strategy	3.18 A Preliminary Employment and Skills Strategy (PESS) has been prepared and outlines the initial themes and potential employment and skills initiatives that could be implemented as part of the Project. The aim of the strategy, it states is to generate local employment and skills opportunities, ensuring that local businesses and workers benefit during both the construction and operational phases, which is to be welcomed. However, once the development is operational the number of permanent jobs will be small involving limited operational employment opportunities (due to the nature of the development), that consist of operation and maintenance crews (including technical professions such as electrical engineers and performance managers), landscaping, and occasional repair teams.	Yes	This **oESSCS [APP/7.15]** builds on the PESS prepared at the PEIR stage. It sets out the Applicant's commitment to promoting competition, innovation and skills within communities surrounding the Scheme, as well as across Breckland, KLWN and the wider county of Norfolk. It also outlines the workforce, skills, equipment and services required to deliver the Scheme, together with measures to engage relevant stakeholders. The Applicant highlights that there will be job opportunities during the operational and maintenance phase where all onsite Solar PV panels and BESS batteries could be replaced over a 12-month period, generating an estimated 125 full-time equivalent (FTE) jobs per annum and a peak onsite workforce of around 360 personnel. This reflects the potential for substantial temporary employment and supply chain activity associated with significant maintenance or equipment replacement during operation. In addition, a range of employment and skills initiatives will be delivered throughout the operational and maintenance phase, as outlined in the **oESSCS [APP/7.15]**. A detailed ESSCS will be prepared in accordance with this **oESSCS [APP/7.15]** and submitted prior to the commencement of construction, as secured by a Requirement in the **draft DCO [APP/3.1].** The ESSCS will identify specific opportunities relating to skills, supply chain and employment that the Applicant will take forward post-consent, enabling local individuals and

				businesses to benefit from the employment, training and procurement opportunities generated by the Scheme.
	Employment and Skills Strategy	3.19 The inclusion of a Preliminary Employment and Skills Strategy (PESS) and the Applicant's early commitment to supporting local jobs, apprenticeships, education provider engagement, and green skills awareness is welcome. To ensure these commitments are meaningful, deliverable, and aligned with Norfolk's strategic ambitions for skills development and local labour market outcomes, an Outline Employment and Skills Strategy (OESS) should be submitted with the DCO Application; or be prepared as a requirement of the DCO process. Such a strategy should also refer to supply chain matters.	Yes	The **oESSCS [APP/7.15]** builds on the PESS prepared at the PEIR stage. It sets out the Applicant's commitment to promoting competition, innovation and skills within communities surrounding the Scheme, as well as across Breckland, KLWN and the wider county of Norfolk. It also outlines the workforce, skills, equipment and services required to deliver the Scheme, together with measures to engage relevant stakeholders. Section 8 of the **oESSCS [APP/7.15** identifies potential opportunities for employment and skills initiatives that are consistent with the Framework's key themes, including: • Local jobs; • Apprenticeships; • Education provider engagement; and • Green skills awareness. An ESSCS will be prepared in accordance with this **oESSCS [APP/7.15]** and submitted prior to the commencement of construction, as secured by a requirement in the **draft DCO [APP/3.1]**.
	Socio-economic benefits Inter project Cumulative impact	3.20 The Environmental Impact Assessment (EIA) will also need to assess the wider economic benefits arising from the above development both in terms of the Project coming forward on its own and in combination with other major energy projects in the area, particularly the adjacent High Grove Solar Farm project.		The Applicant notes this comment and refers to **Chapter 14: Socio-Economics [APP/6.2]** which assesses the wider socio economic impacts arising from the proposal both in isolation and cumulatively, including in relation to the High Grove Solar Farm.
	Financial compensation	Compensation 3.21 Droves Solar Farm Limited will need to consider appropriate compensation packages for those homes and businesses directly affected by both the construction works, and any long-term impacts. The County Council would expect Droves Solar Farm Limited to fully engage with those local communities affected by this development; and for the EIA and Environmental Statement (ES) to reflect that engagement.	No	The Applicant notes that direct monetary compensation is not being considered as part of the Scheme. The Applicant is committed to 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, will determine how best to distribute funding.
	Community benefits – on-site and off-site	Community Benefits 3.22 Whether through the formal DCO process or post DCO, there would be an expectation that Droves Solar Farm Limited will provide and take forward a Community Benefit Fund. Reference to a community benefit fund specifically designed to mitigate and	No	The **Planning Statement [APP/5.5]** confirms that the Applicant has committed to providing a Community Benefit Fund. The Community Benefit Fund does not form part of the DCO Application, and this funding is not required to mitigate the impacts of the Scheme. Therefore, it cannot be considered in the decision-making process for determining

		compensate for any local impacts to residents and businesses should be scoped into the ES as part of any wider consideration of impacts on local communities and business.		the DCO Application. However, it will be available to fund local projects. The Applicant further notes that throughout the pre-application process, the Applicant has consulted on community benefits and, based on feedback and ongoing discussions, will determine how best to distribute funding.
	Development Consent Order application process	4. Evidence and Reasons for Decision 4.1 Responding to this statutory consultation as recommended will enable the County Council's strategic and technical comments on the proposed Solar Farm Project to be considered by Droves Solar Farm Limited before they formally submit their DCO application later in the year. The County Council will have the opportunity to respond and make relevant representations when Droves Solar Farm Limited formally submit their DCO application. The above comments alongside any further representations made by the County Council will ultimately feed into a Public Examination overseen by the Examining Authority (ExA) appointed by the Planning Inspectorate. The final decision on this Project will be made by the Secretary of State following recommendations from the ExA.	No	The Applicant notes this comment and welcomes Norfolk County Council's comments to this consultation, as well as further comments post-acceptance of the DCO Application.
	Local policy National policy	4.2 The County Council's engagement now in the process will help to bring forward the best Project supporting the County Council's clean growth ambitions and Climate Strategy in line with the Government's net zero targets.	No	The Applicant welcomes Norfolk County Council's comments which have, to date, assisted with the refinement of the Scheme to best align with the Council's clean growth ambitions and Climate Strategy which accord with the government's Net Zero targets.
	Statutory consultation engagement	5. Alternative Options 5.1 The County Council could choose not to respond to this statutory consultation, but this would not enable the County Council's strategic and technical comments on Droves Solar Farm Limited's project to be considered and taken into account in the decision-making process.	No	The Applicant notes this comment and welcomes Norfolk County Council's consultation response.
	Consultation and engagement	6. Financial Implications 6.1 Officers have engaged with the Applicant at the technical scoping stage; attending steering group and topic-based meetings and provided technical advice and information in respect of the County Council's statutory responsibilities. The County Council is in discussion with the Applicant in respect of the preparation of a Planning Performance Agreement (PPA), which would allow for the cost recovery of officer time spent on this project.	No	The Applicant acknowledges the Council's comments and appreciates the continued engagement from officers throughout the technical scoping stage. A PPA has been signed with the Council, formalising arrangements for cost recovery of officer time and continued collaboration as the project progresses.)

	Statutory consultation engagement	6.2 To date the County Council has been able to charge for officer time spent engaging with Droves Solar Farm Limited ahead of any formal PPA being signed. The Applicant has provided assurances, through a letter of intent, that reasonable staff time will be paid for.	No	A Planning Performance Agreement (PPA) has been signed with the Council, formalising arrangements for cost recovery of officer time and continued collaboration as the project progresses.
	Statutory consultation engagement	7. Resource Implications 7.1 Staff: Staff resources for dealing with this project is being met from existing resources; and funding from the Applicant as set out above.	No	The Applicant notes this comment.
	General comment	7.2 Property: There are no immediate implications for the County Council as landowner.	No	The Applicant notes this comment.
	General comment	7.3 IT: There are no immediate implications for the County Council.	No	The Applicant notes this comment.
	General comment	8. Other Implications 8.1 Legal Implications: This is a response to a formal statutory consultation on a Project by the Applicant , which if progressed would be determined under the 2008 Planning Act by the Secretary State for Energy Security and Net Zero. While there are no legal implications at this stage to the County Council responding to this consultation, it's continuing involvement and discussion with the Applicant will ensure the County Council's statutory roles and responsibilities are met.	No	The Applicant notes and welcomes this comment.
	General comment	8.2 Human Rights Implications: There are no immediate implications for the County Council.	No	The Applicant notes this comment.
	General comment	8.3 Equality Impact Assessment (EqIA) (this must be included): The Council's Planning functions are subject to equality impact assessments. A detailed equality impact assessment has not been carried out as this report is responding to a consultation; however, consideration has been given to equality issues. The recommended comments relate to the County Council's role as a statutory consultee. This report and the comments set out in the report aim to 8.3 Equality Impact Assessment (EqIA) (this must be included): The Council's Planning functions are subject to equality impact assessments. A detailed equality impact assessment has not been carried out as this report is responding	Yes	The Applicant notes this comment. An **Equality Impact Assessment [APP/7.2]** has been delivered as part of this DCO Application. It assesses the potential equality impacts of the Scheme, identifying any disproportionate or differential effects on protected groups and outlining appropriate mitigation where relevant.

		to a consultation; however, consideration has been given to equality issues. The recommended comments relate to the County Council's role as a statutory consultee. This report and the comments set out in the report aim to ensure that any new Solar Farm infrastructure will have minimal impact on communities, while supporting the County Council's own clean growth ambitions and Climate Strategy in line with the Government's Energy Security Strategy.		
	General comment	8.4 Data Protection Impact Assessments (DPIA): There are no immediate implications for the County Council.	No	The Applicant notes this comment.
	General comment	8.5 Health and Safety implications (where appropriate): The wider Public Health implications of this Project are set out in the Appendices 2 and 3 along with the County Council's detailed technical comments.	No	The Applicant notes this comment.
	General comment	8.6 Sustainability implications (where appropriate): These are considered in the main text of the Report and in Appendices 2 and 3.	No	The Applicant notes this comment.
	General comment	8.7 Any Other Implications: None.	No	The Applicant notes this comment.
	General comment	9. Risk Implications / Assessment 9.1 The County Council is a statutory consultee on any Nationally Significant Infrastructure Project within or adjacent to Norfolk; and the final decision will be determined by the Secretary of State. Following this statutory Section 42 consultation there will be further opportunity for the County Council to respond to this Project at the submission stage under Section 56 of the Planning Act 2008.	No	The Applicant notes this comment and welcomes further response from Norfolk County Council under Section 56 of the PA 2008.
	General comment	9.2 The County Council will also be invited to submit a Local Impact Report later in the DCO process setting out more detailed comments on the Project should they be needed.	No	The Applicant notes this future submission from Norfolk County Council, subject to the acceptance of this DCO Application.
	Statutory consultation engagement	10. Select Committee Comments 10.1 Given the very tight timetable to respond to NSIPs, and to this consultation, there has not been the opportunity to take this consultation through the Select Committee process. However, the consultation has been shared with Executive Members of the Planning and Highways Delegations	No	The Applicant notes this comment.

		Committee in line with the County Council's Constitution.		
	General comment	10.2 Local Member Comments (if returned): These are set out in Appendix 2.	No	The Applicant notes this comment and notes the inclusion of the Appendix in this table.
	Recommendations (repeated)	11 Recommendations: The Director of Growth and Investment is recommended to inform the Applicant (The Droves Solar Farm Ltd) that Norfolk County Council: 1. Has strategic concerns to the Project at this stage for the reasons set out below; 2. Has serious concerns to the potential for new overhead lines and pylons being introduced into this sensitive Nar Valley landscape as part of any grid connection infrastructure needed; 3. Has concerns regarding the cumulative impacts of the Project on Norfolk's environment; and local communities and businesses taken together with other major infrastructure proposed in this area; 4. Has strategic concerns regarding the loss of high-quality agricultural land; 5. Has a number of safety concerns regarding the potential for glint and glare arising from the solar panels in relation to highway users; aviation; and impacts on those using Public Rights of Way; 6. Has concerns regarding the impact the Project will have on the historic assets in this area particularly on Castle Acre (the Castle and the Priory); and on the wider Nar Valley landscape; 7. Favours fixed solar panels with a lower height (3 metres) and therefore less visual and landscape impacts than tracking panels (up to 4.5 metres); 8. Would like to see energy generated by this project being connected into the local distribution network to enable planned housing and employment growth in the County; 9. Would expect to see appropriate compensation for those affected by the Project; 10.Would expect to see a voluntary community benefits fund being established; and	No	The Applicant notes this summary and considers the points raised to have been addressed above. In response to point 10, the Applicant reiterates that it is is committed to 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, will determine how best to distribute funding.

		11.Has a number of detailed technical comments to the Solar Farm Project which are set out in this Report and in the accompanying Appendices 2 and 3.		
Norfolk County Council (Preliminary Environmental Information Report response) (Appendix 2)	Introduction	1. Introduction 1.1 While this is largely a technical officer-level response, it should be noted that local County Council members directly affected by the proposed development have been consulted by officers. The response below has been agreed by the Director of Growth and Investment in consultation with the Executive Members of the County Council's Planning and Highways Delegations Committee.	No	The Applicant notes that the below response has been agreed by the Director of Growth and Investment in consultation with the Executive Members of the County Council's Planning and Highways Delegations Committee.
	Introduction	1.2 The County Council understands given the scale of this proposal (Over 50 MW generating capacity) that it will be progressed as a Nationally Significant Infrastructure Project (NSIP) under the 2008 Planning Act; and that the final decision on any Development Consent Order (DCO) will be made by the Secretary of State for Energy Security and Net Zero.	No	The Applicant notes this comment and confirms the Scheme is an NSIP requiring a DCO.
	Ecology	2. Natural Environment and Archaeology 2.1 Arboriculture Comments 2.1.1 The PEIR describes that trees and hedges are to be retained and the minimum buffer to trees is outlined in section 4.2.34 table 4.1 and considered to be broadly in line with current best practice. The use of existing field entrances limits hedge loss to localised widening where required.	No	The Applicant notes this and confirms measures relating to trees and planting are reflected in Figure 5.8 Green infrastructure Parameter Plan and detailed in the **oLEMP [APP/7.11]** and include the introduction of additional hedgerow trees and woodland belts to provide screening to the solar panels.
	Ecology Additional environmental mitigation, enhancement and protection suggestions	2.1.2 The current and future shade patterns of trees (both retained and planted) should be considered to reduce the requirement to prune trees to minimise shading of solar panels.	No	The Applicant notes this comment. As the proposed and existing trees continue to mature in the long term, the height increase would lead to increased shaved coverage. However, the offset proposed between new and existing tree planting and the Solar PV Arrays is such a distance that this shading is unlikely to be an issue.
	Traffic and Access	2.1.3 Access onto the highway will be considered in the Outline Construction Traffic Management Plan (oCTMP).	No	The Applicant notes this and confirms the **oCTMP [APP/7.7]** forms part of the DCO Application.
	Ecology	2.1.4 It is strongly recommended that existing trees and hedges are considered at an early stage in line with BS 5837: Trees in Relation to Design, Demolition and Construction to Construction – Recommendations to avoid significant impacts to enable the conflicts, particularly with regard to trees adjacent to the highway, to be designed out or appropriately mitigated.	Yes	The Applicant notes this comment and confirms that trees have been fully considered, as demonstrated by the ecological (**ES Chapter 7: Ecology and Biodiversity [APP/6.2]**) and arboricultural (**ES Chapter 16: Other Environmental Matters [APP/6.2]**) survey work. The trees and hedgerows to be retained will have suitable

				buffers, including those adjacent to existing highways ensuring no conflicts.
	Ecology	2.1.5 It should be noted that ownership of trees and hedges adjacent to the highway often lies with the adjacent landowner and not the Highway authority, but this is not always the case. Establishing ownership of trees and hedges that may be impacted by the proposals should be established at an early stage.	Yes	The Applicant notes this comment and confirms that the trees and hedgerows adjacent to the highways are entirely retained with appropriate buffers.
	General comment	2.1.6 Should you have any queries with the above comments please contact [redacted] [redacted](Arboriculture and Woodland Officer).	No	The Applicant notes this comment and point of contact.
	General comment	2.2 Ecology Comments 2.2.1 The Ecology team have reviewed the PEIR and have the following comments to make:	No	The Applicant notes this and the comments set out below.
	Ecology	Desk study - The Ecology team would like to understand when the desk study data was requested from NBIS?	No	The desk study data was requested from NBIS in April 2024 and September 2025.
	Ecology Additional environmental mitigation, enhancement and protection suggestions	Non-Statutory Sites - The site encompasses Roadside Nature Reserve (RNR) 79 River Road, impacts on this site should be minimised.	Yes	Noted and agreed. Impacts on RNR 79 River Road have been fully considered within **ES Chapter 7: Ecology and Biodiversity [APP/6.2]**.
	Ecology Protected sites	Statutory Sites - Whilst the site is not within any statutory designated sites, it is within the secondary buffer of the Breckland Special Protection Area (SPA). In the documentation displaying Statutory sites it is important to display the Buffer zones for the Breckland SPA.	No	The Site is not located within the identified 1.5km Stone Curlew buffer zone identified by Natural England around relevant components of the Breckland SPA.
	Ecology	Habitat - Minimal impacts on habitats are anticipated, cable corridors are to use pre-existing, however, there will be some removal to make way for access points.	No	The notes this comment and can confirm there will be minimal impacts on existing habitats with removal of hedgerows largely limited to the widening of existing access points as set out within the **ES Chapter 7: Ecology and Biodiversity [APP/6.2]**, with numerous habitat enhancements proposed as set out within the **Biodiversity Net Gain Assessment Report [APP/7.4]**. Where vegetation removal is required (e.g. temporary vegetation works to facilitate OHL alignment and/or crossings required for new Access Tracks, perimeter fencing and Cabling – as identified within the **oLEMP [APP/7.11])** this will not result in any permanent removal of

				woodland habitats. Impacts upon these habitats is considered within the **ES Chapter 7: Ecology and Biodiversity [APP/6.2]**.
	Ecology	Protected Species - Most of the species are not anticipated to have any significant adverse (excluding Reptiles) effects, however, this is reliant on information that will be present in the ES.	No	Survey work for protected species has been finalised and the results are included within the **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** and appendices, which indicate no significant (in EIA terms) adverse effects as a result of the Scheme.
	Biodiversity	Biodiversity Net Gain – No Biodiversity Net Gain (BNG) information has been submitted, however BNG is proposed to be applicable in May 2026 Biodiversity net gain for nationally significant infrastructure projects - GOV.UK. Further work is needed on BNG and this should involve early discussion with Norfolk County Council; Breckland District Council; and King's Lynn and West Norfolk Borough Council.	No	The Applicant also notes that mandatory Biodiversity Net Gain remains to be implemented (currently anticipated May 2026), albeit the Scheme will deliver over 10% BNG as calculated within the Statutory BNG metric. The **Biodiversity Net Gain Assessment Report [APP/7.4]** has been submitted with the DCO Application.
	Ecology Impact on local amenities / recreational activities	There are numerous deer in the area and there is a potential for these to be corralled along tight corridors if appropriate space isn't provided for the herds to move around safely without impacting on walking or cyclists.	No	The operational area of the Scheme will be enclosed within perimeter fencing; however, dispersal impacts are not anticipated owing to the incorporation of above ground clearances and mammal gates. Further, the perimeter fencing will be set back from the boundary habitats retained as part of the embedded mitigation.
	General comment	2.2.2 Should have any queries with the above comments please contact [redacted]	No	The Applicant notes this comment and point of contact.
	Scheduled monuments / archaeology / heritage sites	2.3 Archaeology 2.3.1 The Historic Environment team have the following comments to make, regarding Volume I, Chapter 8: Cultural Heritage and Archaeology of the PEIR:	No	The Applicant notes this and responds to the comments below.
	Intra Project Cumulative impact Scheduled monuments / archaeology / heritage sites	8.6.17, Table 8.5 The cumulative impact of piles, cable, access track, substations and other infrastructure as well as construction enablement works such as compounds and set-down areas need to be considered;	No	The Applicant notes this.
	Scheduled monuments / archaeology / heritage sites	8.6.21, Table 8.5 Prior to trial trenching the Historic Environment Team consider there is not enough information to conclude that all of the archaeological	Yes	The Applicant notes that trial trenching has been undertaken in consultation with Norfolk Historic

		remains within the very large application site are of low sensitivity;		Environment Service (NHES) and is further detailed in **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2].**
	Intra Project Cumulative impact Scheduled monuments / archaeology / heritage sites	8.6.21, 8.6.22 Cumulative Impacts on below-ground archaeological remains of all aspects of the proposed development will require mitigation, not a passive absorption of impacts;	Yes	The Applicant notes that an Archaeological Mitigation Strategy (**ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4]**) has been produced in consultation with NHES.
	Intra Project Cumulative impact Scheduled monuments / archaeology / heritage sites	8.2.22, 8.6.23 Cumulative Impacts on below-ground archaeological will require a sliding scale of differing types and levels of mitigation. There is not enough information at this stage to be prescriptive or provide sensible examples.	Yes	The Applicant notes that an Archaeological Mitigation Strategy (**ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4]**) has been produced in consultation with NHES.
	Scheduled monuments / archaeology / heritage sites	8.6.25, 8.8.4 The beneficial impacts on below-ground archaeology of taking the application site out of arable cultivation only apply to below-ground archaeological remains not cumulatively impacted by all aspects of the proposed development.	No	The Applicant notes that this is acknowledged in **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]**.
	General comment	2.3.2 Should you have any queries with the above comments please contact [redacted], Historic Environment Senior Officer (Strategy and Advice).	No	The Applicant notes this comment and point of contact.
	General comment	3. Transport / Highways 3.1 The Highway Authority have the following comments to make regarding the PEIR: Non-Technical Summary	No	The Applicant notes this comment.
	Inter project Cumulative impact	The main cumulative scheme would be High Grove Solar but happy with list in Volume 111. Appendix 2.4.	No	The Applicant notes that the approach to cumulative assessment has been agreed and is presented in the **ES Chapter 9: Transport and Access [APP/6.2].** The Applicant further notes no cumulative significant (in EIA terms) adverse effects have been identified as a result of the Scheme.
	Transport and Access	3.1.3 – S278 will be needed for new access, discussions / signing off will be required.	No	The Applicant notes that there will not be a Section 278 agreement given that the Scheme is for a DCO; however, a broadly equivalent legal agreement will be agreed with NCC and secured by way of Requirement in the DCO.
	Public Rights of Way	4.2.34 – The minimum buffer to PRoWs needs to be 15m.	Yes	The Applicant notes that the Scheme has incorporated a minimum of a 15m offset either side of PRoW that pass

				through the Order Limits. For Fincham Drove and Petticoat Drove this has been increased to 25m. These offsets are secured through the **Works Plan [APP/2.3]** and the **Design Principles, Parameters and Commitments [APP/5.8]**. An **outline Public Rights of Way and Permissive Path Management Plan [APP/7.12]** has been prepared which sets out measures of how the PRoWs that cross the Order Limits will be managed throughout the lifespan of the Scheme.
	Transport and Access	4.1.3 and 4.2.1.9 and 4.2.2.6 – It looks like no cabling will be in the highway, with all the components being kept within site. Is this correct?	No	The Scheme does not require any cabling within the highway, with all grid connection works undertaken through the Overhead Line Works, further details of which are included within **ES Chapter 5: The Scheme [APP/6.1].**
	Construction length	4.3.1 – 24 months period for construction to be started in 2031 earliest, with a 6-month pre-construction for site preparation works.	No	The Applicant this comment.
	Transport and Access	4.3.4 – AIL's to be dealt directly with Norfolk and Suffolk AIL Policing team.	No	The details on the requirements for the abnormal load deliveries will be confirmed within the future iterations of the CTMP, secured by way of Requirement in the DCO, once the abnormal load deliveries are confirmed.
	Construction impact	4.3.5 – Agree with time and days shown for the construction activities to be undertaken and avoiding traditional AM and PM peaks.	No	The restrictions on vehicle deliveries and construction operations during the construction phase of the Scheme are detailed within the outline **oCTMP [APP/7.7]**.
	Construction impact	4.3.6 to 4.3.9 – happy for CEMP and CTMP's to be submitted per phasing to minimise construction impacts.	No	The Applicant notes this.
	Construction impact	4.3.14 and 4.3.15 – happy with an oOTMP to be submitted for traffic flows during replacement infrastructure with OTMP to be submitted for highway authority to sign off.	No	The Applicant notes this.
	Decommissioning phase	4.3.23 and 4.2.24 – oDEMP and oDTMP to be submitted for decommissioning with DEMP and DTMP to be submitted for highway authority to sign off.	No	The Applicant notes this.
	Traffic and Transport	9.2.1 – Has the port been identified and routes discussed / confirmed with Norfolk and Suffolk AIL Policing team.	No	The details on the requirements for the abnormal load deliveries will be confirmed within the future iterations of the CTMP, secured by way of Requirement in the DCO, once the abnormal load deliveries are confirmed.
	Existing road infrastructure	9.2.5 – Kings Lynn is only 40km to the west.	No	The Applicant notes this.

		9.2.8 and 9.2.9 – Westacre Road, Narford Lane, Narford Road, and Southacre Road, very narrow in places. 9.2.13 recognises this.		
	Noise – construction	10.4.1 – Construction traffic noise negligible, this will need confirmation and monitoring.	No	The Applicant notes this, and construction noise assessment has been undertaken **i**n **ES Chapter 10: Noise and Vibration [APP/6.4]** which includes construction traffic noise assessment. The effects have been assessed as negligible and best practise and embedded measures, including noise monitoring in the event of complaint, have been outlined. These will be included in the **oCEMP [APP/7.6]** and **oCTMP [APP/7.7]** and secured by way of Requirement in the DCO.
	Traffic and Transport	Chapter 9 Traffic and Transport 9.2.23 – Stating that no peak time capacity assessments, as agreed with NCC but nothing stated in the document (Volume III, Appendix 9.1) to validate this.	No	The Applicant notes this comment and confirms that peak-hour capacity assessments were not required, as agreed with Norfolk County Council. Accordingly, these assessments are not included within **ES Appendix 9.2: Traffic Assessment [APP/6.4]** or **ES Chapter 9: Transport and Access [APP/6.2].**
	Traffic and Transport	9.4.6 to 9.4.9 same as 9.2.8 and 9.2.9 in Non-Technical Summary.	No	The Applicant notes this comment.
	Construction traffic	9.4.24 - Peak project traffic 622 two-way movements (526lgv/96hgv) per day. This will be 1244 movements per day.	No	Clarification provided to NCC on expected vehicle requirements, which are discussed in **ES Chapter 9: Transport and Access [APP/6.2].**
	Glint and Glare	There needs to be evidence that the solar panels will not adversely affect the highway network in respect to any potential glint and glare.	No	Advance planting has been proposed along the site boundary to screen views of the site from the A1065. This has been proposed such that the vegetation will be sufficiently mature to provide screening by the time panels are installed. Further details are set out in **ES Appendix 16.3: Glint and Glare Assessment [APP/6.4]**.
	Traffic and Transport	Table 9.6 – 25% increase worst case on A1065 45% on River Rd South is this correct with the figures shown in the table?	No	The impact of the Scheme has been confirmed to NCC and is set out in the **ES Appendix 16.3: Glint and Glare Assessment [APP/6.4]**.
	Public Rights of Way	9.6.7 - PRoW temporary closures, diversions will be required.	No	The PRoW management measures, including closures and diversions, are included in the supporting **oPRoWPPMP [APP/7.12]** and the supporting **Access and Right of Way Plan [APP/2.5].**

	Traffic and Transport	9.6.9 – there could still be off-peak restrictions depending on times that work is predicted to be carried out.	No	The restrictions on vehicle deliveries and construction operations during the Scheme's construction phase are detailed in the **oCTMP [APP/7.7]**.
	Traffic and Transport	Table 9.7 – Mentions effect significance as negligible across the board - how is this the case with the levels of traffic in 9.4.24?	No	As noted above, the impact of the Scheme has been confirmed to NCC and is set out in **ES Chapter 9: Transport and Access [APP/6.2]**.
	Inter project Cumulative impact Construction traffic	Appendix 9.3 Construction Traffic Data Accumulative traffic for other NSIPs using the A1065 have not been taken into consideration. Table 1.1 – HGV usage for the A1065 seems low for the number of HGV's and LGV's required to build / use the main access. The Highway Authority would expect traffic to be using internal routes as much as possible rather than the narrow country lanes accessing the site via A1065.	No	The Applicant notes this comment and confirms that the future baseline is described within **ES Chapter 9: Transport and Access [APP/6.2]**, with the approach to cumulative assessment set out in the same chapter.
	Construction traffic	Chapter 9 Figures Figure 9.1 Construction Vehicle Routing and Constraints - No HGVs to use link 3 on drawing.	Yes	The Applicant notes this comment and confirms that no vehicles will use Route 3, which will be secured by way of Requirement in the DCO.
	Construction impact	Figure 9.3 PRoW and Cycle Route Overview – Rebellion Way and local PRoW through site will need to be kept open or diverted during construction.	No	Further detail on the measures to mitigate against the impact to PRoW users are included within the **oPRoWPPMP [APP/7.12]**. The routes will be kept open where possible and any instances where this is not possible, suitable diversions will be agreed with Norfolk County Council, with further details provided within the **oPRoWPPMP [APP/7.12]**that is secured by way of Requirement through the DCO.
	Public Rights of Way	There are concerns about the impact on the footpaths that run through the sites and especially the Peddars Way.	Yes	The Applicant acknowledges this concern. Further details on the measures to mitigate the impact on PRoW users are included in the **oPRoWPPMP [APP/7.12]**.
	General comment	Should you have any queries with the above comments please contact [redacted], Highway Engineer NSIPs, [redacted]@norfolk.gov.uk.	No	The Applicant notes this comment and point of contact.
	Minerals and Waste	4. Minerals and Waste 4.1 As stated in the Minerals and Waste Authority's previous response to the scoping opinion for this	No	The Applicant notes and confirms this comment.

		project, the Mineral Planning Authority does not consider that the proposed development will result in needless sterilisation of safeguarded mineral resources. This is due to the temporary nature of the project, the founding methods to be used for the project, and the limited areas of safeguarded mineral resources within the project boundary.		
	Minerals and Waste Recycling	4.2 The Waste Planning Authority is pleased to note at paragraph 15.1.31 of the non-technical summary that the application will contain an assessment of the waste management capacity in the vicinity of the project boundary, and that this will consider the potential impacts from the waste quantities generated by the construction and operation of the project. A Construction Environmental Management Plan will be developed based on these assessments and will be secured through the DCO. A Site Waste Management Plan will be developed as part of an Operational Environmental Plan to address waste prevention, reuse, recycling and recovery during the Operational phase, an outline SWMP will be submitted with the DCO application. The Waste Planning Authority considers that these measures are appropriate at this stage and will comment on the details contained within the DCO application at a future date.	No	The Applicant notes this confirmation.
	General comment	4.3 Should you have any queries regarding the above comments please contact [redacted] (Senior Planner) at [redacted]@norfolk.gov.uk.	No	The Applicant notes this comment and point of contact.
	Human Health	5. Public Health 5.1 The Public Health team welcomes the inclusion of Human Health considerations in chapter 14 of the PEIR.	No	The Applicant notes this comment.
	Human Health	5.2 NCC Public Health also welcomes the mitigation measures outlined in sections 14.4, 14.4.1 and 14.5.55, including those relating to mental health, visual and dust impacts.	No	The Applicant notes this comment.
	Human Health Inter project Cumulative impact	5.3 The Public Health team supports the commitment to further review the cumulative impact of this Scheme, together with High Grove Solar Farm, in the ES.	No	The Applicant notes this comment.
	Electro-Magnetic Fields (EMFs)	5.4 The Public Health team notes that electromagnetic fields (EMFs) remain out of scope. As raised at the scoping stage, concerns surrounding	No	The Applicant makes note of this comment.

	Human Health and Safety Human Mental Health	electromagnetic fields (EMFs) can contribute to stress and anxiety in local communities. Even perceived impacts can have real effects on mental health and should be considered appropriately, as such, the Public Health team refers back to comments made in our response to the Applicant's Scoping Report.		**ES Chapter 16: Other Environmental Matters [APP/6.2]** details how Electromagnetic Fields (EMF) radiation is scoped out of the EIA as the EMF levels are predicted to be below International Commission on Non-Ionizing Radiation Protection reference levels for magnetic fields. In addition, where the Scheme has cables exceeding 132kV mitigating techniques such as minimum stand-off distances between receptors will be implemented to mitigate the risk to Human Health. It is therefore unlikely that EMF radiation would lead to significant effects on Human Health and is therefore scoped out.
	General comment	5.6 Should you have any queries with the above comments please contact the Public Health team phplanning@norfolk.gov.uk.	No	The Applicant notes this comment.
	Employment and Skills	6. Employment and Skills 6.1 The Norfolk County Council Employment and Skills team welcomes the inclusion of a Preliminary Employment and Skills Strategy (PESS) and the Applicant's early commitment to supporting local jobs, apprenticeships, education provider engagement, and green skills awareness. The team particularly note the longlist of initiatives under section 14.5 of the PEIR, including potential collaborations with local programmes such as the Careers Hub, the Boost Programme, and the Breckland Skills Assembly.	No	The Applicant notes this comment. The **oESSCS [APP/7.15]** builds on the PESS prepared at the PEIR stage and now provides further detail on potential opportunities during the operational and maintenance phase of the Scheme. The Applicant highlights that there will be job opportunities during the operational and maintenance phase, during which all onsite Solar PV panels and BESS batteries could be replaced over a 12-month period, generating an estimated 125 full-time equivalent (FTE) jobs per annum and a peak onsite workforce of around 360 personnel. This reflects the potential for substantial temporary employment and supply chain activity associated with significant maintenance or equipment replacement during operation. As outlined in Section 8 of the **oESSCS [APP/7.15]** the Applicant will seek to collaborate with key countywide and local initiatives, including the Careers Hub and Boost Programme to deliver employer encounters, internships, and career inspiration aligned with the Skills Bootcamps and relevant Adult Learning offers to support local readiness for solar construction, operations, and maintenance; and local colleges and training providers, such as the College of West Anglia, East Coast College, and City College Norwich, to help deliver Level 2–3 skills in solar PV installation, BESS maintenance, and land management. An ESSCS will be prepared in accordance with the **oESSCS [APP/7.15]** and submitted prior to the commencement of construction, as required by the **draft DCO [APP/3.1]**.
	Employment and Skills	6.2 To ensure these commitments are meaningful, deliverable, and aligned with Norfolk's strategic ambitions for skills development and local labour market outcomes, the team request that the Outline Employment and Skills Strategy (OESS), to be	No	The **oESSCS [APP/7.15]** builds on the PESS prepared at the PEIR stage. It sets out the Applicant's commitment to promoting competition, innovation and skills within communities surrounding the Scheme, as well as across Breckland, KLWN and the wider county of Norfolk. It also

		submitted with the DCO Application, incorporates and clearly addresses the following:		outlines the workforce, skills, equipment and services required to deliver the Scheme, together with measures to engage relevant stakeholders.
	Employment and Skills	1. Alignment with Norfolk's NSIP Employment and Skills Framework The Council has developed a framework to guide expectations for Nationally Significant Infrastructure Projects (NSIPs) in Norfolk (see attached). We ask that the OESS responds directly to this Framework, which outlines tiered levels of commitment expected from developers, including: Supplying local labour needs across construction and operational phases. Apprenticeship starts and completions. Engagement with education (site visits, curriculum input, work experience). Employment brokerage or supply chain mapping to help connect local SMEs and jobseekers to opportunities.	Yes	The **oESSCS [APP/7.15]** sets out the Applicant's approach to promoting employment, skills, and supply chain initiatives within the communities surrounding the Scheme, as well as across Breckland, KLWN, and the wider county of Norfolk. The approach has been informed by, and developed to align with, Norfolk's NSIP Employment and Skills Framework, ensuring consistency with local priorities and good practice. At this outline stage, the document does not set out the tiered levels of commitment identified within the Framework. Instead, it establishes the overarching opportunities and actions that will guide the development of the ESSCS. Section 8 of the **oESSCS [APP/7.15]** identifies potential opportunities for employment and skills initiatives that are consistent with the Framework's key themes, including: • Maximising local labour across construction and operational and maintenance phases; • Supporting apprenticeship starts and completions; • Engaging with education providers through site visits, curriculum input, and work experience; and • Employment brokerage and supply chain mapping to connect local SMEs and jobseekers to opportunities. The ESSCS will be prepared following DCO approval and further engagement with BC), NCC, and the Borough Council of KLWN. This continued collaboration will ensure that the final strategy reflects local priorities and that specific commitments are realistic, deliverable, and proportionate to the Scheme's scale and impacts.
	Employment and Skills	2. Collaboration with Existing Programmes Specific proposals should set out how the Project will collaborate with Norfolk County Council and local skills interventions: Careers Hub and Boost Programme to deliver employer encounters, internships, and career inspiration aligned with the Gatsby Benchmarks. Skills Bootcamps or relevant Adult Learning offers to build local readiness for solar construction, operations, and maintenance. Local colleges and training providers, such as the College of West Anglia, East Coast College, and City College Norwich, e.g. for delivering relevant Level 2-	Yes	The Applicant is committed to engaging with established local programmes and initiatives to maximise the employment and skills benefits of the Scheme, working in partnership with Norfolk County Council and relevant local providers. The approach has been developed to align with Norfolk's NSIP Employment and Skills Framework and reflects the range of existing interventions identified within it. As outlined in Section 8 of the **oESSCS [APP/7.15]**, the Applicant will seek to collaborate with key countywide and local initiatives, including the Careers Hub and Boost Programme to deliver employer encounters, internships, and career inspiration aligned with the Skills Bootcamps and relevant Adult Learning offers to support local readiness for solar construction, operations, and

		3 skills in solar PV installation, BESS maintenance, and land management.		maintenance; and local colleges and training providers, such as the College of West Anglia, East Coast College, and City College Norwich, to help deliver skills in solar PV installation, BESS maintenance, and land management. This ongoing engagement will inform the development of the ESSCS, ensuring that commitments are realistic, targeted, and complementary to existing local and regional provision.
	Employment and Skills	3. Securing and Monitoring Delivery The OESS should outline mechanisms for ensuring the delivery of commitments, including: Targets for local employment and apprenticeships. A named liaison responsible for working with the County Council and local education/training providers. Participation in a Skills and Employment Monitoring Group, reporting outcomes annually.	Yes	The Applicant is committed to establishing clear mechanisms to secure, monitor, and report the delivery of commitments set out in the **oESSCS [APP/7.15]**, in line with Norfolk's NSIP Employment and Skills Framework. As detailed in Section 10, these mechanisms will include defined performance targets for local employment and apprenticeships, named liaison responsibilities for coordination with NCC and local education and training providers, and participation in an agreed skills and employment monitoring group to review progress and report outcomes on an annual basis. These arrangements will be further refined through ongoing engagement with NCC and relevant partners during the preparation of the ESSCS, ensuring that monitoring processes are proportionate, transparent, and locally aligned.
	Employment and Skills	4. Engagement with the Local Supply Chain As outlined in the PEIR, local procurement is a key part of the skills ecosystem. The OESS should detail: How local contractors and suppliers will be identified and supported to bid. A register or portal where job openings and sub-contracting opportunities will be advertised locally.	Yes	The Applicant is committed to supporting local procurement and maximising opportunities for local businesses to participate in the delivery of the Scheme, consistent with the principles of Norfolk's NSIP Employment and Skills Framework. As outlined in **Section 8.5** of the **oESSCS [APP/7.15]**, engagement will focus on identifying and assisting local contractors and suppliers to access project-related opportunities, including through engagement, market awareness activities, and collaboration with local business networks. The Applicant will also ensure that job openings and subcontracting opportunities are advertised through appropriate local channels or platforms to maximise visibility and accessibility for local SMEs. These commitments will be developed further in the ESSCS, following continued engagement with NCC and local partners.
	Employment and Skills	6.3 Norfolk County Council would welcome further engagement with the Applicant ahead of the DCO submission to help shape a targeted and deliverable OESS that ensures Norfolk's residents and businesses benefit from the opportunities this Project presents.	No	The Applicant is committed to maintaining active engagement with Norfolk County Council following DCO submission to ensure the continued development and delivery of a targeted and effective **oESSCS [APP/7.15].**

	Employment and Skills	6.4 Should you have any queries with the above comments please contact [redacted] (Employment and Skills Manager) [redacted]@norfolk.gov.uk NB Please see attached NCC Skills and Employment Framework for NSIPs (Excel Spreadsheet).	NO	The Applicant is committed to maintaining active engagement with NCC following DCO submission to ensure the continued development and delivery of a targeted and effective **oESSCS [APP/7.15]**.
	Land	7. Norfolk Property Services 7.1 If Norfolk County Council land is required for the proposed works, NPS would request the Applicant consults directly with [redacted] ([redacted]@norfolk.gov.uk) and [redacted] ([redacted]@norfolk.gov.uk) at NCC County Farms as landowner, with regards to timescale, method of construction, impact on NCC land and compensation.	No	The Applicant notes this comment and point of contact.
	General comment	7.2 Should you have any queries with the above comments please contact [redacted] Associate Director Planning, [redacted]@nps.co.uk.	No	The Applicant notes this comment and point of contact.
	Watercourses and Flood risk	8. Lead Local Flood Authority 8.1 For full comments, please see 'Appendix 4 – LLFA response' attached with the full schedule of their comments.	No	The Applicant notes this and confirms the inclusion of the Appendix in this response table.
	Watercourses and Flood risk	8.2 Should National Grid require any further guidance on the LLFA's expectations for information from Applicants can be found https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-watermanagement/information-for-developers; or email llfa@norfolk.gov.uk.	No	The Applicant notes this comment
	Battery Energy Storage Systems Safety	9. Norfolk Fire and Rescue 9.1 While acknowledging that the PEIR makes specific reference to an Outline Battery Safety Management Plan (OBSMP); any plan will need to be agreed by Norfolk Fire and Rescue Service (through a Planning Requirement in the final DCO). Risk control recommendations for all Battery Storage (BESS) installations should be subject to a suitable fire risk assessment and the development and production (amongst others) of the following strategies and plans: A risk reduction and mitigation strategy that covers the design, construction, installation, operation and	Yes	The Applicant notes that early engagement with the Norfolk Fire and Rescue is envisaged. All the aspects identified in the comment will be contained within the **oBSMP [APP/7.14]**. The **oBSMP [APP/7.14]** defines the proposed safety strategy, requirements, and processes necessary to meet derived safety objectives and to set a level of safety performance that the installation is to be measured against. These standards are derived from the following sources: 1. Planning Practice Guidance (PPG) for Renewable and Low Carbon Energies. 2. Fire and Rescue requirements detailed in the National Fire Chiefs Council (NFCC) Report Grid

		decommissioning phases of the project to minimise the impact of an incident. An emergency response plan in consultation with Norfolk Fire & Rescue Service, which details site specific information regarding the hazards, locations of hydrants or stored water supplies, electrical isolators, measures to be taken during an incident and responses required post incident. Coordination should also include regular onsite training and familiarisation for operational fire service personnel. An environmental impact and risk assessment must be completed. This must include firefighting water run-off including containment and treatment as necessary. Air pollution must also be considered. A transport strategy to minimise the impact of additional vehicle movements and prevent an increase in the potential number of traffic incidents, especially in largely rural settings.		Scale BESS Planning – Guidance for Fire and Rescue Service (FRS). 3. Factory Mutual (FM) Global Loss and Prevention Datasheet 5-33. The OBSMP also provides the basis for the safety management processes and procedures required to satisfy the identified safety requirements for a BESS system capability. A preliminary safety hazard identification and analysis has been conducted for the BESS installation, based on energy storage systems utilising Lithium Ferrous Phosphate (LFP) battery technology. This has identified the likely hazards and causes associated with an installation of this desing and size, and has facilitated the initial identification of potential control measures. When implemented, these measures are expected to reduce the associated risks to an acceptable level. All identified hazards and corresponding mitigations have been documented in the Scheme-specific Hazard Log (HL).
	Battery Energy Storage Systems Safety	9.2 Where appropriate, these plans should be supported with specific fire tests. Property insurers should be involved at an early stage in discussions to agree on a suitable fire strategy for BESS installations. The potential for both property loss and business interruption should be considered. The fire protection and mitigation strategy should be determined on a case-by-case basis, based on battery technology type, BESS site location, layout, compartment construction, system criticality, and other relevant factors. It should be multilayered and include a combination of; good design, thermal runaway avoidance, early detection, and automatic suppression. Manual fire control provision and planning, including water supplies, should be commensurate with BESS and other site fire hazards.	No	The Applicant notes that BESS units to be used will have undergone UL9540 testing, including large scale burn testing, and have the appropriate certification. Requirement details are contained within the **oBSMP [APP/7.14]** and certification will be provided in the Detailed Battery Safety Management Plan.
	Battery Energy Storage Systems Safety	9.3 Specific risk control measures to help minimise the risk or consequence of BESS fires include: BESS rooms and buildings shall be dedicated-use, i.e. not used for any other purpose and accessible only by those required to operate, maintain, test, or inspect the BESS equipment.	No	The Applicant notes that all infrastructure on site will have a dedicated use and the BESS compound will be secured and monitored 24/7 via CCTV. **ES Chapter 5: The Scheme [APP/6.1]** sets out further details of the proposed security measures.

	Battery Energy Storage Systems Safety	Locate BESS systems in non-combustible containers or enclosures at least 3 metres from other equipment, buildings, structures, and storage. This distance shall only be reduced when: a) a suitable fire-barrier (minimum 1-hour fire rated) is installed between the BESS unit and exposed buildings/ structures, b) exposed surfaces (typically exposed walls) are fire-resisting and blank (i.e. no openings), or c) BESS enclosures are constructed with fire resisting blank walls and roofs.	No	The Applicant notes that the BESS unit separation will be a minimum of 3.0m
	Battery Energy Storage Systems Safety	Walk-in containers and other enclosures used to house BESS equipment should not exceed the dimensions of long “high cube” shipping containers, i.e. maximum dimensions, 16.2m long, 2.6m wide, 2.9m high.	No	The Applicant notes that the selection of the BESS and other infrastructure will align with these size requirements.
	Battery Energy Storage Systems Safety	BESS systems should be at least 15 metres from building HVAC air inlets.	No	The Applicant notes that there will be no ‘buildings’ in the BESS compound with HVAC systems other than other BESS units, which are unoccupied enclosures as opposed to buildings.
	Battery Energy Storage Systems Safety	Where installation of BESS equipment in rooms forming part of buildings with other occupancy types cannot be avoided, these should be separated from other areas by minimum 2-hour fire rated construction.	No	The Applicant notes that the BESS units are standalone enclosures – the ability to ‘occupy’ is not possible. Access to the internal sis via external doors, they will not be of the walk-in type.
	Battery Energy Storage Systems Safety	The Battery Management Storage (BMS) should be configured to monitor potential failure conditions that could lead to a thermal runaway and shut down and isolate BESS units where any such conditions are detected.	No	The Applicant notes that the BESS BMS is semi-autonomous and will self-shut down. The BESS operating data is also monitored off-site 24/7 and can be remotely isolated.
	Battery Energy Storage Systems Safety	For critical and significant BESS installations, install early detection of off gases/electrolyte-vapour from thermal runaway events, interlocked to shut down and disconnect the BESS. This may be combined with deployment of an extinguishing agent flooding system (based on the fire control strategy).	No	The Applicant notes that the BESS BMS is semi-autonomous and will self-shut down. The BESS operating data is also monitored off-site 24/7 and can be remotely isolated. All BESS units will be fitted with a bespoke Fire Detection and Suppression System.
	Battery Energy Storage Systems Safety	Provide smoke detection systems for all BESS equipment rooms and compartments, interlocked to shut down and disconnect the BESS. This may be combined with deployment of an extinguishing agent flooding system (based on the fire control strategy).	No	The Applicant notes that the BESS units will be fitted with a bespoke Fire Detection and Suppression System. Outline details are contained within the **oBSMP [APP/7.14]**
	Battery Energy Storage Systems Safety	BESS areas within sprinklered buildings and all BESS installations where sprinkler protection forms part of the fire strategy, should be provided with	No	The Applicant notes that the BESS units will not be placed in a building.

		sprinkler protection, designed to provide a minimum density of discharge of 12.2mm/min over an assumed fire area of 230m2 (or area of room if smaller).		
	Battery Energy Storage Systems Safety	BESS rooms and enclosures should be provided with suitably designed explosion overpressure venting.	No	The Applicant notes that the BESS units will be fitted with an active ventilation system and deflagration ports.
	Battery Energy Storage Systems Safety	Suitable procedures shall be implemented to routinely inspect and test BESS thermal runaway and fire mitigation alarms and systems. Greater separation distances may be appropriate from critical buildings and installations and to meet specified strategic spatial fire separation expectations. Note: Whilst automatic fire suppression is unlikely to extinguish fire in individual battery cells that are undergoing thermal runaway, fire suppression can reduce fire intensity and assist in slowing and limiting fire propagation across battery modules and racks. It may be acceptable to reduce some of the above risk control measures where large-scale testing, such as testing to UL9540A or equivalent, demonstrates that adjusted mitigation measures are adequate.	No	The Applicant notes that the infrastructure will be subject to routine checks and maintenance along with annual safety audits. Outline details are contained within the **oBSMP [APP/7.14].**
	Battery Energy Storage Systems Safety	Ensure that sufficient water is available for manual firefighting. An external fire hydrant should be in close proximity of the BESS containers. − The water supply should be able to provide a minimum of 1,900 l/min for at least 2 hours (dependent upon the design). Further hydrants should be strategically located across the development. These should be tested and regularly serviced by the operator. If insufficient flow is available then stored firefighting water must be provided to supply this design requirement.	No	The Applicant notes that the Site design will include either suitable access to fire hydrants or an Emergency Water Supply with a minimum 228,000 capacity.
	Battery Energy Storage Systems Safety	The site design should include a safe access route for fire appliances to manoeuvre within the site (including turning circles). An alternative access point and approach route should be provided and maintained to enable appliances to approach from an up-wind direction.	No	The Applicant notes that Site access roads and internal service roads will be subject to Swept Path Analysis using DB32 Fire Appliance specifications. Outline details are contained within the **oBSMP [APP/7.14]**
	Battery Energy Storage Systems Safety	The emergency response plan should be maintained and regularly reviewed by the occupier and any material changes notified to NFRS. Relevant Health & Safety signage must be provided which offers warning of any hazards and risks at the site.	No	The Applicant confirms that the Emergency Response Plan will be subject to annual review.

	Emergency access	9.4 Where plans make use of photovoltaics panels across multiple sites, the design of the development should consider ways to contain and restrict the spread of fire through adequate separation between the panels. It should include a safe access and egress routes for fire appliances to be able to reach the structures. Ideally an alternative access point and approach route should be provided to counteract any prevailing winds that may hamper firefighting operations. Its design should meet the latest required standards in electrical safety and consider at all times any design developments in electrical safety such as failure cut out and safety switches at the location of the panels and any interconnecting equipment to other sites, substations and energy storage sites. There should be a regime of regular maintenance to the panels to reduce the risk of fire, such as regular inspection, cleaning and temperature checks which may give early warning of failure to a panel. Should there be areas of vegetation surrounding the panels, it should be well kept and not left to overgrow, which could increase the chances of fire spread should a fire occur.	No	The Applicant confirms that solar PV Arrays across the Fields will form an element of the design.
	Emergency access	9.5 Should any of these recommendations be omitted from the design of the development without explaining the reasoning or no reasonable effort made to meet the recommendations by alternative measures to minimise any impacts during an Emergency situation then the Emergency response expected from Norfolk Fire and Rescue Service may not go as expected, which could lead to a detrimental outcome at the development and its surrounding areas.	No	The Applicant notes this.
	Consultation and engagement	9.6 The Applicant will need to consult with Norfolk Fire and Rescue Service (NFRS) regarding any potential on-going work needed post completion with regard to the inspection of sites (BESS facilities). Any costs associated with this proposal as it affects NFRS on-going work will need to be met by the Applicant; along with any facilities required such as a new fire station or appliances. This should be covered through an accompanying legal agreement.	No	The Applicant notes this and welcomes further engagement with Norfolk Fire and Rescue Service.
	General comment	9.7 Should you have any queries with the above comments please contact: [redacted] @norfolk.gov.uk.	No	The Applicant notes this comment and point of contact.
	Introduction	Thank you for your consultation on the above site, received on 21 May 2025. We have reviewed the submitted information and wish to make the following	No	The Applicant notes this comment and thanks the LLFA for its comments.

Norfolk County Council LLFA Response		comments on the Preliminary Environmental Information Report (PIER) (May 2025).		
	Programme	The Droves Solar Farm PEIR - May 2025 PEIR Chapter 1 The LLFA notes the proposed development's programme, or a summary of the programme is not included within the PEIR. However, a weblink to a completely separate document is provided in the footnotes of page 6 but is not included in the submission. Therefore, the evidence base for the proposed timescales is lacking. Further work is required.	No	The Applicant notes this comment and considers that the feedback received from the LLFA has been adequately addressed within **ES Chapter 12: Water Resources [APP/6.2]**, with updates made as appropriate.
	Watercourses and Flood risk	PEIR Chapter 2 In relation to section 2.5.26, the Applicant is meant to be discussing receptor groups identified in this PEIR. However, not all the bullet points identify receptor groups. For example, in the bullet point for water resources and ground conditions identifies ""land at risk of flooding land quality/soils"". These are well defined and should be given further consideration. In addition, water resources and flood risk are different areas of consideration just like water resources and ground conditions are very different topics. Further consideration and information is required.	No	The Applicant notes this comment and considers that the feedback received from the LLFA has been adequately addressed within **ES Chapter 12: Water Resources [APP/6.2]**, with updates made as appropriate.
	Watercourses and Flood risk	In section 2.5.29, it is not clear to the LLFA whether the "Land at risk of flooding" includes surface water runoff from the proposed development. Clarification is required.	No	The Applicant notes this comment and considers that the feedback received from the LLFA has been adequately addressed within **ES Chapter 12: Water Resources [APP/6.2]**, with updates made as appropriate.
	Inter project Cumulative impact Watercourses and Flood risk	In Table 2.1 on the Cumulative Effects Assessment Approach, the Applicant states that in stage 1 and 2 only existing or approved developments will be considered in the cumulative effects in relation to the scheme. However, this definition will exclude the consideration of the cumulative effects with the proposed High Grove Solar Farm that directly surrounds this application for the proposed Droves Solar Farm. As both schemes have a very similar programmes, they have the potential to be constructed at a similar time. The effects on these schemes therefore should be considered in the Cumulative Effects Assessment rather than in isolation. This is of particular interest to the LLFA as the construction phase for each scheme poses significant potential for flood risk. Further information is required.	No	The Applicant notes this comment and considers that the feedback received from the LLFA has been adequately addressed within **ES Chapter 12: Water Resources [APP/6.2]**, with updates made as appropriate.

	Watercourses and Flood risk	PEIR Chapter 3 The LLFA notes that in sections 3.2.46 to 3.2.47, the two short sentences do not consider all sources of flood risk for the site. The LLFA in accordance with NPPF requires that all sources of flood risk are considered. Further information required.	No	The Applicant notes this comment and considers that the feedback received from the LLFA has been adequately addressed within **ES Chapter 12: Water Resources [APP/6.2]**, with updates made as appropriate.
	Watercourses and Flood risk	PEIR Chapter 4 The LLFA notes that in section 4.3.21, the Applicant again refers to the incomplete consideration of flood risk on the proposed site. Further work and information is required.	No	The Applicant notes this comment and considers that the feedback received from the LLFA has been adequately addressed within **ES Chapter 12: Water Resources [APP/6.2]**, with updates made as appropriate.
	Watercourses and Flood risk Indicative siting zone for Battery Energy Storage System and Customer Substation Indicative siting zone for National Grid Substation	The LLFA notes that at this time the Applicant has not agreed with National Grid as to where the National Grid Substation, the Customer Substation and the BESS are to be located within the development. Later in Chapter 5 in figure 5.1 a master plan is provided that provides indicative locations that the Applicant is suggesting to the National Grid although this is yet to be confirmed with National Grid. This does limit the confidence for the PEIR to consider the proposed scheme when the location of significant elements are not confirmed in the proposal. The LLFA notes in section 4.5.8, there has been minimal consideration to flood risk and other environmental constraints in the selection of alternative sites for the Substations and BESS. The LLFA requires further information.	No	The Applicant notes this comment and considers that the feedback received from the LLFA has been adequately addressed within **ES Chapter 12: Water Resources [APP/6.2]**, with updates made as appropriate.
	Watercourses and Flood risk	On review of the figure supporting Chapter 4, it is noted in Figure 4.2 Environmental Features - Flood Zones and Ecological Designations there is no consideration of surface water flood risk or other sources of flood risk. NPPF is clear it is requirement that all sources of flood risk need to be considered for the assessment and sequential testing. At present, it is not clear whether this work has been undertaken or not as there is no reporting of the consideration of other sources of flood risk. Further information is required.	No	The Applicant notes this comment and considers that the feedback received from the LLFA has been adequately addressed within **ES Chapter 12: Water Resources [APP/6.2]**, with updates made as appropriate.
	Access	PEIR Chapter 5 The LLFA notes in section 5.1.4, the Applicant provides a high level list of features to be included within proposed scheme. On some of the features it is clear they are either temporary or permanent works. However, some elements could be considered as “either”, such as access tracks and highway works. The LLFA seeks clarification on the nature of all	No	The Applicant notes this comment and considers that the feedback received from the LLFA has been adequately addressed within **ES Chapter 12: Water Resources [APP/6.2]**, with updates made as appropriate.

		works to ensure a clear understanding is obtained. Clarification is required.		
	Watercourses and Flood risk Soils	The LLFA is aware the Applicant is still developing their design approach. The LLFA notes in section 5.2.7, the potential need to use ballast slabs in some areas where driving the mounting pole into the ground is not possible. The LLFA notes that should the ballast slabs be required then the surface water runoff from the ballast slabs would need to be attenuated due to the increase in impermeable area that is associated with them. Further information is likely to be required.	No	The Applicant notes this comment and considers that the feedback received from the LLFA has been adequately addressed within **ES Chapter 12: Water Resources [APP/6.2]**, with updates made as appropriate.
	Watercourses and Flood risk Soils	In sections 5.2.8 to 5.2.15, the LLFA notes the increase in impermeable area associated with the invertor units and the switch rooms. However, there is no mention of sustainable surface water management from these structures. The LLFA in accordance with NPPF requires there to be no increase in flood risk from the proposed development on site or elsewhere. Further information is required on the proposed surface water management for these units.	No	The Applicant notes this comment and considers that the feedback received from the LLFA has been adequately addressed within **ES Chapter 12: Water Resources [APP/6.2]**, with updates made as appropriate.
	Watercourses and Flood risk Soils	The LLFA notes that in the description of both the Customer Substation (sections 5.2.18 to 5.2.20) and the National Grid Substation (5.2.20 to 5.2.31), the management surface water runoff has not been discussed. In Table 5.2, the Applicant further notes that the base is likely to consist of hardcore over substrate. Due to the nature of this construction, it is understood to be an impermeable area that would have an increased rate of surface water runoff. The LLFA in accordance with NPPF requires there to be no increase in flood risk from the proposed development on site or elsewhere. Further information is required on the proposed surface water management for these units.	No	The management of surface water for all aspects of the Scheme is outlined in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]**.
	Watercourses and Flood risk Soils	Section 5.2.36 to 5.2.43 provides a description of the proposed BESS facility. However, there is no discussion on the required surface water runoff management. The LLFA notes that both on this component and the other previous components there has been no mention of surface water drainage and attenuation to prevent an increase in surface water flood risk. In Table 5.2, the Applicant further notes that the base is likely to consist of hardcore over substrate with concrete bases for the BESS equipment. Due to the nature of this construction, it is understood to be an impermeable area that would	No	The management of surface water for all aspects of the Scheme is outlined in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]**.

		have an increased rate of surface water runoff. While it is appreciated by the LLFA that the proposed development is at an early stage in the design process, there should some acknowledgement and commitment to the management of surface water flood risk and the provision of suitable space for appropriate drainage features to demonstrate there are measures in place to prevent an increase in flood risk. Further information is required.		
	Watercourses and Flood risk Soils	Again, in relation to the proposed site access (sections 5.2.50 to 5.2.52), there has been no mention of the surface water management arrangements to ensure there is no increase in flood to the existing road or elsewhere. Further information is required.	Yes	The **oCEMP [APP/7.6]** outlines that drainage features, such as cross drains, will be installed at the site access points to limit the potential for surface water to be transferred to the A1065.
	Watercourses and Flood risk Soils	In sections 5.2.53 to 5.2.54, the LLFA welcomes the commitment to include surface water drainage features alongside the proposed access tracks. The LLFA requires commitments similar to this on other components of the proposed scheme as stated in previous comments.	No	The Applicant notes this. Drainage commitments for other aspects of the Scheme are outlined in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4].**
	Operational Phase	In section 5.4, the LLFA notes the discussion how to calculate the development capacity and the NSIP threshold of the capacity. However, the LLFA is unclear what the capacity was estimated to be for the proposed development in this section. Clarification is requested.	No	The Applicant notes this comment and confirms **ES Chapter 5: The Scheme [APP/6.1]** generating capacity of the Scheme and the parameters used for assessment.
	Watercourses and Flood risk Construction impact	In relation to the construction phase of the development described in section 5.5, the LLFA notes the potential for significant areas of hardstanding and impermeable surfacing during the estimated 3 year construction period between 2031 and 2033. However, there is no consideration or commitment to attenuating and managing the surface water runoff from the temporary construction works. The LLFA in accordance with NPPF requires there to be no increase in flood risk from the proposed development on site or elsewhere for the lifetime of the proposed development. This includes the construction phase of the development. Further information and commitment is required.	Yes	Measures to manage surface water runoff during the construction phase are outlined in the **oCEMP [APP/7.6]** and includes measures such as perimeter drains, cross drains and trackside drains, check dams and settlement lagoons. This will be secured through a Requirement of the DCO.
	Watercourses and Flood risk Construction impact	In section 5.5.6 to 5.5.11, the Applicant confirms their intension and commitment to prepare a construction environmental management plan (CEMP) and a construction Traffic Management Plan (CTMP). While the LLFA is supportive of these plans, the LLFA notes	Yes	Measures to manage surface water runoff during the construction phase are outlined in the **oCEMP [APP/7.6]** and include measures such as perimeter drains, cross drains and trackside drains, check dams and settlement

		there is no commitment to prepare a construction surface water management plan as required in the LLFA's Developer Guidance. The LLFA requires commitment at this stage to produce the construction Surface Water Management Plan to support the ES. Further information is required.		lagoons. This will be secured through a Requirement of the DCO.
	Watercourses and Flood risk Additional environmental mitigation, enhancement and protection suggestions	Informative - In relation to section 5.5.12, the Applicant should note that surface water drainage systems in the operational and construction phases will require maintenance. The LLFA notes the Applicant's comments in sections 5.5.13 to 5.5.17 regarding the type of vehicles expected for the maintenance of the operation phase. In relation to the maintenance access for sustainable drainage systems and ordinary watercourses, the LLFA Developer guidance is clear that access or buffer strip should be at 3.5m wide. The LLFA requires commitment to be required to this minimum maintenance buffer strip width. Further information is required.	No	Maintenance requirements for SuDS are outlined in t**ES Appendix 12.2: Flood Risk Assessment [APP/6.4]** and will be secured through by way of Requirement in the DCO.
	Decommissioning phase	The LLFA notes that in section 5.5.25, the Applicant has confirmed the decommissioning process would involve the removal of the PV panels and mounting structures, above ground cabling, conversion units, switch rooms, fencing, ancillary infrastructure, BESS, and customer substation but not the underground cables, access tracks and site access points, the national grid substation, pylons, overhead lines or sealing end compound. It is indicated that substations would be handed over to the Distribution Network Operator or landowner. Therefore, these elements are shown to have a longer design life and are considered to be permanent, rather than temporary, for the proposed development design life previously stated as "60 years." In section 5.5.24, the LLFA notes the Applicant indicates the intention to potentially retain some of the temporary operational access tracks to be "discussed and agreed with the landowners at the time of decommissioning." The reasons for retaining these structures when the rest of the site is decommissioned has not been made clear in the information provided in the PEIR. Therefore, the LLFA will require that all elements and aspects of the proposed development identified as not being removed as part of the decommissioning process should be considered as permanent features and designed appropriately. Many of these features will have a significant impact on the surface water runoff and an improved surface water management design will be required. The LLFA requires that all temporary structures that are likely to remain are identified at this early stage and an appropriate	No	Any infrastructure which remains onsite following the decommissioning of the wider Scheme will also retain the drainage infrastructure which serves it. For example, should tracks be retained for use by the landowner, then the trackside drainage committed to in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]** will be retained, ensuring runoff is controlled.

		permanent design is prepared. Should the Applicant not be able to identify these additional permanent structures at this time, such as culverts, the LLFA recommends the application of a precautious approach to all structures that this situation could apply to. This would involve preparing permanent designs that can then be reduced to temporary designs at a later stage. Further work and information is required.		
	Watercourses and Flood risk	PEIR Chapter 12 The LLFA notes there are a number of points that require further consideration and information in Chapter 12 of the PEIR assessment where they have been carried through from the FRA. Therefore, the LLFA requires the Applicant to review the FRA comments beforehand as these will also apply to the PEIR chapter in addition to these subsequent comments.	No	The Applicant notes this.
	Watercourses and Flood risk	In section 12.2.14 in Table 12.2, the Applicant defines the framework for determining the sensitivity of receptors in each of the categories. The previous sections of the chapter defined the technical areas that were scoped in and out of the PEIR. The surface water flood risk and runoff management was scoped in. However, the LLFA notes that in Table 12.2 and Table 12.3, there is no consideration of how to determine the sensitivity of receptors and magnitude of the effect to surface water floor risk and drainage. Therefore, it is difficult to determine whether or there has been appropriate assessment and consideration in relation to this aspect at this time. Further information is required.	Yes	Non-environmental receptors, such as residential, commercial, and energy transmission sites, in close proximity to the floodplain or pluvial flow pathways, have been included in the Sensitivity Table as High-sensitivity receptors within **ES Chapter 12: Water Resources [APP/6.2]**.
	Watercourses and Flood risk	As noted in the LLFA's comments on climate change allowances in the FRA section. The proposed development straddles both the North West Norfolk Management Catchment and the Cam and Ely Ouse Management Catchment for the peak rainfall allowance climate change catchments map. Therefore, in section 12.4.39 the Applicant states the proposed development is "within the primary catchment of the River Nar." This implies there is a secondary catchment that is not identified in the PEIR or supporting documents. This would be supported by the peak rainfall allowance climate change catchments map which show the site is within two different management catchments. The LLFA requires this to be considered appropriately in the development of the surface water drainage strategy	No	Both the North West Norfolk Management Catchment and the Cam and Ely Ouse Management Catchments have the same climate change allowances for the corresponding epochs. As such, the assessments within the PEIR utilise the correct climate change allowance for peak rainfall.

		for the lifetime of the proposed development. Further information is required.		
	Watercourses and Flood risk	Applicant has indicated that there are no watercourses on site but that there are some ditches. The LLFA highlights that under the legal definition of watercourses, ditches are watercourses. The LLFA further notes the Applicant has not identified where the ditches are on and around the site. This means it is difficult for the LLFA and other risk management authorities to consider whether the PEIR's assessment is appropriate when baseline information has not been provided. Further information is required.	No	The two ephemeral ditches in Fields 29 and 30 of the CSA are shown on **Figure 12-1** to **ES Chapter 12: Water Resources [APP/6.2]**. Photographs of the ditches are provided as Images in **ES Chapter 12: Water Resources [APP/6.2].** Site observations have confirmed that they are not connected to the wider hydrological network as there are no outlets at the ends of the ditches. As discussed with the LLFA on 09/09/2025, these ditches are not classed as Ordinary Watercourses.
	Watercourses and Flood risk	In section 12.5, the Applicant states "The Scheme will utilise existing access road and tracks already in place where practicable, and this will help to minimise ground disturbance and requirement for further drain crossings." It is not clear to the LLFA what access tracks and watercourse crossing are existing and what are proposed as this information is not provided at this time. Furthermore, in paragraph 12.6.30 the Applicant states "No drainage ditch diversions are proposed as part of the Scheme." This is not possible to determine as the location of the ditches or some of the significant elements of the proposed scheme have not been confirmed. Further information is required.	No	The design of the Scheme is not fixed and as such the final crossing locations cannot be confirmed at this stage. The Concept Masterplan shows the access track has the potential to cross ephemeral ditches at two locations within Field 29 and 30 and these are indicative locations.
	Watercourses and Flood risk Soils	In section 12.6.6 the Applicant states "there are a number of 'dry channel' pathways, such as Fincham Drove and the fluvial 'gulleys' to the east of the CSA." There are no plans which show where these features are located across the site. In Paragraph 12.4.44 the Applicant states "the EA identified that a minor section in the east of the CSA shows small fluvial 'gulleys' within the crops of Field 26." The LLFA notes that these are soil erosion features from pluvial events, which demonstrate that surface water runoff significant enough to carry sediment occurs frequently. As it relates to surface water runoff, it is not clear to the LLFA why they are referred to as fluvial (fluvial means it is associated with rivers) when it clearly is not. These sections require correction and further information.	Yes	Two ephemeral ditches and dry channels are shown on **Figure 12-1** to **ES Chapter 12: Water Resources [APP/6.2].** The term 'fluvial 'gulleys'' was used by the EA in their response to scoping and as such the same terminology was used in the PEIR chapter for ease of identification. The term has been updated to ‘pluvial 'gulleys’’ to reflect the Hortonian nature of the features.
	Watercourses and Flood risk Soils	The LLFA notes that in paragraph 12.6.15, the Applicant indicates that pre-cast concrete feet could be required for isolated areas. The LLFA reiterates a previous point that a concrete base or foot would be considered as an impermeable area that would	No	Should there be a requirement to use concrete feet for the Mounting Structures then these would be localised. Measures to limit runoff in these areas would include targeted measures such as berms, bunds and shallow

		require appropriate surface water management to prevent an increase in surface water runoff. Further information maybe required in the future on this matter.		depressions to provide the required attenuation. This will be secured through a Requirement of the DCO.
	Watercourses and Flood risk Soils Indicative area for mitigation, enhancement and/or retained agricultural buildings	In paragraphs 12.6.20 to 12.6.41, the LLFA notes there is a discussion on the embedded mitigation for surface hydrology. The LLFA notes that this is the first mention of some of the mitigation measures proposed and it is not clear what they are mitigating. Furthermore, some of these embedded mitigation measures were not identified in the FRA or the scheme description of works. Therefore, it is not possible to determine whether these relate to the site or not. In addition, the baseline of the assessment and the method for the assessment (as previously discussed) do not effectively identify and define what and how is going to be assessed. Frequently the issue that is meant to be covered in one section focuses on a different issue. This adds a further layer of complexity to understanding what is being assessed and the mitigation that is being proposed. Overall, it is leading to confusion and lack of clarity over what the proposed scheme is, what the impacts could be and what the mitigation (embedded or not) is addressing. Further work and information is required to address the gaps and lack of consistency in the scheme and this PEIR. Some sentences appear to be missing key words. For example, in paragraph 12.6.39 the Applicant states "such as plastic spanning under the Access Tracks to ensure conveyance of flows." Clarification and correction is required.	Yes	The **oCEMP [APP/7.6]** provides clear embedded mitigation, based on construction good practice.
	Watercourses and Flood risk Soils Indicative area for mitigation, enhancement and/or retained agricultural buildings	In paragraphs 12.6.83 to 12.6.86, the LLFA notes the Applicant is discussing the mitigation for the increase in surface water runoff associated with the PV arrays. However, there is no discussion or consideration of other elements of the proposed development such as the substations, BESS and other supporting infrastructure which form a significant part of the development and enable the scheme to operate. Therefore, the LLFA considers the PEIR assessment to be incomplete at this time. Further work is required.	No	Runoff from the BESS is discussed in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]**. SuDS measures to serve the National Grid Substation and other built structures, such as the Conversion Units / 33kV Sub-distribution Switch Rooms, are discussed in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4].**
	Decommissioning phase Watercourses and Flood risk	In paragraphs 12.6.92 to 12.6.94, the LLFA notes that PEIR is stating that in the decommissioning phase, further infrastructure will remain in place, in addition to the infrastructure previously identified in early chapters of the PEIR. The Applicant has stated "Where infrastructure would be left in place, e.g. foundations for onsite buildings, drainage features would also remain where this is compatible with the OCEMP." Therefore, it is indicated that other than the	No	As per the recently published National standards for sustainable drainage systems (SuDS) guidance, the Higher End climate change allowance for the 2070s i.e. 40% uplift would be used to calculate the volume of storage required aspects of the Scheme such as Conversion Units / 33kV Sub-distribution Switch Rooms, Access Tracks, Customer Substation, National Grid Substation, and BESS

		PV arrays and some of the attached units, a significant amount of infrastructure would remain in place after decommissioning. This further increases the amount of permanent structures on site and would increase the associated design life and design requirements, such as applying a higher climate change to additional elements of the proposed design. Further work and information is required.		etc. It should be noted that the drainage design will be secured by way of Requirement in the DCO.
	Consultation and engagement	Appendix 12.1 - Consultation and Legislation The LLFA notes that in Appendix 12.1, the Applicant identified that consultation with PINS was undertaken. The Applicant has indicated they have provided further information regarding the surface water drainage arrangements to PINS than that which has been provided to the LLFA. Further information is required.	No	The same information provided to PINS has been supplied to the LLFA.
	Consultation and engagement	In addition, the LLFA did not observe any consultation summarised from the Norfolk County Council Consultations. The Appendix records the Planning Inspectorate, Anglian Water, the Environment Agency, Kings Lynn and West Norfolk Borough Council and Breckland District Council. Further work and information is required.	No	The Applicant notes that Norfolk County Council's response to the statutory consultation and the Applicant's consideration is provided in **ES Chapter 12: Water Resources [APP/6.2].**
	Watercourses and Flood risk	Appendix 12.2 - Flood Risk Assessment (FRA) The LLFA notes that section 1.2.2, discusses the application of climate change into the proposed design considerations for the proposed development. The LLFA notes that again, the Applicant has assessed based on the assumption of all aspects of the proposed development being decommissioned after 60 years of service. However, in section 5.5.25 of the PEIR a number of elements (including access tracks and site access points, the national grid substation, pylons, overhead lines or sealing end compound) are considered to be permanent with a design life that would extend beyond 2100. The LLFA notes there continues to be an inconsistency through the assessment and the supporting evidence base relating to the expected lifetime of the proposed development and its various elements. Therefore, two climate change allowances for the surface water runoff are to be considered. All features that are proposed to be removed after 60 years of operational life (estimated to start decommissioning in 2093) should be assessed with the central allowance for the 2070s epoch. While those with a permanent lifetime should be considered with a development lifetime of beyond 2100 and have the upper end allowances for the 1% and 3.3% AEP events for the 2070s epoch	No	For aspects of the Scheme that will remain beyond the 60-year lifespan, specifically Work No. 4: National Grid Substation and Work No. 5: Grid Connection Infrastructure (as set out in **ES Chapter 5: The Scheme [APP/6.1]**), the Upper End climate change allowance of 57% will be applied to the watercourses within the catchment. While the LLFA notes that a small section of the Scheme is located within the Cam and Ely Ouse Management Catchment, the nearest watercourse with modeled flood risk to the Order limits is approximately 3 km east and will not impact the Scheme.

		applied. Where there is uncertainty or potential overlap between the proposed design and the surface water discharge, a precautionary approach is advised and the LLFA suggests as a minimum a sensitivity test using the upper end allowance is undertaken that may lead to further mitigation and management measures being required. In addition, there has been no acknowledgment that the proposed development straddles both the North West Norfolk Management Catchment and the Cam and Ely Ouse Management Catchment for the peak rainfall allowance. The Applicant should be aware that their proposed development is located in two different management catchments and therefore two different river catchments. The LLFA requires this to be considered appropriately in the development of the surface water drainage strategy for the lifetime of the proposed development. Further information is required to resolve this inconsistency on the proposed lifetime of the development before the LLFA can fully assess whether the proposed climate change allowances are appropriate.		
	Indicative siting zone for National Grid Substation Indicative siting zone for Battery Energy Storage Systems and Customer Substation Watercourses and Flood risk	The FRA has included the Lidar data for the proposed site. The LLFA notes the Applicant is proposing to locate (subject to NGET's agreement) the national grid substation, the customer substation and BESS in the lowest areas of the proposed sites topography. The Lidar topography shows a clear valley in the landscape. The LLFA is concerned that potentially positioning the substations across or within a valley would alter the behaviour of local surface water flow routes naturally associated with the topography. The LLFA requires consideration of the potential hydrological impacts in more detail the location of the proposed substations and BESS facilities may have. Further information is required.	No	**Appendix F** of **ES Appendix 12.2: Flood Risk Assessment[APP/6.4]** provides detail on the 2D direct rainfall modelling in the location of the National Grid Substation and BESS, which shows that the Works Areas for these aspects of the Scheme are located outside the pluvial flood pathways. As previously noted, a SuDS system designed to the 1% AEP plus 40% climate change event, will serve these aspects of the Scheme, meaning there will not be an increase in surface water runoff rates outside the Order limits. Conversely, due to the use of attenuation and infiltration, there will be a reduction in the volume of water leaving the Site.
	Watercourses and Flood risk	Informative - The topography (Plate 2) along with the 1% AEP surface water mapping (Plate 6) and the OS mapping indicate there is likely to be an ordinary watercourse in the north eastern area of the site while highlighting a potential drainage path.	Yes	A description of this ephemeral linear drainage ditch is provided in **ES Chapter 12: Water Resources [APP/6.2]**, and it is also shown in **Plan 12-7** of **ES Appendix 12.2: Flood Risk Assessment [APP/6.4].**
	Watercourses and Flood risk	In section 30 the Applicant highlights that some initial surface water modelling has been undertaken and some of the high level details of the hydraulic model are provided in Table 1 and the high level results are shown in Plate 7. However, no detailed hydraulic modelling report has been provided to support the modelling undertaken. Therefore, it is not possible for the LLFA to comment on the suitability of the	Yes	A Hydraulic Modelling Report is provided as **Appendix F** of **ES Appendix 12.2: Flood Risk Assessment [APP/6.4**], and includes all relevant information relating to the 2D pluvial flood model.

		evidence base or the results at this time. Table 1 also shows that an inappropriate climate change allowance of 25% has been applied to the hydraulic modelling. This is the central allowance and as previously discussed as the substations, access tracks and other infrastructures that is proposed to be located within the valley of the ordinary watercourses, the hydraulic model should be applying a 40% allowance to the surface water model. The LLFA require a hydraulic modelling report with a suitable amount of detail to be provided. Further information is required.		
	Watercourses and Flood risk Soils	In section 2.2.1 of the FRA, the Applicant states that "The CSA is in agricultural (arable and pastoral) use and is free draining, however it has been observed that some areas in the north of the CSA are prone to generating surface water run-off during extreme or prolonged rainfall events and these area are associated compaction from pig and poultry farming, as shown in Plate 9." The LLFA notes that without infiltration testing it is not possible for the infiltration rate to be determined. Furthermore, Plate 9 only shows the areas of pig paddocks and there is not comparable photos provided for arable areas. Therefore, the assumption in the FRA is based on incomplete information. Further information is required to demonstrate the infiltration rates.	Yes	Infiltration testing was undertaken at nine test locations in July 2025. All test pits, except one location, showed the underlying geology to permit drainage at a rate suitable for infiltration SuDS. Infiltration testing results are presented in **Appendix B** of **ES Appendix 12.2: Flood Risk Assessment [APP/6.4].** Additional photographs of arable areas are provided in **ES Chapter 12: Water Resources [APP/6.2]**, which shows the majority of the CSA to be free draining.
	Indicative siting zone for Battery Energy Storage Systems and Customer Substation Watercourses and Flood risk	In paragraph 53 to 54 the Applicant states that "Solar PV Arrays will avoid areas of modelled pluvial flood risk." The LLFA notes that while this is true the Applicant is proposing to place the substations and BESS potential within and adjacent to the areas of surface water flood risk. Further information is required.	No	The LLFA should note that the Scheme, as with most solar DCO applications, is not a fixed design and the final design will be presented following the granting of the DCO. As such, the Design Principles are secured through the recommendations of **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]**, which is informed by the 2D rainfall modelling.
	Grid connection infrastructure Watercourses and Flood risk	The LLFA note the comments in paragraphs 56 to 57 that states "Areas of cable trench excavations will not be left open for considerable periods of time therefore limiting the potential interaction with surface water." At present the location of the cable trench is not defined and therefore it is not possible to assess. In addition, while a cable trench might be anticipated to be open for a limited time during construction, the considerations leading to the assumption that it will be negligible have not been laid out. For example, how long will a trench be open, where and at what time of year. While in section 2.2.3 the BESS units and the flood risk is discussed, there is no discussion on the substations. The location of these features is yet to be determined. As the location of each of these features interacts with the others, it is difficult for the	Yes	Cabling locations are not defined at this stage however it is anticipated that Cabling will be laid immediately adjacent to Access Tracks. Indicative crossing locations are shown on Figure 12-2 of **ES Chapter 12: Water Resources [APP/6.2].** Overlap of the potential areas for individual aspects of the Scheme, such as the BESS and the National Grid Substation was presented at the PEIR stage. The areas have now been defined and an assessment of the risk of flooding to these areas is presented in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]**.

		flood risk to these features to be assessed with confidence at this time. At present the flood risk assessment is trying to assess some of the individual elements of the site. However, as there is only vague information and not all elements are discussed the LLFA has limited confidence in the incomplete assessment based on incomplete scheme information. Further information is required.		
	Indicative siting zone for Battery Energy Storage Systems and Customer Substation Watercourses and Flood risk	The LLFA notes that in section 2.2.3 in paragraph 60 the Applicant indicates that each of the modular buildings that contain the BESS units are proposed to be placed 100mm above the ground level. The LLFA Developer Guidance is clear that the finished floor levels for building and key infrastructure should be at least 150mm above the finished ground level. Therefore, these modular buildings will need to be raised a further 50mm to achieve the 150mm freeboard. Further work is required.	Yes	The EA have requested that if BESS units are located within the modelled 1% AEP flood event plus 40% CC allowance during the detailed design stage, then they should be raised 300 mm above the flood level. As this is a more conservative design scenario, the suggestion from the EA has been incorporated into **ES Appendix 12.2: Flood Risk Assessment [APP/6.4].**
	Indicative siting zone for Battery Energy Storage Systems and Customer Substation Watercourses and Flood risk	In section 2.4.2, the Applicant states that "a small footprint of the Scheme located within a pluvial flow pathway." The Applicant goes on to state that "the BESS units and Customer substation area has a minor section located within a pluvial flow pathway which has a modelled depth of less than 0.3 m." The LLFA is concerns about the potential impact the development would have on the flood risk should the current flood flow path and its associated storage be reduced or disrupted. There is concern that should this site block or reduce the flood flow path there would be an increase in surface water flood risk both on site and disruption to the existing flow patterns in the sub-catchment. Further information is required to demonstrate there is no increase in flood risk to the proposed development and elsewhere.	Yes	As outlined during a meeting with the LLFA on 09/09/2025 there is a shallow pluvial flow pathway modelled to drain through Work No. 2: BESS and Work No.3: Customer Substation. The detailed design of the Scheme will take account of this pluvial pathway seeking to avoid placing infrastructure within it. It should be noted that there is a commitment to a SuDS system for Work No.2 to 4 which will be designed to the 1% AEP plus 40% climate change allowance event, meaning that the current pluvial pathway would enter the drainage system, rather than flow across the surface of the Scheme. Additionally, the indicative siting zone for the National Grid Substation has been refined since PIER (now Work No 4) and is no longer located within the modelled pluvial flow pathway. This is shown on Figures A12-1-8 of **ES Appendix 12.2: Flood Risk Assessment [APP/6.4].**
	Watercourses and Flood risk	In section 2.4.2 the Applicant states "Hardstanding areas will be served by surface water drainage infrastructure (SuDS) to limit surface water runoff to greenfield (baseline) rate up to the 1% AEP + 40% CC event." The LLFA has seen no information or evidence prior to this statement to support this statement. There has been a consistent lack of information about the surface water management features. In section 4 paragraph 141, the Applicant indicates that a surface water drainage scheme will be developed at the ES stage. However, in paragraph 143 the Applicant then states "Discharge will be throttled using a Hydro-Brake or similar flow	Yes	As outlined in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]**, the SuDS strategy at PEIR presented two cases, in the event that infiltration testing showed that disposal to ground was not viable. Infiltration testing was undertaken at nine locations onsite and confirmed that infiltration is a viable disposal route for surface water. As such, **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]** has been updated to confirm the intention to attenuate surface water for the 1% AEP + 4 40% CC event. The detailed drainage design will be secured by a Requirement of the DCO.

		restriction device" with no explanation of the proposed surface water drainage system. Further information is required.		
	Construction impact Watercourses and Flood risk	In section 3.1 in paragraph 116 indicates that the compaction of the ground from the construction activities will be outlined in the Soil Management Plan. However, as this is an issue for surface water management it should also be covered in both the construction surface water management plan and the operational maintenance plan (to ensure there is no increase in the compaction resulting in an increase in surface water runoff). Further information is required.	Yes	The measures set out in the **oSMP [APP/7.13]** will effectively manage compaction of soils and therefore runoff. As such, the **oSMP [APP/7.13]** is the most appropriate place to outline measures to avoid soil compaction during the construction phase.
	Watercourses and Flood risk	Informative - In relation to section 4 paragraph 139, the LLFA remind the Applicant of the NPPF policy requirement for no increase in flood risk onsite or elsewhere for the lifetime of the proposed development.	No	The NPPF wording in Paragraph 170 is not as prescriptive as LLFA outline regarding onsite flooding. Regardless, due to the design of the Scheme incorporating SuDS and RSuDS, flood risk will not increase onsite or offsite, as outlined in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]**.
	Watercourses and Flood risk	The LLFA notes in section 4 paragraph 138, the Applicant lists the NCC - Lead Local Flood Authority Statutory Consultee for Planning Guidance Document (Version 7.1, June 2024). However, the LLFA notes the latest version of the LLFA Developer Guidance is version 7.3 dated April 2025, which is freely available on the Norfolk County Council Water and Water Management web pages. Furthermore, while the Applicant indicates the scheme will be designed to meet the requirements including the LLFA Developer Guidance. It is therefore not clear to the LLFA, why in paragraph 140 and Plate 19 the Applicant has not calculated the greenfield runoff rate in accordance with the LLFA's Developer Guidance. The LLFA guidance clearly states the requirement to use either the FEH or ReFH2 methods for calculating greenfield runoff rates (section 12.1.6). However, the Applicant has used the older ICP SUDS/IH124 method with no robust technical justification for the applied approach. Further work and information is required.	Yes	Version 7.3 of the LLFA guidance was published after the FRA which accompanied the PEIR was authored. Given the confirmation that the Scheme will utilise infiltration to dispose of surface water rather than discharge to a watercourse / drain, the use of QBAR / greenfield rates is no longer applicable to the Scheme.
	Watercourses and Flood risk Fire safety	In section 4 paragraph 142, the Applicant discusses the need to contain firewater and prevent its release into the environment. However, in paragraph 143 the Applicant states that "Discharge will be throttled using a Hydro-Brake or similar flow restriction device." This is contradictory as while a hydrobrake does control the flow it does not act as a pollution control point without further control structures being included into the chamber design. It is not until paragraph 153 in a different section of the report that a penstock control is mentioned. At present the discussion on these aspects in these sections of the report are unclear	Yes	**ES Appendix 12.2: Flood Risk Assessment [APP/6.4]** states that in the unlikely event of a battery fire then a penstock would be used to stop firewater from being discharged from the Site - not the Hydro-Brake, as stated by the LLFA. Given the confirmation that the Scheme will utilise infiltration to dispose of surface water rather than discharge to a watercourse / drain, the use of flow restriction devices, such as vortex controls, is no longer applicable to the Scheme.

		and require better structuring and further information to improve them. Further work and information is required.		Given the confirmation that the Scheme will utilise infiltration to dispose of surface water rather than discharge to a watercourse / drain, the use of Q_{BAR} / greenfield rates is no longer applicable to the Scheme. The penstock on the attenuation chamber will close in the event of a BESS fire and sealed the basin. The hydro-brake is used to slow the flow of water once it has been tested and agreement to discharge has been granted by the EA
	Watercourses and Flood risk Fire safety	In section 4.1, there is some initial information about fire suppression for the BESS facility. However, there is no information about the fire suppression for either of the substations, both of which will have transformers and other infrastructure included onsite with specific fire control and drainage requirements. As this has not been considered, further information is required.	Yes	**ES Appendix 12.2: Flood Risk Assessment [APP/6.4]** commits to the containment of fire suppressant for Work No. 3: customer Substation and Work No. 4: National Grid Substation via dedicated sumps and tanks.
	Watercourses and Flood risk	In relation to the conclusion drawn in section 5, the LLFA notes that at present there is a significant amount of information required just to address the issues identified on the current FRA. Further information is required.	Yes	All information presented in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]** is appropriate for the conclusions.
	Watercourses and Flood risk	The LLFA also notes the Environment Agency Flood Product Data is dated 2nd September 2024. However, in the main body of the FRA in section 1.5 and 1.7 the Applicant has indicated that a different data set from the NaFRA2 work available on the website has been used. Therefore, the Applicant has inferred the Environment Agency information in the appendix is not relevant and does not support the FRA. Further information is required.	No	There is no inference that the River Nar modelling presented in both the main body of text and the Appendix to **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]** is not relevant. The NaFRA2 data has been used as a source of information to validate the River Nar modelling.
	Watercourses and Flood risk	The LLFA notes there is no schedule of ordinary watercourses provided within the PEIR and the support appendices. The LLFA requires further information to be provided.	Yes	A schedule of potential watercourse crossings is provided in **ES Figure 12.2 Indicative Watercourse Crossing [APP/6.3]**. It should be noted that the crossings would be over 'blind' ditches that are not connected to the wider hydrological network and ae therefore not classed as ordinary watercourses, as discussed with the LLFA.
	Watercourses and Flood risk	Informative - The LLFA notes there has been no mention of the need for ordinary watercourse consents that could be required for any permanent or temporary access track crossing. These would be needed for crossing on ditches as well as rivers. Further information is required.	No	Should the Access Tracks or Cabling cross an Ordinary Watercourse then consents would be sought from the LLFA prior to the construction phase, once the detailed design has been confirmed. This is secured through a DCO Requirement. It should be noted that the crossings would be over 'blind' ditches that are not connected to the wider hydrological network and are therefore not classed as ordinary

				watercourses, as discussed with the LLFA, and would not require ordinary watercourse consents.
	Watercourses and Flood risk	Further guidance on the information required by the LLFA from Applicants can be found at https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management.	No	The Applicant notes this comment

1.22 Norfolk Fire and Rescue

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Norfolk Fire and Rescue	General comment	Please see points below that we would like taken into account pre-application for this site. We would appreciate being involved in full consultation with you regarding battery management, safety systems and other fire safety concerns on the site and welcome the opportunity to set up meetings both before and during the planning application process.	No	The Applicant notes this comment and thanks Norfolk Fire and Rescue for its response to this consultation. The Applicant also confirms Norfolk Fire and Rescue's feedback has been considered in the preparation of this DCO Application and welcomes further engagement.
	Health and safety	Developers will be required to: Produce and develop a risk reduction and mitigation strategy that covers the design, construction, installation, operation and decommissioning phases of the project to minimise the impact of an incident.	No	The Applicant notes this requirement and confirms an **oBSMP [APP/7.14]** has been submitted in support of this DCO Application and sets out the safety measures proposed to be installed to reduce fire risk, as well as fire protection measures.
	Health and safety	Produce an emergency response plan in consultation with Norfolk Fire & Rescue Service, which details site specific information regarding the hazards, locations of hydrants and electrical isolators, measures to be taken during an incident and responses required post incident. Coordination should also include regular onsite training and familiarisation for operational fire service personnel.	No	The Applicant notes this comment and confirms that an **oBSMP [APP/7.14]** has been submitted in support of this DCO Application and sets out the safety measures proposed to be installed to reduce fire risk, as well as fire protection measures. The Applicant also notes it is open to further engagement with Norfolk Fire and Rescue.
	Transport and access Health and safety	Produce a transport strategy to minimise the impact of additional vehicle movements and prevent an increase in the potential number of traffic incidents, especially in largely rural settings.	No	The Applicant notes this comment and confirms a detailed Construction Traffic Management Plan (CTMP) will be implemented to manage construction traffic during the construction phase, in order to minimise disruption and implications on the wider road network surrounding the Scheme. Production of a detailed CTMP will need to substantially accord with the **oCTMP [APP/7.7]**. The **oOTMP [APP/7.9]** sets out the measures to manage traffic during the operational phase, in order to minimise

				disruption and implications on the wider road network surrounding the Scheme.
	Health and safety Battery Energy Storage Systems safety	Include in the development design appropriate automatic fire, heat, smoke and gas detection systems linked to an external alarm receiving centre and include redundancy in the design to provide multiple layers of protection. Systems should be capable of detecting off-gases in low concentrations, provide an early warning of an impending thermal runaway and trigger shut down systems to electrically isolate the individual or bank / rack of battery cells and thus avoid thermal runaway occurring in a single cell.	No	The Applicant notes that the selected BESS will be fitted with bespoke Fire Detection and Suppression Systems as secured within the **oBSMP [APP/7.14]**. The BESS will have an active ventilation system that is interlinked with off gas sensing systems and activate on the detection of explosive gases, thus keeping the enclosure below LEL. In addition, the operating data is monitored by the BESS BMS which will self-isolate on detection of cell stress, this information is also monitored 24/7 off-site and the off-site control room can remotely isolated individual BESS units.
	Health and safety Battery Energy Storage Systems safety	Include automatic fire suppression systems in the development design. Where various systems are available, the preferred system would be a remote water drenching system, as fires involving Lithium-ion batteries have the potential for thermal runaway. Any proposed system should be certified and demonstrated as effective for this application with appropriate testimonials from third party accredited testing.	No	The Applicant's BESS selection will consider aerosol-based suppression systems. Fire safety measures include spacing requirements between the BESS Containers and between the BESS compound and other infrastructure, which have also been included within the **oBSMP [APP/7.14]**. Further details of the BESS are contained within **ES Chapter 5: The Scheme [APP/6.1]**.
	Health and safety Battery Energy Storage Systems safety	Install adequate ventilation and air conditioning systems to maintain the temperature of batteries and charging equipment in the recommended safe operating range and in addition ensure the correct handling, installation and operation of lithium-ion batteries; including a pre-installation quality control inspection and removal of any batteries with visible defects or irregular voltages in accordance with manufacturer's instructions.	No	The Applicant notes that the BESS units will be fitted with Environmental Conditioning Units or Chiller Units should liquid cooled technology be selected. Fire safety measures include spacing requirements between the BESS Containers and between the BESS compound and other infrastructure, which have also been included within the **oBSMP [APP/7.14]**. Further details of the BESS are contained within **ES Chapter 5: The Scheme [APP/6.1].**
	Health and safety Battery Energy Storage Systems safety	Ensure adequate water is available for manual fire-fighting; an external hydrant should be located in close proximity to the BESS containers and the water supply should be capable of providing a minimum of 1900 l/min for at least 2 hours. Additional regularly serviced and tested hydrants should be strategically placed across the development.	No	The Applicant notes that the Site design will include either suitable access to fire hydrants or an Emergency Water Supply with a minimum 228,000 capacity. Fire safety measures include spacing requirements between the BESS Containers and between the BESS compound and other infrastructure, which have also been included within the **oBSMP [APP/7.14]**. Further details of the BESS are contained within **ES Chapter 5: The Scheme [APP/6.1].**

	Health and safety Battery Energy Storage Systems safety Transport and access	Design the development to contain and restrict the spread of fire through the use of fire resistant materials and provision of adequate separation between elements of the BESS. Any site design should include a safe access route for fire appliances to manoeuvre within the site including turning circles. An alternative access point and approach route should be provided and maintained prior to any battery installation to enable appliances to approach from an up-wind direction where necessary.	No	The Applicant notes that access to and around the BESS units will be subject to Swept Path Analysis using DB32 Fire Appliance data. Fire safety measures include spacing requirements between the BESS Containers and between the BESS compound and other infrastructure, which have also been included within the **oBSMP [APP/7.14]**. Further details of the BESS are contained within **ES Chapter 5: The Scheme [APP/6.1].**

1.23 Norfolk Rivers Internal Drainage Board

Respondent	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Norfolk Rivers Internal Drainage Board	Introduction	Overview: Thank you for consulting Norfolk Rivers Internal Drainage Board on this proposal. The proposed development site is near to the Internal Drainage District (IDD) of the Norfolk Rivers Internal Drainage Board (IDB) and is within the Board's Watershed Catchment (meaning water from the site will eventually enter the IDD). Maps are available on the Board's webpages showing the Internal Drainage District [redacted] as well as the wider watershed catchment [redacted]"	No	The Applicant thanks Norfolk Rivers Internal Drainage Board for responding to the consultation.
	Watercourses	I note that the developer has not provided a drainage strategy for the development at this consultation stage although it is stated that (i) "surface water runoff from the solar PV array will be managed through RSuDS and NFM techniques such as grassland / wildflower, which will act to bind soils, slow surface water and increase water quality compared to the baseline scenario"; and (ii) "the outline Construction Environmental Management Plan will describe water management measures to control surface water runoff and drain hardstanding and other structures during the construction, operation and decommissioning phases". We recommend that a drainage strategy is supplied, which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy. The Board would request to be consulted on the drainage strategy.	No	The Applicant notes this recommendation and confirms a SuDS, designed to the 1% AEP plus 40% climate change event, will serve these aspects of the Scheme, meaning there will not be an increase in surface water runoff rates outside the Order limits. Conversely, due to the use of attenuation and infiltration, which accords with the Planning Practice Guidance SuDS discharge location hierarchy, there will be a reduction in the volume of water leaving the Site. This is secured in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]**. The Applicant also notes that measures to manage surface water runoff during the construction phase are outlined in the **oCEMP [APP/7.6]**. The Applicant further notes that the **oCEMP [APP/7.6]** includes measures such as perimeter drains, cross drains and trackside drains, check dams and

				settlement lagoons. This will be secured through a requirement of the DCO.
	Watercourses	If it is proposed that the site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced. We would therefore recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency.	Yes	The Applicant notes this recommendation and confirms that infiltration testing was undertaken at nine test locations in July 2025. All test pits, with the exception of one location, showed the underlying geology to permit drainage at a rate which is suitable for infiltration SuDS. Infiltration testing results are presented **ES Appendix 12.2: Flood Risk Assessment [APP/6.4].**
	Watercourses	If (following testing) a strategy wholly reliant on infiltration is not viable and a surface water discharge is proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the National standards for sustainable drainage systems (SuDS). Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.	No	The Applicant notes that infiltration testing was undertaken at nine test locations in July 2025. All test pits, with the exception of one location, showed the underlying geology to permit drainage at a rate which is suitable for infiltration SuDS. As such, the drainage system will not discharge to an IDB asset or watercourse and greenfield rates are not applicable. Infiltration testing results are presented in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]**.
	Watercourses	If the development does propose to discharge water into the internal Drainage District of the IDB, the Board's consent may be required under Byelaw 3 and we would welcome consultation early in the drainage design process.	Yes	The Applicant notes this comment but confirms that the Scheme will not discharge into the internal Drainage District of the IDB.
	Watercourses National policy	The reason for our recommendation is to promote sustainable development within the Board's Watershed Catchment therefore ensuring that flood risk is not increased within the Internal Drainage District (required as per paragraph 167 of the National Planning Policy Framework). For further information regarding the Board's involvement in the planning process please see our Planning and Byelaw Strategy, available online.	No	The Applicant welcomes the recommendations set out in this response. As a result of the Scheme, flood risk within Internal Drainage District catchment does not increase, evidence of which is set out in **ES Appendix 12.2: Flood Risk Assessment [APP/6.4].** The Applicant thanks the Norfolk Rivers Internal Drainage Board for providing details of where further information can be found.
	Concluding statement	The Board would be happy to engage directly with The Droves project team for pre-application discussions, should these be beneficial.	No	The Applicant notes this and welcomes future engagement with the Norfolk Rivers Internal Drainage Board.

THE DROVES
SOLAR FARM