

The Drovers Solar Farm

Consultation Report Appendix H: Section 47 - Responses Received and Applicants Response

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1 Introduction

1.1.1 This appendix presents the Applicant's response to feedback received from Section 47 consultees during the statutory consultation. The feedback has been categorised into thematic categories based on the key topics raised by respondents. Each theme is accompanied by a summary of feedback received and the Applicant's response.

1.1.2 The thematic categories are as follows:

- Community benefit
- Connectivity
- Consultation
- Construction
- Cumulative impacts
- Decommissioning
- Environment
- Ethics and supply chain
- Indicative layout
- Landscape and visual impact
- Land use and agriculture
- Needs case
- Operational phase
- People
- Project design
- Property
- Public recreation and access



2 Community benefits

Topic	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Community benefits	On-site benefits	That rights of way and new additional permissive paths are preserved and established to boost local health and wellbeing. This could include the provision of seating, parking spots, way marking, picnic areas and public access points. Thus, the development would not be set apart from the community but the complements existing provision.	Yes	<p>The Scheme includes proposed enhancements and improvements to the local footpath network, including approximately 3.5km of new permissive paths and an area identified for publicly accessible amenity space at the edge of the plateau. The Scheme would be designed to provide education and interpretation of the solar farm site as set out within the outline Landscape Environmental Management Plan (oLEMP) [APP/7.11].</p> <p>Opportunities for the local community to engage with and learn about the natural environment will be provided. This will include the provision of informal, low-key interpretation boards at appropriate, strategic points across the Order limits that would allow the community to learn and engage with the local history of the Site and Nar Valley, and the Site's ecology. Information will also be provided on the solar farm, climate change and the benefits of renewable energy.</p>
	On-site benefits	There are two Water Treatment Plants, at West Acre and Castle Acre (both North of the river so not directly in The Drovers area). Working with Anglian Water to improve the quality of discharge water into the SSSI River Nar would be of societal benefit improving the quality of the river water. Alternatively working with landowners, AW and maybe Norfolk Rivers Trust, to install Integrated Constructed Wetlands or provide other river pollution mitigation would be beneficial. Norfolk Rivers Trust would be an excellent first point of contact.	No	<p>ES Chapter 12: Water Resources [APP/6.2] presents the findings of the EIA of effects on Water Resources as a result of the Scheme, as well as proposing measures to address the potential impacts and likely effects during the construction, operation and decommissioning phases. It concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse water effects expected across the Scheme's construction, operational and decommissioning phases on water quality, water bodies or protected areas</p> <p>Embedded scheme design measures are set out within the outline Construction Environmental Management Plan (oCEMP) [APP/7.6].</p> <p>The Applicant welcomes the opportunity to continue to work with all relevant stakeholders, including Norfolk Rivers Trust.</p>
	On-site benefits	We strongly support the inclusion of on-site green infrastructure, such as the provision of new green spaces, hedgerow for screening, grassland creation etc, as well as the provision of other wildlife habitats such as bat and bird boxes.	No	<p>The Applicant notes this comment and confirms that enhancements such as those listed are provided as part of the Scheme.</p> <p>The Applicant also notes that the design of the Scheme has sought to retain, buffer and enhance the existing on-site green infrastructure where practicable. The minimum buffers to existing onsite features are set out within the Design Principles, Parameters and Commitments</p>



				<p>document [APP/5.8]. 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].</p>
	On-site benefits	Funding wildlife corridors to link existing areas of habitats and allow wildlife and people to move across the landscape - a sunshine walk with interpretation along the way	Yes	<p>The offsets from Fincham Drove and Petticoat Drove were increased from 30m to 50m, following feedback, to provide a wider ecological corridor through the Site. The Scheme includes proposed enhancements and improvements to the local footpath network, including approximately 3.5km of new permissive paths and an area identified for publicly accessible amenity space at the edge of the plateau. The Scheme would be designed to provide education and interpretation of the solar farm site as set out within the oLEMP [APP/7.11].</p> <p>Opportunities for the local community to engage with and learn about the natural environment will be provided. This will include the provision of informal, low-key interpretation boards at appropriate, strategic points across the Order limits that would allow the community to learn and engage with the local history of the Site and Nar Valley, and the Site's ecology. Information will also be provided on the solar farm, climate change and the benefits of renewable energy.</p>
	On-site benefits	Funding a community meadows programme where donor meadows are created to provide green hay to new meadow creation sites	No	<p>The Applicant notes this comment but can confirm that funding a community meadows programme does not form part of the Scheme. However, the Applicant is committed to ensuring that local 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.</p>
	Subsidised energy	Yes. Provide free electricity to power all the public street lighting in Castle Acre, Sporle, and Swaffham.	No	<p>The effects of the Scheme on the local community in terms of socio-economic are assessed within ES Chapter 14: Socio-Economics [APP/6.2], which 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.</p> <p>At this stage, there are no plans to provide free electricity to power public street lighting locally.</p>
	Subsidised energy	Ensuring all pensioners within the impacted area never have to pay a Winter fuel bill during the project's lifetime.	No	<p>These comments are noted by the Applicant. Whilst there are no plans to provide free or subsidised electricity locally it should be noted that the effects of the Scheme on the local community in terms of socio-economic and human health are assessed within ES Chapter 14: Socio-Economics and ES Chapter 14: Socio-Economics</p>



				[APP/6.2], which 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.
	Subsidised energy	<p>In addition, we strongly recommend that there is a wider community financial benefit beyond just a modest benefit fund, which would see those who experience the greatest amenity impacts, experiencing direct financial benefits such as discounted bills.</p>	No	<p>The effects of the Scheme on the local community in terms of socio-economic are assessed within ES Chapter 14: Socio-Economics [APP/6.2], which 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.</p> <p>As acknowledged by the comment, the Applicant is proposing a community benefit fund as part of the Scheme. Should the Scheme receive development consent, to be independently administered by a local foundation and would be available for local initiatives to provide services to the community.</p>
	Subsidised energy – emails	For example, will we see a rebate on our energy bills	No	<p>There are currently no mandatory or legislative frameworks in the UK to support community benefits but voluntary guidance does exist. There are no current plans to provide subsidised energy or rebates to the local community directly as a result of the Scheme. That said, the Applicant is proposing a community benefit fund as part of the Scheme, should the Scheme receive development consent. This will be independently administered by a local foundation and would be available for local initiatives to provide services to the community which could include local energy schemes. The wider effects of the Scheme on the local community in terms of socio-economic are assessed within ES Chapter 14: Socio-Economics [APP/6.2], which 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.</p>
	Subsidised energy	<p>Community benefit. Communities which are given no choice but to host national infrastructure have a right to expect some significant proportionate community benefit. At the very least residents of the area to be affected by this scheme should be given discounted energy bills, compensation for any loss of their property value, or other community payments.</p>	No	<p>There are currently no mandatory or legislative frameworks in the UK to support community benefits but voluntary guidance does exist. There are no current plans to provide subsidised energy or rebates to the local community directly as a result of the Scheme. That said, the Applicant is proposing a community benefit fund as part of the Scheme, should the Scheme receive development consent. This will be independently administered by a local foundation and would be available for local initiatives to provide services to the community which could include local energy schemes.</p> <p>The wider effects of the Scheme on the local community in terms of socio-economic are assessed within ES Chapter 14: Socio-Economics [APP/6.2], which concludes that no residual significant effects from the Scheme on human</p>



				health are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation.
Domestic renewable energy installations	Also large solar farms cause the environmental change and temperature increase in the surround area. Enabling 115k homes to have their own solar panels and battery storage would be the best environmental solution	No		<p>ES Chapter 13: Climate Change [APP/6.2] identifies and proposes measures to address the potential impacts and likely effects on Climate Change during the Construction, Operation and Decommissioning Phases of the Scheme. The Scheme's design and integrated mitigation measures effectively address climate change risks including any temperature changes in the surrounding area. No significant climate change risks during the Construction, Operation, or Decommissioning Phases have been identified.</p> <p>Ultimately, this Scheme represents a significant contribution to the delivery of the UK Government's commitment to achieve net zero emissions by 2050. This will assist in limiting further global temperature increases.</p>
Domestic renewable energy installations	Why are the local residents and businesses not offered the option of solar panels on property rather than destroying the countryside?	No		The Applicant agrees that domestic solar should also be pursued, but that this is not able to meet the national urgent need for new generation on its own. Therefore, rooftop solar should come forward as well as, rather than instead of, large-scale ground mounted schemes such as this Scheme.
Domestic renewable energy installations	Solar panels for local schools, community centres etc?	No		The Applicant agrees that this should also be pursued alongside, rather than instead of, large-scale ground-mounted schemes to meet the national need for renewable energy generation.
Domestic renewable energy installations	Provide educational resources to schools and solar panels, batteries etc to public buildings where appropriate.	No		The Applicant agrees that this should also be pursued alongside, rather than instead of, large-scale ground-mounted schemes to meet the national need for renewable energy generation.
EV charging	Active travel? Horse riding, quad bike - e-scooter one is looking to the future.	No		ES Chapter 9: Transport and Access [APP/6.2] concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse transport and access related effects expected across the Scheme's construction, operational and decommissioning phases of the Scheme.
Educational initiatives	<p>Social value etc...could be expanded to include a holistic educational facility for folk.</p> <p>Every project needs to be thoughtfully feedback consider ""outside the box"" for the many aspects to achieve the best outcome overall.</p>	No		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 NCC 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.



				<p>As outlined in Section 8 of the outline Employment, Skills and Supply Chain Strategy (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 skills in solar PV installation, BESS maintenance, and land management.</p> <p>This ongoing engagement will inform the development of the detailed Employment, Skills, and Supply Chain Strategy (ESSCS), ensuring that commitments are realistic, targeted, and complementary to existing local and regional provision.</p>
	Educational initiatives	I think that people need to be educated in energy saving practices, food waste (especially as so many local people are opposed to the scheme on the basis of lost agricultural land - and most people throw away a lot of food), and general environmental improvements that impact us all.	No	The Applicant notes this response.
	Educational initiatives	In coordination with other developers establish a local centre of education and interpretations.	No	The Applicant is open to engagement regarding the delivery of community benefits in collaboration with other developers; however, no joint approach is committed to at this stage.
	Educational initiatives	<p>Funding the NWT Wilder Learning programme for West Norfolk we can provide more details on this if required.</p> <p>Funding research into priority species or habitats in the area</p> <p>Funding a citizen science programme to monitor new nature recovery initiatives</p>	No	<p>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 NCC 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.</p> <p>The draft Local Nature Recovery Strategy principles, where appropriate, have informed the approach to biodiversity enhancements across the Site. The oLEMP [APP/7.11] sets out specific strategies and priorities identified in the draft LNRS, of relevance to the Site, and how these have been incorporated into the Scheme.</p>
	Educational initiatives	Educational levels at 16 and 18 are below the national average, as is the level of Higher Education attendance. There is also a significant degree of rural deprivation in the area. Hence, a community education programme and appropriate long-term financial obligation, would be an appropriate approach towards community mitigation of amenity. This may be negotiated and secured to support	No	<p>The Applicant makes note of this comment. Section 6 of this the oESSCS [APP/7.15] identifies potential opportunities for employment and skills initiatives. These include:</p> <ul style="list-style-type: none"> • Local jobs • Apprenticeships



		understanding of your solar farm project and the value of sustainable land use historically. Both historical human and natural landscape and wildlife could easily fit such an education programme and even, aid upskilling and enhance education outputs in the area.		<ul style="list-style-type: none"> • Education provider engagement; and • Green skills awareness.
	Educational initiatives	What input will you provide for our local schools?	No	<p>The Applicant's approach to skills development focuses on strengthening local capacity in green and technical occupations through collaboration with further and higher education providers and established local initiatives. Key priorities include supporting apprenticeships, promoting STEM engagement in schools and colleges, and expanding access to vocational training aligned with the Scheme's requirements. Partnerships will be sought to deliver upskilling programmes and qualifications relevant to renewable energy and construction disciplines, helping local residents gain sustainable employment and progress into higher-value roles.</p> <p>Further details are set out in Section 6 of the oESSCS [APP/7.15].</p>
	New jobs associated with the Scheme	Cooperative Movement (see https://www.uk.coop) small plant growers and livestock keeps should be allowed to cultivate and maintain ground around the solar panels to allow for biodiversity, custom artisan crops and provide local employment to the surrounding community	No	The Applicant notes these comments and the recommendations put forward. The draft Local Nature Recovery Strategy principles, where appropriate, have informed the approach to biodiversity enhancements across the Site,
	New jobs associated with the Scheme	It is essential that this development becomes part of the community rather than being viewed as remote investors just profiteering from the locality. This means an ongoing, trustful relationship with the community and engaging on a positive basis to help fund local organisations, amenities and facilities in consultation with the town and parish councils and community groups. Company officials should not be remote and unobtainable and there should be an ongoing liaison over the life of the development. The community cohesion and acceptance is key to the success of this development and there are significant concerns locally. We would suggest that each affected community is given a stake in a section of the proposed development such that they get a regular payout over the life of the development rather like solar panels on buildings and feed in tariff. As it stands there is opposition given the impression that this is a group of outside investors cashing in with no real community affiliation.	No	<p>The Applicant notes these comments and points to the approach being taken to the community benefit fund, should the DCO Application be granted. The Applicant is proposing a community benefit fund, to be independently administered by a local foundation and available for local initiatives to provide community services.</p> <p>In addition to the Pre-Application consultation undertaken by the Applicant, should the Scheme be granted consent, a Consultation Liaison Manager (CLM) would be established prior to construction commencing, and last through the construction and operational phase of the Scheme. This would provide a forum for discussion throughout the construction period, to act as a point of contact should there be any queries outside of the forum.</p> <p>During long-term general operation and maintenance activities, a full-time member of the Scheme's operation and maintenance team should also be in dedicated 'community contact' position whereby they are responsible for monitoring community interaction to ensure community concerns are heard, responded to and suitably addressed throughout the duration of the Scheme's operation and maintenance phase. Details of the Community Liaison Manager within the operation and maintenance team should be made available to members of the public through</p>



				elected representatives or online, and kept up-to-date at all times. The role of the CLM is secured by the oCEMP [APP/7.6] and outline Operational Environmental Management Plan (oOEMP) [APP/7.8] .
	New jobs associated with the Scheme	<p>2. Community-Resilience & Worker Accommodation Support</p> <p>Support for small-scale rural accommodation infrastructure, aligned with the projects own temporary worker needs (e.g. a barn-to-worker-lodge conversion, or seasonal camping area).</p> <p>A modest fund or profit-share scheme open to small landowners or community members to develop low-impact rural enterprises from local food production to conservation projects.</p> <p>Could be matched with help securing planning approval or low-interest loans backed by the developer.</p>	No	<p>Some construction workers will be specialists with highly specialised skills and are likely to be sourced from a range of locations. It is conservatively estimated that 50%-75% of the construction workforce would come from outside of the Labour Catchment Area and therefore, may require temporary accommodation during the construction phase.</p> <p>At the peak of the construction phase used for assessment (Q2 2032), it is estimated that 740 workers will be onsite. Applying a leakage of 50%-75% suggests that 370-555 construction workers at peak would come from outside of the LCA and seek temporary accommodation (see ES Chapter 14: Socio-Economics [APP/6.2]).</p>
	New jobs associated with the Scheme – emails	<p>How many local jobs will be created?</p>	No	<p>The Scheme is 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 (see ES Chapter 14: Socio-Economics [APP/6.2]).</p>
	Improved local infrastructure	<p>Support the local churches of the Nar Valley, especially South Acre and Castle Acre.</p> <p>Close the road down to the ford at South Acre permanently to prevent motorbikes and landrovers racing down the track creating pollution in our wild chalk stream river.</p>	No	<p>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.</p> <p>ES Chapter 9: Transport and Access [APP/6.2] concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse transport and access related effects expected across the Scheme's construction, operational and decommissioning phases of the Scheme. . .</p>
	Improved local infrastructure	<p>Swaffham park is in a poor state. The toddler park is closed off completely, and locked off, which is a really sad loss for the community. The Nicholas Hamond Academy in Swaffham would probably love to speak to you about educational opportunities for students. The high school covers catchment for the villages surrounding the solar farm and has many students from deprived backgrounds. I know they seriously lack benches for the students, so there would probably be many ways you could help. If you are interested in pursuing this [REDACTED] the deputy head would be the lady to speak to.</p>	No	<p>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.</p>



	Improved local infrastructure	<p>Telling the story of why we need this next infrastructure, how it works, landscape & climate change etc, a place for local schools & community.</p> <p>The infrastructure of some local villages is in a relatively poor condition & not at all energy efficient. West Acre village hall for example!</p> <p>Can developers & communities find ways of creating examples of efficient energy use?</p>	No	<p>The Applicant notes these comments and has prepared a Statement of Need [APP/5.4] which sets out the justification for the Scheme within the context of the clear and urgent national need for low-carbon, home-grown energy.</p> <p>The Applicant also notes the comments around community benefit and energy efficiency of local community infrastructure. 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.</p>
	Improved local infrastructure	We would like support for the church and churchyard.	No	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.
	Improved local infrastructure	Local Infrastructure and Suggestions Wishes the village still had a Post Office.	No	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.
	Improved local infrastructure - Emails	<p>You may remember we discussed community funding initiatives that Drovers Solar and/or RWE would consider as part of the overall development. I am working very closely with the team at West Acre Theatre to raise funds essentially for their sustainable future.</p> <p>The key aims and our plans have been captured in a crowdfunding programme Save Us From Extinction Crowd Funder with support from Stephen Fry, one of our patrons.</p> <p>The crowdfunder is one part of a £3m fund raising programme to create a new larger capacity theatre, with corporate sponsorship activity running alongside.</p> <p>This may provide a great and timely opportunity for your company to be associated with a significant community hub perhaps with building naming opportunity.</p> <p>I would like to open dialogue on this opportunity perhaps by way of a meeting with the theatre in West Acre.</p>	No	<p>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.</p> <p>With regard to the specific request made by the respondent with regard to a meeting at West Acre Theatre, the Applicant is open discussing the matter further.</p>
	Local green infrastructure	The construction phase and ongoing maintenance of this man made, engineering project needs to have an upside over the environment for the local community, especially involving maintenance of the purity of the chalk stream which is the Nar. A complex project to	No	ES Chapter 12: Water Resources [APP/6.2] presents the findings of the EIA of effects on Water Resources as a result of the Scheme as well as proposing measures to address the potential impacts and likely effects during the Construction,



		protect the Nar river course, needs to be undertaken as a <i>quid pro quo</i> for the local community. Its to ensure no pollution, (sewage and/or construction run off) and indeed some river and/or bank improvements, (yet to be determined.) This contribuion from the wider population is to involve and improve the environmnet for the South Acre community.		<p>Operation and Decommissioning Phases, which concludes the Scheme is not anticipated to result in any residual adverse effects on water receptors across the Scheme's construction, operational and decommissioning phases. .</p> <p>Efforts to provide specific benefits in locally impacted communities are set out in the oSSCEP [APP/7.15] (for employment and economy), in the oLEMP [APP7.11] (for landscape and ecological improvements) and through the provision of community benefits such as new permissive access routes, or through the community benefit fund (separate to the DCO process).</p>
	Local green infrastructure	<p>As part of the broader landscape and heritage mitigation strategy, we respectfully propose that enhancement of the churchyard be included within the project's local amenity and environmental investment planning. This might include:</p> <p>A lump sum contribution toward the annual maintenance of the church building and grounds, supporting its preservation and continued use by the local community.</p> <p>Inclusion of the churchyards and grounds in landscape planning, with improved planting, access, or interpretation that reflects the shared cultural value of the site.</p> <p>We believe this would be a meaningful gesture of recognition for the role South Acre's heritage plays in the wider character of the area and a positive example of long-term local benefit.</p>	No	<p>Efforts to provide specific benefits in locally impacted communities are set out in the oSSCEP [APP/7.15] (for employment and economy), in the oLEMP [APP7.11] (for landscape and ecological improvements) and through the provision of community benefits such as new permissive access routes, or through the community benefit fund (separate to the DCO process).</p> <p>These comments are noted by the Applicant and it will ensure this is 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.</p>
	Local green infrastructure	We need community facilities in Little Dunham - a new village hall/hut, or at least a toilet block for it.	No	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 green infrastructure	Swaffham is poorly provided with infrastructure and public amenities such as a swimming pool that lies dormant because the Town council who own it are unable to fund modernisation and no tennis courts. It is quite a vibrant community but honest ongoing support would be valued - not least to improve the visitor and resident offer for the natural environment and active transport.	No	<p>ES Chapter 14: Socio-Economics [APP/6.2] assesses the impact of the Scheme on local tourism and businesses and concludes 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. .</p> <p>The Applicant is committed to ensuring that communities benefit from the Scheme. Throughout the pre-application process, the Applicant has consulted on community</p>



				benefits and, based on feedback and ongoing discussions, will determine how best to distribute funding.
	Funding allocated to local groups/councils	Sadly, I believe that this project under the current Government is unstoppable. Local towns and villages should get some recompense to support local communities.	No	The wider effects of the Scheme on the local community in terms of socio-economic are assessed within Chapter 14: Socio-Economics, which 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.
	Funding allocated to local groups/council	Perhaps money towards our community centre to make it more of a social club. The 3 villages of Raynham each receive £12,000 per annum from their solar farm.	No	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.
	Funding allocated to local groups/council	Several, including a fund to help maintain St Georges Church in South Acre, but by far the most useful and if I were you impactful would be to lobby for and secure the closure to traffic of the lane and ford crossing the River Nar from South Acre to Castle Acre. This has been the bane of residents of both communities for years, and the council always end up caving into 4x4 clubs who threaten legal action. We need you to put your weight behind the ongoing campaign to have the lane and ford decommissioned.	No	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.
	Funding allocated to local groups/council	This means an ongoing, trustful relationship with the community and engaging on a positive basis to help fund local organisations, amenities and facilities in consultation with the town and parish councils and community groups. We would suggest that each affected community is given a stake in a section of the proposed development such that they get a regular payout over the life of the development rather like solar panels on buildings and feed in tariff.	No	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.
	Funding allocated to local groups/council	In addition, we strongly recommend that there is a wider community financial benefit beyond just a modest benefit fund, which would see those who experience the greatest amenity impacts, experiencing direct financial benefits such as discounted bills.	No	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.



	Funding allocated to local groups/councils - emails	Will there be any funding available for the local football club at Castle Acre? As a village club, we survive on the support of local business's and are always looking for opportunities for donations/sponsorship.	No	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.
	Funding allocated to local groups/council	We would like support for the church and churchyard.	No	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.
	Rejection of community benefits	Companies always put 'spins', to make something look like you absolutely need it, but in reality only companies reap the rewards, the working class will not see or have any benefit for at least 10-12 years!	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. A Statement of Need [APP/5.4] has been prepared, which sets out the critical benefits of the Scheme, including supplying low-cost, secure energy to the nation.
	Rejection of community benefits	this is too big, right along daily access roads between Swaffham and Castle Acre , not discretely tucked in a vadt exoansf of unfrequented land or ali g long stretches of motorway. It is dlsio directly adjacrnt to another dolar fat. propisal (High Groves) and therefore a cumulative burden to local people, visitors to the area and wildlife. It will involve years of noise from piling and transport traffic. It is planned on good agricultural land, which goes against the sims of green energy planning. The lease is also 60 years-unacceptable that 2 generations will experience this immediately in their daily lives. I cannot see any benefits	No	The Applicant notes the comment regarding the sized of the Scheme but disagrees. 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. Cumulative effects associated with the Scheme are addressed in the topic chapters of the ES [APP/6.1 – 6.4] and summarised in ES Chapter 17: In-Combination Effects [APP/6.2] . ES Chapter 10: Noise and Vibration [APP/6.4] includes a cumulative assessment of noise impacts and considers the effects from High Grove Solar Farm proposed adjacent to the Site. It should be noted that the construction phases are not expected to overlap, and noise effects have been assessed on a worst-case basis, i.e., loudest piling activity at the nearest point to each receptor residential property, where in practice most of the piling work will take place further away than those assessed and will result in lower impact. Cumulative traffic noise has also been taken into account in the growth factors for the future baseline traffic levels.



				<p>Both traffic noise and construction noise have been assessed as non-significant effects at the worst-case, and will in practice be lower in effect.</p> <p>Regarding the use of agricultural land, the Applicant notes that 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 of BMV land.</p> <p>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 within the Scheme is justified, given the economic and other benefits of the land.</p> <p>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.</p> <p>The design of the Scheme has also sought to retain, buffer and enhance the existing on-site green infrastructure where practicable. The minimum buffers to existing onsite features are set out within the Design Principles, Parameters and Commitments document [APP/5.8]. 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].</p>
	Rejection of community benefits	Impact on landscape. Removal of productive agricultural land. Proximity to historic heritage sites and sssi environment. Impact on Pedders Way. Far too large. No discernable benefit to local community.	No	<p>The Design Approach Document [APP/5.7] sets out the Project level Design Principles which have guided the detailed design of the Scheme. This includes commitments to respond to the character of the Site, respect the setting of heritage assets, and support the objectives of Norfolk's Green Infrastructure Strategy.</p> <p>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.</p> <p>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].</p>



				The Policy Compliance Document [APP/5.6] further confirms that the use of BMV land as part of the Scheme is justified, considering the economic and other benefits of the land.
Rejection of community benefits	Social value & community benefits - 'community benefits' are being offered as a conciliatory gesture but can never compensate for the loss of productive farmland; the visual intrusion and the adverse impact on heritage and wildlife.	No		The utilised agricultural area (UAA) in the UK was 16.8 million hectares (ha) 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. A Statement of Need [APP/5.4] has been prepared, which sets out the critical benefits of the Scheme, including supplying low-cost, secure energy to the nation.
Rejection of community benefits	The idea of 'supporting nature recovery' is frankly absurd when you are taking a perfectly fine piece of nature and destroying it in order to add this solar farm in the first place. This is similar to new build developments destroying a field and the homes of wildlife in favour of building a housing area and then adding a small area of grass to the estate which in turn gets a park that no one wants built on it when the local council needs to spend its money at the end of the year.	No		The draft Local Nature Recovery Strategy principles, where appropriate, have informed the approach to biodiversity enhancements across the Site. The oLEMP [APP/7.11] sets out specific strategies and priorities identified in the draft LNRS, of relevance to the Site, and how these have been incorporated into the Scheme. 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.
Rejection of community benefits	It is huge, and after you build it, recover your company costs, pay your shareholders, I do not feel I would benefit in any way. The energy you don't use will go into the grid, but where do you use your energy?	No		The Applicant notes these comments but disagrees that no benefits will be felt locally. A Statement of Need [APP/5.4] has been prepared, which sets out the critical benefits of the Scheme and the wider effects of the Scheme on the local community in terms of socio-economic are assessed within Chapter 14: Socio-Economics [APP/5.2] .
Rejection of community benefits	No discernable benefit to local community.	No		A Statement of Need [APP/5.4] has been prepared, which sets out the critical benefits of the Scheme, including supplying low-cost, secure energy to the nation. Also, the wider effects of the Scheme on the local community in terms of socio-economic are assessed within Chapter 14: Socio-Economics [APP/5.2] .
Rejection of community benefits	The fix is clearly in. This is a done deal, the opportunity grasped by yourselves with a completely pliant Secretary of State and new planning rules that entirely subvert our democracy. Apparently, politicians are concerned about the ever lowering levels of participation in politics and voting by the general public: for all and any genuinely interested, look no further than here.	No		The Applicant notes these comments but wishes to reiterate that the appropriate approval processes are being followed for the Scheme with all required levels of scrutiny being upheld.



	Rejection of community benefits	<p>This development is unwelcome in our area. It will not supply us with power. There is no amount of greenwash that can justify this. The site may be very convenient for the developer but is wholly inappropriate for this area.</p> <p>The farmer selling you the land gets rich(er), IGP gets richer. We get a view of plant machinery and buildings that support the panels.</p> <p>All your explanations, mitigations and childish illustrations are a bit of an insult really because I know this is a done deal and you dont really care what local people think anyway. Peace& love =)</p>	No	<p>The Applicant notes these comments but disagrees with the principles outlined. A Statement of Need [APP/5.4] has been prepared, which sets out the critical benefits of the Scheme, including supplying low-cost, secure energy to the nation.</p> <p>Efforts to provide specific benefits in locally impacted communities are set out in the oSSCEP (for employment and economy), in the oLEMP [APP/7.11] (for landscape and ecological improvements) and through the provision of community benefits such as new permissive access routes, or through the community benefit fund (separate to the DCO process).</p> <p>The Applicant wishes to reiterate that the appropriate approval processes are being followed for the Scheme with all required levels of scrutiny being upheld.</p>
	Rejection of community benefits	<p>We asked what benefits the locality would get. The project team couldn't think of any. The only lasting difference I can see is the loss of land. You can't eat solar panels.</p>	No	<p>A Statement of Need [APP/5.4] has been prepared, which sets out the critical benefits of the Scheme, including supplying low-cost, secure energy to the nation. Also, the wider effects of the Scheme on the local community in terms of socio-economic are assessed within Chapter 14: Socio-Economics [APP/5.2].</p> <p>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.</p>
	Non-specific community benefit comments	<p>Your questions and answer options are loaded and do not offer the opportunity to capture my views in full. In sum, my concerns are:</p> <p>Existing infrastructure's ability handle this (road and grid);</p> <p>Manufacture of components involves modern-day slavery practices overseas;</p> <p>Lack of legacy for affected communities;</p> <p>Fast-moving technology updates will render system obsolete within it's lifetime;</p> <p>Government investment in nuclear had made this kind of development unnecessary; and</p>	No	<p>The Applicant notes the comment regarding the road network; however disagrees. ES Chapter 9: Transport and Access [APP/6.2] concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse transport and access related effects expected across the Scheme's construction, operational and decommissioning phases of the Scheme.</p> <p>Controls are established within the outline Construction Traffic Management Plan (oCTMP) [APP/7.7] and the outline Operational Traffic Management Plan (oOTMP) [APP/7.9]; these outline management plans have been prepared in support of the DCO Application and set out measures to manage any potential transport and access effects that may arise from construction and operational</p>



		The productivity will not deliver supply commensurate with scale of impact - it is simply not a very effective way of manufacturing energy.		<p>activities and are secured by Requirements within the draft Development Consent Order (draft DCO) [APP/3.1].</p> <p>The Applicant notes that IGP is a signatory of the Solar Energy UK supply chain statement, which commits the company to a transparent, sustainable supply chain free of human rights abuses.</p> <p>The Applicant is also 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.</p> <p>The Statement of Need [APP/5.4] confirm government's policy position that large-scale ground mounted solar farms have a critical role to play in achieving the government's energy policy aims of delivering a secure, low carbon and low-cost electricity supply for consumers on the way to delivering net zero carbon emissions by 2050. The National Policy Statements for Energy (Energy NPSs) establish a critical national priority (CNP) for low carbon infrastructure, including for large-scale solar farms, because of the decarbonisation, energy security, and affordability benefits that they deliver. Government's analysis concludes that "a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar" (Energy NPS EN-1, Para. 3.3.20).</p> <p>The Statement of Need [APP/5.4] also describes current progress in, and risks associated with nuclear development in Great Britain. While nuclear may play a future clean power role, the delivery of other clean sources of electricity with shorter development timescales than new nuclear power (such as large-scale ground mount solar) is also required.</p>
	Non-specific community benefit comments	No social or community benefits were demonstrated in either your literature or community meeting at Castle Acre. So too your biodiversity and environmental net gains. Nada.	No	The Applicant is proposing a community benefit fund which will be independently administered by a local foundation and would be available for local initiatives to provide services to the community. The BNG Assessment Report submitted with the DCO Application demonstrates significant net gains for biodiversity as a result of the Scheme.
	Non-specific community benefit comments	Please see our generalised comments that we have made to support the local area. maximise biodiversity and local benefits.	No	The Applicant notes these comments and has responded in turn below.



	Non-specific community benefit comments	<p>An ongoing community fund that organisations and groups can bid to often fairly limited amounts of money can be of benefit to them.</p> <ul style="list-style-type: none"> - Possible reduction of energy costs to those adversely affected by the development. - Pride in being a green energy hub. The Ecotricity turbines were a local showcase when they were installed and put Swaffham 'on the map' as a clean energy hub. 	No	<p>The Applicant is proposing a community benefit fund which will be independently administered by a local foundation and would be available for local initiatives to provide services to the community.</p> <p>The Applicant notes the comments around “green energy hub” and the relationship with the Ecotricity turbines in Swaffham and agrees that a mix of renewable energy is the appropriate solution to be implemented if the national need for generation is to be met.</p>
	Non-specific community benefit comments	There is no long-term, proportionate legacy proposed.	No	<p>The Applicant notes this comment but disagrees with the conclusion drawn. A Statement of Need [APP/5.4] has been prepared, which sets out the critical benefits of the Scheme, including supplying low-cost, secure energy to the nation.</p>
	Non-specific community benefit comments	<p>The walk to swaffham would be a great addition to the landscape, and is should be a permanent right of way as a legacy of this project. Land access is being denied to people in the UK on a regular basis, so it would be a nice legacy to protect this new proposed walk.</p>	No	<p>The Scheme includes proposed enhancements and improvements to the local footpath network, including approximately 3.5km of new permissive paths and an area identified for publicly accessible amenity space at the edge of the plateau.</p> <p>The Scheme would be designed to provide education and interpretation of the solar farm site as set out within the oLEMP [APP/7.11]. Opportunities for the local community to engage with and learn about the natural environment will be provided. This will include the provision of informal, low-key interpretation boards at appropriate, strategic points across the Order limits that would allow the community to learn and engage with the local history of the Site and Nar Valley, and the Site's ecology. Information will also be provided on the solar farm, climate change and the benefits of renewable energy. The Applicant has collaborated with High Grove Solar Farm to provide a permissive link through to Swaffham. The Applicant does not control the land to the south of the Site and therefore can't commit to providing a permanent right of way over this land.</p>
	Non-specific community benefit comments	<p>"It is essential that this development becomes part of the community rather than being viewed as remote investors just profiteering from the locality. This means an ongoing, trustful relationship with the community and engaging on a positive basis to help fund local organisations, amenities and facilities in consultation with the town and parish councils and community groups. Company officials should not be remote and unobtainable and there should be an ongoing liaison over the life of the development. The community cohesion and acceptance is key to the success of this development and there are significant</p>	No	<p>The Applicant is proposing a community benefit fund which will be independently administered by a local foundation and would be available for local initiatives to provide services to the community.</p> <p>The Applicant notes the comments around accessibility and an ongoing relationship with the community throughout the lifetime of the Scheme. The administration of the community benefit fund is to take place throughout the operation of the solar farm and IGP are committed to ensuring any relationships built within the community are maintained throughout.</p>



		concerns locally. We would suggest that each affected community is given a stake in a section of the proposed development such that they get a regular payout over the life of the development rather like solar panels on buildings and feed in tariff. As it stands there is opposition given the impression that this is a group of outside investors cashing in with no real community affiliation.		
	Non-specific community benefit comments	Should this development go ahead, there needs to be ongoing support for the local churches, historic sites and communities in South Acre and Castle Acre. These communities will be sorely blighted by the scale of the development, their once peaceful rural lives and environment irrevocably altered.	No	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.
	Non-specific community benefit comments	Your companys link with the other proposed site should have been made clear. A much wider consultation on the impact of visual, cultural and heritage destruction needs to be discussed. Also there is very little to no community benefit of this development.	No	The effects of the Scheme on the local community in terms of socio-economic are assessed within ES Chapter 14: Socio-Economics [APP/6.2] , which 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.
	Non-specific community benefit comments	The fast tracking of this proposal adjoining a vast acreage already proposed. DS F will critically affect the local economy here, impacting on both farming and tourism. Ruining the context of the many important heritage assets in the immediate vicinity. I hope that these plans are most closely scrutinised. The notion of amelioration and compensation let alone benefits do sound hollow when the loss of amenity would be profound.	No	ES Chapter 14: Socio-Economics [APP/6.2] assesses the impact of the Scheme on local tourism and businesses. The Scheme is 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 (see ES Chapter 14: Socio-Economics [APP/6.2]). 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.
	Non-specific community benefit comments	It will be important that final scheme details are made available to local communities. In particular in relation to the following: - LUIA judgements, mitigations & utilisations - Detailed final landscape layout & specifications - Landscape management strategy	No	The Applicant notes these comments. All information submitted to PINS as part of the application process will be made available to the public including details on the topics outlined.



		<ul style="list-style-type: none"> - Detailed solar panel & fencing layouts - Detailed biodiversity strategy & BNG - A full agreed scheme of all community benefit 		
	Non-specific community benefit comments	It is important that there is genuine community benefit from such schemes and it must be ensured that there is community support. Imposing unpopular schemes on local communities risks the danger that there is a move away from the support of the transition to net zero as a result, thus harming our collective efforts to transition away from fossil fuels.	No	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..
	Non-specific community benefit comments - Emails	Given the lifecycle of this scheme is at a generational scale and the landscape scale of the development is so impactful on the historic landscape character of mid Norfolk (Claylands/Breckland, Nar and Wissey river valley and plateaux settlement pattern), this is why an appropriate planning obligation should be agreed to support long-term community engagement (in-kind and financial obligations, in line with s.106 of the Town and Country Planning Act 1990 (as amended)).	No	<p>Embedded mitigation measures to safeguard the River Nar SSSI and a full assessment of potential impacts to relevant SSSIs and irreplaceable habitats have been undertaken in Section 7.7 and Section 7.8 of ES Chapter 7: Ecology and Biodiversity [APP/6.2], which concludes there would be no significant adverse effects associated with the Scheme on the River Nar SSSI.</p> <p>Impacts of the Scheme on Priority Habitats have been fully considered within Section 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2].</p>
	Non-specific community benefit comments	As a Swaffham resident I am interested to learn what DIRECT benefits will be provided (financial or otherwise) to local people?	No	The effects of the Scheme on the local community in terms of socio-economic are assessed within Chapter 14: Socio-Economics. The Applicant is proposing a community benefit fund as part of the Scheme. Should the Scheme receive development consent, to be independently administered by a local foundation and would be available for local initiatives to provide services to the community.
	Non-specific community benefits	<p>On a few occasions we have briefly discussed the possibility of community benefits that might be available if approval for The Drovers Solar Farm were to be consented. You advised that I should confirm the interest of the Castle Acre Community expressing an interest in what public benefits might be available should this project proceed.</p> <p>On the understanding that we discussed the lack of current processes due to early-stage planning and the time scale involved to potential connection, I write as Chairman of Castle Acre Parish Council and ask you to please accept this email as confirmation of the communities interest in exploring what community benefits might be available if The Drovers Solar Farm is to be consented.</p>	No	<p>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.</p> <p>The Applicant does however note that it is open to continued engagement with the Castle Acre Community regarding the Scheme and the delivery of community benefits.</p>



		Again, we discussed examples of possible projects for the village and agreed, due to the lack of current processes and extended time scales involved, this was difficult, so would clearly have to be discussed at an appropriate date in the future.		
	Non-specific benefits community	<p>Long term Catchment management plan % of revenue generated</p> <p>Education on Nar Valley Way</p> <p>River Nar improvement plan Long term and funded</p> <p>River maintenance budget</p> <p>Long term monitoring “ Impact and Benefits</p> <p>Opportunity for local ownership.</p>	No	<p>Embedded mitigation measures to safeguard the River Nar SSSI and full assessment of potential impacts to relevant SSSIs and irreplaceable habitats has been undertaken in Section 7.7 and Section 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2], which concludes there would be no significant adverse effects associated with the Scheme on the River Nar SSSI.</p> <p>Impacts of the Scheme on Priority Habitats have been fully considered within Section 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2].</p> <p>Long-term monitoring would be achieved by establishing a framework that requires producing an annual report for the council. The report would set out how the community benefits have been used and what impact they have had.</p>
	Non-specific benefits community	<p>poor transport links to Downham Market, Fakenham, Narborough, Kings Lynn and Swaffham, poor public toilet facilities in all the villages, reduced property values, improve school technology and science attainments locally with guaranteed training, jobs and apprenticeships</p>	No	<p>ES Chapter 9: Transport and Access [APP/6.2] concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse transport and access related effects expected across the Scheme’s construction, operational and decommissioning phases of the Scheme..</p> <p>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 skills in solar PV installation, BESS maintenance, and land management.</p>

3 Connectivity

Topic	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant’s evidence?	Applicant response
Connectivity	Existing road infrastructure	Having met the representatives at Swaffham Assembly Rooms, I was reassured that the local	No	The Applicant notes this comment.



		landscape will be retained and that the local roads would not be too impacted by the project development. Consideration had been taken for environmental issues and the impact for local residents/cyclists/walkers.		
	Existing road infrastructure	Your questions and answer options are loaded and do not offer the opportunity to capture my views in full. In sum, my concerns are: Existing infrastructure's ability handle this (road and grid);	No	The Applicant notes this comment as part of its response
	Existing road infrastructure	Installing the panels and infrastructure will cause disruption on the rural road network as construction, operation and decommissioning all involve actions which cause physical changes to the local topography	No	<p>The Applicant notes these concerns; however, an assessment of the effects on the road network during construction, operation, and decommissioning is provided in ES Chapter 9: Transport and Access [APP/6.2], which concludes that there are no significant effects associated with the Scheme. The Applicant notes that the assessments undertaken take full account of the rural nature of the Scheme.</p> <p>The Applicant notes that with regard to the local topography, the Scheme has been designed to minimise ground disturbance and avoid extensive earthworks wherever practicable.</p>
	Existing road infrastructure	We have selected ""neutral"" regarding improvements to access for walking. From South Acre's perspective, this remains unresolved. In particular, we would like to see the small portion of the Castle Acre circular walk that passes along South Acre Road toward the River Nar clearly addressed. This portion of road is under consideration for permanent closure to four-wheeled traffic, but motorcycles and quad bikes currently continue to use it, often crossing the river via the pedestrian bridge overlooking the Priory, rather than the ford. This presents significant disruption to walkers, and the local setting. The South Acre community would prefer to see this road fully closed to all motorised traffic, except for property access, in order to support walking access and protect the landscape character.	No	The Applicant notes that this area lies outside the Order limits for the Scheme. However, as part of its wider approach to community benefits, the Applicant is open to further discussions with the South Acre community and relevant community representatives about how it could support this ambition.
	Existing road infrastructure	Road networks need to be protected during construction and improved roads to provide access to construction and maintenance vehicles. The impact of the closure of roads or restricted access needs to be minimised to prevent disruption to local traffic and avoid unnecessary air pollution from idling vehicles.	No	<p>The Applicant notes these comments and confirms that condition surveys will be agreed with the local highway authorities through the CTMP, secured by way of a requirement in the DCO and prepared in substantial accordance with the oCTMP [APP/7.7] submitted as part of the DCO Application. The condition surveys will keep a log of the state of the highway and ensure that any damages are addressed post-construction.</p> <p>The Applicant does not anticipate the need for road closures during construction. Should any temporary</p>



				restrictions or closures be required, these would be limited in duration and managed through measures traffic management measures, such as appropriate signage and advance notice to affected parties. Further measures to manage traffic during construction and maintain access for residents is provided in the oCTMP [APP/7.7] .
	Existing road infrastructure	We therefore request that the developer put in place a continuous maintenance and road cleaning plan throughout the construction period, and that the traffic management strategy includes specific provisions for rural and road safety and the protection of public rights of way, especially where they are shared with site access. "	No	<p>The Applicant notes these comments and confirms that condition surveys will be agreed with the local highway authorities through the CTMP, secured by way of a requirement in the DCO and prepared in substantial accordance with the oCTMP [APP/7.7] submitted as part of the DCO Application. The condition surveys will keep a log of the state of the highway and ensure that any damages are addressed post-construction.</p> <p>The Applicant further notes that measures to manage and maintain the condition of local roads during construction, such as wheel washing facilities and the provision of a road sweeper in the area surrounding site access points to alleviate any residual debris generated during construction, will be secured through the CTMP, secured by way of a requirement in the DCO and prepared in substantial accordance with the oCTMP [APP/7.7] submitted as part of the DCO Application.</p> <p>The outline Public Right of Way and Permissive Path Management Plan (oPROWPPMP) [APP/7.12] details the maintenance and cleaning regime to ensure that the PRow remain appropriate for use throughout construction and are not damaged.</p>
	Existing road infrastructure	We have also selected transport and access as a key concern. The land around the site, particularly near working area 11 and Bartholomew Hills, is characterised by sandy soil, which already causes surface issues. Sand is regularly displaced onto the road near Glebe Cottages, especially after rainfall, where it travels downhill toward the junction of Big Wood Lane, Three Corners Lane, and South Acre Road. If site traffic increases in this area, the problem will worsen, posing risks for walkers and cyclists using this stretch of Peddars Way.	No	<p>The oPROWPPMP [APP/7.12], will detail the maintenance and cleaning regime to ensure that the PRow remain appropriate for use throughout construction and are not damaged.</p>
	Existing road infrastructure	Several, including a fund to help maintain St Georges Church in South Acre, but by far the most useful and if I were you impactful would be to lobby for and secure the closure to traffic of the lane and ford crossing the River Nar from South Acre to Castle Acre. This has been the bane of residents of both communities for years, and the council always end up caving into 4x4 clubs who threaten legal action. We need you to put your weight behind the ongoing campaign to have the lane and ford decommissioned.	No	<p>The Applicant notes that this area lies outside the Order Limits for the Scheme. However, as part of its wider approach to community benefits, the Applicant is open to continued dialogue with the South Acre and Castle Acre communities, local representatives, and relevant authorities about how it could support this ambition.</p>



	Existing road infrastructure	Your proposed site access off the A46 is at their junction of 3 minor roads to the north (Castle Acre), the west (Westacre), the east (Sporle) and the crossing for a public footpath. You will know of the number of accidents which have happened there. Moderating the hazard through highway "improvements" would be visually v. disruptive.	No	<p>Access junctions for the Scheme are located off the A1065, which are being upgraded to accommodate the expected vehicles in a safe and efficient manner.</p> <p>The Applicant notes that a Stage 1 Road Safety Audit has been undertaken in ES Appendix 9.2: Traffic Assessment [APP/6.4] which identifies no concerns with the proposed access locations or design. A review of Road Safety data has also been undertaken in ES Appendix 9.2: Traffic Assessment [APP/6.4] which has found no existing collision clusters present in the vicinity of the proposed access junctions.</p>
	Existing public rights of way (PRoW)	I was told our area was chosen because it was rural. I live here BECAUSE it is rural. I enjoy the countryside, the trees, the hedgerows, the wildlife., the footpaths. I was told there will still be access to footpaths but how can we enjoy walking along these when we will be walking along a path with fencing either side and solar panels. Now we can walk along footpaths and know if we cannot continue for reasons like flooding or fallen trees, we can take ourselves off the path but when you have fenced us in, we won't be able to do that. Walking in nature has been proven to help our mental health and wellbeing. It gives us a sense of freedom. I don't want to walk along a path where our beautiful countryside has been industrialised.	Yes	<p>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.</p> <p>These offsets are secured through the Works Plan [APP/2.3] and the Design Principles, Parameters and Commitments [APP/5.8]. An oPROWPPMP [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.</p>
	Existing public rights of way (PRoW)	This particular area of farmland is beautifully scenic and unspoilt. There are hedgerows and quiet lanes connecting these villages.	No	The Applicant notes that a detailed site selection process was undertaken to determine the suitability of the Site.
	Existing public rights of way (PRoW)	Also don't think encircling whole villages in Norfolk is fair either...not the droves but other solar farms in the area. My concerns about the Drovers are the hedges and trees beside the bridleways and if they will be protected, and the bridleways themselves. How much disruption to locals and wildlife will there be?	Yes	<p>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].</p> <p>An oPROWPPMP [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.</p> <p>An oCEMP [APP/7.6] has been prepared which requires a pre-construction tree survey to be undertaken prior to starting construction works to inform the tree protection zones to be applied during construction.</p>
	Existing public rights of way (PRoW)	Me and my family are keen walkers, cyclists and me and my daughter ride, we regularly use the paths where the solar farm will be	No	The Applicant notes this comment and addresses the concern below.



Existing public rights of way (PRoW)	Currently the PRoW go through beautiful countryside and walking there is a pleasure. This will not be the case when walking past rows upon rows of solar panels, even if there are hedgerows, panels will be visible as the landscape is undulating.	No	<p>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].</p> <p>The Applicant considers this sufficient with regard to maintaining the experience of PRoW across the Site. An assessment of the effects of the Scheme on PRoW is included in ES Chapter 6: Landscape and Visual [APP/6.2].</p>
Existing public rights of way (PRoW)	The proposed new 'permissive' path to Swaffham will be an improvement - it should however become an official/legal PRoW as a legacy item.	No	The permissive path within the Order Limits is reliant on offsite connections that are not within the control of the Applicant. The Applicant has collaborated with the promoters of High Grove Solar Farm to secure a permissive path that connects through to Swaffham.
Existing public rights of way (PRoW)	The lay out looks good, glad to see more planting of trees and hedges planned, and the extra permissive paths added. If another path could be added between the two sets of panels between the South Acre bridleway and the A1065 that would be fantastic.	No	<p>The Applicant welcomes this comment and notes the feedback regarding the proposed layout, additional tree and hedgerow planting, and new permissive paths.</p> <p>The provision of a new route across the A1065 was discussed with Norfolk County Council prior to submission; however, confirmation was not provided as to whether this could be supported, given the A1065's function as a strategic road within the area, the volume of traffic, and the absence of existing pedestrian crossing facilities. On this basis, no link is currently proposed across the A1065, although this could be considered in the future if supported by Norfolk County Council</p>
Existing public rights of way (PRoW)	New green spaces with easy access and parking (this area is not easily accessible by public transport) Easy to access pathways wide enough to make green spaces available to walkers. Possibly cycle ways.	Yes	<p>A new publicly accessible amenity space has been incorporated into the Scheme within the north west corner of Field 4 as shown on the Works Plan [APP/2.3].</p> <p>Permissive paths have been incorporated into the Scheme to improve the connectivity between Swaffham and the Nar Valley. An oPROWPPMP [APP/7.12] has been prepared which sets out measures of how the PRoWs and permissive paths that cross the Order Limits will be managed throughout the lifespan of the Scheme.</p>
Existing public rights of way (PRoW)	Just another couple of paths, lots of family's use the area for walking, cycling etc, and kids appreciate being able to keep them away from roads.	No	<p>The Applicant notes this comment and confirms that Permissive paths, totalling approximately 3.5km, have been incorporated within the Scheme. Further details can be found within the oPROWPPMP [APP/7.12].</p> <p>.</p>



Existing public rights of way (PRoW)	"The 'potential' off-site 'permissive' link to Swaffham should become a permanent legacy in the form of an official PRoW - in place beyond the lifetime of the solar farm.	No	The permissive path within the Order Limits is reliant on offsite connections that are not within the control of the Applicant. The Applicant has collaborated with the promoters of High Grove Solar Farm to secure a permissive path that connects through to Swaffham.
Existing public rights of way (PRoW)	I welcome the focus on mitigating impact on the historic dunes/PRoW but I would like to see a more comprehensive mitigation strategy for areas of River Road (a significant recreational route) & the A1065 (a major north Norfolk gateway route)."	No	The Scheme already incorporates a minimum 15m offset from the hedges that line River Road to the fencing infrastructure as set out on the Works Plan [APP2.3] . The existing hedges along either side of River Road will be planted up, the details of which can be found within the oPROWPPMP [APP/7.12] .
Existing public rights of way (PRoW)	I understand from your newsletter that you are considering the Rights of Way across your proposed planning application red-lined area but also mitigating the visual amenity too. That is fine, but the lived experience of local people, living, being in and moving through this landscape needs to be considered (not just now, but for the long-term and lifecycle of your project).	No	ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4] has been undertaken which assesses the impacts of the Scheme on the users of the PRoW network. This assessment details any potentially adverse effects associated with the various PRoW within the Site and wider study area. The assessment concludes that there would be potentially long-term operation phase adverse effects upon the following PRoW: South Acre/ RB1, RB2, RB6 and RB7, Sporle with Palgrave/BR2, BR5 and FP11, Peddars Way and Norfolk Coastal Path National Trail, The Nar Valley Way. These effects are not significant. It also concludes that there would be potentially long-term operation phase adverse effects upon the following accessible landscapes: Castle Acre Priory and permissive routes within the surrounding grounds as well as Castle Acre Castle and PRoW within the surrounding grounds. These effects are not significant.
Existing public rights of way (PRoW)	So I thought I'd email a couple of questions through instead, as a keen walker, cyclist, rider in the area I was just wondering what provision had been put in place for all the lovely, mostly grass, off road public bridleways/paths in the area, there is a nice little network of them across the proposed area. Most of these are flanked by hedgerows and old trees, will these be left in situ?	No	The alignment of existing PRoW within the Site has been incorporated into the design of the Scheme. As such, the alignment of PRoW will be unaffected by the Scheme during the operation and maintenance phase of the Scheme. Further details can be found within the oPROWPPMP [APP/7.12] . Measures have been taken to retain existing vegetation including woodland / copses, veteran trees, scrub and hedgerows /hedgerow trees, with specific buffers to protect their root zones and opportunities created for habitat enhancement. Further information can be found within the oPROWPPMP [APP/7.12] .
Public access in across Scheme	I cannot see how fencing off footpaths is improving access to walking? How do you make that fit?	No	The alignment of existing PRoW within the Site has been incorporated into the design of the Scheme. As such, the alignment of PRoW will be unaffected by the Scheme during the operation and maintenance phase of the Scheme. Permissive paths, totalling approximately 3.5km, have been incorporated within the Scheme. Further details can be found within the oPROWPPMP [APP/7.12] .



	Public access in across Scheme	If another path could be added between the two sets of panels between the South Acre bridleway and the A1065 that would be fantastic.	No	The provision of a new route across the A1065 was discussed with Norfolk County Council prior to submission; however, confirmation was not provided as to whether this could be supported, given the A1065's function as a strategic road within the area, the volume of traffic, and the absence of existing pedestrian crossing facilities. On this basis, no link is currently proposed across the A1065, although this could be considered in the future if supported by Norfolk County Council. On this basis the Applicant has not included east west routes across the Site that terminate at the A1065.
	Public access in across Scheme	People visit the area for the natural walks that are there many of which have been for hundreds of years, there is a huge network of walks in the area which do not need to be improved on. The active travel you are proposing to improve on includes the ford through the river Nar, SSSI, which the local residents are trying to stop access through - again going against what the local residents are trying to enhance and improve upon.	No	The permissive paths that are incorporated within the Scheme are pedestrian only. The oPRoWPPMP [APP/7.12] includes details on how these paths will be managed during the lifespan of the Scheme. The ford crossing lies outside the Order Limits.
	Public access in across Scheme	Improving access and active travel: I'm sure there are people who love walking a post-apocalyptic landscape but I'm certainly not one.	No	The Applicant notes this comment but disagrees with the sentiment.
	Public access in across Scheme	To only have natural footpaths, no tarmac or concrete. To plant more English Oaks. To have a very large well maintained wildflower meadow.	Yes	The permissive paths will be 'grassed' – further details of which are set out within the oPRoWPPMP [APP/7.12] . The oLEMP [APP/7.11] includes information on the indicative planting mix for woodland and hedgerows, both of which include English Oaks. Wildflower grassland will also be established within the margins between the hedgerows and Solar PV and beneath the Solar PV Arrays. A new publicly accessible amenity space has been incorporated into the Scheme within the north west corner of Field 4 as shown on the Works Plan [APP/2.3] .
	Public access in across Scheme	"- The ability of the public to gain reasonable access for site tours, etc. - That rights of way and new additional permissive paths are preserved and established to boost local health and wellbeing. This could include the provision of seating, parking spots, way marking, picnic areas and public access points. Thus, the development would not be set apart from the community but complements existing provision. Cycling routes could be established as gravel tracks as part of the visitor offer.	Yes	A new publicly accessible amenity space has been incorporated into the Scheme within the north west corner of Field 4 as shown on the Works Plan [APP/2.3] . The oPRoWPPMP [APP/7.12] and the oLEMP [APP/7.11] provide further details on the permissive paths and opportunities for information boards to be incorporated into the Scheme.



	Public access in across Scheme	The walk to swaffham would be a great addition to the landscape, and is should be a permanent right of way as a legacy of this project. Land access is being denied to people in the UK on a regular basis, so it would be a nice legacy to protect this new proposed walk.	No	The permissive path within the Order Limits is reliant on offsite connections that are not within the control of the Applicant. The Applicant has collaborated with the promoters of High Grove Solar Farm to secure a permissive path that connects through to Swaffham.
	Public access in across Scheme	Also I was wondering if you were putting in any new paths at all please? as I thought I saw this mentioned somewhere on your website I often cycle with my children and unfortunately the roads out that way are terrible, we try and do as much as we can on the paths, but some of it the paths are linked by road, a few new ones would be awesome if that was a possibility.	No	Permissive paths, totalling approximately 3.5km, have been incorporated within the Scheme. Further details can be found within the oPRoWPPMP [APP/7.12] .
	Swaffham Link (new)	The walk to swaffham would be a great addition to the landscape, and is should be a permanent right of way as a legacy of this project. Land access is being denied to people in the UK on a regular basis, so it would be a nice legacy to protect this new proposed walk.	No	The permissive path within the Order Limits is reliant on offsite connections that are not within the control of the Applicant. The Applicant has collaborated with the promoters of High Grove Solar Farm to secure a permissive path that connects through to Swaffham.

4 Consultation

Topic	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Consultation	Consultation length	Letter arrived after date of last open day	No	<p>The Applicant acknowledges these comments but remains confident that information issued for the consultation provided adequate time for community involvement and invited participation.</p> <p>An initial newsletter was posted to residents and businesses within the identified PCZ on 6 May 2025, followed by a second notification leaflet sent via post to land within the PCZ well before the close of the statutory consultation at 23:59 on 9 July 2025. This newsletter provided details of the in-person consultation events and webinars, which were held on a range of days and times, including during the evening and at weekends, to accommodate different schedules.</p>
	Reference to early stage engagement	As indicated before You should work closely with NGOs who have local knowledge in addition to the statutory agencies and enter management agreements to manage land and water positively over the life of the development and beyond.	No	The Applicant welcomes the recommendation and has been working with a wide range of stakeholders in helping to shape the Scheme. This includes Non-Governmental Organisations (NGO) such as Norfolk Wildlife Trust and the Norfolk Community Foundation.



		The Birkbeck family are rewilding the area and should be engaged.		The Applicant further notes that pre-application engagement has taken place with the Westacre Estate rewilding project.
	Reference to early stage engagement	Why did you not come and speak in person to people like myself who have lived in Southacre in the Nar Valley for 30 years?	No	As part of the pre-application consultation the Applicant held a number of in person events, including early engagement workshops with local stakeholders and community groups During the statutory consultation the Application also held four in-person consultation events.
	Consultation materials information	I think there should be more photos, before and after. Some materials are difficult to interpret. I think the scale of what is proposed (IGP and RWE) means that the character of this part of the world could be changed forever.	Yes	The request for further imagery is noted by the Applicant and visualisations of the Scheme are provided as a part of the landscape and visual assessment in the ES Chapter 6: Landscape and Visual [APP/6.2] .
	Consultation materials information	The consultation materials are provided too late. I received the dates for the consultation events by post in July. The dates were in June. The consultation document is ok as far as the print goes, but the maps are extremely hard to read with nearly all the relevant information is produced green on green. This may be to show eco credentials but it fails to aid communication of information especially to anyone with visual difficulties. If you really do want to communicate and consult it is important that the plans are accessible.	No	The Applicant acknowledges these comments but remains confident that the information issued for the consultation was clear, provided adequate time for community involvement, and effectively invited participation. An initial newsletter was posted to residents and businesses within the identified PCZ on 6 May 2025, followed by a second notification leaflet sent via post to land within the PCZ well before the close of the statutory consultation at 23:59 on 9 July 2025. This newsletter provided details of the in-person consultation events and webinars, which were held on a range of days and times, including during the evening and at weekends, to accommodate different schedules. To improve accessibility, the consultation materials were made available on the Scheme website for respondents to 'zoom in' and print. Consultation materials, including maps such as the Indicative Masterplan, were also available in hard copy and accessible formats upon request.
	Consultation materials information	I can't find any reference in either documents around contingency planning for when/if the land is urgently required for food production (arable and/or livestock). Is there a Project Risk Register (professionally required - see PRINCE2 etc)? If so, can I see a copy please? Similarly I can't find a Site Security Plan (e.g. for trespass, criminal damage, sabotage, etc). Can I also see a copy of this please? Presumably you will have already consulted with Police, Fire, and Ambulance service and created a generic Multi-agency Major Incident Plan for the site? Have you agreed RVP's, Marshalling Areas, Casualty/Survivor Reception Centres, Body Collection Points, Radio Communications boosters, etc?	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 therefore considered that the use of agricultural land for the Scheme would not materially affect national food supply or agricultural resilience. Further details of the assessments under taken can be found in E S Chapter 11: Soils and Agriculture [APP/6.2] . Further to this, the Applicant notes the Policy Compliance Document [APP/5.6] , which confirms that the use of Best and Most Versatile (BMV) land as part of the Scheme is



				<p>justified, considering the economic and other benefits of the land.</p> <p>A Project Risk Register is maintained internally in accordance with good industry practice; however, it does not form part of the DCO Application.</p> <p>Regarding security, the boundary of the Solar PV Site will be secured both by fencing and by the provision of Closed-Circuit Television (CCTV) equipment. Cameras would be placed on poles with a maximum height of 3m. Perimeter fencing will be deer wire mesh and wooden post fencing with a maximum height of 2.5m. All new access tracks will be secured by gates, which will be set back from the public highway. Where existing access tracks are used that also provide access to residential properties, appropriate security measures will be put in place in consultation with the relevant property owner(s). The oOEMP [APP/7.8] further sets out security measures for the Scheme during the operational phase.</p> <p>The Applicant has met with representatives from Norfolk Fire and Rescue and the East of England Ambulance Service, as detailed in the Consultation Report [APP/5.1]. The Applicant also notes ongoing discussions regarding a joint Statement of Common Ground, as detailed in Section 6.2 of the Consultation Report [APP/5.1].</p>
	Consultation materials	information	<p>Biodiversity: there is not enough information provided how this would be improved. The construction phase will almost certainly diminish biodiversity and wildlife in particular.</p>	<p>No</p> <p>The Applicant acknowledges these comments but remains confident that information made available during the consultation was adequate and appropriate for that stage in the process.</p> <p>With regard to the concerns raised, the Applicant notes that ES Chapter 7: Ecology and Biodiversity [APP/6.2] considers the potential impacts and proposed mitigation regarding the Scheme with regard to wildlife and biodiversity.</p> <p>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.</p> <p>Details of the measures proposed to manage and reduce impacts on biodiversity and wildlife during construction are outlined in the oCEMP [APP/7.6].</p>
	Consultation materials	information	<p>The consultation information was incomplete and vague, particularly on the design. It did not say exactly what type and size of solar panels would be used- only</p>	<p>No</p> <p>The Applicant acknowledges these comments but remains confident that information made available during the</p>



		that 2 types are being considered. It did not say exactly where the 10HA battery and the 4HA transformer would be sited- only possible areas in which they might be positioned, etc.		consultation was adequate and appropriate for that stage in the process.
	Consultation materials	information The details provided so far, do not fully explain who these outcomes are calculated or achieved.	No	The Applicant acknowledges these comments but remains confident in the level of consultation undertaken and information presented throughout the pre-application stage.
	Consultation materials	information Just a lot of jargon.	No	<p>The Applicant notes this comment but remains confident that the information presented during the statutory consultation was sufficiently accessible. A Non-Technical Summary (NTS) of the Preliminary Environmental Information Report (PEIR) was provided to summarise the key findings in an accessible format, supported by community-facing materials such as the Consultation Information Booklet and exhibition boards. Clarification and further information were also available upon request throughout the consultation period.</p> <p>The Applicant also notes that an Non-Technical Summary [APP/6.5] of the ES [APP/6.1 - 6.5] has been submitted as part of the DCO Application.</p>
	Consultation materials	information The documents on the website run to many hundreds of pages, and are full of statutory detail and short on hard facts. I struggle to understand why the Nar Valley should be targeted for such a sized Solar farm. I am worried about the impact upon the River Nar catchment.	No	<p>The Applicant acknowledges these comments but remains confident in the level and accessibility of information presented throughout the pre-application stage. A NTS of the PEIR and other community-facing materials were made available to help explain the proposals in clear, non-technical language, with further clarification provided upon request.</p> <p>The overarching need for the Scheme is also set out in brief in ES Chapter 1: Introduction [APP/6.1]. Further explanation of the alternatives considered, including site selection and design evolution, is provided in ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.2]. An assessment of the Scheme's impact on the River Nar catchment is provided in ES Chapter 12: Water Resources [APP/6.2].</p> <p>The Applicant also notes that an Non-Technical Summary [APP/6.5] of the ES [APP/6.1 - 6.5] has been submitted as part of the DCO Application.</p>
	Consultation materials	information The green on green and green tone used in the production of the maps makes them very difficult to access so it is really hard to fully appreciate the positive and negative impact the plan will have on the environment and any positive social benefits.	No	It is noted that some material may have been technical in nature or some respondents may have been challenged in reading the maps available – every effort was made to ensure this information was clear and the applicant is confident that the opportunity for clarification was made available to all interested parties.



				The Applicant also notes that materials were available in hard copy or accessible formats upon request.
	Consultation materials	information	As previously mentioned the maps are not clear as there is too much green on green and closely toned greens to enable me to fully appreciate them.	No It is noted that some material may have been technical in nature or some respondents may have been challenged in reading the maps available – every effort was made to ensure this information was clear and the applicant is confident that the opportunity for clarification was made available to all interested parties. The Applicant also notes that materials were available in hard copy or accessible formats upon request.
	Consultation materials	information	<p>The documentation refers to 'indicative sitings' and 'potential mitigation and enhancement' so does not indicate what exactly we are asked to comment on.</p> <p>There is also a lack of graphics to show the visual impact and the extent to which this could be mitigated over time - e.g. after 1 year, 5 years, 10 years.</p> <p>The wide-angle nature of the graphics on show at the local events appears to be designed to minimise the visual impacts.</p>	Yes The Applicant acknowledges these comments but remains confident in the level of consultation undertaken and information presented throughout the pre-application stage. Efforts were made to be transparent and open with the material presented throughout the consultation. The The Applicant also notes that that as part of the Application, additional visualisations will be provided to accompany ES Chapter 6: Landscape and Visual [APP/6.2] . Please refer to ES Figure 6.10: (PP1-16 and PPa-g): Winter Photograph Panels [APP/6.3] and Figure 6.11: (PP1-16 and PPa-g): Summer Photograph Panels [APP/6.3] .
	Consultation materials	information	<p>Info should be made available as to the negative effects:</p> <p>For example, long term damage to the soil and to the health of humans..if this research is available.</p>	No The Applicant notes these comments and confirms that potential negative effects, including those relating to soil quality and human health, were assessed as part of the PEIR and have been further assessed and reported in the ES [APP/6.1] submitted with the DCO Application. As outlined in the Scoping Report ES Appendix 2.2: Scoping Opinion [APP/6.4] , health effects related to land quality were scoped out of further assessment on the basis that agricultural land quality and soil resources were not expected to be significantly affected during any phase of the Scheme. The Planning Inspectorate agreed with this approach. The Applicant notes that the potential health impacts of the Scheme and the effects on soils are set out in ES Chapter 11: Soils and Agriculture [APP/6.2] , of which concludes that there are no significant effects with embedded mitigation.
	Consultation materials	information	Can you also use more basic language, so everyone can understand, using only facts and not 'spin' everything to look rosey and great.	No The Applicant acknowledges this comment but remains confident that the information presented during the statutory consultation was factual in tone and sufficiently accessible and appropriate for that stage of the process. A NTS of the PEIR was provided to summarise the key findings in an accessible format, supported by community-



				<p>facing materials such as the Consultation Information Booklet and exhibition boards. Clarification and further information were also available upon request throughout the consultation period.</p> <p>The Applicant also notes that an NTS [APP/6.5] of the ES [APP/6.1 - 6.5] has also been submitted as part of the DCO Application.</p>
	<p>Consultation materials</p> <p>information</p>	<p>Too much jargon.</p> <p>At the consultation drop-in, there was no information on the substation at all, only a tentative location on the plans. I now understand that the substation location will be decided by the National Grid, presumably in consultation with the customer (i.e. Drovers Solar). I sincerely hope that there will be no substation which would be visible from Castle Acre Priory or Chimney Street.</p>	No	<p>The Applicant acknowledges this comment but remains confident that the information presented during the statutory consultation was sufficiently accessible.</p> <p>A NTS of the Preliminary PEIR was provided to summarise the key findings in an accessible format, supported by community-facing materials such as the Consultation Information Booklet and exhibition boards. Clarification and further information were also available upon request throughout the consultation period.</p> <p>The Applicant also notes that an Non-Technical Summary [APP/6.5] of the ES [APP/6.1 - 6.5] has also been submitted as part of the DCO Application.</p> <p>With regard to the proposed location of the substation, the Applicant notes that feedback on this matter was sought during consultation. The Applicant has chosen to locate the National Grid Substation, Customer Substation, and Battery Energy Storage System (BESS) within Fields 27 and 24, to the south of Bartholomew's Hills Plantation, reducing the visibility of this infrastructure from Castle Acre. The solar PV panels have been removed from Field 35 and the northern extents of Field 33.</p>
	<p>Consultation materials</p> <p>information</p>	<p>The leaflet informing us of any visit/webinars was not received until after they had all passed.</p>	No	<p>The Applicant acknowledges these comments but remains confident that information sent out for our consultation was done with adequate time for involvement and collaboration from the community.</p> <p>The Applicant also notes that an initial newsletter was posted to local residents and businesses within the identified PCZ on 6 May 2025 notifying of the statutory consultation. This newsletter provided details of the in-person consultation events and webinars, which were held on a range of days and times, including during the evening and at weekends, to accommodate different schedules.</p>
	<p>Consultation materials</p> <p>information</p>	<p>The size of the documents makes reading it all too much effort, and the reports are full of waffle. I could not find a succinct summary. I honestly think this proposal is too large, does not fit the area, and does not benefit the area.</p>	No	<p>The Applicant notes that some material may have been technical in nature or some respondents may have been challenged in following the maps available – every effort was made to ensure this information was clear and the applicant is confident that the opportunity for clarification was made available to all interested parties.</p>



				<p>A NTS of the Preliminary PEIR was provided to summarise the key findings in an accessible format, supported by community-facing materials such as the Consultation Information Booklet and exhibition boards. Clarification and further information were also available upon request throughout the consultation period.</p> <p>The Applicant also notes that an Non-Technical Summary [APP/6.5] of the ES [APP/6.1 - 6.5] has also been submitted as part of the DCO Application.</p> <p>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. The Applicant also notes engagement with the Norfolk Community Foundation as detailed in this Consultation Report [APP/5.1].</p> <p>In addition, the Applicant notes that the Scheme will generate business rates that are paid to the local authority.</p>
	Consultation materials	information	Please reconsider the use of one colour on maps. Use high contrast colours or symbols, preferably both.	<p>No</p> <p>The Applicant notes that some material may have been technical in nature or some respondents may have been challenged in reading the maps available – every effort was made to ensure this information was clear and the applicant is confident that the opportunity for clarification was made available to all interested parties.</p> <p>The Applicant also notes that materials were available in hard copy or accessible formats upon request.</p>
	Consultation materials	information	All your explanations, mitigations and childish illustrations are a bit of an insult really because I know this is a done deal and you don't really care what local people think anyway. Peace& love =)	<p>No</p> <p>The Applicant acknowledges these comments but remains confident that information used during the pre-application consultation was appropriate in language and tone.</p> <p>The Applicant also wishes to clarify that the Scheme remains subject to the statutory decision-making process and welcomes further engagement with stakeholders and members of the public throughout the Examination stage.</p> <p>Following submission of the DCO Application, the Planning Inspectorate will determine whether the application meets the standards required for acceptance. If accepted, the application will enter the Examination stage, during which stakeholders and members of the public will have the opportunity to register as Interested Parties and provide further feedback, either in writing or at hearings. Once the Examination has concluded, PINS will make a recommendation to the Secretary of State, who will then make the final decision on whether to grant development consent.</p>



	Consultation materials	information	Too much info to wade through....Search function would be helpful!	No	The Applicant notes this but remains confident that the information used during the pre-application consultation was appropriate in language and tone. All consultation documents were made available on the project website, where they could be searched and downloaded, and clarification or assistance was available upon request throughout the consultation period.
	Consultation materials	information	By the time I received the letter about the consultation events, they had already been and gone! In effect, I was not given the opportunity to learn more or put forward my views.	No	<p>The Applicant acknowledges these comments but remains confident that information issued for the consultation provided adequate time for community involvement and invited participation.</p> <p>An initial newsletter was posted to residents and businesses within the identified PCZ on 6 May 2025, followed by a second notification leaflet sent via post to land within the PCZ well before the close of the statutory consultation at 23:59 on 9 July 2025. This newsletter provided details of the in-person consultation events and webinars, which were held on a range of days and times, including during the evening and at weekends, to accommodate different schedules.</p> <p>The Applicant also notes that there will be further opportunities for stakeholders and members of the public to provide their views during the Examination stage of the DCO process.</p>
	Consultation materials	information	It is the 1st July and a flyer delivered today reference consultation events in May and June. It is clear that this project is being moved forward with a consultation timeline that actually doesn't reflect the calendar displayed in the post office delivered flyer and real time calendar. I therefore would like you to provide me with the evidence of dates and times that your company issued the flyers to the Post Office to distribute to enable me to attend the consultations; because unless I have a TARDIS it is impossible for me to attend in retrospect. (FOI act 20 days minimum).	No	<p>The Applicant acknowledges these comments but remains confident that information issued for the consultation provided adequate time for community involvement and invited participation.</p> <p>An initial newsletter was posted to residents and businesses within the identified PCZ on 6 May 2025, followed by a second notification leaflet sent via post to land within the PCZ well before the close of the statutory consultation at 23:59 on 9 July 2025. This newsletter provided details of the in-person consultation events and webinars, which were held on a range of days and times, including during the evening and at weekends, to accommodate different schedules.</p>
	Consultation materials	information	Why is it I get this information letter on the 1st of July when all the event dates to get involved have now passed.. this doesn't bode well for future communication!!	No	<p>The Applicant acknowledges these comments but remains confident that information issued for the consultation provided adequate time for community involvement and invited participation.</p> <p>An initial newsletter was posted to residents and businesses within the identified PCZ on 6 May 2025, followed by a second notification leaflet sent via post to land within the PCZ well before the close of the statutory consultation at 23:59 on 9 July 2025. This newsletter provided details of the in-person consultation events and</p>



				webinars, which were held on a range of days and times, including during the evening and at weekends, to accommodate different schedules.
	Consultation materials	information	Received leaflet (allegedly sent first class) today, 1st July!!! Let's hope your admin. Is a little more efficient than your mailings! What a waste of money!	No The Applicant acknowledges these comments but remains confident that information issued for the consultation provided adequate time for community involvement and invited participation. An initial newsletter was posted to residents and businesses within the identified PCZ on 6 May 2025, followed by a second notification leaflet sent via post to land within the PCZ well before the close of the statutory consultation at 23:59 on 9 July 2025. This newsletter provided details of the in-person consultation events and webinars, which were held on a range of days and times, including during the evening and at weekends, to accommodate different schedules.
	Consultation materials	information	Very disappointed to receive a leaflet today 1st July informing me of a 7 week consultation that runs out on the 9th of July. The information gives me dates from May to July to attend a consultation. Surely this is too late! Please give me answers by responding to this email	No The Applicant acknowledges these comments but remains confident that information issued for the consultation provided adequate time for community involvement and invited participation. An initial newsletter was posted to residents and businesses within the identified PCZ on 6 May 2025, followed by a second notification leaflet sent via post to land within the PCZ well before the close of the statutory consultation at 23:59 on 9 July 2025. This newsletter provided details of the in-person consultation events and webinars, which were held on a range of days and times, including during the evening and at weekends, to accommodate different schedules.
	Consultation materials	information	I had a leaflet come through the post on Saturday about the Drovers Solar farm, unfortunately all the dates on the sheet have past, as I'd have really liked to come along and see what it was all about.	No The Applicant acknowledges these comments but remains confident that information issued for the consultation provided adequate time for community involvement and invited participation. An initial newsletter was posted to residents and businesses within the identified PCZ on 6 May 2025, followed by a second notification leaflet sent via post to land within the PCZ well before the close of the statutory consultation at 23:59 on 9 July 2025. This newsletter provided details of the in-person consultation events and webinars, which were held on a range of days and times, including during the evening and at weekends, to accommodate different schedules.
	Consultation materials	information	I received your leaflet yesterday in the post informing me of the consultations you are holding in connection with the Drovers Solar Farm. Total waste of time if you	No The Applicant acknowledges these comments but remains confident that information issued for the consultation provided adequate time for community involvement and invited participation.



		<p>ask me all the consultation dates are well gone so I've got no chance to hear what you have to say.</p> <p>Are you planning anymore or just going to go ahead anyway no matter what the public think.</p>		<p>An initial newsletter was posted to residents and businesses within the identified PCZ on 6 May 2025, followed by a second notification leaflet sent via post to land within the PCZ well before the close of the statutory consultation at 23:59 on 9 July 2025. This newsletter provided details of the in-person consultation events and webinars, which were held on a range of days and times, including during the evening and at weekends, to accommodate different schedules.</p> <p>The Applicant also notes that there will be further opportunities for stakeholders and members of the public to provide their views during the Examination stage of the DCO process.</p>	
	Consultation materials	information	<p>What is the point of the invitation received today, 27 Jun, as all the events have already happened? This does not bode well for the quality of your planning.</p>	No	<p>The Applicant acknowledges these comments but remains confident that information issued for the consultation provided adequate time for community involvement and invited participation.</p> <p>An initial newsletter was posted to residents and businesses within the identified PCZ on 6 May 2025, followed by a second notification leaflet sent via post to land within the PCZ well before the close of the statutory consultation at 23:59 on 9 July 2025. This newsletter provided details of the in-person consultation events and webinars, which were held on a range of days and times, including during the evening and at weekends, to accommodate different schedules.</p>
	Consultation materials	information	<p>I have received a leaflet today 26.6.2025 @ 12:30 from yourselves reference consultation events and webinars however all of these events have already taken place, I would have been interested in attending a webinar?</p>	No	<p>The Applicant acknowledges these comments but remains confident that information issued for the consultation provided adequate time for community involvement and invited participation.</p> <p>An initial newsletter was posted to residents and businesses within the identified PCZ on 6 May 2025, followed by a second notification leaflet sent via post to land within the PCZ well before the close of the statutory consultation at 23:59 on 9 July 2025. This newsletter provided details of the in-person consultation events and webinars, which were held on a range of days and times, including during the evening and at weekends, to accommodate different schedules.</p>
	Consultation materials	information	<p>I am a Swaffham resident, and I have today received a letter from you regarding the 7 week statutory consultation exercise for the proposed Drovers Solar Farm.</p> <p>To my surprise, I find all 4 of the advertised consultation events, as well as the two webinars have already happened!</p> <p>What exactly is the point of notifying me of a consultation exercise that has been and gone, and</p>	No	<p>The Applicant acknowledges these comments but remains confident that information issued for the consultation provided adequate time for community involvement and invited participation.</p> <p>An initial newsletter was posted to residents and businesses within the identified PCZ on 6 May 2025, followed by a second notification leaflet sent via post to land within the PCZ well before the close of the statutory consultation at 23:59 on 9 July 2025. This newsletter</p>



		that I cannot take part in?		<p>provided details of the in-person consultation events and webinars, which were held on a range of days and times, including during the evening and at weekends, to accommodate different schedules.</p> <p>The Applicant also notes that there will be further opportunities for stakeholders and members of the public to provide their views during the Examination stage of the DCO process.</p>
	Consultation materials	<p>An OS map of proposed area initially would be helpful in understanding the topography of the complete area and its relationship to existing networks.</p>	No	<p>Maps indicating the topography of the Site were provide as part of the PEIR.</p> <p>The Applicant also notes that ES Figure 6.4: Landscape Character [APP/6.3] submitted with the Application details the topography of the Site.</p>
	Consultation events	<p>Project team were deeply unimpressive - they did not understand the technology in full and clearly did not care about the local impact on a very special area.</p> <p>In comparison with small nuclear reactors they are a very poor second.</p>	No	<p>The Applicant has confidence in the project team appointed to deliver the Application and notes that detailed measures to mitigate potential impacts on the local area are set out within the Scheme design.</p> <p>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. It recognises that a mix of technologies, including solar, wind, nuclear, and other low-carbon generation, will be required to achieve these targets, with the Scheme contributing to this balanced energy portfolio.</p>
	Consultation events	<p>No social or community benefits were demonstrated in either your literature or community meeting at Castle Acre. So too your biodiversity and environmental net gains. Nada.</p>	No	<p>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. Engagement with the Norfolk Community Foundation with regard to community benefits is detailed in this Consultation Report [APP/5.1].</p> <p>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..</p>
	Consultation events	<p>Impact on SSSI.</p> <p>Project team seemed unaware that solar panels are less efficient over 25. Indeed they denied that was the case. They are wrong.</p> <p>Panels will need replacing 2-3 times over life of project. How is that environmental.</p>	No	<p>Large-scale solar schemes in the UK are efficient compared to other technologies in terms of energy generation over their operational lifespan. The Applicant notes that Island Green Power (IGP) is a signatory to the Solar Energy UK Supply Chain Statement, committing to a transparent and sustainable supply chain free from human rights abuses. Panel replacement and maintenance requirements have been accounted for within the</p>



		Nearly 80% of solar panels are made in China - I need reassurance that these will not be.		<p>Scheme's design and environmental assessments, as detailed throughout the ES [APP/6.1 – 6.5].</p> <p>The Applicant also notes that for the panels are expected to be replaced once during the lifespan of the Scheme over a 12-24 month period. Further details of replacement activities are set out in the oOEMP [APP/7.8].</p>
	Consultation events	<p>I attended the open evening at Castle Acre today and they were unable to tell me how many metal uprights will be required for your application, but it will be a very great many. 2 years of construction and continuous pile driver noise will drive all of us in Castle Acre and surrounding villages quite potty.</p> <p>Your representatives said that the noise nuisance will have to be ameliorated, but I am unclear as to how this will be possible.</p>	No	<p>The Applicant notes that noise from piling activities have been assessed in the ES Chapter 10: Noise and 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.</p> <p>The Applicant also notes that where percussive piling is undertaken for the foundations of the Solar PV Arrays within 400m of sensitive receptors, this should be restricted to no more than two periods of four hours each with at least one hour of no piling between these four-hour periods and restricted to the hours of 07:00 to 18:00 Monday to Friday and 08:00 to 13:30 on Saturdays.</p> <p>In addition, piling works within 130m of Keepers Cottage will be further controlled to reduce noise levels to not exceed 65dB LAeq over the working day, through use of quieter piling techniques, and if possible, use of localised screening or a combination of these measures.</p> <p>Further details of how noise and vibration as a result of the construction works would be managed are presented in the oCEMP [APP/7.6].</p>
	Consultation events	<p>I am physically disabled but will do my utmost to get to Swaffham Assembly Rooms in June to see your roadshow and ask you lots of difficult questions.</p> <p>I am a retired Met Police Inspector who used to be responsible for all of London's multiagency emergency planning (both civil emergencies and terrorism). I have an MSc in Emergency Planning and Leadership. I kind of know what I'm talking about re my responses above.</p>	No	<p>The Applicant notes this comment and welcomes ongoing engagement from all affected parties.</p>
	Consultation events	<p>It was quite intimidating walking in to the community centre, as I entered there were so many corporate men, in suits and ties, I felt uncomfortable and then could not ask the things I wanted to.</p>	No	<p>The Applicant notes this comment but remains confident that the consultation events were appropriately staffed to ensure attendees could access accurate information and speak directly with the relevant technical specialists.</p>



				The Applicant further notes that at the in-person events, appropriate facilities were available for attendees to discuss the Scheme privately, away from the main room and in a less intense environment, should this have been requested.
	Consultation events	<p>Consultation meeting was poor. No information was given unless by asking direct questions. Responses were limited. No idea how much energy each panel produces. No idea how much farm will cost. No idea how efficient each panel is. Told noise would try to be mitigated but unsure wheather this was possible. Was told house prices would not drop but I seriously would not have bought a home here if I knew that it was then going to be on the edge of a battery cell .Therefore im sure prices will drop and who will compensate us for this. I choose to live in the countryside with the low employment , poor road links and peace and quite I have not choosen to live beside a solar farm.</p> <p>During the meeting a female member just stood smirking and saying unhelpful comments about how she would love the panels in her environment and how beautiful they are! But was unable to give out any useful information.</p>	No	<p>The Applicant notes this comment but remains confident that the consultation events were appropriately staffed with knowledgeable members of the project team to answer questions on all aspects of the Scheme. If questions were not able to be answered on the day of the in-person events, attendees were encouraged to follow up with the Community Relations Team via email or phone.</p> <p>The Applicant also notes that there is no research or evidence to suggest solar farms impact property values.</p>
	Consultation events	the experts on attendance were very vague on many issues, gave us assumed processes rather than definite mutigations, misinformed about the procedures with planning, suggested that archeology on sute and nearby was not significant or could ve " built over for future generations" very condescending	No	<p>The Applicant notes this comment but remains confident that the consultation events were appropriately staffed with knowledgeable members of the project team to answer questions on all aspects of the Scheme.</p> <p>An assessment of the effects of the Scheme on cultural heritage and archaeology, including local receptors such as Castle Acre Priory, is presented in ES Chapter 9: Cultural Heritage and Archaeology [APP/6.2].</p>
	Consultation events	Good in terms of the presentations at the consultation event. But this form not really couched in simple terms.	No	The Applicant acknowledges these comments but remains confident in the level of consultation undertaken and information presented throughout the pre-application stage.
	Consultation events	The personal interaction and knowledge of the personnel involved in the in person presentation was excellent.	No	The Applicant welcomes this comment.
	Consultation events	You would have been wise to take the team that was at Swaffham to the village meetings as the feedback was very poor from my friends in Castle Acre	No	The Applicant notes this comment but remains confident that the consultation events were appropriately staffed with knowledgeable members of the project team to answer questions on all aspects of the Scheme.



	Consultation events	The in-person event was interesting and the hosts both considerate and well informed. However, it was NOT A CONSULTATION - just an exhibition	No	The Applicant notes this comment. Attendees at the in-person consultation events were able to provide feedback on the day by completing a Feedback Form, and additional feedback could be submitted online, by post, or via email during the consultation period. The exhibition events formed part of a wider programme of engagement designed to inform, gather views, and encourage participation in the statutory consultation process. The Applicant considers that these events provided meaningful opportunities for attendees to discuss the proposals with the project team and to have their comments recorded and taken into account.
	Consultation events	The community event was very underwhelming. Polite staff but little engagement - standing in front of maps and posters is not meaningful consultation.	No	The Applicant acknowledges these comments but remains confident in the level of consultation undertaken and information presented throughout the pre-application stage. Attendees at the in-person consultation events were able to provide feedback on the day by completing a Feedback Form, and additional feedback could be submitted online, by post, or via email during the consultation period. The exhibition events formed part of a wider programme of engagement designed to inform, gather views, and encourage participation in the statutory consultation process. The Applicant considers that these events provided meaningful opportunities for attendees to discuss the proposals with the project team and to have their comments recorded and taken into account.
	Consultation events	At the consultation event, I was told about the legally binding register of commitments, which I thought was great in principal, but still have little faith that if a commitment is broken, anything is ever done about it.	No	The Applicant acknowledges these comments and confirms that all commitments made through the Application, along with any requirements imposed through the DCO, will be fully adhered to.
	Consultation events	On 2nd July I received in the post a leaflet inviting me to take part in the seven week statutory consultation that started on 21st May. All of the dates of the consultation events, including the webinars were in the past! The last ending on the 25th June. How can this be deemed to be genuine consultation when it is not possible to attend any of the events?	No	The Applicant acknowledges these comments but remains confident that information issued for the consultation provided adequate time for community involvement and invited participation. An initial newsletter was posted to residents and businesses within the identified PCZ on 6 May 2025, followed by a second notification leaflet sent via post to land within the PCZ well before the close of the statutory consultation at 23:59 on 9 July 2025. This newsletter provided details of the in-person consultation events and webinars, which were held on a range of days and times, including during the evening and at weekends, to accommodate different schedules. The Applicant also notes that there will be further opportunities for stakeholders and members of the public



				to provide their views during the Examination stage of the DCO process.
	Consultation events	Thank you for the time you gave me at your latest consultation event held at Westacre Theatre, West Acre PE32 1UD, Friday 20th June, it was appreciated.	No	The Applicant welcomes this comment.
	Consultation events	At the village hall in Castle Acre your representatives could only bleat that these solar farms have to be built somewhere. I felt that to be a weak justification because of the too obvious conflation of somewhere with anywhere there being many other less picturesque parts of Norfolk of equal suitability.	No	<p>The Applicant notes that the Site Evaluation Report, provided in Appendix 1 of the Planning Statement [APP/5.5], demonstrates that the Site is suitable for the proposed development, having been selected following a comprehensive assessment of environmental, technical, and planning considerations.</p> <p>The Statement of Need [APP/5.4] further 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.</p>
	Consultation events	Castle Acre only had the consultation visit as the Parish Council requested it, bearing in mind we are one of the closest villages to the proposed site, I feel we should have been considered foremost.	No	<p>The Applicant notes that the locations of in-person consultation events were selected based on a range of factors, including proximity to the Site, accessibility for residents within the Primary Consultation Zone (PCZ), and the availability and suitability of local venues.</p> <p>Castle Acre Village Hall was included in the in-person event schedule following a request from Castle Acre Parish Council. The Applicant considers that the overall programme of events provided appropriate coverage across the PCZ to ensure that local communities had an opportunity to attend and provide feedback.</p>
	Consultation website	I have tried three times to complete this form online but it has disappeared each time before I could fully do so. As it is the deadline today for returning the form I am going to try sending this to you again. I do not know if I was timed out therefore	No	The Feedback Form was received by the Applicant and considered within the responses as outlined.
	Consultation website	Too much info to wade through....Search function would be helpful!	No	The Applicant notes that a search function for all documents uploaded to the Scheme website was available throughout the consultation period. Every effort was made to ensure that this information was clear and accessible, and the Applicant is confident that opportunities for clarification were available to all interested parties.
	Consultation Good	Thank you for the information to date, and the opportunity to discuss the project more	No	The Applicant welcomes this comment.
	Consultation (Bad)	It is incredibly easy to write reams of waffle that feels like it has been generated by ChatGPT. The proof will be in the pudding. This is a totally pointless section of the survey because you can talk about all of this with	No	The Applicant notes these comments and confirms that all commitments made through the Application, along with any requirements imposed through the DCO, will be fully adhered to.



		the best of intentions and do precisely none of it when it comes to the crunch.		
	Consultation (Bad)	The 'consultation' appears to be inward looking - focused solely on these proposals rather than broader consideration of alternatives.	No	<p>The Statement of Need [APP/5.4] provides the justification for the Scheme, outlining its role in supporting the UK's renewable energy and net zero objectives. It recognises that a mix of technologies, including solar, wind, nuclear, and other low-carbon generation, will be required to achieve these targets, with the Scheme contributing to this balanced energy portfolio.</p> <p>The Applicant notes that the Site Evaluation Report, provided in Appendix 1 of the Planning Statement [APP/5.5], demonstrates that the Site is suitable for the proposed development, having been selected following a comprehensive assessment of environmental, technical, and planning considerations. Further details of the reasonable alternatives considered, including site selection and design evolution, are set out in ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.2].</p>
	Consultation (Bad)	<p>It is difficult to tailor one's comments and objections to fit in with the structure of this form. The form does not really allow for full expression. It seems to be a fitting example of your 'design principles' - designed to obfuscate.</p> <p>The consultation information was incomplete and vague, particularly on the design. It did not say exactly what type and size of solar panels would be used- only that 2 types are being considered. It did not say exactly where the 10HA battery and the 4HA transformer would be sited- only possible areas in which they might be positioned, etc.</p>	No	The feedback form included free form boxes for the submission of feedback comments. The Applicant also welcomed feedback received via the Community Relations inbox or by Freepost, and promoted these alternative channels accordingly.
	Consultation (Bad)	This is beyond satire. You are vague where you require respondents to be specific! Build the bloody thing elsewhere.	No	The Applicant notes this comment.
	Consultation (Bad)	Not sure how you achieve it but feel you need greater public engagement.	No	<p>The Applicant notes this but remains confident that the level of engagement undertaken was appropriate and proportionate, providing multiple opportunities for consultees to access information and provide feedback throughout the pre-application period.</p> <p>The Applicant also notes that there will be further opportunities for stakeholders and members of the public to provide their views, including during the Examination stage of the DCO process.</p>



	Consultation (Bad)	Your companys link with the other proposed site should have been made clear. A much wider consultation on the impact of visual, cultural and heritage destruction needs to be discussed. Also there is very little to no community benefit of this development.	No	<p>The Drovers Solar Farm and High Grove Solar Farm are two separate Nationally Significant Infrastructure Projects (NSIPs), being developed by IGP and RWE respectively.</p> <p>The Applicant has engaged with the High Grove project team, and measures for continued collaboration prior to construction have been secured within the relevant management plans.</p> <p>ES Chapter 17: In-Combination Effects [APP/6.2] assesses potential in-combination effects on various receptor groups, including heritage assets.</p>
	Consultation (Bad)	The fix is in. This public consultation is a performative, tick-box affair entirely subverted by the cynical conjoining of political will and commercial opportunity.	No	<p>The Applicant notes this but disagrees, remaining confident that the level of engagement undertaken was appropriate and proportionate, providing multiple opportunities for consultees to access information and provide feedback throughout the pre-application period.</p>
	Trust/confidence in developer	<p>As discussed with one of your representatives I feel Norfolk is being targeted unfairly for solar farms. The whole county seems to be victim of these plans</p> <p>I am also very displeased that all your proposed solar farms are of a size where you know local planning have no say. You know that because this government has created a ridiculous time scale for net zero that they want to be seen to meet this goal so you know you are onto a winner and despite saying you will listen to us, we know you wont.</p> <p>Stop thinking about money and think about people and their lives and how they want to enjoy this beautiful county. We want our trees to be safe, our wildlife to have freedom of movement to thrive.</p>	No	<p>ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] summarises the reasonable alternatives considered for the Scheme, including the initial site selection and subsequent design development.</p> <p>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.</p> <p>The Applicant further notes it remains committed to meaningful engagement with local communities and stakeholders. Feedback received throughout the pre-application process has been carefully considered and, where practicable, used to inform the evolution of the Scheme's design and mitigation measures.</p> <p>In bringing forward the Scheme, the Applicant considers it to be part of the vital mix of renewable energy generation needed to achieve the UK's net zero and energy security objectives, while also incorporating measures to protect, enhance and restore the local environment.</p>
	Trust/confidence in developer	Companies always put 'spins', to make something look like you absolutely need it, but in reality only companies reap the rewards, the working class will not see or have any benefit for at least 10-12 years!	No	<p>The Statement of Need [APP/5.4] sets out the national new renewable energy infrastructure to help achieve the UK Government's net zero and energy security objectives. The Scheme will make a meaningful contribution to this transition while supporting local employment and supply chain opportunities during construction and operation.</p> <p>The Applicant is also committed to ensuring that local communities benefit from the Scheme and continues to engage with stakeholders and the Norfolk Community</p>



				<p>Foundation to shape and deliver an appropriate package of community benefits.</p> <p>ES Chapter 14 Socio-Economics [APP/6.2] further sets out the assessment of the Scheme's socio-economic effects, including employment generation and supply chain opportunities.</p>
	Trust/confidence in developer	<p>This seems like a stitch up between the developing company and the farmers who are leasing the land to make lots of money for both in the guise of "providing green energy". There is no thought for the people who live in Swaffham whose lives will be diminished.</p>	No	<p>The Statement of Need [APP/5.4] sets out the national new renewable energy infrastructure to help achieve the UK Government's net zero and energy security objectives. The Scheme will make a meaningful contribution to this transition while supporting local employment and supply chain opportunities during construction and operation.</p> <p>In bringing forward the Scheme, the Applicant considers it to be part of the vital mix of renewable energy generation needed to achieve the UK's net zero and energy security objectives, while also incorporating measures to protect, enhance and restore the local environment.</p> <p>ES Chapter 14: Socio-Economics [APP/6.2] sets out the assessment of the Scheme's socio-economic effects, including employment generation and supply chain opportunities.</p> <p>The Applicant is also committed to ensuring that local communities benefit from the Scheme and continues to engage with stakeholders and the Norfolk Community Foundation to shape and deliver an appropriate package of community benefits.</p>
	Trust/confidence in developer	<p>In relation to 1 (c), any trust I have in the project will be dependent on where the proposed substations are. There is a proposed zone in which the two substations are potentially positioned. If they are NOT placed next to each other, and both south of Bartholemew's Hills Plantation, then that will be a disgrace, and can only be a cost saving measure, however you try and dress it up.</p>	No	<p>The Applicant has chosen to locate the National Grid Substation, Customer Substation, and Battery Energy Storage System (BESS) within Fields 27 and 24, to the south of Bartholemew's Hills Plantation, reducing the visibility of this infrastructure from Castle Acre. The solar PV panels have been removed from Field 35 and the northern extents of Field 33.</p>
	Trust/confidence in developer	<p>Having looked into the matter extensively I have come to the conclusion that this is nothing more than corporate money making at the expense of our food production, countryside/native wildlife and our own wellbeing.</p>	No	<p>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.</p> <p>The Applicant also notes that an assessment of effects of the Scheme on wildlife are presented in ES Chapter 7: Ecology and Biodiversity [APP/6.2].</p>



				In bringing forward the Scheme, the Applicant considers it to be part of the vital mix of renewable energy generation needed to achieve the UK's net zero and energy security objectives, while also incorporating measures to protect, enhance and restore the local environment.
	Trust/confidence in developer	Your masterplan is to make lots of money! I am not convinced for one moment that you give a toss about the environment!	No	<p>In bringing forward the Scheme, the Applicant considers it to be part of the vital mix of renewable energy generation needed to achieve the UK's net zero and energy security objectives, while also incorporating measures to protect, enhance and restore the local environment.</p> <p>A full assessment of the potential environmental effects of the Scheme has been undertaken, with the findings reported in the ES [APP/6.1 - 6.5].</p> <p>The Applicant believes that the Scheme will make a meaningful contribution to the UK's transition to a low-carbon future and forms part of the balanced energy mix required to achieve national net zero and energy security objectives, while incorporating measures to protect and enhance the local environment.</p>
	Trust/confidence in developer	More sophistry.	No	The Applicant notes this comment.
	Trust/confidence in developer	This whole project appears to be about project and making money	No	The Applicant notes these comments but disagrees. The Scheme is being brought forward to support the UK's transition to a low-carbon energy system and will make a meaningful contribution towards achieving national net zero and energy security objectives. The Scheme forms part of the balanced energy mix required to meet these goals, while incorporating measures to protect, enhance, and restore the local environment.
	Trust/confidence in developer	It is huge, and after you build it, recover your company costs, pay your shareholders, I do not feel I would benefit in any way. The energy you don't use will go into the grid, but where do you use your energy?	No	<p>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.</p> <p>ES Chapter 14: Socio-Economics [APP/6.2] also sets out the assessment of the Scheme's socio-economic effects, including employment generation and supply chain opportunities. Justification for the size of the development can be found in the Statement of Need [APP/5.4].</p>
	Trust/confidence in developer	This feels like an attempt to bribe local communities into agreeing the proposals.	No	<p>The Applicant notes this comment but does not agree with the suggestion that community benefits are intended to influence local support for the Scheme.</p> <p>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,</p>



				will determine how best to distribute funding. Any fund will help ensure that community benefit initiatives are transparent, locally focused, and appropriately managed
	Trust/confidence in developer	The bribery section. I'm sure there will be many better suggestions than I'm in the mood to offer but I'm confident you'll have no trouble falling short of them even so.	No	<p>The Applicant notes this comment but does not agree with the suggestion that community benefits are intended to influence local support for the Scheme.</p> <p>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. Any fund will help ensure that community benefit initiatives are transparent, locally focused, and appropriately managed.</p>
	Trust/confidence in developer	It is essential that this development becomes part of the community rather than being viewed as remote investors just profiteering from the locality. This means an ongoing, trustful relationship with the community and engaging on a positive basis to help fund local organisations, amenities and facilities in consultation with the town and parish councils and community groups. Company officials should not be remote and unobtainable and there should be an ongoing liaison over the life of the development. The community cohesion and acceptance is key to the success of this development and there are significant concerns locally. We would suggest that each affected community is given a stake in a section of the proposed development such that they get a regular payout over the life of the development rather like solar panels on buildings and feed in tariff. As it stands there is opposition given the impression that this is a group of outside investors cashing in with no real community affiliation.	No	<p>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.</p> <p>Any fund will help ensure that community benefit initiatives are transparent, locally focused, and appropriately managed.</p> <p>While the Applicant cannot offer direct financial participation or ownership, it remains open to further engagement regarding the development of community benefit initiatives and ongoing community liaison arrangements.</p>
	Trust/confidence in developer	<p>Conclusion</p> <p>I hope the above points are of interest and can be considered as part of this ongoing 'collaborative consultation' process for your proposed scheme. I do feel without this level of long-term engagement and 'buy-in' from your client to the quality of life for local peoples and experience at Drove Farm and the linked environs popular interest and support may wavier.</p>	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.
	Trust/confidence in developer	A political expediency has been grasped here by cynical operators and the stench is revolting.	No	The Applicant notes these comments but disagrees. The Statement of Need [APP/5.4] sets out the national new renewable energy infrastructure to help achieve the UK Government's net zero and energy security objectives. The Scheme will make a meaningful contribution to this



				transition while supporting local employment and supply chain opportunities during construction and operation.
	Trust/confidence in developer	Another cowardly and cynical calculation, another indulgence of profligacy with the very environment you affect to care about	No	The Applicant notes these comments but disagrees. In bringing forward the Scheme, the Applicant considers it to be part of the vital mix of renewable energy generation needed to achieve the UK's net zero and energy security objectives, while also incorporating measures to protect, enhance and restore the local environment.
	Trust/confidence in developer	<p>The Numbers.</p> <p>Initial consultation budget</p> <p>Construction budget</p> <p>Income projections</p> <p>Long-term Running and projected margins</p> <p>Community Budget Long term</p>	No	<p>The current cost estimate for the Scheme is approximately £900 million – £950 million.</p> <p>This estimate includes construction costs, preparation costs, supervision costs, land acquisition costs (including compensation payable in respect of any compulsory acquisition), equipment purchase, installation, commissioning, and power export. The estimate also includes an allowance for inflation and project contingencies.</p> <p>Further details of the Scheme's funding are set out in the Funding Statement [APP/4.2].</p> <p>The Applicant notes that any community benefit fund would be calculated based on the Scheme's generating capacity (MW per year) and delivered in line with industry standards for renewable energy projects.</p>
	Trust/confidence in developer	<p>Policy EC 06 – Farm Diversification</p> <p>While this policy supports diversification, it makes clear that development must be "appropriate in scale and character" and not conflict with wider sustainability and environmental objectives. This scheme far exceeds the scope of reasonable diversification and appears driven by commercial energy generation objectives rather than agricultural enhancement.</p>	No	<p>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.</p> <p>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.</p> <p>ES Chapter 11: Soils and Agriculture [APP/6.2] assesses the potential effects on local agricultural business, the potential wider effects on food production and the wider rural economy and concludes no permanent significant effects anticipated. Instead, the anticipated residual significant effects are temporary and limited mainly to the construction and decommissioning phases of the Scheme.</p> <p>Further to this, 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.</p> <p>In summary, whilst temporary minor adverse effects (in EIA terms) on soil resources are anticipated during the</p>



				<p>construction of the Scheme, this is balanced by the temporary beneficial effect which results from taking land out of intensive arable production for 60 years. A more detailed assessment regarding Policy EC06 Farm Diversification of the Breckland Local Plan is provided in the Planning Statement [APP/5.5].</p>
	Ongoing engagement	<p>Ongoing Community Engagement</p> <p>Will there be a local liaison committee or point of contact for complaints or concerns?</p>	No	<p>The Applicant notes this comment and remains committed to ongoing dialogue with the local community throughout all stages to ensure that the benefits of the Scheme are realised locally. The Community Relations channels will also remain open throughout the consenting process.</p> <p>The Applicant further notes that a Community Liaison Manager will be appointed as a temporary facilitator of communications between communities and the Scheme's operators. During long-term general operation and maintenance activities, a member of the Scheme's operation and maintenance team would also be in a dedicated 'community contact' position whereby they are responsible for monitoring community interaction to ensure community concerns are heard, responded to and suitably addressed throughout the duration of the Scheme's operation and maintenance phase. Further details of this are set out in the oOEMP [APP/7.8] which forms part of the DCO Application.</p>
	Ongoing engagement	<p>We therefore ask the developer to formally commit to:</p> <p>Sharing accessible updates with the community, and providing a clear channel for feedback or concerns, with a commitment to timely responses.</p> <p>These requests are made in the spirit of constructive engagement, to ensure that the scheme, if approved, is delivered in a way that respects the distinctive qualities of South Acre and its residents.</p>	No	<p>The Applicant notes these comments and remains committed to ongoing dialogue with the local community throughout all stages. The Community Relations channels will remain open throughout the consenting process.</p> <p>The Applicant further notes that a Community Liaison Manager will be appointed as a temporary facilitator of communications between communities and the Scheme's operators. During long-term general operation and maintenance activities, a member of the Scheme's operation and maintenance team would also be in a dedicated 'community contact' position whereby they are responsible for monitoring community interaction to ensure community concerns are heard, responded to and suitably addressed throughout the duration of the Scheme's operation and maintenance phase. Further details of this are set out in the oOEMP [APP/7.8] which forms part of the DCO Application.</p> <p>The Applicant further notes that, throughout the pre-application process, it has endeavoured to ensure that the Scheme design is sensitive to its surroundings.</p>



5 Construction

Topic	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Construction	Construction length	ecology and biodiversity, especially wildlife, will be disturbed to a huge extent during construction as this is forecast to be 24 months. This is unlikely to be remedied through the proposed measures.	No	The Applicant acknowledges this comment but disagrees with the conclusion. The oCEMP [APP/7.6] submitted as part of the DCO Application sets out the measures that will be implemented to protect the environment and mitigate potential effects during construction. A detailed CEMP will be prepared in accordance with the oCEMP [APP/7.6] and secured by way of a requirement within the DCO.
	Construction traffic and impact on roads	this is too big, right along daily access roads between Swaffham and Castle Acre , not discretely tucked in a vadt exoansf of unfrequented land or ali g long stretches of motorway. It is dlso directly adjacrnt to another dolar fat. propisal (High Groves) and therefore a cumulative burden to local people, visitors to the area and wildlife. It will involve years of noise from piling and transport traffic	No	<p>The Applicant notes these comments but disagrees with the conclusions. 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.</p> <p>With regard to traffic impacts, the cumulative traffic impacts of the Scheme are assessed within ES Chapter 9: Transport and Access [APP/6.2], which concludes that no significant adverse effects are anticipated. The Applicant also notes that High Grove Solar Farm has been included within this assessment.</p> <p>With regard to wildlife, the Scheme has been designed to incorporate the retention of valuable habitats and ecological features, including those identified to be of importance for protected species. Impacts of the Scheme on relevant habitats and species have been fully considered and reported on in ES Chapter 7: Ecology and Biodiversity [APP/6.2].</p> <p>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, with the minimum 10% commitment secured via a requirement in the DCO. The Biodiversity Net Gain Assessment Report [APP/7.4] has been submitted with the DCO Application.</p> <p>ES Chapter 17: In-Combination Effects [APP/6.2] provides a summary of the cumulative impacts associated with the Scheme.</p> <p>The Applicant notes that noise from piling activities has been assessed in the ES Chapter 10 Noise and 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</p>



				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.
	Construction traffic and impact on roads	<p>I do not consider this location to be suitable for what seems to be a large solar farm.</p> <p>Reasons: too near historic place of interest, and dwellings, increased heavy traffic flow through Swaffham.</p>	No	<p>The Applicant acknowledges this comment but considers the location suitable for the proposed development, noting that a detailed site selection process has been undertaken, taking into account proximity to heritage assets, residential properties and the existing transport network.</p> <p>ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/ 6.2] and Appendix 1: Site Evaluation Report, part of the Planning Statement [APP/5.5], provides an overview of the site evaluation process, which the Applicant has undertaken.</p> <p>Potential impacts on heritage assets are assessed within ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2], which concludes that with embedded and additional mitigation there would be no significant (in EIA terms) residual adverse effects.</p> <p>Heavy Goods Vehicle (HGV) routing would also avoid Swaffham and will be secured by way of requirement within the DCO through the CEMP. The outline framework for this is set out within the oCEMP [APP/7.6].</p>
	Construction traffic and impact on roads	<p>Disruption to Local Communities and Infrastructure</p> <p>The A1065, a key route connecting our villages Castle Acre, West Acre, South Acre and the market town of Swaffham, will be severely disrupted. The heavy traffic from construction vehicles will cause daily commuting delays, as well as damage the surrounding farmland on both sides of the road. The combined work of Drovers and High Groves solar farms will take over four years to complete, and the extensive use of heavy machinery will further exacerbate the disruption.</p>	No	<p>The Applicant acknowledges this comment and notes that potential impacts of construction traffic have been fully assessed within ES Chapter 9: Transport and Access [APP/6.2]. The assessment concludes there would be no significant effects, including with regard to the A1065. The Applicant further confirms that High Grove Solar Farm has been included within this assessment.</p> <p>Condition surveys will be agreed with the local highway authorities through the later iterations of the CTMP that will be secured by way of requirement within the DCO. The condition surveys will keep a log of the state of the highway and ensure that any damages are addressed post-construction.</p>
	Construction traffic and impact on roads	Peace and quiet is destroyed by industrial grade traffic and light pollution.	No	<p>A standalone noise assessment has been undertaken in ES Chapter 10: Noise and Vibration [APP/6.2] which assesses the impact associated with an uplift in traffic and which concludes there are no significant effects predicted.</p> <p>The Applicant also notes that the Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation, which would only include motion sensing lighting, and used only for security and</p>



				<p>maintenance purposes. Further details are set out in ES Chapter 5: The Scheme [APP/6.1].</p>
	Construction traffic and impact on roads	<p>You also will increase the traffic in this area taking away the beautiful quiet of the area.</p>	No	<p>The Applicant acknowledges this comment but notes that any increase in traffic would be temporary and limited to the construction phase. Measures to manage and minimise construction traffic are set out within the oCTMP [APP/7.7].</p> <p>During operation, traffic will be limited to occasional maintenance visits and will therefore not materially affect local traffic levels.</p> <p>Potential noise effects, including those associated with construction and traffic movements, are assessed within ES Chapter 10: Noise and Vibration [APP/6.2], which concludes that no significant adverse effects are predicted.</p>
	Construction traffic and impact on roads	<p>What impact will there be on the public rights of way, especially during construction and decommissioning? Especially since Fincham Drove, within 200m of the Roman road runs through the centre of the site.</p> <p>What consideration has been given to nighttime traffic, especially during construction and decommissioning?</p> <p>What consideration has been given to the increased traffic, especially large plant machinery around the small country lanes?</p>	No	<p>The Applicant notes that potential impacts on Public Rights of Way (PRoW) have been assessed within ES Chapter 9: Transport and Access [APP/6.2], which concludes no significant effects are predicted.</p> <p>All existing PRoW will be retained as part of the Scheme, and the historic droves crossing the Site, including Fincham Drove, will be enhanced to improve connectivity.</p> <p>The oCTMP [APP/7.7] sets out the proposed routing for HGVs, which will utilise the A1065 and avoid the use of rural roads where practicable. A detailed CTMP will be developed in accordance with the CTMP, with the measures secured by way of a requirement in the DCO. The Applicant notes that non-compliance with the requirements of the DCO would constitute a criminal offence.</p> <p>Construction deliveries would take place only during standard daytime working hours, with no night-time HGV movements.</p>
	Construction traffic and impact on roads	<p>Road networks need to be protected during construction and improved roads to provide access to construction and maintenance vehicles. The impact of the closure of roads or restricted access needs to be minimised to prevent disruption to local traffic and avoid unnecessary air pollution from idling vehicles. Good drainage of the site and food prevention is essential.</p>	No	<p>The Applicant notes these comments and confirms that condition surveys will be agreed with the local highway authorities through the later iterations of the CTMP, which will be developed in accordance with the oCTMP [APP/7.7] and secured by way of a requirement within the DCO. The condition surveys will keep a log of the state of the highway and ensure that any damages are addressed post-construction.</p> <p>The Applicant does not anticipate that road closures will be required during construction. Should any temporary closures be necessary, they will be managed in accordance with the oCTMP [APP/7.7] through</p>



				<p>appropriate signage, banksmen, and traffic management measures.</p> <p>Drainage across the site has been considered in ES Chapter 12: Water Resources [APP/6.2], which concludes that the Scheme is not anticipated to result in any residual adverse effects on water receptors during the Scheme's construction, operational, and decommissioning phases. The Applicant also notes that a Surface Water Drainage Strategy is embedded in ES Appendix 12.2: Flood Risk Assessment [APP/6.4] and introduces and secures the use of suitable SuDS measures.</p> <p>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.</p>
	Construction traffic and impact on roads	<p>We have also selected transport and access as a key concern. The land around the site, particularly near working area 11 and Bartholomew Hills, is characterised by sandy soil, which already causes surface issues. Sand is regularly displaced onto the road near Glebe Cottages, especially after rainfall, where it travels downhill toward the junction of Big Wood Lane, Three Corners Lane, and South Acre Road. If site traffic increases in this area, the problem will worsen, posing risks for walkers and cyclists using this stretch of Peddars Way.</p> <p>We therefore request that the developer put in place a continuous maintenance and road cleaning plan throughout the construction period, and that the traffic management strategy includes specific provisions for rural and road safety and the protection of public rights of way, especially where they are shared with site access.</p>	No	<p>The Applicant notes these comments and confirms that condition surveys will be agreed with the local highway authorities through the later iterations of the CTMP, which will be developed in accordance with the oCTMP [APP/7.7] and secured by way of a requirement within the DCO. The condition surveys will keep a log of the state of the highway and ensure that any damages are addressed post-construction.</p> <p>The outline Public Right of Way and Permissive Path Management Plan [APP/7.12] details the maintenance and cleaning regime to ensure that the PRow remain appropriate for use throughout construction and are not damaged.</p>
	Construction traffic and impact on roads	<p>Community impact: transport and access. The consultation information booklet notes that during the peak, construction movements are expected to be 622 two-way movements per day. The significant increase in traffic volumes on rural roads during construction & decommissioning will result in delays for local people and could lead to greater road damage.</p>	No	<p>The Applicant notes these concerns. An assessment of the impacts of construction traffic is included within ES Chapter 9: Transport and Access [APP/6.2], which concludes there are no significant adverse effects as a result of the Scheme.</p> <p>Outline measures to mitigate the impacts of construction traffic are included within the oCTMP [APP/7.7] which includes restrictions on the routing and hours of deliveries, as well as using internal routes to minimise impacts to other</p>



		Mitigating measures should be considered as part of a proper traffic management plan working with local people and councils.		road users. These measures will developed in consultation with relevant authorities, including National Highways, and will be secured by way of requirement under the DCO via the CTMP.
	Construction traffic and impact on roads	Installing the panels and infrastructure will cause disruption on the rural road network as construction, operation and decommissioning all involve actions which cause physical changes to the local topography,	No	<p>The Applicant notes these comments but does not consider construction of the Scheme to alter the topography of the area.</p> <p>Outline measures to mitigate the impacts of construction traffic are included within the oCTMP [APP/7.7] which includes restrictions on the routing and hours of deliveries, as well as using internal routes to minimise impacts to other road users. These measures will developed I consultation with relevant authorities, including National Highways, and will be secured by way of requirement under the DCO via the CTMP.</p>
	Construction impact (general)	The impact on a rural area such as this would be too severe in terms of damage from construction, damage from ongoing maintenance activities and visual impact on an area of natural beauty.	No	<p>The Applicant acknowledges this comment but disagrees with the conclusion. The oCEMP [APP/7.6] submitted as part of the DCO Application sets out the measures that will be implemented to protect the environment and mitigate potential effects during construction. A detailed CEMP will be prepared in accordance with the oCEMP [APP/7.6] and secured by way of a requirement within the DCO.</p> <p>To minimise the landscape and visual impacts of the Scheme, the Design Principles, Parameters and Commitments [APP/5.8] secure embedded mitigation measures which include the planting of new hedgerows, native woodland belts and scrub planting. New planting and maintenance regimes are outlined within the oLEMP [APP/7.11].</p> <p>The Applicant also notes that ES Chapter 6: Landscape and Visual [APP/6.2] assesses the visual impact of the Scheme. While some adverse impacts are identified, the majority are temporary. As set out in the Planning Statement [APP/5.5], the wider benefits of the Scheme, 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 effect, outweigh the residual adverse landscape and visual effects.</p>
	Construction impact (general)	You are only doing to disturb it all in the building of the farm.	No	The Applicant notes that oCEMP [APP/7.6] sets out the proposed measures to manage and mitigate environmental effects during construction of the Scheme. A detailed CEMP will subsequently be prepared in accordance with



				the oCEMP [APP/7.6] and secured by way of a Requirement in the DCO.
	Construction impact (general)	Peace and quiet will be destroyed by industrial grade traffic and light pollution.	No	<p>The Applicant notes these comments but disagrees with the conclusion. ES Chapter 9: Transport and Access [APP/6.2] concludes that no significant adverse effects are anticipated with regard to traffic associated with the Scheme.</p> <p>The Applicant also notes that the Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation, which would only include motion-sensing lighting and would be used only for security and maintenance purposes. Further details are set out in ES Chapter 5: The Scheme [APP/6.2].</p>
	Construction impact (general)	I am very concerned about destruction of wildlife habitats and plants during construction. And at the end of construction are you contractually committed to keep plantings alive? i have seen thousands of new trees proudly being planted along new infrastructure projects, only to die in subsequent months/years because no-one looks after them.	No	<p>The Applicant notes that the oCEMP [APP/7.6] sets out the proposed measures to manage and mitigate environmental effects during construction. A detailed CEMP will subsequently be prepared in accordance with the oCEMP [APP/7.6] and secured through a requirement in the DCO.</p> <p>The Applicant further notes that the oLEMP [APP/7.11], which is secured by a requirement in the draft DCO [APP/3.1], sets out the ongoing management and maintenance measures required to maintain the landscape and support ecological mitigation.</p>
	Construction impact (general)	<p>In addition, we would like to reinforce the importance of consistent delivery of mitigation measures outlined in the masterplanning documents. While noise, lighting and exposure to magnetic fields impacts are acknowledged in the planning stage, our experience suggests that these safeguards are often diluted during the construction, operational, and the decommissioning phases.</p> <p>We would also like to highlight the need to preserve the wellbeing of our small South Acre community, particularly during the construction phase, when increased noise, activity and disruption could have a significant effect on mental health, sense of safety, and daily life in this otherwise peaceful setting.</p>	No	<p>The Applicant notes these comments but confirms that the management plans set out how the Scheme's design commitments will inform the detailed documents secured by the requirements within the draft DCO [APP/3.1].</p> <p>The oLEMP [APP/7.11] sets out the ongoing management and maintenance measures required for the long-term upkeep of the landscape and ecological mitigation.</p> <p>ES Chapter 10: Noise and Vibration [APP/6.2] assesses the potential effects during the construction, operational, and decommissioning phases of the Scheme. Following the implementation of embedded and additional mitigation measures, as detailed within the chapter, it is concluded that there would be no significant adverse effects.</p> <p>The Applicant also notes that the Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation, which would include motion-sensing lighting used only for security and maintenance purposes.</p> <p>ES Chapter 15: Human Health [APP/6.2] provides an assessment of the likely significant effects on human health and the social environment resulting from the Scheme. It concludes that no residual significant effects on human</p>



				health are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation measures.
	Construction impact (general)	We would like to ensure the road to Swaffham is not blocked for two years.	No	The Applicant does not anticipate any road closures as a result of the Scheme. An assessment of the impacts of construction traffic is included within ES Chapter 9: Transport and Access [APP/6.2] , which concludes there are no significant effects and traffic management measures during the construction phase are set out in the oCTMP [APP/7.7] .
	Construction impact (general)	Will the site generate traffic, noise, or dust during installation or operation?	No	<p>The Applicant notes that while the Scheme will result in an increase in traffic from construction vehicles, an assessment of the impacts of construction traffic is included within ES Chapter 9: Transport and Access [APP/6.2], which concludes that there would be no significant effects.</p> <p>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.</p> <p>Appropriate mitigation measures to minimize dust generation from construction and decommissioning traffic are included within ES Chapter 16: Other Environmental Matters [APP/6.2].</p>
	Construction impact (general)	What access routes will construction vehicles use?	No	The Applicant notes that HGVs will route to the Scheme via the A1065, either arriving from the south via the A47 or from the north via the A1065. HGVs will only be permitted to use these routes, which will be secured by way of requirement in the DCO via the CTMP. The oCTMP [APP/7.7] forms part of the DCO Application.
	Construction impact (general)	<p>Construction & Maintenance</p> <p>How long will the construction phase last, and what hours will construction operate?</p>	No	The construction phase will last over a period of 24 months, with the opening hours of 07:00-19:00 Monday to Friday and a half day on Saturday.
	Construction impact (general)	The site gives a risk of release of pollutants into the water, soil and air.	No	<p>The Applicant notes that the Scheme incorporates robust drainage and containment measures to prevent contamination and manage surface water effectively, as set out in ES Chapter 12: Water resources [APP/6.2].</p> <p>Appropriate mitigation measures to minimise dust and traffic emissions during construction and decommissioning are detailed within ES Chapter 16: Other Environmental</p>



				Matters [APP/6.2] , and as such there are no significant effects.
	Construction impact (general)	Although being supportive the UK's ambition to reach net zero by 2050 and recognise that Norfolk may offer favourable conditions for solar energy. However we remain uncertain about the overall carbon benefit of large-scale solar farms, as there is no comparison of emissions from construction and decommissioning versus the savings generated.	No	<p>The Applicant notes that the climate assessment set out in ES Chapter 13: Climate Change [APP/6.2] includes a Lifecycle Greenhouse Gas (GHG) Impact Assessment.</p> <p>These assessments conclude that the construction and decommissioning of the Scheme will result in a not significant effect on the global climate while the operation of the Scheme will result in a significant beneficial effect on the global climate, due to the clean energy it produces, thereby providing a net reduction in GHG emissions.</p>
	Construction of BESS & Customer Substation	The battery energy storage system should be spatially dispersed to avoid a risk of catastrophic thermal runaway whose consequences could cause permanent contamination and poisoning of the environment (carcinogenic organics, Nickel dust, HF (Hydrofluoric Acid) et al.). The reports are silent about this issue that could be very significant in an event of a serious accident occurring.	No	<p>The BESS Unit separation is compliant with the guidance provided in the National Fire Chiefs Council Planning Guidance for BESS, which cites the spacing requirements contained in the Fm Global Loss and Prevention Datasheet 5-33, in which the spacing between LFP chemistry BESS units is to be no less than 1.5m. To date in the UK no BESS fire has resulted in any reported environmental impact, third party asset damage or harm to human health.</p> <p>Further details regarding BESS safety are set out in the oBSMP [APP/7.14] which has been submitted as part of the DCO Application.</p>
	Noise and vibration – construction	It will involve years of noise from piling and transport traffic.	No	<p>A standalone Noise assessment has been undertaken in ES Chapter 10: Noise and Vibration [APP/6.2] which assesses the impact associated with an uplift in traffic which concludes there are no significant effects predicted.</p> <p>The Applicant also notes that noise from piling 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.</p>
	Noise and vibration – construction	Mitigate for loss of visitors, distress leading to mental health effects from noise and visual impact	No	<p>The Applicant notes these comments and confirms that measures to mitigate the impacts of construction are set out in the oCEMP [APP/7.6].</p> <p>ES Chapter 15: Human Health [APP/6.2] provides an assessment of the likely significant effects on human health and the social environment, including on mental health, resulting from the Scheme during the construction phase. It 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,</p>



				<p>training and supply chain as a result of the Scheme's construction, operational and decommissioning phases.</p> <p>The Applicant notes that construction effects are temporary and have been assessed based on worst-case assumptions i.e., loudest plant operating at the closest point to receptors, further these effects are mitigation where required to non-significant effects. The impact from noise & vibration in practise is therefore likely to be lower than those presented in ES Chapter 10: Noise and Vibration [APP/6.2].</p>
	Noise and vibration construction	<p>I am very concerned to hear that your construction plans involve using pile drivers for all the panel uprights and the noise nuisance this will cause.</p> <p>I attended the open evening at Castle Acre today and they were unable to tell me how many metal uprights will be required for your application, but it will be a very great many. 2 years of construction and continuous pile driver noise will drive all of us in Castle Acre and surrounding villages quite potty.</p> <p>There is a clay pigeon shooting site at Chalk Farm near the A47 and the sound of gunfire on a Tuesday evening carries quite clearly to Castle Acre, so I am in no doubt that the sound of pile driving will similarly be an unwelcome intrusion.</p> <p>Your representatives said that the noise nuisance will have to be ameliorated, but I am unclear as to how this will be possible.</p> <p>Residents of Castle Acre and surrounding villages deserve significant monetary compensation for the disturbance you seem to be planning.</p>	No	<p>The Applicant notes these comments but confirms that noise from piling activities have been assessed in the ES Chapter 10 Noise and 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.</p> <p>Further details of the Scheme components of the Scheme are set out in ES Chapter 5: The Scheme [APP/6.1].</p> <p>While the Applicant cannot commit to awarding compensation regarding the Scheme, it 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.</p>
Pi	Noise and vibration construction	<p>The combined work of Drovers and High Groves solar farms will take over four years to complete, and the extensive use of heavy machinery will further exacerbate the disruption.</p> <p>Environmental Concerns and Noise Pollution</p> <p>The noise from both the construction and daily operations of the substations situated at the north-eastern most point of the site would be a significant disturbance. This site could have been better located further away from residential areas, in particular more to the western extent of the plot.</p>	No	<p>ES Chapter 10: Noise and Vibration [APP/6.2] outlines cumulative assessment from construction noise as well as operational noise. The construction programme for the two schemes is not expected to overlap for a prolonged period and are at sufficient distances to have negligible cumulative effects.</p> <p>The Applicant notes that the Customer and National Grid Substations and BESS have been located to the middle of the Scheme area to maximise separation distance where possible from receptors as part of the embedded measures in the design evolution of the Scheme. Fields 27 and 24 have been selected to provide sufficient distance to receptors to reduce operational noise to non-significant effects. An assessment of significant effects is provided in ES Chapter 10: Noise and Vibration [APP/6.2].</p> <p>The Applicant also notes that ES Chapter 10: Noise and Vibration [APP/6.2] concludes that, with embedded and</p>



				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.
	Noise and construction vibration –	I would like to make sure any potential noise impacts are fully addressed.	No	<p>The Applicant notes these comments and confirms that ES Chapter 10: Noise and Vibration [APP/6.2] considers and assesses all potential noise and vibration impacts expected from the construction, operation, and decommission phase of the Scheme.</p> <p>The Applicant also 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.</p>
	Noise and construction vibration –	Given South Acres close proximity to the proposed substation and working areas, we would welcome further detail on how noise and lighting will be managed during both construction and operational phases. These aspects remain uncertain at this stage, and therefore cannot be properly assessed from our perspective. The planning documents note that the specific technologies to be used for drilling, excavation, scabbing or other high-noise activities are yet to be determined, as well as the location of the generator. For this reason, we strongly encourage the developer to ensure that strict requirements are set for all contractors, with a clear exception that noise and lighting are kept to an absolute minimum.	No	<p>The Applicant notes this and confirms that ES Chapter 10: Noise and Vibration [APP/6.2] outlines best practice, embedded measures, and additional measures that will be incorporated into the oCEMP [APP/7.6] and oOEMP [APP/7.8], which will be secured by way of a Requirement of the DCO. All contractors will be required to adhere to these management plans and the measures set out within them.</p>
	Noise and construction vibration –	There is also a risk to noise including vibration and light pollution.	No	<p>The Applicant notes that noise & vibration risks have been addressed in the ES Chapter 10: Noise and Vibration [APP/6.2], which 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.</p> <p>The Applicant also notes that the Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation, which would only include motion-sensing lighting and would be used only for security and maintenance purposes.</p>
	Noise and construction vibration –	Noise and vibration that the appropriate noise and vibration assessments are undertaken to avoid deleteriously impacting residents or other sensitive receptors	No	<p>The Applicant notes that the noise vibration assessments detailed in ES Chapter 10: Noise and Vibration [APP/6.2] have been undertaken on the basis is conservative and worst-case assumption e.g., machine running at 100% capacity at all times, loudest construction activity at closest point to receptors etc. which is unlikely to be the case in</p>



				<p>practise and therefore the ES [APP/6.1 - 6.5] presents a worst-case assessment of effects.</p> <p>The assessment 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.</p>
	Noise and vibration – construction	<p>You have to mitigate the visual, audible and environmental impact of the eventual site, and as a minimal requirement this means planting hedgerows and belts of trees NOW so that they have a chance to grow before the construction phase. I know that this is the responsibility of the landlord before decisions are made, but you are in partnership with him, so it is incumbent on you to persuade him.</p>	No	<p>The Applicant notes that hedgerows or foliage have a negligible effect on reducing noise; mitigation measures such as acoustic barriers and machinery placement have been considered in ES Chapter 10: Noise and Vibration [APP/6.2] to reduce noise impacts to non-significant effects.</p>
	Mental health - construction	<p>We would also like to highlight the need to preserve the wellbeing of our small South Acre community, particularly during the construction phase, when increased noise, activity and disruption could have a significant effect on mental health, sense of safety, and daily life in this otherwise peaceful setting.</p>	No	<p>The Applicant notes the comments and points to ES Chapter 15: Human Health [APP/6.2] which identifies and proposes measures to address the potential impacts and likely significant effects on Human Health, during the construction, operation and decommissioning phases of the Scheme.</p>
	Temporary compounds construction	<p>Construction Compounds</p> <p>The development of a large scale solar array will require the delivery and storage of construction materials, plant, machinery and office/ welfare accommodation. It is therefore likely that a temporary construction compound will be required. Such compounds should be carefully located in order to minimise environmental or amenity impact and any planning application should contain details of their size and location. Topsoil and subsoil should be stripped from such areas and stored on site for replacement following the completion of construction works.</p> <p>Details of such soil stripping, storage and replacement should be contained within any planning application, together with the anticipated life of the construction compound.</p>	No	<p>The Applicant notes this comment and confirms that temporary construction compounds would be required during the construction phase. Measures to mitigate the effects on the environment, including those relating to drainage and welfare accommodation, are set out in the oCEMP [APP/7.6].</p> <p>The Applicant further notes that the location of the temporary construction compounds is shown in in the Works Plan [APP/2.3] and E S Figure 5.1: Concept Masterplan [APP/6.3].</p> <p>Works associated with the provision of temporary construction compounds are addressed in the oCEMP [APP/7.6].</p>



6 Cumulative impacts

Topic	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Cumulative Impacts	Inter project cumulative impact	Given that three major solar farms are planned in the local area - High Grove, East Pye, and The Drovers - covering a total of 3,849 hectares of arable farmland, there are concerns that the cumulative impact of these developments could be catastrophic for local agriculture, landscape, tourism, wildlife, and the community. The visual intrusion of these large-scale solar farms will dramatically alter the character of Norfolk, countryside, diminishing its natural beauty and appeal and destroying its aesthetic and environmental integrity for future generations.	No	<p>The Applicant notes these comments and recognises concerns regarding cumulative effects from solar development in the wider area.</p> <p>In terms of land use in Norfolk, the three projects as cited in the comment would use less than 1% of farmland, and less than 0.75% of the whole area of the county. The Applicant does not consider this quantum of land use to be a dramatic alteration.</p> <p>Nevertheless, the Applicant accepts that there is the potential for cumulative and in-combination effects, though not between The Drovers and East Pye, as there is a significant distance between them. Relevant cumulative effects have been summarised in ES Chapter 17: In-Combination Effects [APP/6.2].</p> <p>In relation to landscape and visual matters, ES Chapter 6: Landscape and Visual [APP/6.2] demonstrates that the Site can accommodate the proposed Solar PV arrays without causing significant long-term visual impacts on the surrounding landscape. While the Applicant acknowledges that there would be moderate significant adverse landscape effects within the Site in the long term, no significant adverse landscape effects are identified outside the Site.</p>
	Inter project cumulative impact	As discussed with one of your representatives I feel Norfolk is being targeted unfairly for solar farms. The whole county seems to be victim of these plans.	No	<p>A Statement of Need [APP/5.4] has been submitted as part of this application, which demonstrates that a significant capacity of low-carbon solar generation is urgently needed in the UK, and that the Scheme will, if consented, provide an essential progression to meeting the governmental objectives of delivering sustainable development to enable decarbonisation. Norfolk, alongside other areas of the country, will have a share of this type of infrastructure.</p>
	Inter project cumulative impact	Concerns: countryside appearance will be unnatural, comprising semi industrial looking infrastructure. Burden of solar panel farms should be spread fairly so the harm in the appearance is not concentrated in one area of East Anglia.	No	<p>The ES Chapter 6: Landscape and Visual [APP6.2] set outs the ways in which the Applicant has considered the potential visual and landscape impacts to local residents and visitors, potential effects associated with the panels and associated infrastructure. This has resulted in a number of changes to reduce visual impact, such as moving the proposed locations of the substations and</p>



				battery storage site. Even so, the Applicant recognises that there is the potential for some significant (in EIA terms) visual impacts during construction and decommissioning and to a lesser extent during operation of the site.
	Inter project cumulative impact	The only people who will be in favour of this plan are the landowners and the council. Between Sporle and Cambridge there is a possible 8,000 acres being taken out of productivity for solar panels and lakes. An [illegible] person would suggest putting desalination plants in.	No	<p>The utilised agricultural area (UAA) in the UK was 16.8 million hectares (ha) 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.</p> <p>Cumulative and in-combination effects, including those relating to agriculture, have been summarised in ES Chapter 18: Summary of Effects [APP/6.2].</p>
	Inter project cumulative impact	Finally, there are too many solar schemes proposed, Swaffham will be surrounded by solar farms to the great detriment of our rural environment. This seems like a stitch up between the developing company and the farmers who are leasing the land to make lots of money for both in the guise of “providing green energy”. There is no thought for the people who live in Swaffham whose lives will be diminished.	No	<p>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, including those relating to agriculture, have been summarised in ES Chapter 18: Summary of Effects [APP/6.2].</p> <p>Each topic chapter considers the impacts of the Scheme, and the impact of the Scheme in conjunction with other large-scale solar proposals and other committed developments within the region. For the town of Swaffham specifically, no significant effects (in EIA terms) are expected.</p>
	Inter project cumulative impact	It is also [also] directly adjacent [adjacent] to another solar farm proposal [solar farm proposal] (High Groves) and therefore a cumulative burden to local people, visitors to the area and wildlife.	No	<p>The Applicant is aware of the High Grove scheme and has undertaken assessments to consider the potential cumulative effect of this. Cumulative effects, including those relating to agriculture, have been summarised in ES Chapter 17: In-Combination Effects [APP/6.2].</p> <p>Each topic chapter in the Environmental Statement considers the impacts of the Scheme, and the impact of the Scheme in conjunction with other large-scale solar proposals and other committed developments within the region.</p> <p>ES Chapter 17: In-Combination Effects [APP/6.2] summarises the cumulative effects, and anticipates some significant effects (in EIA terms) on residents in terms of visual impact but no significant effects on tourism or wildlife. The Applicant is committed to increasing biodiversity across the site.</p>
	Inter project cumulative impact	If the proposed Drovers Solar Farm is added to the already proposed High Grove Solar Farm, it becomes overwhelmingly disproportionate, that our small village of Sporle should bear the brunt of industrialisation of our rural landscape. This will not only impact visually the people of this area, but also,	No	<p>Cumulative effects have been summarised in ES Chapter 18: Summary of Effects [APP/6.2].</p> <p>Each topic chapter considers the impacts of the Scheme, and the impact of the Scheme in conjunction with other</p>



		and perhaps more importantly, will impact physically the diverse flora & fauna of this rural landscape.		large-scale solar proposals and other committed developments within the region. ES Chapter 6: Landscape and Visual [APP6.2] sets out the ways in which the Applicant has considered the potential visual and landscape impacts to local residents and visitors, potential effects associated with the panels and associated infrastructure. No significant effects or in combination effects are expected at Sporle, although the Applicant notes that its Application does not consider effects from the High Grove scheme by itself.
	Inter project cumulative impact	But we, in Norfolk, are being inundated w/ solar farms.	No	The Applicant respectfully disagrees with this assertion. The three current NSIP solar proposals identified to the Planning Inspectorate in Norfolk (this Application, High Grove and East Pye), would use less than 0.75% of the area of Norfolk.
	Inter project cumulative impact	Too big and should not be using agricultural land. Another project either side of Sporle is also being proposed. Solar panels should be on top of all new builds and existing commercial buildings. This proposal, for profit, adds to the urbanisation of very important countryside. Norfolk being particularly targeted in this respect.	No	While noting the concern about the size of this Scheme, the Applicant observes that it amounts to only 0.2% of Norfolk's farmland. Cumulative effects are summarised in ES Chapter 18: Summary of Effects [APP/6.2] , but the Applicant respectfully disagrees with the assertion that Norfolk is being particularly targeted. The three current NSIP solar proposals identified to the Planning Inspectorate (this Application, High Grove and East Pye), would use less than 0.75% of the area of Norfolk. The Applicant agrees that rooftop solar should be explored locally and nationally, but that practical constraints mean this is a longer-term option. Locations with rooftop solar would also retain a grid connection and use this when their own generation was insufficient, meaning that utility-scale generation would still be required.
	Inter project cumulative impact	I believe that Norfolk is being called upon to house far too many solar farms. The Nar valley is particularly beautiful area and as yet largely unspoiled.	No	The three current NSIP solar proposals in Norfolk identified to the Planning Inspectorate (this Application, High Grove and East Pye), would use less than 0.75% of the area of Norfolk. The Applicant accepts that some people may feel this is too much, but does not agree. The Applicant believes that its Application demonstrates how it has considered, and avoided or mitigated, impacts on the Nar Valley.
	Inter project cumulative impact	The overall scale of proposed Solar developments in this part of Norfolk is far too extensive and intensive, and is in serious danger of undermining the rural character of the area and destroying the diversity of landscapes in the county.	No	The Applicant is cognisant of other projects proposed in the area and has undertaken assessments to consider the potential cumulative effects. Cumulative effects are summarised in ES Chapter 18: Summary of Effects [APP/6.2] . Each topic chapter considers the impacts of the Scheme, and the impact of the Scheme in conjunction with



		<p>The CUMULATIVE effect of the proposed development along with others in the area means an INEQUITABLE CONCENTRATION of solar industry.</p> <p>Fields would be replaced not by a 'farm' but by what is, in effect, an industrial landscape of monotonous artificial structures. The proposed mitigation measures are rather vague, and seem quite inadequate in terms of visual impact - and certainly unlikely to be effective within the first ten years.</p> <p>The cumulative effect also seems to be entirely the opposite of what people are striving for in terms of rewilding</p>		<p>other large-scale solar proposals and other committed developments within the region.</p> <p>The three current NSIP solar proposals in Norfolk identified to the Planning Inspectorate (this Application, High Grove and East Pye), would use less than 0.75% of the area of Norfolk. The Applicant therefore does not believe that this would destroy the diversity of landscapes in Norfolk.</p> <p>ES Chapter 6: Landscape and Visual [APP/6.2] sets out the ways in which the Applicant has considered the potential visual and landscape impacts to local residents and visitors, potential effects associated with the solar PV panels and associated infrastructure.</p> <p>In terms of rewilding, the Applicant has engaged with the Westacre Estate to see how its plans can support their rewilding efforts.</p>
	Inter project cumulative impact	<p>We are concerned about the scale of the solar farm development particularly in combination with the The Drovers development proposals by IGP which also lies to the north of Swaffham. There is an unexplained overlap between the two developer's proposals. There also are a high concentration planned across East Anglia and in terms of community acceptance it would be enhanced if they were more dispersed across the country notwithstanding we realise the main drivers.</p> <p>The need to assess the possible issue of dazzle to road users</p>	No	<p>The Applicant is cognisant of other projects proposed in the area and has undertaken assessments to consider the potential cumulative effects. Cumulative effects are summarised in ES Chapter 18: Summary of Effects [APP/6.2]. Each topic chapter considers the impacts of the Scheme, and the impact of the Scheme in conjunction with other large-scale solar proposals and other committed developments within the region.</p> <p>Effects relating to glint and glare are considered in ES Chapter 16: Other Environmental Matters [APP/6.2]. It outlines landscape mitigation measures to provide new planting to mitigate the potential impacts and effects of glint and glare, including new native hedgerows and tree cover, along with their management and maintenance. The chapter concludes that no significant (in EIA terms) adverse effects are anticipated.</p>
	Inter project cumulative impact	<p>I am generally supportive of the solar farms but have concerns about the cumulative impact of many large solar farms also proposed adjacent to each other in this part of Norfolk.</p>	No	<p>The Applicant is cognisant of other projects proposed in the area and has undertaken assessments to consider the potential cumulative effects. Cumulative effects are summarised in ES Chapter 18: Summary of Effects [APP/6.2].</p> <p>Each topic chapter considers the impacts of Scheme; and the impact of the Scheme in conjunction with other large scale solar proposals and other committed developments within the region. As a result, the Applicant recognises that there is the potential for some significant (in EIA terms) visual impacts during construction and decommissioning and to a lesser extent during operation of the site.</p>
	Inter project cumulative impact	<p>Also don't think encircling whole villages in Norfolk is fair either...not the droves but other solar farms in the area.</p>	No	<p>The Applicant notes that the comment recognises that its Application does not encircle villages but is cognisant of other projects proposed in the area and has undertaken assessments to consider the potential cumulative effects.</p>



				<p>Cumulative effects are summarised in ES Chapter 18: Summary of Effects [APP/6.2].</p> <p>Each topic chapter considers the impacts of Scheme; and the impact of the Scheme in conjunction with other large scale solar proposals and other committed developments within the region. As a result, the Applicant recognises that there is the potential for some significant (in EIA terms) visual impacts during construction and decommissioning and to a lesser extent during operation of the site, but is working with nearby schemes to mitigate this.</p>
	Inter project cumulative impact	I have concerns that the masterplan landscape strategy as currently described is not robust enough a cumulative impacts with adjacent solar farms (proposed) is unresolved.	No	<p>The Applicant is cognisant of other projects proposed in the area and has undertaken assessments to consider the potential cumulative effects. Cumulative effects are summarised in ES Chapter 18: Summary of Effects [APP/6.2]. The Applicant recognises that there is the potential for some significant (in EIA terms) visual impacts during construction and decommissioning and to a lesser extent during operation of the site, but is working with nearby schemes to mitigate this.</p>
	Inter project cumulative impact	Too many solar farms proposed for the Swaffham area. Degradation of a pleasant rural environment.	No	<p>The Applicant is cognisant of other projects proposed in the area and has undertaken assessments to consider the potential cumulative effects. Cumulative effects are summarised in ES Chapter 18: Summary of Effects [APP/6.2]. Each topic chapter considers the impacts of the Scheme, and the impact of the Scheme in conjunction with other large-scale solar proposals and other committed developments within the region.</p> <p>ES Chapter 6: Landscape and Visual [APP6.2] sets out the ways in which the Applicant has considered the potential visual and landscape impacts to local residents and visitors, potential effects associated with the solar PV panels and associated infrastructure.</p> <p>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 the Site, in the long term.</p>
	Inter project cumulative impact	Cumulative eddect of 2 neighbouring proposals - High Groves and The Drovers.	No	<p>The Applicant is aware of the High Grove scheme and has undertaken assessments to consider the potential cumulative effect of this. Cumulative effects, including those relating to agriculture, have been summarised in ES Chapter 17: In-Combination Effects [APP/6.2].</p> <p>Each topic chapter in the Environmental Statement considers the impacts of the Scheme, and the impact of the Scheme in conjunction with other large-scale solar proposals and other committed developments within the region.</p>



				ES Chapter 17: In-Combination Effects [APP/6.2] summarises the cumulative effects, and anticipates some significant effects (in EIA terms) on residents and public rights of way in terms of visual impact.
	Inter project cumulative impact	Agriculture will be diminished hugely as you propose to cover a huge area with solar panels. It should be looked at as a whole for Norfolk. There are too many proposals for solar farms.	No	<p>The utilised agricultural area (UAA) in the UK was 16.8 million hectares (ha) 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.</p> <p>The three current NSIP solar proposals in Norfolk identified to the Planning Inspectorate (this Application, High Grove and East Pye), would use less than 1% of Norfolk's farmland.</p>
	Inter project cumulative impact	I am concerned re the size and siting of the large solar farms currently being proposed for Norfolk. The fast tracking of this proposal adjoining a vast acreage already proposed.	No	The Applicant is cognisant of other projects proposed in the area and has undertaken assessments to consider the potential cumulative effects. Cumulative effects are summarised in ES Chapter 18: Summary of Effects [APP/6.2] . The Applicant has not requested that its proposal is fast tracked and it will be assessed using the usual timeframes for a Nationally Significant Infrastructure Project.
	Inter project cumulative impact	I am also very concerned by the very large number of solar farms that are being considered all over Norfolk's high quality agricultural land.	No	<p>The utilised agricultural area (UAA) in the UK was 16.8 million hectares (ha) 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.</p> <p>The three current NSIP solar proposals in Norfolk identified to the Planning Inspectorate (this Application, High Grove and East Pye), would use less than 1% of Norfolk's farmland.</p>
	Inter project cumulative impact	The overall plans for Norfolk will damage the country irreparably.	No	<p>The Applicant notes this comment but disagrees with this statement. This and other solar schemes proposed are temporary in duration. In the case of the Applicant's Scheme the land (except the National Grid substation) will return to agricultural use at the end of the consent period.. The Applicant is cognisant of other projects proposed in the area and has undertaken assessments to consider the potential cumulative effects. Cumulative effects are summarised in ES Chapter 18: Summary of Effects [APP/6.2].</p> <p>The design of the Scheme has also sought to retain, buffer and enhance the existing on-site green infrastructure where practicable. The minimum buffer requirements for existing onsite features are set out in the Design Principles, Parameters and Commitments document [APP/5.8]. The strategy for existing and proposed green infrastructure throughout the Site is detailed within</p>



				Appendix 1: Green Infrastructure Strategy Plans to the oLEMP [APP/7.11] . New planting and maintenance regimes outlined within the oLEMP [APP/7.11] .
	Inter project cumulative impact	Your companys link with the other proposed site should have been made clear. A much wider consultation on the impact of visual, cultural and heritage destruction needs to be discussed. Also there is very little to no community benefit of this development.	No	<p>The Applicant notes this comment but disagrees with this statement. The Applicant is cognisant of other projects proposed in the area and has undertaken assessments to consider the potential cumulative effects. Cumulative effects are summarised in ES Chapter 18: Summary of Effects [APP/6.2]. However, the High Grove scheme is being promoted by a separate company. The only link between that company and the Applicant is that the two companies have sought to work together to understand cumulative effects and how these might be mitigated.</p> <p>Efforts to provide specific benefits in locally impacted communities are set out in the oESSCS [APP7.5] (for employment and economy), in the oLEMP [APP/7.11] (for landscape and ecological improvements) and through the provision of community benefits such as new permissive access routes, or through the community benefit fund (separate to the DCO process).</p>
	Inter project cumulative impact	Locally the cumulative impact with other adjacent proposed solar farm developments is of concern. For West Acre residents Swaffham is a major service destination so it will be the landscape and visual impact of the solar farm from local connecting roads which will be a significant concern.	No	<p>Cumulative effects, including those relating to agriculture, have been summarised in ES Chapter 17: In-Combination Effects [APP/6.2].</p> <p>Each topic chapter in the Environmental Statement considers the impacts of the Scheme, and the impact of the Scheme in conjunction with other large-scale solar proposals and other committed developments within the region.</p> <p>ES Chapter 17: In-Combination Effects [APP/6.2] summarises the cumulative effects, and anticipates some significant effects (in EIA terms) on residents and public rights of way in terms of visual impact.</p>
	Inter project cumulative impact	Cumulative impact. The number of large-scale solar farms planned across the county will have a substantial cumulative impact. Specifically in this area, between the Drovers and High Grove Solar Farm, there will be 6,700 acres covered by solar panels; with c. 20,000 acres across the whole county. The cumulative impact including economic, environmental, landscape and visual effects should be calculated in their totality. Preserving our diversity of landscapes and rural heritage should be considered in this regard.	No	<p>Cumulative impacts of the Scheme have been addressed as a whole within the Cumulative Effects chapter of the Environmental Statement.</p> <p>Efforts to provide specific benefits in locally impacted communities are set out in the oESSCS [APP7.15] (for employment and economy), in the oLEMP [APP/7.11] (for landscape and ecological improvements) and through the provision of community benefits such as new permissive access routes, or through the community benefit fund (separate to the DCO process).</p> <p>The utilised agricultural area (UAA) in the UK was 16.8 million hectares (ha) in 2024. The agricultural land taken for the Scheme represents less than 0.01% of the UAA and</p>



				<p>is not expected to have a significant impact on national food production and security</p> <p>The three current NSIP solar proposals in Norfolk identified to the Planning Inspectorate (this Application, High Grove and East Pye), would use less than 0.75% of the area of Norfolk. The Applicant therefore does not believe that this would destroy the diversity of landscapes in Norfolk.</p>
	Inter project cumulative impact	<p>4. Cumulative Impact and Inadequate Justification</p> <p>The NPPF requires planning authorities to consider the cumulative impacts of development. The proposed solar farm adds to a growing number of renewable energy developments in the region, placing pressure on the landscape, wildlife corridors and rural communities. The developer has not provided an adequate justification demonstrating why this site is necessary, especially when previously developed land, rooftops or less sensitive locations are available.</p> <p>The cumulative negative effect of increasing numbers of solar farms in the wider area should be recognised, as increasing amounts of land used for food production is being lost, thus threatening moves towards food security. This proposal does not provide “the most compelling evidence” necessary to justify such loss of agricultural land.</p>	No	<p>A Statement of Need [APP/5.4] has been submitted as part of this application, which demonstrates that a significant capacity of low-carbon solar generation is urgently needed in the UK, and that the Scheme will, if consented, provide an essential progression to meeting the governmental objectives of delivering sustainable development to enable decarbonisation. Norfolk, alongside other areas of the country, will have a share of this type of infrastructure. Currently, the three current NSIP solar proposals in Norfolk identified to the Planning Inspectorate (this Application, High Grove and East Pye), would use less than 0.75% of the area of Norfolk.</p>
	Inter project cumulative impact	<p>It is disappointing that the Breckland Local Plan does not identify suitable areas for renewable development and low carbon energy sources, in line with the recommendation in NPPF (Dec 2024) para. 165b, as this could avoid the increasing number of unregulated applications for solar farms across rural landscapes in the plan area.</p>	No	<p>The Statement of Need describes the Government’s policy that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that “a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”. The draft revised Overarching National Policy Statement for Energy EN-1 (April 2025) states that that the UK has huge potential for solar power and that solar energy is at the heart of the Clean Power 2030 Mission [Paras 2.10.1 & 2.10.2]. This Scheme therefore directly contributes towards meeting the national net zero and energy security requirements for the near future. Give the numerous constraints in identifying sites suitable for renewable energy generation like solar farms, most local authorities do not earmark or allocate land for renewable energy like they would for other forms of development such as housing or commercial.</p>
	Inter project cumulative impact	<p>9. Cumulative and Visual Impact</p> <p>The proposal contributes to a growing concentration of solar schemes in the Breckland area. There is no cumulative impact assessment to measure the combined visual, landscape, and ecological burden of</p>	No	<p>Cumulative effects, including those relating to agriculture, have been summarised in ES Chapter 17: In-Combination Effects [APP/6.2].</p> <p>Each topic chapter in the Environmental Statement considers the impacts of the Scheme, and the impact of the</p>



		this and other nearby energy developments. The absence of a landscape capacity analysis undermines the credibility of the scheme.		<p>Scheme in conjunction with other large-scale solar proposals and other committed developments within the region.</p> <p>ES Chapter 17: In-Combination Effects [APP/6.2] anticipates some significant effects (in EIA terms) on residents and public rights of way in terms of visual impact.ES Chapter 6: Landscape and Visual [APP/6.2] set outs the ways in which the Applicant has considered the potential visual and landscape impacts to local residents and visitors, potential effects associated with the panels and associated infrastructure.</p>
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7 Decommissioning

Topic	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Decommissioning of the Scheme	Decommissioning phase	How quickly can the "farm" be removed and returned to productive farmland? [This ought to be accounted for in the Project Risk Register)	No	<p>The Applicant expects the decommissioning phase to take between 12 and 24 months after the 60-year operational phase of the Scheme.</p> <p>The Applicant has prepared an outline Decommissioning Strategy (oDS) [APP/7.10] as part of the DCO Application. Should the Scheme be granted development consent, the Applicant would be required to prepare a detailed Decommissioning Strategy substantially in accordance with the oDS [APP/7.10] at the time of decommissioning. The Decommissioning Strategy would require approval from Breckland Council.</p>
	Decommissioning phase	Please ensure that the solar farm is surrounded by vegetation and that there should be powerfully legislation that when the solar farm is redundant that everything to do with its construction both above and below ground is removed and the land is restored to what it was.	No	<p>When the operational 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.</p> <p>All PV Panels, Mounting Structures, above ground cabling (not including the National Grid Substation and Grid Connection Infrastructure), Conversion Units / 33kV Sub-distribution Switch Rooms, BESS and the Customer Substation would be removed from within the Order limits 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 1m below the surface to enable future ploughing. Any piles would be removed.</p> <p>After the decommissioning phase, the landowners would choose how the land is to be used and managed.</p>



				Further details can be found in the oDS [APP/7.10] , which has been prepared by the Applicant as part of the DCO Application.
	Decommissioning phase	Decommissioning & Reversibility Is the lifespan of the solar farm still proposed as 60 years, and what happens at end-of-life? Is there a decommissioning plan in place? Will the site be restored to its original condition? Will a bond or fund be held in trust to guarantee decommissioning?	No	<p>The Applicant is seeking a time-limited consent, which would allow for the operation of the scheme to be 60 years.</p> <p>After the expected 60-year design life of the Scheme, the Applicant would commence decommissioning activities in accordance with a detailed Decommissioning Strategy, which could be prepared at the time of decommissioning. The Decommissioning Strategy would be drafted substantially in accordance with the oDS [APP/7.10] submitted with the DCO Application.</p> <p>The detailed Decommissioning Strategy would ensure that decommissioning was undertaken safely and with regard to the environmental legislation at the time of decommissioning, including relevant waste legislation.</p> <p>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. .</p> <p>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 1m below the surface to enable future ploughing. Any piles would be removed.</p> <p>After the decommissioning phase, the landowners would choose how the land is to be used and managed.</p> <p>Further details can be found in the oDS [APP/7.10], which has been prepared by the Applicant as part of the DCO Application.</p>
	Decommissioning phase	The solar farm should allow the land to be later recovered and returned to its former agricultural purpose, provided that contamination does not occur as a result of thermal runaway and contamination arising from the battery energy storage arrangement.	No	<p>The Applicant has prepared an outline Battery Safety Management Plan [APP/7.14] as part of this DCO Application, which sets out the safety measures proposed to be installed to reduce fire risk as well as fire protection measures.</p> <p>During the decommissioning phase, the Solar PV Site, including the BESS, would be decommissioned and the land returned to the landowner.</p>



				<p>After decommissioning, the landowners would choose how the land is to be used and managed. They may choose to return all of the land to agricultural use, although it is possible that established habitats such as hedgerows and woodland could be retained, given their potential benefits to agricultural land and the wider farming estate.</p> <p>Further details can be found in the oDS [APP/7.10], which has been prepared by the Applicant as part of the DCO Application.</p>
	Decommissioning phase	<p>6. Uncertain Decommissioning and Land Restoration Strategy</p> <p>National policy stresses the importance of temporary and reversible use of land for solar development. the proposal lacks a clear decommissioning plan, long-term land stewardship strategy, or legally enforceable mechanism to ensure restoration of land to its former agricultural use after the project's lifespan.</p>	No	<p>The Applicant notes this comment. An oDS [APP/7.10] has been prepared as part of the DCO Application. Should the Scheme be granted development consent, the Applicant would be required to prepare a detailed Decommissioning Strategy substantially in accordance with the oDS [APP/7.10] at the time of decommissioning. The Decommissioning Strategy would require approval from Breckland Council.</p>
	Decommissioning phase	<p>Reversability: the proposed method of construction, with metal poles driven into the ground would make it very difficult, if not impossible to return this land back to farm land at the end of the lease as it would be impossible to plough</p>	No	<p>When the operation and maintenance phase of the Scheme ends, the Solar PV Site would be decommissioned and the land returned to the landowner.</p> <p>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 1m below the surface to enable future ploughing. Any piles would be removed.</p> <p>The Applicant notes that some soil profiling and reseeded may be required, as there may be some areas where grass does not exist because of the footprint of the previous infrastructure (e.g. the BESS and Customer Substation). These areas will be reseeded with suitable native species, in liaison with the landowner and in accordance with the Decommissioning Strategy, which will be prepared substantially in accordance with the oDS [APP/7.10], prepared by the Applicant as part of the DCO Application.</p>



8 Environment

Topic	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Environment	Ecology	Detrimental effect on wildlife and landscape.	No	The Applicant notes this comment but disagrees. 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.
	Ecology	Far too big and will be intrusive even with trees around the edge. Much needed farming space being occupied. Animals natural habitats ruined in process etc the list goes on.	No	<p>The Statement of Need [APP/5.4] and Planning Statement [APP/5.5], both submitted in support of the Development Consent Order (DCO) Application, set out a detailed and compelling case as to why the Proposed Development is urgently required and at the proposed scale.</p> <p>The utilised agricultural area (UAA) in the UK was 16.8 million hectares (ha) 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.</p> <p>On the point regarding habitat, the Scheme means it delivers a BNG well in excess of 10%, and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme.</p>
	Ecology	I feel there are far more appropriate places to build a solar farm of this size in Norfolk. Not in this very special area of beauty which has a very active ecosystem, which will only be disrupted, not created.	No	<p>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, layouts and 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.</p> <p>The Statement of Need [APP/5.4] also 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.</p> <p>The Applicant further notes that oLEMP [APP/7.11], detailing habitat creation, monitoring and management measures is provided as part of the DCO Application,</p>



				which will become controlled through the detailed LEMP as a requirement of the DCO.
	Ecology	The point of Solar panels is to generate power with minimum impact to the environment... so solar farms seem to be an enormous contradiction and are working at cross purposes with the environment	No	The Applicant notes that the Scheme seeks to protect the existing sensitive ecological receptors at the site through careful design of the Scheme and provision of a number of mitigation measures. In addition, the Scheme delivers a BNG well in excess of 10% as set out in the Biodiversity Net Gain Assessment Report [APP/7.4] , which forms part of the DCO Application, and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme.
	Ecology	My concerns about the Drovers are the hedges and trees beside the bridleways and if they will be protected, and the bridleways themselves. How much disruption to locals and wildlife will there be?	No	<p>The majority of the hedgerows and trees are retained within the Scheme, with any removal of hedgerows anticipated to be limited to minor widening of existing gaps to enable appropriate access.</p> <p>The Applicant further notes that the Scheme includes a large amount of new hedgerow planting and enhancement of existing hedgerows. In addition, large buffers to the hedgerows and trees are included within the Scheme design to ensure their protection. Veteran trees are entirely retained and protected within the Scheme.</p> <p>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.</p>
	Ecology	<p>CONCERNS: MAINTAINING DARK SKIES STATUS</p> <p>LOSS OF NATURAL HABITAT</p>	No	Lighting is not required within the Solar PV Site for the Operational Phase. Lighting will centre on the Customer Substation, National Grid Substation, and within the BESS compound, to maintain safe working conditions in winter months, for security purposes, and for maintenance activities, as set out in ES Chapter 5: The Scheme [APP/6.1] . All lighting will seek to limit impacts on sensitive receptors. Accordingly, the Solar PV Site will not cast light into retained boundary habitats, thereby retaining dark corridors.
	Ecology	wildlife habitat, within designated nature conservation sites or areas identified as high priority for restoration or where harm is likely to be caused to populations of vulnerable, threatened and endangered species.	No	A full assessment of the direct and indirect effects on national and international designated sites, including Breckland SPA, Breckland Forest SSSI, and River Nar SSSI, has been undertaken within ES Chapter 7: Ecology and Biodiversity [APP/6.2] , with consideration of air quality and water pollution, which concludes no significant adverse effects associated with the Scheme.



				Non-statutory designations, including Roadside Nature Reserves, are also assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2] .
	Ecology	I believe that the present landscape and ecology has been given due consideration and it appears that there is some flexibility to adjust to resident's concerns	No	The Applicant notes these comments and agrees that mitigation measures and design choices have been made in consideration of feedback received through the Applicant's consultation process.
	Ecology	the nature and ecosystem will not recover	No	The Applicant notes this comment but disagrees. 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.
	Ecology	In a county with such rich biodiversity, it is impossible to manage all impacts. There will inevitably be negative consequences and disruption to habitat and wildlife environments.	No	Ecological receptors are fully considered within ES Chapter 7: Ecology and Biodiversity [APP/6.2] , and the embedded mitigation measures included within the Scheme result in no significant adverse effects anticipated.
	Ecology	I think that its difficult to tell about the environmental impacts until the farm is built - the risk of fire and the chemicals stored onsite to minimise the risk could pose a large threat to the environment if they leaked, or needed to be used. Nature recovery would be a great outcome, but if lots of chemical sprays are used, then this is unlikely. The details provided so far, do not fully explain who these outcomes are calculated or acheived.	No	Potential for risk of adverse effects such as fire and chemical storage/leaks will be dealt with through appropriate embedded design commitments, including suitable buffers, absorbent spill pads/kits and other measures secured within the oCEMP [APP/7.6] . An oLEMP [APP/7.11] , detailing habitat creation, monitoring and management measures is provided as part of the DCO Application, which will become controlled through the detailed LEMP as a requirement of the DCO.
	Ecology	I TOTALLY OBJECT TO THE PROPOSED SITING OF THE DROVES SOLAR FARM on productive farmland in an area with multiple heritage assets, many SSSIs, a nationally important chalk stream..the Nar, a National Trail, notable flora and fauna and Rewilding areas etc etc etc	No	Embedded mitigation measures to safeguard the River Nar SSSI and a full assessment of potential impacts to relevant SSSIs and irreplaceable habitats have been undertaken in ES Chapter 7: Ecology and Biodiversity [APP/6.2] . Impacts of the Scheme on Priority Habitats have also been fully considered within this assessment. The potential for pollution of the water environment is assessed in ES Chapter 12: Water Resources [APP/6.2] , which concludes the Scheme would have no significant effects on water resources, including the River Nar, throughout the construction, operation and decommissioning stages, through implementation of good practice measures.



				<p>PRoW have been assessed within the Landscape and Visual Impact Assessment, as set out in ES Chapter 6: Landscape and Visual [APP/6.2], which also considers both the visual experience of users and the character of the wider landscape.</p> <p>The Applicant has also engaged with the West Acre Estate to discuss its rewilding project.</p> <p>Principles set out in the draft Norfolk LNRS, where appropriate, have also informed the approach to biodiversity enhancements across the Site. Further details of this are provided in the Design Approach Document [APP/5.7].</p>
	Ecology	Think nature will find the building of a solar farm very disruptive.	No	<p>To ensure that sensitive ecological receptors are protected during construction of the Scheme, the measures to be adhered to are set out in the oCEMP [APP/7.6]. This includes, but is not limited to, measures to control noise, light, and pollution.</p>
	Ecology	The project would have an overall adverse impact on the local environment and community and would reduce biodiversity through the clearance of what is a natural area. It would have an adverse impact on the character of the area which is of a traditional rural nature.	No	<p>The Applicant notes that the Scheme seeks to protect the existing sensitive ecological receptors at the site through careful design of the Scheme and provision of a number of mitigation measures. In addition, the Scheme delivers a BNG well in excess of 10%, and provides a number of faunal enhancement measures, resulting in a betterment for biodiversity as a result of the Scheme.</p> <p>The Biodiversity Net Gain Assessment Report [APP/7.4] has been submitted with the DCO Application.</p>
	Ecology	Ecology and biodiversity would be affected by the change in the landscape with an adverse impact on flora and fauna.	No	<p>The Applicant notes this comment but disagrees. While 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.</p>
	Ecology	The current site has natural beauty and wildlife. I can't see many folk who would like to wander around a solar farm listening to the hum of battery cooling fans and transformers.	No	<p>The Applicant notes this comment but confirms that work has been undertaken to outline a Green Infrastructure Strategy, developed to support landscape character opportunities and draft LNRS and Norfolk BAP objectives. Further information can be found within the oLEMP [APP/7.11].</p> <p>Permissive paths, providing circa 3.5km of new pedestrian routes, have also been incorporated within the Scheme. Further information can be found within the outline Public Right of Way and Permissive Path Management Plan [APP/7.12].</p>



				<p>ES Chapter 10: Noise and Vibration [APP/6.2] assesses the noise impacts of the Scheme which concludes there are no significant adverse effects (in EIA terms) associated with the Scheme.</p>
	Ecology	Large solar farms are a blight on the beautiful country side with its inherent wildlife and unique archeological heritage	No	<p>The Applicant notes this comment but disagrees and 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.</p> <p>While the Applicant acknowledges there would be moderately 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.</p> <p>Figure 6.12 and Figure 6.13 Parameter Based Winter and Summer Photomontages and Figure 6.14 and Figure 6.15 Winter and Summer Photomontages Illustrative Scheme [APP/6.3] provide visualisations to support the LVIA and include both photowires and illustrative photomontages.</p> <p>The Applicant considers that the visualisations provided demonstrate how the Scheme has been designed sensitively in relation to the surrounding area and illustrate the effectiveness of the proposed screening.</p> <p>The Applicant also notes 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.</p>
	Ecology	We live in an conservation area and the River Nar is one of a few chalk streams in the country. Am happy to see that new hedgerows will be put in place but is this really enough.	No	<p>Embedded mitigation measures to safeguard the River Nar SSSI such as specific measures to stop spillages entering the watercourse.</p> <p>Are included in the management plans submitted a part of the DCO Application, and a full assessment of potential impacts to relevant SSSIs and irreplaceable habitats has been undertaken in ES Chapter 7: Ecology and Biodiversity [APP/6.2], which concludes no significant adverse effects.</p>
	Ecology	Nature recovery is already being enhanced in the area by re-wilding which has already proven to be controversial, as it has stopped access across public rights of way	No	<p>The Applicant notes these comments and seeks to reassure respondents that access will be maintained throughout the Site. Permissive paths, providing circa 3.5km of new pedestrian routes, have also been</p>



				incorporated within the Scheme. Further information can be found within the oPROWPPMP [APP/7.12] .
	Ecology	<p>Let the following stand as an example of my major concerns about GREENWASHING:</p> <p>Solar panels do not change with the seasons - they just replace a natural, changing and varied environment with a monotonous and bleak landscape.</p> <p>The neighbouring Rewilding Scheme on West Acre Estate is striving to restore the countryside - not obliterate it.</p>	No	<p>The Applicant notes these comments but contests their relevance to the approach being taken with this Scheme.</p> <p>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</p> <p>The Applicant has also engaged with the West Acre Estate in order to discuss the proposals and identify any key concerns and opportunities to complement measures within the Rewilding project.</p>
	Ecology	<p>You are not going to improve anything!! This is already a beautiful area with walking, community and a huge range of nature and ecosystem.</p> <p>You are only doing to disturb it all in the building of the farm.</p>	No	<p>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</p>
	Ecology	<p>We want to know how you are going to build this farm without ruining the ever increasing bird and animal life that thrives in this beautiful valley</p>	No	<p>To ensure that sensitive ecological receptors are protected through the construction of the Scheme, measures to be adhered to are set out within the oCEMP [APP/7.6].</p> <p>This includes, but is not limited to, measures to control noise, light, and pollution. In addition, a Ground Nesting Bird Strategy has been prepared to fully mitigate potential impacts on these species (Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP/6.4]).</p>
	Ecology	<p>How can wildlife move through the site? it will be fenced off like the other solar farms in the area.</p> <p>The proposed installation would be seen from the Castle Acre Priory. On maps it is easy to show hedgerows but it does not show elevations and what can be seen from higher lying ground.</p> <p>I am very concerned about destruction of wildlife habitats and plants during construction. And at the end of construction are you contractually committed to keep plantings alive? i have</p>	No	<p>The operational area of the Scheme will be enclosed within perimeter fencing; however, dispersal impacts on wildlife are not anticipated owing to the incorporation of above ground clearances and mammal gates.</p> <p>The Applicant also notes that perimeter fencing will be set back from the boundary habitats retained as part of the embedded mitigation, as detailed within ES Chapter 7: Ecology and Biodiversity [APP/6.2]. These boundary</p>



		seen thousands of new trees proudly being planted along new infrastructure projects, only to die in subsequent months/years because no-one looks after them.		<p>habitats will form corridors through which wildlife can move.</p> <p>Figure 6.12 and Figure 6.13 Parameter Based Winter and Summer Photomontages and Figure 6.14 and Figure 6.15 Winter and Summer Photomontages Illustrative Scheme [APP/6.3] provide visualisations to support the LVIA and include both photowires and illustrative photomontages.</p> <p>To ensure that sensitive ecological receptors are protected through the construction of the Scheme, measures to be adhered to are set out within the oCEMP [APP/7.6]. This includes, but is not limited to, measures to control noise, light, and pollution.</p> <p>The Project Level Design Principles, as set out in the Design Approach Document [APP/5.7], seek to retain and enhance connectivity of habitat (through hedgerow planting, for example), retention and enhancement of Marl Pits, ponds, and large areas of Curlew and Skylark mitigation land, all secured in the oLEMP [APP/7.11]. New habitat creation will include grassland, scrub, and attenuation features.</p> <p>The Applicant also notes that the oLEMP [APP/7.11], detailing habitat creation, monitoring and management measures is provided as part of the DCO Application, which will become controlled through the detailed LEMP as a requirement of the DCO.</p>
	Ecology	SEE ABOVE COMMENTS ON LIGHT POLLUTION AND IT'S KNOWN HARMFUL IMPACTS ON ECOSYSTEMS	No	<p>As set out in ES Chapter 5: The Scheme [APP/6.1], lighting is not required during the operational phase of the Scheme. Focused task specific lighting would only be required in the event of emergency works / equipment failure and motion sensing security lighting would be provided within the Customer and National Grid Substations and within the BESS compound.</p>
	Ecology	We welcome the proposals outlined in the indicative masterplan, which include the protection of existing habitats and the introduction of new areas of grassland. We recommend that other habitats in addition to grassland are incorporated in to the design (see comments above). We support the intention to support nature recovery, by strengthening the connections between these habitats, creating ecological stepping stones and wildlife corridors that link the area's key biodiversity hotspots. However, it must be ensured that these plans translate in to real gains for nature on the ground.	No	<p>The Applicant welcomes this comment and confirms that a Green Infrastructure Strategy has been developed to support the landscape character opportunities and draft LNRS and Norfolk BAP objectives. Further information can be found within the oLEMP [APP/7.11].</p> <p>A Biodiversity Net Gain Assessment Report [APP/7.4] has been submitted as part of the DCO Application which demonstrates that biodiversity net gains in habitat and hedgerow units will significantly exceed 10%.</p>
	Ecology	In particular:	No	<p>The draft Norfolk LNRS has been reviewed and the aims incorporated into the proposals, where possible, as set out within the Biodiversity Net Gain Assessment Report [APP/7.4].</p>



		Solar developments should be planned with the grid network as part of a national spatial strategy and their specific location informed by the local nature recovery strategy.		
	Ecology	There is some evidence that aquatic insects, bats, and birds may mistake large solar arrays as water bodies, causing them to attempt to breed on them, drink from them or land on them. This potential impact should be considered for any solar farm development close to protected sites which are designated for their importance for these species. Further monitoring of solar farms is required to confirm or disprove this potential impact to wildlife from solar development The ES will need to demonstrate that there are no adverse impacts on bats, and we recommend that construction and operational phase impacts on connectivity between roosts and foraging areas is robustly considered.	No	<p>In regard to potential for birds and bats to mistake solar panels for water bodies ('the lake effect') resulting in potential harm or mortality, the paper Solar photovoltaic energy development and biodiversity conservation: Current knowledge and research gaps (Gomez-Catasus et al., 2024) concludes "there is little evidence proving this causal factor".</p> <p>Specific survey work has been undertaken in respect of bats (as detailed within the Baseline Ecological Survey Report [APP/6.4]) and ES Chapter 7: Ecology and Biodiversity [APP/6.2] assesses the potential impacts of the Scheme with embedded mitigation (including retention of boundary habitats ensuring continued connectivity through the landscape and measures with regard to lighting etc.) provided within the oCEMP [APP/7.6] this results in no significant adverse effect anticipated on bats.</p>
	Ecology	Hedgerow and tree planting first. Commit to not taking down mature trees.	No	Measures relating to trees and planting are reflected in Appendix 1 – Green infrastructure Parameter Plan to the oLEMP [APP/7.11] and include the introduction of additional hedgerow trees and woodland belts to provide screening to the solar panels.
	Ecology	I consider the proposed solar farm and plan to be very destructive to a unique heritage and ecological area. This is an area that should be protected from such a proposition. It has 1000s of years of history and a vibrant and delicate eco balance.	No	The Applicant notes this comment but disagrees. The Applicant notes that the Scheme seeks to protect the existing sensitive ecological receptors at the site through careful design of the Scheme and provision of a number of mitigation measures.
	Ecology	Totally the wrong area in so many ways; historically, visually, Environmentally, agricultural sustainability, ethically and impactfullness.	No	<p>The Applicant notes these comments but contests the impact suggested in the statement. The Applicant notes that the Scheme seeks to protect the existing sensitive ecological receptors at the site through careful design of the Scheme and provision of a number of mitigation measures.</p> <p>Solar irradiation in North Norfolk is above the UK average, and given that the opportunities to bring large-scale solar schemes forward are limited, we believe this site to be amongst the most appropriate in the country.</p>
	Ecology	Transitory animals have their traditional routes blocked. Deer are often diverted onto roads. Bird and bat deaths are common as they mistake the glass for water. The land is degraded with little potential for biodiversity as half of it will be in permanent shadow and rain water run-off creates set channels without proper dispersal. Topsoil is removed and cleaning materials can contaminate the soil. There is the possibility of toxic	No	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 for foraging and to move through without diverting onto roads.



		chemicals leaching out from the panels. Lithium-ion battery storage represents a huge fire risk.		
	Ecology	This proposal would cause substantial and unjustified harm to the historic, archaeological, ecological, and visual landscape of Castle Acre, a village of exceptional heritage significance. While the need for renewable energy is acknowledged, this development fails the tests set out in the NPPF and planning law and does not represent sustainable development.	No	Comments with regards to the landscape of Castle Acre are noted. Measures have been taken to revise the Scheme's layout and to concentrate most of the Scheme beyond the ridgeline. This is further described in the ES Chapter 5: The Scheme [APP/6.1] , reflected in ES Figure 5.8 Concept Masterplan [APP/6.3] and assessed in ES Chapter 6 Landscape and Visual [APP/6.2] .
	Ecology	This will cause immediate and long term damage to the environment.	No	The Applicant notes this comment but contests the statement made. The Scheme will deliver a BNG well in excess of 10%, and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity. The Biodiversity Net Gain Assessment Report [APP/7.4] has been submitted with the DCO Application.
	Ecology	ecology and biodiversity, especially wildlife, will be disturbed to a huge extent during construction as this is forecast to be 24 months. This is unlikely to be remedied through the proposed measures.	No	The Applicant notes this comment but contests the statement made. The Scheme will deliver a BNG well in excess of 10%, and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity. The Biodiversity Net Gain Assessment Report [APP/7.4] has been submitted with the DCO Application. Measures to manage and mitigate environmental impacts during the construction phase are set out in the oCEMP [APP/7.6] .
	Ecology	We want the old green spaces. All of them.	No	The Applicant notes the comment but refers to the Green Infrastructure Parameter Plan to the oLEMP [APP/7.11] , which demonstrate how the green spaces will be enhanced.
	Ecology	we don't need new green spaces. We don't want current ones being ruined.	No	The Applicant notes the comment but refers to the Green Infrastructure Parameter Plan to the oLEMP [APP/7.11] , which demonstrate how the green spaces will be enhanced.
	Ecology	We strongly support the inclusion of on-site green infrastructure, such as the provision of new green spaces, hedgerow for screening, grassland creation etc, as well as the provision of other wildlife habitats such as bat and bird boxes.	No	The Applicant notes these comments and welcomes the support for the provisions included in the Scheme.
	Ecology	Wildlife and Ecology Concerns Local insect and butterfly species have disappeared due to habitat loss (especially in the backwaters of the River Nar and	No	The Applicant notes this comment and can confirm the habitats of importance for these species are retained and enhanced within the proposals, such that opportunities will increase at the Site. The roadside verges and



		<p>chalk stream areas).</p> <p>Species previously common include:</p> <p>Gaws Hawk moth Buzzards near road verges Blue tits feeding on caterpillars and eggs (e.g. bluetit eggs and flails caterpillars) Silver-studded blue butterflies, small skipper butterflies, and moths Marsh carpet moths that feed on alder and reed plants Bird species such as yellowhammers and bluetits are now rare due to loss of food plants and habitats. Roadside verges and hedgerows, once key ecological corridors, have declined.</p> <p>Survey Concerns:</p> <p>Surveys have missed some important species because they are not looking closely enough (e.g. two types of moths that appear 6 feet apart).</p>		<p>hedgerows are also retained and enhanced and will be protected throughout the construction period.</p> <p>With regard to invertebrate species, given that this Scheme is impacting the arable habitat within the site (which is not of high importance to invertebrates), specific survey work for invertebrates has not been undertaken. As mentioned above, habitats for this species group will be retained and substantially enhanced within the Scheme.</p>
	Ecology	<p>I am concerned about our wildlife, especially birds. How will birds of prey hunt. Barn owl, kestrels both need to catch mice and rodents by hovering about the landscape. How can they do so will solar panels? How can skylarks nest and fly high? I was told our area was chosen because it was rural.</p>	No	<p>Natural England's review of the literature (Evidence review of the impact of solar farms on birds, bats and general ecology (NEER012) (Harrison, Lloyd, and Field, 2016)) concludes that "evidence suggests that the collision risk presented by solar panels to birds is low" and "With regards collision risk to bats, there is no evidence."</p> <p>Large boundary areas are retained within the Scheme, between the panelled areas, and as such, foraging areas for birds of prey will be retained.</p> <p>In addition, a Ground Nesting Bird Strategy has been prepared to fully mitigate potential impacts on these species, including skylarks (Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP/6.4]).</p>
	Ecology	<p>Ecology and Biodiversity:</p> <p>I note that in EN0110013 The Drovers Chapter 7 Ecology and Biodiversity there is mention of the importance of Functionally Linked Land outside of the Breckland SPA, and that "none of the qualifying species were recorded during any of the specific breeding bird surveys conducted across the Study Area in 2024 and therefore the Site does not appear to represent functionally linked land used by qualifying species". As part of the site is within the Brecks National Character Area it will have soils and agricultural land which may be suitable for breeding stone curlew. As stone curlew nesting on arable land is dependent on crop rotation (they will usually only nest in years when there</p>	No	<p>A comprehensive programme of ecological survey work has been undertaken, including detailed breeding bird surveys across the proposed Solar PV Site during April to July 2024.</p> <p>During the survey work undertaken, a total of 121 Skylark breeding territories were recorded across the surveyed area, along with breeding activity by a single pair of Lapwing and two pairs of Curlew.</p> <p>Regarding Sone-curlew, the Site is located approximately 2.4 km from the Breckland SPA designation at its closest point (whilst the closest components relate to Breckland</p>



		are spring-sown root crops) they may only nest one year in every 4 or 5 years so a survey in a single year may not record any of this species. It is therefore unsafe to conclude that “no significant adverse effects on Breckland SPA in relation to functionally linked land are anticipated”. Effects on stone curlew would not be limited to the construction phase; the operational phase may also deter nesting.		<p>Forest SSSI), which is not understood to provide suitable habitat for Stone-curlew in particular. Further, the Site is located entirely outside the 1.5 km constraint zone identified by Natural England using the Stone-curlew Planning Tool. None of the qualifying species was recorded during any of the specific breeding bird surveys conducted at the Site in 2024, and therefore, the Site does not appear to represent functionally linked land used by qualifying species.</p> <p>Given the information and considerations set out in ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP/6.4], 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.</p>
	Ecology	<p>Ecology and Biodiversity:</p> <p>Your assessment of the effect on bat species concludes that no significant adverse impacts on foraging/commuting bats are anticipated in relation to habitat loss as a result of the construction and operational phases. This would not appear to have taken account of the research at the University of Stirling (Article Renewable energies and biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity University of Stirling) which concludes that “Ground-mounted solar photovoltaic developments have a significant negative effect on bat activity”. I suggest you need to review this assessment.</p>	No	<p>Natural England’s review of the literature (Evidence review of the impact of solar farms on birds, bats and general ecology (NEER012) (Harrison, Lloyd, and Field, 2016)) concludes that “<i>evidence suggests that the collision risk presented by solar panels to birds is low</i>” and “<i>with regards collision risk to bats, there is no evidence.</i>”</p> <p>In particular, it is noted that the cited article identified no difference in Barbastelle (representing a rarer species recorded at Site) activity between the sampling locations tested (with or without solar), consistent with other studies, whilst mitigation measures proposed (including maintenance and enhancement of boundary vegetation) have been incorporated within the Scheme in line with the article, which concludes that “<i>Successful mitigation measures at solar PV developments will be an opportunity to manage climate change while supporting biodiversity</i>”.</p>
	Ecology	<p>Ecology and Biodiversity:</p> <p>Part of the development lies within National Character Area The Brecks - National Character Area Profiles, a unique biodiversity hotspot in the UK, vitally important for rare and threatened species. Over 12,500 species were documented in 2010, 2,000 of which were endangered. The Brecks contains 28 per cent of all rare species in the UK and is particularly important for invertebrate species. Many of these species rely on the bare sandy soils of the Brecks and are reliant on management involving rotational tillage or other disturbance. Many of the rare plants characteristic of The Brecks rely on disturbance produced by rotational tillage or other interventions, so the establishment of a grassland sward will not necessarily suit these species. Greater certainty of outcomes for characteristic flora and fauna is needed before this proposal can be submitted for approval.</p>	No	<p>A full assessment of direct and indirect effects on national and international designated sites, including Breckland SPA, Breckland Forest SSSI, and River Nar SSSI, has been undertaken with Section 7.8 of the ES Chapter 17: Ecology and Biodiversity [APP/6.2], including considerations with regard to air quality and water pollution.</p> <p>Non-statutory designations, including Road-Side Nature Reserves, are also assessed within Section 7.8 of ES Chapter 7: Ecology and Biodiversity [APP/6.2].</p> <p>ES Chapter 7: Ecology and Biodiversity [APP/6.2] notes that there is anticipated to be no significant adverse effects identified. However, there are four significant beneficial effects for Hedgerows and Tree Lines Habitat and Breeding Birds, Wintering Birds and Amphibians –</p>



				Great Crested Newt, both during operational and decommissioning phases.
	Ecology	<p>My concerns about the Drovers are the hedges and trees beside the bridleways and if they will be protected, and the bridleways themselves.</p> <p>How much disruption to locals and wildlife will there be?</p>	No	<p>Hedgerows 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 are considered within Section 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2].</p> <p>Retained hedgerows will also be enhanced through species-rich planting.</p> <p>Created habitats will be retained for the duration of the operational phase, with the land returning to the landowner after the decommissioning phase; it is assumed that the established woodland and hedges will be retained.</p>
	Ecology	Also large solar farms cause the environmental change and temperature increase in the surround area	No	The Applicant notes these comments, but confirms ES Chapter 13: Climate Change [APP/6.2] includes measures to address the potential impacts and likely effects on Climate Change during the construction, operation and decommissioning phases of the Scheme. It concludes that there are no significant (in EIA terms) adverse effects.
	Ecology	Bird and bat deaths are frequently recorded on existing solar farms as they mistake the glass for water.	No	In regard to the potential for birds and bats to mistake solar panels for water bodies ('the lake effect'), resulting in potential harm or mortality, the paper Solar photovoltaic energy development and biodiversity conservation: Current knowledge and research gaps (Gomez-Catasus et al., 2024) concludes "there is little evidence proving this causal factor".
		If the proposed Drovers Solar Farm is added to the already proposed High Grove Solar Farm, it becomes overwhelmingly disproportionate, that our small village of Sporle should bear the brunt of industrialisation of our rural landscape. This will not only impact visually the people of this area, but also, and perhaps more importantly, will impact physically the diverse flora & fauna of this rural landscape.	No	<p>Design Principles seek to retain and enhance connectivity of habitat (through hedgerow planting for example). New habitat creation will include grassland, scrub, and attenuation features.</p> <p>Hedgerows 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 are considered within Section 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2]. Retained hedgerows will be enhanced through species-rich planting.</p>
	Ecology	Wildlife (and this is a diverse area w/ many species of deer, badgers, hares, rabbits, stoats, weasels, mice, voles, shrews - I could go on. As well as garden birds, we have skylarks (where are they going to nest?), lapwings, pink-footed geese, owls,	No	The Applicant notes these comments and confirms that ES Chapter 7: Ecology and Biodiversity [APP/6.2] details measures to retain and enhance connectivity of habitat (through hedgerow planting, for example). New



		birds of prey including red kites, linnets, gold crests, yellowhammers. I could go on.)		habitat creation will include grassland, scrub, and attenuation features.
	Ecology	Protection? Thunder, lightening affect on energy generation and substations.	No	The Applicant notes these comments, but these weather conditions are factored into the likely outputs of electricity generation across the Scheme and mitigated for.
	Ecology	We welcome the selection of fields to avoid designated sites important for their nature conservation value. There are however several areas of Priority Habitat within the red line boundary so appropriate mitigation must be in place to ensure that there are no negative impacts on these habitats or the species they support.	No	Impacts of the Scheme on Priority Habitats have been fully considered within Section 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2] ES Chapter 7: Ecology and Biodiversity [APP/6.2] also notes that there are anticipated to be no significant adverse effects identified. However, there are four significant beneficial effects for Hedgerows and Tree Lines Habitat and Breeding Birds, Wintering Birds and Amphibians – Great Crested Newt, both during operational and decommissioning phases.
	Ecology	Surveys of impact on biodiversity/species should focus more on hares (extinct from large parts of UK rather than badgers). Also barn owls of which I have seen within The Drovers Solar Farm area. There are a very limited number of breeding pairs of these fascinating birds. Survey impact of farmland birds (yellow hammers, linnets) should be carried out. These are on the endangered species list.	No	Specific survey work has been undertaken in relation to a range of habitats and faunal species in order to inform the Scheme, including in particular consideration in respect of farmland birds, whilst consideration in regard potential impacts on the Scheme on these and mammal species such as Brown Hare are fully considered within Section 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2] . The proposed inclusion of substantial additional grassland habitats across the site will likely benefit a range of species, including Brown Hare, and will likely provide additional habitats for small mammal species, which in turn represent an increased foraging resource for predators such as Barn Owl. The Scheme's green Infrastructure proposals are established by the oLEMP [APP/7.11] and are secured by way of Requirement in the DCO.
	Ecology	Bats Paragraph 5.3.9 of Appendix 7.2 Ecological habitat survey states that overall, across the detector locations, the greatest number of bat registrations were recorded within the east of the site, with locations SD5 and SD2 returning the highest numbers of registrations. We note that these locations are adjacent to the proposed substation locations. We recommend reconsidering the siting of the substations, given the importance of these fields to bats.	No	The impacts of the Scheme on bats are considered in the ES Chapter 7: Ecology and Biodiversity [APP/6.2] . Nonetheless, the boundary habitats and corridors form the focus of recorded bat activity, and will be retained and enhanced within widened corridors of undisturbed vegetation (in contrast to the existing arable management). Embedded mitigation measures include design measures to ensure boundary corridors remain unlit and continue to provide linked corridors for bat use. The Scheme's green Infrastructure proposals are established by the oLEMP [APP/7.11] and are secured by way of Requirement in the DCO.



	Ecology	<p>The PIER recorded the presence of barbastelles, a protected species, in the draft Order Limits. Barbastelles have</p> <p>very large home ranges in Norfolk, typically travelling c. 5-6km away from the roost woodlands in a night, but can easily go double that distance. Foraging areas closest to maternity woodlands are key as when the pups are very young the females have high energetic demands and need to stay close/forage close-to the woodlands. It is also known that they forage over farmland, although typically this is focussed on the hedge/field margin edge.</p>	No	<p>The Applicant notes this comment and agrees. The Scheme will include the retention and enhancement of vegetated boundary corridors, strengthening their potential to serve as wildlife corridors, including for Barbastelle, and further connecting the existing woodland areas.</p>
	Ecology	<p>Protected species</p> <p>Results of protected species surveys will need to be presented in the ES and it must be shown that there are no adverse impacts on these species.</p>	No	<p>The Applicant notes that ES Chapter 7: Ecology and Biodiversity [APP/6.2] considers potential effects on protected faunal species.</p> <p>As a result of embedded and additional mitigation and enhancement measures, there are four direct residual significant (in EIA terms) beneficial effects as a result of the Scheme, which are anticipated in relation to the following ecological features: hedgerows and lines of trees; breeding birds – other species; wintering birds – other species and amphibians – Great Crested Newt.</p>
	Ecology	<p>Hedgerows</p> <p>Paragraph 7.6.77 of the PIER states that the hedgerows and tree lines within the Site are of significance at the Site level and that the retention of existing hedgerows and tree lines has been incorporated into the Scheme design. It goes to state that any removal of hedgerows would be anticipated to be limited to minor widening of existing gaps to ensure appropriate access. The ES must demonstrate that the extent of this widening does not have a negative impact on the ecology of the area.</p>	No	<p>Hedgerows 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 are considered within Section 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2].</p> <p>Retained hedgerows will be enhanced through species-rich planting.</p> <p>The Scheme's green Infrastructure proposals are established by the oLEMP [APP/7.11] and are secured by way of Requirement in the DCO.</p>
	Ecology	<p>Finally, the area proposed to be carpeted with solar panels and substations is a very rare Breckland ecosystem home to endless habitats and species. The sea of solar panels will - at the very least - ruin the nesting grounds of already endangered species such as curlews.</p> <p>Those are the issues, you suggest the solutions seeing as this is entirely your project.</p>	No	<p>The Applicant notes that ES Chapter 7: Ecology and Biodiversity [APP/6.2] considers the effects of the Scheme, and concludes there are no significant adverse effects anticipated.</p> <p>ES 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.</p>



	Ecology	And as for nature recovery? How do you think you are assisting in that?	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/7.4] , and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme.
	Biodiversity	As local people we obviously want to see measured local development that enhances the area or at least has the least impact but with significant benefits to biodiversity and community. In terms of biodiversity large sections of the former agricultural land is being rewilded and some is being farmed according to regenerative agricultural principles. The scheme should aim to interlink with these areas with 'green corridors' for wildlife.. Similarly hedges and verges should aim to create green corridors. As indicated before You should work closely with NGOs who have local knowledge in addition to the statutory agencies and enter management agreements to manage land and water positively over the life of the development and beyond. Reintroduction of Breckland plants and other biota where it has been absent should be a key feature of the project. At the end of the development term every effort must be utilised to protect the biodiversity created from the development. Take into account the Countywide Nature Recovery Strategy which is currently out to consultation. There is a large colony of toads that live in the Nar valley south of the West Acre to South Acre road. Each spring they pass through the woodland area and fields to spawn in the valley bottom lakes crossing the road on the way. The valley bottom held nightingales within the last 5 years in the scrub around the lakes. The Birkbeck family are rewilding the area and should be engaged.	No	<p>Impacts of the Scheme in relation to bats are considered within the ES Chapter 7: Ecology and Biodiversity [APP/6.2], which confirms there are no significant adverse effects.</p> <p>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. Movement of faunal species, including toads, within the landscape will not be restricted as the boundary habitats will be maintained within enhanced corridors to ensure wildlife movement can continue, whilst the provision of new grassland habitat throughout will likely benefit a number of species, such as toads.</p> <p>Relevant documents, including the emerging Norfolk Local Nature Recovery Strategy, have been reviewed, whilst organisations including Natural England, Norfolk Wildlife Trust and the West Acre Estate have been consulted in order to inform the Scheme and associated consideration and measures in regard to biodiversity, further detailed within the Design Approach Document [APA/5.7].</p>
	Biodiversity	The site lies within the catchment of the River Nar, a protected chalk stream Site of Special Scientific Interest (SSSI). This rare habitat supports nationally significant biodiversity. Under NPPF Paragraphs 180-182, development must avoid significant harm to protected habitats and should deliver measurable net gain for biodiversity.	No	A full assessment of direct and indirect effects on national designated sites, including the River Nar SSSI, has been undertaken with Section 7.8 of the ES Chapter 7: Ecology and Biodiversity [APP/6.2] , including considerations with regard to air quality and water pollution, taking into account the associated mitigation and design measures proposed in order to avoid significant harm to these designations.
	Biodiversity	This rare habitat supports nationally significant biodiversity. Under NPPF Paragraphs 180-182, development must avoid	No	The Applicant notes that the Planning Statement [APP/5.5] and Policy Compliance Document [APP/5.6]



		significant harm to protected habitats and should deliver measurable net gain for biodiversity.		provide detailed evidence of compliance with relevant national and local policy documents, including the NPPF.
	Biodiversity	Use of insecticides etc should be minimal in order to encourage biodiversity.	No	The Applicant notes that the cessation of intensive arable production across the Solar PV Site will result in reduced physical disturbance during the operational phase (e.g., through the lack of ploughing, seeding, and harvesting of crops) and a reduction in the application of pesticides (including insecticides and herbicides).
	Biodiversity	The Nar river valley is an area around South Acre of national importance. It is sensitive, beautiful and critical for biodiversity.	No	<p>The Applicant notes this comment and considers the River Nar SSSI fully within ES Chapter 7: Ecology and Biodiversity [APP/6.2], which concludes no significant adverse effects.</p> <p>The Applicant also notes that while Mandatory 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.</p>
	Biodiversity	Concerned at loss of good agricultural land, and the size of the proposed solar scheme upon biodiversity and an area I consider to be of outstanding natural beauty.	No	<p>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.</p> <p>Further appraisal of the use of BMV land, and why this is justified, is set out in the Planning Statement [APP/5.5].</p> <p>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.</p>
	Biodiversity	Ensure as far as possible that existing biodiversity and habitats are preserved and create a development that is planned so that the BNG of 10% is at least realized not in a tokenistic way but by careful design and working with all the relevant partners such as the Norfolk Wildlife Trust and statutory bodies. The biodiversity actions should obviously support the native flora and fauna.	No	<p>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.</p> <p>The Applicant also notes that consultation with Norfolk Wildlife Trust and relevant statutory bodies has been undertaken during the pre-application process, as set out in this Consultation Report [APP/5.1].</p>



	Biodiversity	<p>All developments must be designed to provide ambitious net gains for nature, going above the minimum mandatory 10% requirement of BNG.</p> <p>Solar farms and their associated infrastructure must not be sited directly on areas of existing high value wildlife habitat, within designated nature conservation sites or areas identified as high priority for restoration or where harm is likely to be caused to populations of vulnerable, threatened and endangered species.</p> <p>The Drovers Solar Farm should be an exemplar of ecology-led design, construction, operation, and decommissioning to protect, restore and enhance nature, healthy functioning ecosystems, and ecological connectivity. It should leave the natural environment in a measurably better state and make a significant and meaningful contribution to the creation of a Nature Recovery Network in Norfolk.</p>	No	<p>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.</p> <p>There are no SSSIs located on the land within the Order limits, nor is it located immediately adjacent to any statutory ecological designations, the closest of which is the River Nar SSSI, which is located approximately 0.27km north of the Site and Castle Acre Common SSSI, which is located approximately 0.44km north of the Site.</p> <p>ES Chapter 7: Ecology and Biodiversity [APP/6.2] considers the ecological and biodiversity impacts of the Scheme across the construction, operational, and decommissioning phases. It outlines all designated sites (international, national, and local) of ecological and geological conservation importance, protected species, habitats and other species identified as being of principal importance for the conservation of biodiversity within the study area, as per the Order limits.</p> <p>The design of the Scheme has also sought to retain, buffer and enhance the existing on-site green infrastructure where practicable. The minimum buffer requirements for existing onsite features are set out in the Design Principles, Parameters and Commitments document [APP/5.8]. The strategy for existing and proposed green infrastructure throughout the Site is detailed within ES Appendix 1: Green Infrastructure Strategy Plans to the oLEMP [APP/7.11]. New planting and maintenance regimes are outlined within the oLEMP [APP/7.11].</p>
	Biodiversity	<p>Habitats for ground-nesting birds will be destroyed.</p> <p>27% of rare priority species that are already supported on farmland in Norfolk. It is misleading to imply that solar farms will do more for nature recovery. In fact, there will be disruption to established habitats, displacing birds, insects, and bats, including species protected in law and those dependent on arable land.</p> <p>How ironic that the Environment Act 2021 includes a nature recovery strategy and nature recovery networks and even charges parish councils with producing their own plans for increased biodiversity, when our rural landscape is being industrialised by solar panels.</p>	No	<p>The Applicant also notes this comment and confirms that, while mandatory, Biodiversity Net Gain remains to be implemented (currently anticipated May 2026), 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.</p> <p>ES Appendix 7.3: Proposed Mitigation Strategy for Ground Nesting Birds Requiring Open Habitats [APP/6.4] sets out the proposed mitigation and compensation package for ground-nesting bird species and is appropriate and proportionate in regard to legislative and planning policy requirements relating to the proposed Scheme.</p> <p>The Applicant further notes that a draft Norfolk Local Nature Recovery Strategy (LNRS) was published by NCC</p>



				<p>for public consultation between April and June 2025, with final publication to Defra anticipated in Autumn 2025.</p> <p>The draft LNRS principles, where appropriate, have informed the approach to biodiversity enhancements across the Site. The oLEMP [APP/7.11] sets out the specific strategies and priorities identified in the draft LNRS that are relevant to the Site and how they have been incorporated into the Scheme. Once finalised, the LNRS will be reviewed and will inform future detailed Landscape and Ecology Management Plans.</p>
	Biodiversity	there are more wildlife considerations than what can be met with some wildflower planting;	No	<p>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].</p>
	Biodiversity	I have put Disagree because whatever you put in place or say that you will put these things in place, the whole area will be completely changed for the environment, diversity, social etc.	No	<p>The Applicant notes this comment but considers that the Scheme has been deliver a range of environmental benefits, including biodiversity enhancements, habitat creation, and improved ecological connectivity.</p> <p>The Scheme's green Infrastructure proposals are established by the oLEMP [APP/7.11] and are secured by way of Requirement in the DCO.</p> <p>ES Chapter 14: Socio-Economics [APP/6.2] also concludes that there would be 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.</p>
	Biodiversity	if the solar farm is encroaching on areas of outstanding natural beauty, then i can't support that all biodiversity, sustainability etc. considerations have been taken into account.	No	<p>The Applicant notes that there are no SSSIs located on the land within the Order limits, nor is it located immediately adjacent to any statutory ecological designations, the closest of which is the River Nar SSSI, which is located approximately 0.27km north of the Site and Castle Acre Common SSSI, which is located approximately 0.44km north of the Site.</p>
	Biodiversity	<p>I have not had time to fully explore the design strategy documents. However I do have a comment on the biodiversity net gain. A great deal was made at the presentation of the use of one higher grade field for skylark plots. This is a very generic and light touch intervention in an area where skylarks are one species which is thriving (my experience working in fields across East Anglia).</p> <p>In the Brecks research at the UEA following on from the Breckland Biodiversity Audit found that periodic cultivation benefitted many rare Brecks specialist species (unfortunately this intervention is not considered in the BNG rules). The audit is available at</p>	No	<p>A range of relevant documents and papers have been reviewed in order to inform the Scheme, along with consultation and engagement with organisations including Natural England, Norfolk Wildlife Trust and the West Acre Estate.</p> <p>Survey work has been undertaken in reaction to the habitats present and key faunal species in order to identify the nature of existing biodiversity value and communities, with corridors strengthened to benefit wildlife wherever possible.</p>



		<p>https://www.norfolkbiodiversity.org/assets/Uploads/Absolutely-Final-Report-Appendices.pdf and the key research paper at</p> <p>https://doi.org/10.1111/1365-2664.13827 [REDACTED], author of the paper is happy to be contacted at [REDACTED]@rspb.org.uk He led a DEFRA funded project with Breckland Farmers Wildlife Network which, using the audit findings, found key locations for cultivated margins forming a connected network throughout the Breckland National Character area. A major part of The Drovers plan in in the NCA and includes linkage margins. It is surprising that Norfolk Wildlife Trust, who I understand you have been working with, did not mention this as an important local intervention for wildlife. I would urge you to consider inclusion of cultivated margins alongside the droves instead or as well as floristic margins.</p>		<p>Proposed landscape treatments are outlined in the oLEMP [APP/7.11], taking into account a range of considerations in order to maximise the benefits provided (e.g. inclusion of seeding with a suitable grassland mix in order to maximise biodiversity with species consistent with the local area, whilst also helping to stabilise soils and intercept rainfall/surface water flow to benefit drainage. Specific details such as precise planting mixes and landscape management treatments will be controlled through the detailed LEMP as a requirement of the DCO.</p>
	Biodiversity	<p>There is a risk of biodiversity loss through habitat destruction.</p> <p>How much consideration has been given to the long-term effect on the land?</p> <p>For example, soil compaction, increased surface water run-off, erosion and sedimentation, changes to groundwater flow, chemical pollution, change in quality and quantity of private and public water supply. These could result in old watercourses becoming reactivated, Google Earth already shows gulleys in the proposed site area.</p> <p>Why are the local residents and businesses not offered the option of solar panels on property rather than destroying the countryside?</p>	No	<p>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/7.4], and provides a number of faunal enhancement measures, resulting in a betterment for biodiversity as a result of the Scheme.</p> <p>For the majority of land within the Order limits, the land will be sown to grassland and managed, including potentially by being grazed with sheep, for the duration of the operational phase. This is expected to have a significant benefit for soils. Further information on how soils will be managed is set out within the oSMP [APP/7.13].</p> <p>The Applicant also notes that a Surface Water Drainage Strategy is embedded in ES Appendix 12.2: Flood Risk Assessment [APP/6.4] and introduces and secures the use of suitable SuDS measures.</p> <p>The Applicant further notes that it 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.</p>
	Biodiversity	<p>He aesthetic of rolling countryside, rare in much of Norfolk is an environmental plus which your proposal destroys.</p> <p>No social or community benefits were demonstrated in either your literature or community meeting at Castle Acre. So too your biodiversity and environmental net gains. Nada.</p>	No	<p>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</p>



				measures, together resulting in a betterment for biodiversity as a result of the Scheme
	Biodiversity	Biodiversity: there is not enough information provided how this would be improved. The construction phase will almost certainly diminish biodiversity and wildlife in particular.	No	<p>Survey work has been undertaken in reaction to the habitats present and key faunal species in order to identify the nature of existing biodiversity value and communities, with corridors strengthened to benefit wildlife wherever possible. Proposed landscape treatments are outlined in the oLEMP [APP/7.11], taking into account a range of considerations in order to maximise the benefits provided.</p> <p>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%, and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme</p>
	Biodiversity	<p>As above. & I have lived in the Nar Valley for 30 years & recorded the amazing biodiversity of the Nar Valley & adjacent land on which. you want to put a solar farm !</p> <p>The Red/Roe deer will not be able to traverse your solar farm !</p> <p>What about the Quails & Harvest mice that breed where you want to put a solar farm ?</p>	No	<p>Harvest mice can breed in grasslands of which there will be large areas included and enhanced within the retained boundary habitats.</p> <p>While ES Chapter 5: The Scheme [APP/6.1] sets out that during operation; a perimeter fence will enclose the operational area of the Scheme, 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 for foraging and to move through without diverting onto roads.</p>
	Biodiversity	<p>At this stage, there is not enough information provided to form an opinion around BNG/nature recovery targets, as it is simply stated that at least 10% BNG will be achieved. We recommend that a target of at least 20% BNG is sought.</p> <p>Habitat creation objectives should consider local conservation priorities and provide benefits for priority species where possible and which should include a variety of habitat types. Solar farm developments should consider alternative habitats to grassland where this is suitable. For example, pockets of woodland, scrub and ponds can be incorporated into solar farm design in areas where shading on solar panels is avoided. Woodland and scrub can be managed by coppicing on a shorter rotation to avoid panel shading. Coppicing creates a dense woodland structure which is more suitable for nesting birds. Woodland within solar farms is also protected from deer browsing, which has a negative impact on woodland in the wider landscape. These factors should be carefully considered when Biodiversity Net Gain assessments are undertaken.</p> <p>Other habitats which could be created on site include areas of rough or tussocky grassland, which require less management and provide habitat for species such as reptiles, small mammals, and birds of prey. Field margins and corners can be enhanced by sowing native nectar-rich and/or winter bird seed</p>	No	<p>The Applicant notes that the draft Norfolk Local Nature Recovery Strategy (LNRS) has been used to inform the Scheme design and the approach to biodiversity enhancements across the Site. Further details of which are set out in the Design Approach Document [APP/5.8].</p> <p>The oLEMP [APP/7.11] sets out specific strategies and priorities identified in the draft LNRS, of relevance to the Site, and how these have been incorporated into the Scheme. Once finalised, the LNRS will be reviewed and will inform future detailed Landscape and Ecology Management Plans.</p> <p>The Applicant further notes that 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.</p>



		<p>mixes as well as being used to create arable plant areas. Management that includes cultivation to create areas of bare ground can help arable plants establish and benefit wide range of wildlife. Woody material from any unavoidable hedgerow or tree works on site can also be used to create features for amphibians, reptiles, and invertebrates including hibernacula and log piles.</p>		<p>Wildflower grassland would be provided in the boundary areas of the Scheme. Where suitable woody material arises from any unavoidable hedgerow or tree works, the Applicant confirms that it can be used to create features such as hibernacula and log piles for amphibians, reptiles, and invertebrates. The use and placement of such materials would be considered through the within the LEMP, which will be secured by way of a requirement within the DCO.</p>
	Biodiversity	<p>Long-term management and monitoring for wildlife</p> <p>A Landscape and Ecology Management (LEMP) should be provided, lasting for the 30 years required for biodiversity net gain in accordance with the Environment Act 2021 or the lifetime of the solar farm. We recommend that where new habitats are created or enhanced, these should be retained beyond the point of decommissioning i.e. delivering a permanent net gain.</p>	No	<p>Ongoing management of habitats will be undertaken in order to maximise value for biodiversity throughout the Operational Phase of the Scheme, including in particular field boundary vegetation (hedgerows and trees) along with grassland areas. Proposed management strategies are set out within the oLEMP [APP/7.11] submitted to accompany the DCO Application, including timescales for provision of further details and timescales for implementation set out.</p> <p>Following decommissioning, planting associated with the National Grid Substation will remain and will continue to be managed accordingly. In line with the DCO requirements, remaining areas will be returned to the control of the landowner, such that no control would be available over the future management of new habitats; it is, however, assumed that established trees and hedgerows would remain post-decommissioning.</p>
	Biodiversity	<p>The idea of 'supporting nature recovery' is frankly absurd when you are taking a perfectly fine piece of nature and destroying it in order to add this solar farm in the first place. This is similar to new build developments destroying a field and the homes of wildlife in favour of building a housing area and then adding a small area of grass to the estate which in turn gets a park that no one wants built on it when the local council needs to spend its money at the end of the year.</p>	No	<p>Survey work has been undertaken in reaction to the habitats present and key faunal species in order to identify the nature of existing biodiversity value and communities, with corridors strengthened to benefit wildlife wherever possible. Proposed landscape treatments are outlined in the oLEMP [APP/7.11], taking into account a range of considerations in order to maximise the benefits provided.</p> <p>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.</p>
	Biodiversity	<p>The project would have an overall adverse impact on the local environment and community and would reduce biodiversity through the clearance of what is a natural area. It would have</p>	No	<p>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</p>



		an adverse impact on the character of the area which is of a traditional rural nature.		<p>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.</p> <p>The Applicant has developed the Scheme's design to reflect the local character of the Site. This has formed part of the iterative design and EIA process and is assessed in ES Chapter 6: Landscape and Visual [APP/6.2].</p> <p>The Design Approach Document [APP/5.7] sets out how good design has been embedded into the Scheme from the outset of the project, and how it will continue to be achieved through to detailed design, to ensure that the Scheme achieves well-designed project outcomes and mitigates adverse effects.</p>
	Biodiversity	The National Planning Policy Framework expects local authorities to protect and enhance valued landscapes and sites of biodiversity and recognise the character and beauty of the countryside and the benefits of the best and most versatile farmland in their policies and decisions.	No	<p>The Applicant notes that 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.</p> <p>The Applicant has developed the design of the Scheme to respond to the local character of the Site. This has formed part of the iterative design and EIA process and is assessed in ES Chapter 6: Landscape and Visual [APP/6.2].</p> <p>The potential benefits for the Site's soil health and quality are set out in ES Chapter 11: Soils and Agriculture [APP/6.2]. The assessment notes that the majority of land within the Order limits is currently arable land fertilised with inorganic fertiliser, as well as spread with farmyard manure and liquid slurry. Livestock (pigs, poultry and sheep) are kept on rotation.</p> <p>The Scheme also 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.</p>
	Biodiversity	who wants to walk through a Solar Farm. Ther character of the area is vistas of countryside and history not Solar Panels.	No	The Applicant notes that mitigation measures are proposed to minimise the level of visual change for PRoW



		Biodiversity of agricultural ground is greater than a restricted Solar farm biodiversity.		<p>users and ensure that PRowS can continue to be used in a similar manner as pre-development of the Site.</p> <p>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.</p>
	Biodiversity	I do not want the wildlife disturbed at all.	No	<p>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 also notes that the inclusion of long-term managed grassland habitats throughout the Site in place of arable areas, which are cropped and disturbed several times a year, will result in reduced disturbance for a range of wildlife.</p>
	Biodiversity	The wildflower plan is very limited, brambles and ragwort often take over. Wild flower planting does not suit many species nor will the run off to the chalk based Nar River help the biodiversity challenges (a SSSI)."	No	<p>The Applicant notes that the proposed planting is appropriate to the Site and is set out in the oLEMP [APP/7.11]. This will be further detailed and confirmed in the LEMP, which will be secured by way of a requirement in the DCO.</p> <p>The Applicant also notes 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].</p>
	Biodiversity	Don't see how it can when nature is effectively being pushed out..	No	<p>The Applicant notes this comment. 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.</p>



	Biodiversity	Biodiversity natural recovery - all these aspects are moving, nothing is static in nature, moves to be mature in the management of the area to keep it cared for or rewilding.	No	The Applicant notes this comment. 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.
	Biodiversity	Biodiversity has not been demonstrated and the development actively threatens what is already there - notably the river Nar.	No	<p>The Applicant notes this comment. 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.</p> <p>The potential for pollution of the water environment is assessed in ES Chapter 12: Water Resources [APP/6.2], which concludes the Scheme would have no significant effects on water resources, including the River Nar, throughout the construction, operation and decommissioning stages, through implementation of good practice measures.</p>
	Biodiversity	These proposals are unsightly and unwelcome. E.G. far better biodiversity can be achieved with agro-ecology, not solar farms.	No	The Applicant notes this comment. 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.
	Biodiversity	Please see our generalised comments that we have made to support the local area. maximise biodiversity and local benefits.	No	The Applicant notes this comment. 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



				<p>resulting in a betterment for biodiversity as a result of the Scheme.</p> <p>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.</p>
	Biodiversity	<p>Biodiversity supproting nature recovery, we need more detailed information to understand how this has been calculated, and how exactly plans will be implemented without being watered down by a contractor on site (as is often the case)"</p>	No	<p>The Applicant notes this comment. 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.</p> <p>The Applicant also notes that measures to manage and mitigate the effects on the environment during the construction phase are set out in the oCEMP [APP/7.6].</p>
	Biodiversity	<p>Nature I think will miss the working of the land, ploughing brings worms and insects to the surface, crops provide cover, harvest leaves grains behind...</p>	No	<p>The Applicant notes this comment. 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.</p> <p>The Applicant also notes that the inclusion of long-term managed grassland habitats throughout the site in place of arable areas, which are cropped and disturbed several times a year, will result in reduced disturbance for a range of wildlife.</p>
	Biodiversity	<p>Nature recovery across the site in the form of BNG remains unproven.</p>	No	<p>The Applicant notes this comment. 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.</p>



	Biodiversity	We have generalised comments but would like to see maximised biodiversity benefits and the use of agrivoltaics in appropriate areas.	No	The Applicant notes this comment. 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.
	Biodiversity	We welcome the over-arching principles outlined in the Indicative Masterplan, particularly the intention to - To support nature recovery, the biodiversity strategy aims to strengthen the connections between these habitats creating ecological stepping stones and wildlife corridors that link the areas key biodiversity hotspots.	No	The Applicant notes this comment and confirms that 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.
	Biodiversity	E.G. far better biodiversity can be achieved with agro-ecology, not solar farms.	No	The Applicant notes this comment but confirms that 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.
	Biodiversity	The land is degraded with little potential for biodiversity as half of it will be in permanent shadow and rain water run-off creates set channels without proper dispersal.	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/7.4] , and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme.
	Biodiversity	Could you target new species? Create a specific new habitat that would complement what is already here? Apart from muntjac - don't encourage them!	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/7.4] , and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme.
	Biodiversity	I walk this area everyday and everyday I see something different, yesterday the first orchid of the year, I have photos of all the things I see, Red Kite, Hobby, Buzzards, Egrets, geese and their goslings, toads, newts, hares, albino pheasants, herons, rabbits, water voles, pike, trout, snakes, lizards, many species of butterflies and birds, roe deer, muntjac deer, dragonflies, bats and it worries me a lot to know what will happen to these, especially when breeding season is here (woodpeckers, cuckoos).	No	<p>Specific survey work has been undertaken in relation to a range of habitats and faunal species in order to inform the Scheme, including in particular consideration in respect of farmland birds, whilst consideration in regard potential impacts on the Scheme .</p> <p>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.</p>
	Biodiversity	Can you design the grass areas so to provide habitat for hares. These are present at the moment..	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/7.4] , and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme.
	Biodiversity	My comments on biodiversity are included in the section above on BNG, please refer to them here if they are more appropriate in this section.	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/7.4] , and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme.
	Biodiversity	It must ensure the 'integrity' of the chalk stream and its margins. It could provide an annual fund for river management/restoration and bio diversity.	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/7.4] , and provides a number of faunal enhancement



				measures, together resulting in a betterment for biodiversity as a result of the Scheme.
	Biodiversity	The Nar river valley is an area around South Acre of national importance. It is sensitive, beautiful and critical for 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/7.4] , and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme.
	Biodiversity	The disruption to wildlife and changes to wildlife corridors could increase the number of deer on the roads, already an issue in the area without it being exacerbated. There is a risk of biodiversity loss through habitat destruction.	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/7.4] , and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme.
	Biodiversity	We would like hedges reinforced and planted asap. We want to know how you are going to build this farm without ruining the ever increasing bird and animal life that thrives in this beautiful valley	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/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 also notes that measures to manage and mitigate the effects on the environment during the construction phase are set out in the oCEMP [APP/7.6] .
	Biodiversity	I would like to be reassured that the land used for the solar farm will be used for agricultural benefit where possible and bio diversity where this isn't an option.	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/7.4] , and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme. For the majority of land within the Order limits, the land will be sown to grassland and managed, including potentially by being grazed with sheep, for the duration of



				the operational phase. This is expected to have a significant benefit for soils. Further information on how soils will be managed is set out within the oSMP [APP/7.13] .
	Biodiversity	Extensive and early woodland planting It seems completely bizarre to suggest that there might be 'new green spaces' when the proposals means that acres and acres of green spaces are under threat.	No	The Applicant notes that a new publicly accessible amenity space has been incorporated into the Scheme within the north west corner of Field 4 as shown on the Works Plan [APP/2.3] .
	Biodiversity	That local wildlife organisations eg. Norfolk Wildlife trust, RSPB, BTO etc are engaged to maximise biodiversity and be actively engaged in site management plans including management agreements to help fund local biodiversity initiatives.	No	The Applicant notes that engagement with wildlife organisations, such as the Norfolk Wildlife Trust, has been undertaken and is detailed within this Consultation Report [APP/5.1] . 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.
	Biodiversity	Include places for education & interpretations with topics of landscape change, climate change, energy & biodiversity... encourage access for education.	No	The Applicant notes that interpretation boards will be provided as part of the Scheme.
	Biodiversity	Cooperative Movement (see https://www.uk.coop) small plant growers and livestock keeps should be allowed to cultivate and maintain ground around the solar panels to allow for biodiversity, custom artisan crops and provide local employment to the surrounding community	No	The Applicant notes this comment; however, is not currently considering this as an option. However, 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. 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.
	Biodiversity	Environmental & Historical/Heritage Concerns	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



		What impact will this have on local wildlife, habitats, and biodiversity?		Biodiversity Net Gain Metric, which concludes that it will deliver biodiversity gains well in excess of 10%, as set out in the Biodiversity Net Gain Assessment Report [APP/4.7] , and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme.
	Biodiversity	<p>Ecology and Biodiversity:</p> <p>Under your design principle on biodiversity net gain & nature recovery you state an aim to deliver a measurable Biodiversity Net Gain of at least 10%. In reality this is not hard to achieve if you are taking arable land out of production and turning it into grassland, but the actual benefits to biodiversity of a species-poor grassland sward will be minimal. The biodiversity value of any grassland is entirely dependent on the soils, aspect, local climate and, crucially, how it is established and managed, so it is misleading to suggest it will be of increased value to wildlife without any further information. Management actions to create and maintain species-rich swards will be essential.</p>	No	<p>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.</p> <p>For the majority of land within the Order limits, the land will be sown to grassland and managed, including potentially by being grazed with sheep, for the duration of the operational phase. This is expected to have a significant benefit for soils. Further information on how soils will be managed is set out within the oSMP [APP/7.13].</p>
	Biodiversity	<p>5. Inadequate Biodiversity Net Gain and Environmental Stewardship</p> <p>Under the Environment Act 2021, all new development is required to deliver a minimum of 10% biodiversity net gain (BNG). There is insufficient evidence that this scheme will achieve this standard. NPPF Paragraph 187(d) encourages opportunities to secure measurable net gains for biodiversity. The development lacks a detailed and enforceable Biodiversity Metric calculation, and there are concerns that the scale and intensity of the installation will undermine local habitat value and ecosystem function.</p>	No	<p>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.</p>
	Biodiversity	<p>Policy ENV 06 – Trees, Hedgerows and Development</p> <p>The proposal risks fragmentation of existing hedgerows and insufficient compensatory planting. The site layout does not indicate adequate biodiversity buffers or enhancements to mitigate the loss of semi-natural habitat, failing to meet the policy's aims.</p>	No	<p>The Applicant notes that 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 of 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.</p>
	Biodiversity	Flooding, rain landing on panels? Drainage into land underneath.	No	<p>As outlined in the FRA [APP/6.4], surface water would be retained in SuDS onsite for the 1% AEP event plus the upper end climate change allowance (+40%) and water</p>



				<p>could infiltrate, meaning flood risk is not increased elsewhere.</p> <p>Additionally, surface water run-off rates will be managed using RSuDS techniques, such as grassland under the drip lines, for the PV Tables meaning flood risk is not increased elsewhere.</p>
	Flood risk	<p>Environmental risks</p> <p>The site gives a risk of release of pollutants into the water, soil and air. There is also a risk to noise including vibration and light pollution.</p> <p>Water pollution, the proposed site is in a drinking water protected area (EA IDGB105033047791), how is it proposed this is protected?</p> <p>Castle Acre is in an area of serious water stress as per the 2021 report of water stressed areas on gov.uk what impact will the proposed site have on water resources and water quality not only during construction, but for cleaning plant machinery etc.</p>	No	<p>The Applicant notes this and in terms of noise and vibration refers to ES Chapter 10: Noise and Vibration [APP/6.2] which assess vibration from construction and states that vibration from operation of plant is negligible at short distances as close as 10m from plant. Therefore, the risk of noise inducing vibration out of the site is very low.</p> <p>Good construction practice measures to control runoff rates and limit the potential for sedimentation and pollution are outlined in the oCEMP [APP/7.6] and the FRA [APP/6.4]. This is secured through a requirement of the draft DCO [APP/3.1].</p> <p>As outlined in ES Chapter 12: Water Resources [APP/6.2] The 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, therefore not exacerbating the current or future water stress of the groundwater resource.</p>
	Flood risk	<p>Flood risk</p> <p>Will there be a flood risk in the valley during heavy rain?</p>	No	<p>As outlined in the FRA [APP/6.4], surface water would be retained in SuDS onsite for the 1% AEP event plus the upper end climate change allowance (+40%) and water could infiltrate, meaning flood risk is not increased elsewhere.</p> <p>Additionally, surface water run-off rates will be managed using RSuDS techniques, such as grassland under the drip lines, for the PV Tables meaning flood risk is not increased elsewhere.</p>
	Flood risk	<p>Our Villages are in the Nar Valley at a lower elevation than the proposed Solar farm. The heavy plant machinery is likely to affect water runoff from the fields adversely and create a flood risk to the village in the valley floor.</p>	No	<p>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 and will be secured by a requirement of the draft DCO [APP/3.1].</p>
	Flood risk	<p>Soil health. Studies have shown solar farms can lead to poor soil health with lower soil carbon below the panels. A study by Lancaster University Environment Centre found the ground immediately under the panels was more compacted, with implications for water infiltration and root growth. It contained</p>	No	<p>The Applicant notes this but considers it a misconception that solar arrays create impermeable areas as the PV array are located well above the ground surface, have drip</p>



		<p>lower levels of organic carbon and particulate matter, essential for soil related ecosystem services. With flooding occurring more frequently across Norfolk, and surface water run off becoming a growing concern, the critical need for good soil health was one of the key points raised in a recent parliamentary flood summit to help prevent flooding.</p>		<p>lines and substantial gaps between rows of panels and around the edges of panels.</p> <p>As outlined in the FRA [APP/6.4], there is a substantial body of research which outlines that solar panels do not have a significant effect on runoff volumes or peak flows, however where ground beneath panels is bare there may be an increase in peak discharge. Grassland under the PV arrays will act to bind the soil and slow the flow of water from the PV arrays therefore not contributing to or exacerbating existing flooding downstream of the Site.</p> <p>No formal attenuation is required for the solar panels as the raised nature of PV Arrays will not prevent soil from absorbing rainwater as the panels will not be placed directly on the ground and each PV Row will be separated, with the same area of soil / grassland available for infiltration as per the baseline scenario. The PV array tables will have regular rainwater gaps to prevent water being concentrated along a single drip line. As such, rainfall landing on the solar panels will drain through rainwater gaps and infiltrate into the ground beneath and between each row of panels.</p> <p>The Lancaster University study (Carvalho et al. 2025) referenced in the response notes that the most marked impact of ground-mounted solar panels is on vegetation, with cascading effects on soil properties. This indicates that solar farms in temperate systems with a past agricultural legacy should be actively managed (e.g. by seeding diverse native species mixtures and maintaining structured habitats) to maximise delivery of plant- and soil-related ecosystem services. As outlined in the oLEMP [APP/7.11], the Site will be seeded with a suitable grass mix meaning there will be established vegetation to bind soils and retard the energy of rainfall dripping from the PV arrays.</p>
	Watercourses hydrology and	<p>Nar SSSI and Local Nature Recovery Aims</p> <p>The site lies within the catchment of the River Nar, a protected chalk stream Site of Special Scientific Interest (SSSI). This rare habitat supports nationally significant biodiversity. Under NPPF Paragraphs 180–182, development must avoid significant harm to protected habitats and should deliver measurable net gain for biodiversity.</p>	No	<p>Embedded mitigation measures to safeguard the River Nar SSSI and a full assessment of potential impacts to relevant SSSIs and irreplaceable habitats have been undertaken in the Ecology and Biodiversity ES chapter [APP/6.2].</p> <p>Impacts of the Scheme on Priority Habitats have also been fully considered within the Ecology and Biodiversity ES chapter [APP/6.2], which concludes no significant adverse effects are anticipated.</p>
	Watercourses hydrology and	<p>My concerns focus on the national treasure that is the nearby chalk stream, the Nar. It is essential that this is fully protected from any effects of solar farming.</p>	No	<p>The potential for pollution of the water environment is assessed in ES Chapter 12: Water Resources [APP/6.2], which concludes that the Scheme would have no significant effects on water resources, including the River Nar, throughout the construction, operation and</p>



				<p>decommissioning stages, through implementation of good practice measures.</p> <p>Good construction practice measures to control runoff rates and limit the potential for sedimentation and pollution are outlined in the oCEMP [APP/7.6] and the FRA [APP/6.4]. This is secured through a requirement of the dDCO [APP/3.1].</p>
	Watercourses hydrology and	<p>The solar farm will encroach on some outstanding natural beauty, around castle acre in particular and the ancient Nar river valley.</p> <p>Whilst not against solar farms in general, I don't think this is the best location.</p>	No	<p>A full assessment of direct and indirect effects on national designated sites, including the River Nar SSSI, has been undertaken within ES Chapter 7: Ecology and Biodiversity [APP/6.2], taking into account the associated mitigation and design measures proposed in order to avoid significant harm to these designations.</p> <p>The Applicant also notes 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, including in relation to Castle Acre.</p> <p>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, layouts and 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 Applicant's site evaluation process.</p> <p>The Statement of Need [APP/5.4] further 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.</p>
	Watercourses hydrology and	<p>I believe that Norfolk is being called upon to house far too many solar farms. The Nar valley is particularly beautiful area and as yet largely unspoiled. I think that the proximity of the development to South acre church is devastating.</p>	No	<p>The Applicant notes this comment. 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, layouts and 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 Applicant's site evaluation process.</p> <p>A full assessment of direct and indirect effects on national designated sites, including the River Nar SSSI, has been undertaken within ES Chapter 7: Ecology and Biodiversity [APP/6.2], taking into account the</p>



				<p>associated mitigation and design measures proposed in order to avoid significant harm to these designations.</p> <p>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, including in relation to the South Acre Conservation Area.</p>
	Watercourses hydrology and	The Nar river valley is an area around South Acre of national importance. It is sensitive, beautiful and critical for biodiversity.	No	<p>The Applicant notes this comment and confirms that a full assessment of direct and indirect effects on national designated sites, including the River Nar SSSI, has also been undertaken within ES Chapter 7: Ecology and Biodiversity [APP/6.2], taking into account the associated mitigation and design measures proposed in order to avoid significant harm to these designations.</p>
	Watercourses hydrology and	The nearby river Nar is a rare chalk stream with brown trout amongst its fauna and the run-off impact from your development has been but poorly considered.	No	<p>The potential for pollution of the water environment is assessed in ES Chapter 12: Water Resources [APP/6.2], which concludes the Scheme would have no significant effects on water resources, including the River Nar, throughout the construction, operation and decommissioning stages, through implementation of good practice measures.</p> <p>Good construction practice measures to control runoff rates and limit the potential for sedimentation and pollution are outlined in the oCEMP [APP/7.6] and ES Appendix 12.2: Flood Risk Assessment (FRA) [APP/6.4]. This is secured through a requirement of the dDCO [APP/3.1].</p>
	Watercourses hydrology and	There will be no social value to the local area. We have wonderful walks through fields and along hedgerows and of course the unique River Nar.	No	<p>The Applicant notes this comment but disagrees and has considered the experience of the area and users of PRow within ES Chapter 6: Landscape and Visual [APP/6.2].</p> <p>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.</p> <p>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.</p>
	Watercourses hydrology and	the Roman and Norman historic ways should not be tampered with, the water pressure is already low in this area and large scale solar industry requirements for fire prevention and cooling systems is not acceptable as it will add to the problem	No	<p>As outlined in ES Chapter 12: Water Resources [APP/6.2] The 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,</p>



				therefore not exacerbating the current or future water stress of the groundwater resource.
	Watercourses hydrology and	Nar River protection not guaranteed	No	Good construction practice measures to control runoff rates and limit the potential for sedimentation and pollution are outlined in the oCEMP [APP/7.6] and the FRA [APP/6.4] . This is secured by the draft DCO [APP/3.1] .
	Watercourses hydrology and	<p>The site boundary is within 200m of the River Nar, a chalk river SSSI and one of only 220 such rivers in the world, home to water voles and otters, which are both protected species.</p> <p>SSSI River Nar and the historic water meadows in Castle Acre are downhill of the proposed site and therefore at risk from any increased surface water run-off.</p>	No	<p>The potential for pollution of the water environment is assessed in ES Chapter 12: Water Resources [APP/6.2], which concludes that the Scheme would have no significant effects on water resources, including the River Nar, throughout the construction, operation and decommissioning stages, through implementation of good practice measures.</p> <p>Good construction practice measures to control runoff rates and limit the potential for sedimentation and pollution are outlined in the oCEMP [APP/7.6] and the FRA [APP/6.4]. This is secured through a requirement of the draft DCO [APP/3.1].</p>
	Watercourses hydrology and	<p>We live in an conservation area and the River Nar is one of a few chalk streams in the country. The panels whilst needed will not enhance our views. The sound from the battery packs whilst being told it will be mitigated- definition ""action of reducing the severity, seriousness or painfulness of something""</p>	No	<p>The potential for pollution of the water environment is assessed in ES Chapter 12: Water Resources [APP/6.2], which concludes the Scheme would have no significant effects on water resources, including the River Nar, throughout the construction, operation and decommissioning stages, through implementation of good practice measures.</p> <p>Good construction practice measures to control runoff rates and limit the potential for sedimentation and pollution are outlined in the oCEMP [APP/7.6] and ES Appendix 12.2: Flood Risk Assessment (FRA) [APP/6.4]. This is secured through a requirement of the draft DCO [APP/3.1].</p> <p>ES Chapter 10: Noise and Vibration [APP/6.2] also 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.</p>
	Watercourses hydrology and	<p>The wildflower plan is very limited, brambles and ragwort often take over. Wild flower planting does not suit many species nor will the run off to the chalk based Nar River help the biodiversity challenges (a SSSI).</p>	No	<p>Proposed landscape treatments are outlined in the oLEMP [APP/7.11], taking into account a range of considerations in order to maximise the benefits provided (e.g. inclusion of seeding with a suitable grassland mix in order to maximise biodiversity with species consistent with the local area, whilst also helping to stabilise soils and intercept rainfall/surface water flow to benefit drainage. Specific details such as precise planting mixes and landscape management treatments will be controlled through the detailed LEMP as a requirement of the DCO.</p>



				<p>As outlined in the FRA [APP/6.4], there is a substantial body of research which outlines that solar panels do not have a significant effect on runoff volumes or peak flows, however where ground beneath panels is bare there may be an increase in peak discharge. Grassland under the PV arrays will act to bind the soil and slow the flow of water from the PV arrays therefore not contributing to or exacerbating existing flooding downstream of the Site.</p> <p>The Applicant further notes that 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.</p> <p>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].</p>
	Watercourses hydrology and	Biodiversity has not been demonstrated and the development actively threatens what is already there - notably the river Nar.	No	<p>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.</p>
	Watercourses hydrology and	The documents on the website run to many hundreds of pages, and are full of statutory detail and short on hard facts. I struggle to understand why the Nar Valley should be targeted for such a sized Solar farm. I am worried about the impact upon the River Nar catchment.	No	<p>The Applicant notes this comment but remains confident that the information presented during the statutory consultation was sufficiently accessible</p> <p>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, layouts and 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.</p> <p>The potential for pollution of the water environment is assessed in ES Chapter 12: Water Resources [APP/6.2], which concludes the Scheme would have no significant effects on water resources, including the River</p>



				<p>Nar, throughout the construction, operation and decommissioning stages, through implementation of good practice measures.</p> <p>Good construction practice measures to control runoff rates and limit the potential for sedimentation and pollution are outlined in the oCEMP [APP/7.6] and the FRA [APP/6.4]. This is secured through a requirement of the draft DCO [APP/3.1].</p>
	Watercourses hydrology and	This is a unique heritage setting in a chalk stream valley with nationally significant heritage assets - I would be hard pressed to think of a less suitable site!	No	<p>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.</p> <p>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, layouts and 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.</p>
	Watercourses hydrology and	<p>I am concerned for the maintenance of clean water within the river Nar and the aquifers that feed it, if there were to be a fire within your planned battery storage area.</p> <p>I am unclear what measures you can take to prevent noxious chemicals and or heavy metals entering the aquifer should a fire occur.</p>	No	<p>The FRA [APP/6.4] commits the detailed design of the Scheme to include dedicated contaminated water tank(s) in a closed system for the BESS and substations sized to accommodate 228m³ plus the 1% AEP event in the rare event of a battery fire. This is secured by the draft DCO [APP/3.1].</p>
	Watercourses hydrology and	Its up to you, not us to suggest solutions Our solution would be not to build the thing in the first place. You will be aware, I hope, that the River Nar in the valley below the site is one of only 220 chalkstreams IN THE ENTIRE WORLD and so any risk to this ecosystem is completely unacceptable.	No	<p>The potential for pollution of the water environment is assessed in ES Chapter 12: Water Resources [APP/6.2], which concludes the Scheme would have no significant effects on water resources, including the River Nar, throughout the construction, operation and decommissioning stages, through implementation of good practice measures.</p> <p>Good construction practice measures to control runoff rates and limit the potential for sedimentation and pollution are outlined in the oCEMP [APP/7.6] and the FRA [APP/6.4]. This is secured through a requirement of the draft DCO [APP/3.1].</p>



	Watercourses hydrology and	<p>It must ensure the 'integrity' of the chalk stream and its margins. It could provide an annual fund for river management/restoration and bio diversity.</p> <p>Any pollution, as a result of the various phases for this project, are unacceptable.</p>	No	<p>The potential for pollution of the water environment is assessed in ES Chapter 12: Water Resources [APP/6.2], which concludes the Scheme would have no significant effects on water resources, including the River Nar, throughout the construction, operation and decommissioning stages, through implementation of good practice measures.</p> <p>Good construction practice measures to control runoff rates and limit the potential for sedimentation and pollution are outlined in the oCEMP [APP/7.6] and the FRA [APP/6.4]. This is secured through a requirement of the draft DCO [APP/3.1].</p> <p>The Applicant also notes that 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.</p>
	Watercourses hydrology and	<p>There will inevitably be run-off from your installation works and that will impact the Nar, trout stream. There will also be increased run-off from rain to the extent that significant portions of the PV fields will lie in rain shadow. The Nar valley is historically and archaeologically rich environment which your project trashes.</p>	No	<p>The potential for pollution of the water environment is assessed in ES Chapter 12: Water Resources [APP/6.2], which concludes that the Scheme would have no significant effects on water resources, including the River Nar, throughout the construction, operation and decommissioning stages, through implementation of good practice measures.</p> <p>Good construction practice measures to control runoff rates and limit the potential for sedimentation and pollution are outlined in the oCEMP [APP/7.6] and the FRA [APP/6.4]. This is secured through a requirement of the draft DCO [APP/3.1].</p> <p>The Applicant further 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.</p>
	Watercourses hydrology and	<p>The nearby river Nar is a rare chalk stream with brown trout amongst its fauna and the run-off impact from your development has been but poorly considered.</p>	No	<p>The potential for pollution of the water environment is assessed in ES Chapter 12: Water Resources [APP/6.2], which concludes the Scheme would have no significant effects on water resources, including the River Nar, throughout the construction, operation and decommissioning stages, through implementation of good practice measures.</p>



				Good construction practice measures to control runoff rates and limit the potential for sedimentation and pollution are outlined in the oCEMP [APP/7.6] and the FRA [APP/6.4] . This is secured through a requirement of the draft DCO [APP/3.1] .
	Watercourses hydrology and	We would like to ensure our beautiful wild chalk stream - The River Nar - is not contaminated.	No	The potential for pollution of the water environment is assessed in ES Chapter 12: Water Resources [APP/6.2] , which concludes the Scheme would have no significant effects on water resources, including the River Nar, throughout the construction, operation and decommissioning stages, through implementation of good practice measures.
	Watercourses hydrology and	River Nar maintenance and improvements ensuring its integrity.	No	<p>Embedded mitigation measures to safeguard the River Nar SSSI and a full assessment of potential impacts to relevant SSSIs and irreplaceable habitats have been undertaken in ES Chapter 7: Ecology and Biodiversity [APP/6.2].</p> <p>Impacts of the Scheme on Priority Habitats have also been fully considered within ES Chapter 7: Ecology and Biodiversity [APP/6.2], which concludes no significant adverse effects are anticipated.</p>
	Watercourses hydrology and	How will you manage surface water runoff and prevent localised flooding, which is already a serious problem in this valley, which is the catchment area for one of only 220 chalkstreams in the world, and a protected habitat	No	<p>As outlined in ES Appendix 12.2: Flood Risk Assessment (FRA) [APP/6.4], there is a substantial body of research which outlines that solar panels do not have a significant effect on runoff volumes or peak flows; however, where the ground beneath the panels is bare, there may be an increase in peak discharge. Grassland under the PV arrays will act to bind the soil and slow the flow of water from the PV arrays, therefore not contributing to or exacerbating existing flooding downstream of the Site.</p> <p>A SuDS system designed to the 1% AEP +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. It should be noted that the drainage design will be secured through a requirement of the draft DCO [APP/3.1].</p>
	Watercourses hydrology and	<p>Sites to look at as part of research</p> <p>https://norfolkrivertrust.org</p> <p>https://norfolkrivertrust.org/wp-content/uploads/2019/02/River-Nar-local-catchment-plan-final-ver.pdf</p>	No	<p>The Applicant notes this comment and welcomes the suggestions.</p> <p>The Scheme has been informed by specific habitat survey work, whilst a full assessment of direct and indirect effects on habitats present within and in the vicinity of the Order limits has been undertaken within the ES Chapter 7:</p>



		<p>Bit out of date but the outcomes can be discussed on the walkover.</p> <p>There are only 220 Chalk streams in the world The Nar is the best example in the East of England - A restoration program is in place that needs long term funding this is a great Global, Local, and community opportunity.</p> <p>There is a plan to join local chalk river Landscape Recovery plans into one big landscape that Drove could consider.</p> <p>https://www.wendlingbeck.org</p> <p>Local BNG project already selling units into the Market - Has a water project.</p> <p>Natural Capital focused.</p> <p>https://www.diggandco.com</p> <p>Conflict of interest but has just completed master and management planning for Duchy of Cornwall on Dartmoor.</p>		<p>Ecology and Biodiversity [APP/6.2], including specific consideration in relation to the River Nar SSSI.</p> <p>No rivers are located within or immediately adjacent to the Order Limits that could be subject to enhancement measures as part of the Scheme design, albeit the presence of offsite features (including the River Nar) has been taken into account where appropriate and mitigation measures embedded to avoid harm and strengthened habitat corridors and habitat enhancements will link with offsite networks including watercourses.</p> <p>The Applicant also notes that 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.</p>
	Watercourses hydrology and	Is there a Water Management plan?	No	<p>Good construction practice measures to control runoff rates and limit the potential for sedimentation and pollution are outlined in the oCEMP [APP/7.6] and the FRA [APP/6.4]. This is secured through a requirement of the draft DCO [APP/3.1].</p>
	Watercourses hydrology and	Has aquifer recharge been considered? Have you spoken to Anglian water? Water Recourses East? A joined-up plan would make massive sense.	No	<p>The Applicant notes that effects on groundwater / aquifers are assessed in ES Chapter 12: Water Resources [APP/6.2] which concludes no significant effects on the groundwater resource.</p>
	Watercourses hydrology and	<p>Environmental risks</p> <p>The site gives a risk of release of pollutants into the water, soil and air. There is also a risk to noise including vibration and light pollution.</p> <p>The site boundary is within 200m of the River Nar, a chalk river SSSI and one of only 220 such rivers in the world, home to water voles and otters, which are both protected species.</p> <p>SSSI River Nar and the historic water meadows in Castle Acre are downhill of the proposed site and therefore at risk from any increased surface water run-off.</p>	No	<p>The Applicant notes this and in terms of noise and vibration refers to ES Chapter 10: Noise and Vibration [APP/6.2] which assess vibration from construction and states that vibration from operation of plant is negligible at short distances as close as 10m from plant. Therefore, the risk of noise inducing vibration out of the site is very low.</p> <p>Good construction practice measures to control runoff rates and limit the potential for sedimentation and pollution are outlined in the oCEMP [APP/7.6] and the FRA [APP/6.4]. This is secured through a requirement of the draft DCO [APP/3.1].</p> <p>As outlined in the FRA [APP/6.4], there is a substantial body of research which outlines that solar panels do not have a significant effect on runoff volumes or peak flows, however where ground beneath panels is bare there may be an increase in peak discharge. Grassland under the PV arrays will act to bind the soil and slow the flow of water</p>



				<p>from the PV arrays, therefore not contributing to or exacerbating existing flooding downstream of the Site.</p> <p>A SuDS system designed to the 1% AEP +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. It should be noted that the drainage design will be secured through a requirement of the draft DCO [APP/3.1].</p>
	Watercourses hydrology and	You will be aware, I hope, that the River Nar in the valley below the site is one of only 220 chalkstreams IN THE ENTIRE WORLD and so any risk to this ecosystem is completely unacceptable.	No	<p>The potential for pollution of the water environment is assessed in ES Chapter 12: Water Resources [APP/6.2], which concludes that the Scheme would have no significant effects on water resources, including the River Nar, throughout the construction, operation and decommissioning stages, through implementation of good practice measures.</p>
	Watercourses hydrology and	We would like to ensure our beautiful wild chalk stream - The River Nar - is not contaminated.	No	<p>The potential for pollution of the water environment is assessed in ES Chapter 12: Water Resources [APP/6.2], which concludes that the Scheme would have no significant effects on water resources, including the River Nar, throughout the construction, operation and decommissioning stages, through implementation of good practice measures.</p> <p>Good construction practice measures to control runoff rates and limit the potential for sedimentation and pollution are outlined in the oCEMP [APP/7.6] and the FRA [APP/6.4]. This is secured through a requirement of the draft DCO [APP/3.1].</p>
	Watercourses hydrology and	Castle Acre is in an area of serious water stress as per the 2021 report of water stressed areas on gov.uk what impact will the proposed site have on water resources and water quality not only during construction, but for cleaning plant machinery etc	No	<p>As outlined in ES Chapter 12: Water Resources [APP/6.2], the 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, therefore not exacerbating the current or future water stress of the groundwater resource.</p>
	Watercourses hydrology and	The construction phase and ongoing maintenance of this man made, engineering project needs to have an upside over the environment for the local community, especially involving maintenance of the purity of the chalk stream which is the Nar. A complex project to protect the Nar river course, needs to be undertaken as a pro quo for the local community. Its to ensure no pollution, (sewage and/or construction run off) and indeed some river and/or bank improvements, (yet to be determined.) This contribution from the wider population is to	No	<p>The potential for pollution of the water environment is assessed in ES Chapter 12: Water Resources [APP/6.2], which concludes that the Scheme would have no significant effects on water resources, including the River Nar, throughout the construction, operation and decommissioning stages, through implementation of good practice measures. Maintenance of the Scheme is outlined in the oOEMP [APP/7.8]</p> <p>The Applicant also notes that the Scheme incorporates a range of new habitat provision and enhancement</p>



		involve and improve the environmnet for the South Acre community.		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.
	Watercourses hydrology and	Good drainage of the site and food provention is essential.	No	Surface water run-off rates will be managed using SuDS techniques, such as grassland under the drip lines for the solar PV panels, meaning flood risk is not increased elsewhere, as set out within ES Chapter 12: Water Resources [APP/6.2] .
	Soils	Long term damage to soil.	No	The Applicant notes this comment but confirms that the majority of land within the Order limits would be sown to grassland and managed, including potentially by being grazed with sheep, for the duration of the operational phase. This is expected to provide significant benefits to soils. Further information on how soils will be managed is set out within the oSMP [APP/7.13] .
	Soils	<p>Info should be made available as to the negative effects:</p> <p>For example, long term damage to the soil and to the health of humans..if this research is available.</p>	No	<p>The Applicant acknowledges this comment but confirms that the majority of land within the Order limits will be sown to grassland and managed, potentially including grazing by sheep, for the duration of the operational phase. This is expected to have a significant benefit for soils. Further information on soil management is provided in the oSMP [APP/7.13].</p> <p>The Applicant also notes that ES Chapter 15: Human Health [APP/6.2] provides an assessment of the likely significant effects on human health as a result of the Scheme. 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.</p>



	Soils	<p>Do you have a copy of the soil analysis?</p> <p>Assuming that the underlying geology is Chalk then the opportunity to create calcareous meadows with its specialist species is great. NRT have all the specialist knowledge and know how. Target species recovery Chalk Downland</p>	No	<p>The Applicant notes that a soil assessment is provided in ES Chapter 11: Soils and Agriculture [APP/6.2].</p> <p>The Applicant confirms that ES Chapter 12 Water Resources [APP/6.2] recognises the underlying geology as being chalk.</p> <p>Proposed landscape treatments are outlined in the oLEMP [APP/7.11], taking into account a range of considerations in order to maximise the benefits provided (e.g. inclusion of seeding with a suitable grassland mix in order to maximise biodiversity with species consistent with the local area, whilst also helping to stabilise soils and intercept rainfall/surface water flow to benefit drainage. Specific details such as precise planting mixes and landscape management treatments will be controlled through the detailed LEMP as a requirement of the DCO.</p>
	Soils	<p>Soil health. Studies have shown solar farms can lead to poor soil health with lower soil carbon below the panels. A study by Lancaster University Environment Centre found the ground immediately under the panels was more compacted, with implications for water infiltration and root growth. It contained lower levels of organic carbon and particulate matter, essential for soil related ecosystem services. With flooding occurring more frequently across Norfolk, and surface water run off becoming a growing concern, the critical need for good soil health was one of the key points raised in a recent parliamentary flood summit to help prevent flooding.</p>	No	<p>The Applicant notes this comment but confirms that the majority of land within the Order limits would be sown to grassland and managed, including potentially by being grazed with sheep, for the duration of the operational phase. This is expected to provide significant benefits to soils. Further information on how soils will be managed is set out within the oSMP [APP/7.13].</p> <p>As outlined in the FRA [APP/6.4], there is a substantial body of research which outlines that solar panels do not have a significant effect on runoff volumes or peak flows; however, where the ground beneath panels is bare, there may be an increase in peak discharge. Grassland under the PV arrays will act to bind the soil and slow the flow of water from the PV arrays therefore not contributing to or exacerbating existing flooding downstream of the Site.</p>
	Soils	<p>Topsoil is removed and cleaning materials can contaminate the soil. There is the possibility of toxic chemicals leaching out from the panels</p>	No	<p>The Applicant notes this comment but disagrees. The Applicant notes that measures to protect and mitigate the environmental impacts of the Scheme during construction are set out in the oCEMP [APP/7.6]. Further information on how soils will be managed is set out within the oSMP [APP/7.13].</p>
	Additional environmental mitigation, enhancement and protection suggestions	<p>HALF THE TIME IT'S NIGHT TIME: MORE CONSIDERATION NEEDS TO BE GIVEN TO EMPHASISING AND REFINING THE PLANNING TOWARDS MITIGATION OF LIGHT POLLUTION.</p>	No	<p>The Applicant also notes that the Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation, which would only include motion-sensing lighting and be used only for security and maintenance purposes. Further details are set out in ES Chapter 5: The Scheme [APP/6.1].</p>
	Additional environmental mitigation, enhancement and protection suggestions	<p>As above. By changing and adding in a few paths and cycle routes, planting hedgerows etc, this does not make up for all that would be lost in all these areas.</p>	No	<p>The Applicant notes this comment but disagrees that the Scheme detracts from the area.</p> <p>The design of the Scheme has sought to retain, buffer and enhance the existing on-site green infrastructure where</p>



				practicable. The minimum buffers to existing onsite features are set out within the Design Principles, Parameters and Commitments document [APP/5.8] . 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] .
	Additional environmental mitigation, enhancement and protection suggestions	I am very concerned about destruction of wildlife habitats and plants during construction. And at the end of construction are you contractually committed to keep plantings alive? i have seen thousands of new trees proudly being planted along new infrastructure projects, only to die in subsequent months/years because no-one looks after them.	No	<p>The Applicant notes that measures to protect and mitigate the environmental impacts of the Scheme during construction are set out in the oCEMP [APP/7.6].</p> <p>Measures relating to trees and planting are reflected in Figure 5.8 Green infrastructure Parameter Plan and are detailed in the oLEMP [APP/7.11], including the introduction of additional hedgerow trees and woodland belts to provide screening for the solar panels.</p>
	Additional environmental mitigation, enhancement and protection suggestions	A larger area of land free of solar farm to South Acre Church.	Yes	The Applicant notes this comment and confirms Solar PV panels have also been removed entirely from Field 35 and the northern half of Field 33.
	Additional environmental mitigation, enhancement and protection suggestions	We have generalised comments but would like to see maximised biodiversity benefits and the use of agrivoltaics in appropriate areas.	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/7.4] , and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme.
	Additional environmental mitigation, enhancement and protection suggestions	As stated in previous e-mails, I would be very keen to learn of the community-level mitigation for your proposed planning application to the Secretary of State. There needs to be a very significant offer, to local people, to off-set the loss of access to, perception of, and experience this unique mid-Norfolk valley/clay plateaux landscape.	No	The Applicant notes this comment. 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.
	Additional environmental mitigation, enhancement and protection suggestions	<p>We would like to see a much stronger visual and acoustic mitigation plan, particularly at the northern edge of the site. This should include:</p> <p>Planting of tall, mature-species trees lines and even higher hedgerows that are suitable for effective screening.</p> <p>A clear long-term maintenance plan, with a commitment to replant any failed trees during the operational life of the site.</p>	No	The Applicant notes this comment and, in terms of noise and vibration, refers to ES Chapter 10: Noise and Vibration [APP/6.2] , which assesses noise to a conservative criterion at the nearest receptors and includes buffer zones for receptor and noise-emitting plant. The Scheme is expected to have non-significant effects at receptors closer than South Acre valley, therefore, noise levels at the valley would be even lower than those assessed and below the absolute criteria of adverse effect.



		<p>Specific design and placement of buffer zones to prevent noise from travelling down toward the river valley, where it would directly affect the tranquil setting of South Acre.</p> <p>We are very grateful for the opportunity to comment and hope these suggestions can be taken into account during the design refinement phase. As well as any other suggestion through this feedback form.</p>		
	Additional environmental mitigation, enhancement and protection suggestions	Plant as many trees as possible.	Yes	<p>The Applicant welcomes this comment. The design of the Scheme has sought to retain, buffer and enhance the existing on-site green infrastructure where practicable. The minimum buffer requirements for existing onsite features are set out in the Design Principles, Parameters and Commitments document [APP/5.8]. 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].</p>
	Additional environmental mitigation, enhancement and protection suggestions	River Nar and Nar Valley, protection and maintenance program. The development time scale through to 2033 is not conducive to meaningful discussions at this stage.	No	<p>The Applicant notes this comment and confirms that the River Nar and Nar Valley have been fully considered within ES Chapter 12 Water Resources [APP/6.2] concludes the Scheme is not anticipated to result in any residual adverse effects on water receptors across the Scheme's construction, operational and decommissioning phases.</p>
	Additional environmental mitigation, enhancement and protection suggestions	Are there plans for wildflower meadows or ecological enhancement within the site?	Yes	<p>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].</p> <p>The design of the Scheme has also sought to retain, buffer and enhance the existing on-site green infrastructure where practicable. The minimum buffer requirements for existing onsite features are set out in the Design Principles, Parameters and Commitments document [APP/5.8]. 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].</p>
	Additional environmental mitigation, enhancement and protection suggestions	Wild flower margins in front and beside the panels. Poppies grow very well round here.	No	<p>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].</p>



	Additional environmental mitigation, enhancement and protection suggestions	In addition, we would like to reinforce the importance of consistent delivery of mitigation measures outlined in the masterplanning documents. While noise, lighting and exposure to magnetic fields impacts are acknowledged in the planning stage, our experience suggests that these safeguards are often diluted during the construction, operational, and the decommissioning phases.	No	The Applicant notes this and, in terms of noise and vibration, refers to ES Chapter 10: Noise and Vibration [APP/6.2] which outlines all embedded and additional mitigation measure to achieve the non-significance criteria which will be outlined and implemented in the relevant management plans for construction (oCEMP [APP/7.6]), operation (oOEMP [APP/7.8]), and decommissioning (oDS [APP/7.10]), which in turn are all secured through corresponding requirements of the DCO.
	Additional environmental mitigation, enhancement and protection suggestions	<p>Buffers</p> <p>Paragraph 7.5.2 of the PIER states that development buffers will be secured with fencing at the outer extents of the buffers to separate the Solar PV Site, with individual panels sited no closer than 4m to the secure fencing. We recommend that these buffers should be of insect-rich habitat around the field edges, along with large hedgerows (i.e. tall and wide) and other enhancements such as introduction of ponds/wetland areas to also help boost insect abundance.</p> <p>We recommend increasing the buffer size around water courses (including ditches) and ponds to 20m. This will ensure appropriate mitigation for any pollution events.</p>	No	<p>The design of the Scheme has sought to retain, buffer and enhance the existing on-site green infrastructure where practicable. The minimum buffer requirements for existing onsite features are set out in the Design Principles, Parameters and Commitments [APP/5.8] document.</p> <p>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]</p>
	Additional environmental mitigation, enhancement and protection suggestions	Extensive field areas covered in solar panels may have a negative impact, however, this could potentially be mitigated by maintaining wide buffers of insect-rich habitat around the field edges, along with large hedgerows (i.e. tall and wide) and other enhancements such as introduction of ponds/wetland areas to also help boost insect abundance, alongside no lighting, retention of and mature trees. In particular, we recommend maintaining extra wide insect-rich buffers around any woodlands with bats present.	No	<p>The Applicant notes and agrees with this comment and can confirm appropriate buffers are proposed to the retained hedgerows and woodland which will comprise species-rich wildflower grassland and will be of benefit to invertebrates. Many of the hedgerows will also be enhanced to increase species diversity, which will again benefit invertebrates. In addition, a number of the ponds will be enhanced, and attenuation basins are proposed.</p> <p>The buffers to retained habitats are as set out in Table 5.2 of ES Chapter 5: The Scheme [APP/6.1], and Table 7.11 of ES Chapter 7: Ecology and Biodiversity [APP/6.2].</p> <p>The minimum buffers to existing onsite features are set out within the Design Principles, Parameters and Commitments [APP/5.8] document. 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].</p>
	Additional environmental mitigation, enhancement	Ideally livestock will be removed and/or grassland left unmown between April and July to allow plants to flower and set seed, providing a nectar resource for invertebrates. Some areas of grassland should be left uncut over winter to provide habitat for	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



	and protection suggestions	<p>a range of species and allow invertebrates such as butterflies to overwinter in grass stems.</p> <p>Hedgerows on site should be managed for wildlife, by avoiding cutting during the bird nesting season (March to August inclusive), not cutting hedges every year, allowing them to grow at least 2 metres wide and tall and leaving an uncut grass margin along the base of the hedge</p> <p>Management operations on site should avoid the bird nesting season (March to August inclusive) to reduce disturbance.</p> <p>Mitigation plans should include plans for adaptive management to ensure measures can be adapted if mitigation is not initially successful.</p> <p>There is a lack of evidence for the efficacy of establishing different grassland types within solar farms and longterm ecological changes in terms of species composition, diversity, and abundance for different taxonomic groups.</p> <p>Long-term ecological monitoring of solar farms would help to create this evidence base. There are several species groups in particular which require further long-term monitoring to determine how solar development impacts them. For example, there is some evidence to suggest that aquatic insects may mistake solar arrays for water, however more evidence is needed to confirm or disprove this theory.</p> <p>We recommend that academic bodies, environmental organisations, developers and their trade associations should take the opportunity to monitor the impacts on wildlife and the surrounding environment and to carry out more research. This will improve our understanding and contribute to improved future policy and practice. Long term ecological monitoring of the development and mitigation, compensation, and enhancement areas, for the life of the development, will provide valuable scientific evidence for the ecological effects of large-scale solar farm schemes and inform the adaptive management of habitats retained or created for wildlife through this scheme, as well as design and delivery of future schemes.</p>		<p>planting and management, please refer to the oLEMP [APP/7.11].</p> <p>Measures relating to trees and planting are reflected in Figure 5.8 Green infrastructure Parameter Plan and are detailed in the oLEMP [APP/7.11], including the introduction of additional hedgerow trees and woodland belts to provide screening for the solar panels.</p> <p>More broadly, the design of the Scheme has sought to retain, buffer and enhance the existing on-site green infrastructure where practicable. The minimum buffer requirements for existing onsite features are set out in the Design Principles, Parameters and Commitments document [APP/5.8]. 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].</p> <p>The Scheme has also been assessed using the government's Biodiversity Net Gain Metric, which concludes that it will deliver biodiversity gains well in excess of 10%, as set out in the Biodiversity Net Gain Assessment Report [APP/7.4], and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme.</p> <p>The Applicant notes that engagement with key stakeholders, such as Norfolk Wildlife Trust and Natural England, is detailed within this Consultation Report [APP/5.1].</p>
	Protected sites	<p>. Â The whole basis of your approach is cynical - to buy or lease land wherever you can and then seek to put solar panels upon it rather than to target suitable land (WWII airfields, anyone?) not in proximity to SSSIs or upon productive agricultural land.</p> <p>Â To be clear, you're doing what you're doing because you really couldn't care less about the environment.</p>	No	<p>The Applicant notes this comment but disagrees. A full assessment of direct and indirect effects on national designated sites, including the River Nar SSSI, has been undertaken within ES Chapter 7: Ecology and Biodiversity [APP/6.2], including considerations with regard to air quality and water pollution, taking into account the associated mitigation and design measures proposed in order to avoid significant harm to these designations.</p> <p>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</p>



				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.
	Protected sites	<p>River Narr SSSI</p> <p>As set out within Volume I, Chapter 12: Water Resources (PIER), 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. Paragraph 7.6.34 of the PIER states that in the absence of mitigation, there is potential for chemical spills and contaminated surface water runoff to reach the River Nar SSSI via overland flows such as ditches, which has the potential to degrade the habitats with adverse effects to the associated faunal and botanical assemblages of the River Nar SSSI. The ES must demonstrate that the pollution prevention measures included within the embedded mitigation ensure that there are no adverse effects on the SSSI.</p>	No	<p>The Applicant notes this comment and confirms that ES Chapter 7: Ecology and Biodiversity [APP/6.2] assesses the direct and indirect effects on nationally designated sites, including the River Nar SSSI.</p> <p>The Applicant further notes that this includes considerations regarding air quality and water pollution, taking into account the associated mitigation and design measures proposed to avoid significant harm to these designations.</p>
	Protected sites	<p>Road Side Nature Reserves</p> <p>Paragraph 7.6.54 of the PIER refers to River Road RNRs (refs.033086 & U22086). These are non-statutory designations of local significance and it states that these are located adjacent to the Site boundary. However, we draw your attention to the fact that as shown on Fig 7.1, RNR 033086 is within site boundary. We recommend amending the text to reflect this. Mitigation must be put in place to ensure that there are no adverse impacts on the RNRs.</p>	Yes	<p>The Applicant notes this and confirms that ES Chapter 7: Ecology and Biodiversity [APP/6.2] has accounted for RNRs. The Applicant also confirms there are no SSSIs located on the land within the Order limits, nor is it located immediately adjacent to any statutory ecological designations, the closest of which is the River Nar SSSI, which is located approximately 0.27km north of the Site and Castle Acre Common SSSI, which is located approximately 0.44km north of the Site.</p>

9 Ethics and supply chain

Topic	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Ethics and Supply Chain	Supply Chain (general)	The present enquiries into the production of solar panels and their use of rare earth materials coupled with Chinese manufacturing make many very questionable.	No	IGP is a signatory of the Solar Energy UK supply chain statement, which commits the company to a transparent, sustainable supply chain free of human rights abuses.
	Supply Chain (general)	Manufacture of components involves modern-day slavery practices overseas;	No	IGP is a signatory of the Solar Energy UK supply chain statement, which commits the company to a transparent, sustainable supply chain free of human rights abuses.
	Supply Chain (general)	The resource needed for solar panels make solar panels unenvironmental. The company is owned by a	No	The embodied carbon within solar panels and associated transport is considered within ES Chapter 13: Climate Change [APP/6.2] . The overall conclusion of this quantitative assessment has shown that the emissions



		foreign country, it is never a wise move to hand over control of the UK's utilities to another country.		generated by production and shipping of the solar panels is not significant and the overall effect of the Scheme has been judged to be beneficial with regards to greenhouse gas emissions.
	Supply Chain (general)	Did not look at supply chain. Is there anywhere that panels can be sourced, other than China?	No	China is responsible for around 75% of all solar equipment manufacturing. For the purposes of the assessment and to represent a realistic conservative scenario of greenhouse gas (GHG) emissions, it has been assumed that all panels will come from China.
	Supply Chain (general)	<p>Efficient infrastructure & ethical supply chain - I</p> <p>China alone is responsible for 87% of global emissions produced by solar manufacturing, particularly regarding pollution and waste.</p> <p>[REDACTED]</p> <p>There is the significant carbon footprint associated with shipping solar parts internationally.</p> <p>The global supply chain is vulnerable because of China's dominance in the global solar market.</p> <p>China has significant control over the price of solar panels and has the ability to massively change global prices if it decides to. This puts other countries in a weakened position where they are reliant on China's solar supply.</p>	No	<p>The embodied carbon within solar panels and associated transport from China is considered within ES Chapter 13: Climate Change [APP/6.2]. The assessment has assumed that transport from Shanghai to the UK will be by sea.</p> <p>The overall conclusion of this quantitative assessment has shown that the emissions generated by the production and shipping of the solar panels are not significant, and the overall effect of the project has been judged to be beneficial with regard to greenhouse gas emissions.</p> <p>The Applicant and the wider Island Green Power group are committed to Global Anti-Slavery and Human Trafficking and their policy can be found on IGP's website.</p> <p>Island Green Power opposes modern slavery and human trafficking in all forms, wherever in the world it may occur. It has a zero-tolerance approach to slavery and human trafficking in its supply chain as well as in its own operations. It is IGP policy to conduct all business with honesty, integrity and transparency, with a commitment to acting professionally, ethically and fairly in all our business dealings and relationships wherever we operate; and to implement and enforce effective processes to identify and prevent slavery and human trafficking in our supply chain.</p> <p>Island Green Power is a signatory of the Solar Energy UK Supply Chain Statement, which commits the company and its projects to sourcing materials produced sustainably and to a supply chain free of human rights abuses. The company is building on this commitment through membership of the Solar Stewardship Initiative, an international supply chain audit programme, and through the use of independent international standards bodies, with inspection staff on the ground in major producing locations, to review, inspect and accredit suppliers.</p> <p>Island Green Power will cease business relationships with anyone who, in the reasonable opinion of the Board, fails to address modern slavery or human trafficking.</p>
	Supply Chain (general)	PV panels probably sourced from China are undoubtedly have extremely damaging effects on the	No	The embodied carbon assessed in ES Chapter 13: Climate Change [APP/6.2] includes raw material



		environment and those associated with mineral extraction and their production.		extraction as part of the embodied carbon of the materials used for products under the Scheme. This includes silicon in cells, steel for mounting, and other ancillary products.
	Supply Chain (general)	Manufacturing panels is not energy efficient or will not reduce carbon unless of course you plan to make them by employing locals and using locally resourced materials !	No	<p>The energy efficiency of panels in comparison with other methods of energy generation is considered within ES Chapter 13: Climate Change [APP/6.2].</p> <p>The assessment concludes that the energy efficiency of the proposed scheme is typical of a large scale solar project and produces significantly less emissions per unit of energy generated when compared with other non-renewable methods.</p>
	Supply Chain (general)	Where are the panels coming from? You haven't told us. If they are not produced in GB then the supply chain will be unethical.	No	<p>China is responsible for around 75% of all solar equipment manufacturing. For the purposes of the assessment and to represent a realistic conservative scenario of emissions, it has been assumed that all panels will come from China.</p> <p>IGP is committed to acting professionally, ethically and fairly in all our business dealings and relationships wherever we operate; and to implementing and enforcing effective processes to identify and prevent slavery and human trafficking in our supply chain.</p> <p>IGP is a signatory of the Solar Energy UK supply chain statement, which commits the company to a transparent, sustainable supply chain free of human rights abuses.</p>
	Supply Chain (general)	You have utterly failed to convince as to an ethical supply chain: hopes were expressed regarding the source of the PV panels but China couldn'tt be specifically ruled out - where fossil fuels (and quite possibly slave labour) will be used to manufacture them and ship them across the globe which would also leave your vaunted environmental credentials in tatters.	No	<p>The embodied carbon within solar panels and associated transport from China is considered within ES Chapter 13: Climate Change [APP/6.2]. The assessment has assumed that transport from Shanghai to the UK will be by sea.</p> <p>The overall conclusion of this quantitative assessment has shown that the emissions generated by production and shipping of the solar panels are not significant and the overall effect of the project has been judged to be beneficial with regard to greenhouse gas emissions.</p> <p>IGP are committed to Global Anti-Slavery and Human Trafficking, and their policy can be found on IGP's website.</p> <p>Island Green Power Limited opposes modern slavery and human trafficking in all forms, wherever in the world it may occur. We are committed to ensuring transparency in our business and in our approach to tackling modern slavery across our supply chains.</p> <p>Island Green Power Limited has a zero-tolerance approach to slavery and human trafficking in its supply chain as well as in its own operations. It is our Policy to conduct all our business with honesty, integrity and transparency. We are committed to acting professionally, ethically and fairly in all</p>



				<p>our business dealings and relationships wherever we operate; and to implementing and enforcing effective processes to identify and prevent slavery and human trafficking in our supply chain.</p> <p>Island Green Power Limited will cease business relationships with any such persons who, in the reasonable opinion of the Board, fail to address modern slavery or human trafficking within the organisation.</p> <p>IGP is a signatory of the Solar Energy UK supply chain statement, which commits the company to a transparent, sustainable supply chain free of human rights abuses.</p>
	Supply Chain (general)	This is akin to monoculture using imported materials from China.	No	ES Chapter 13: Climate Change [APP/6.2] has considered emissions from importing materials from China as a worst-case scenario.
	Supply Chain (general)	The solar panels are sourced from China? these are not produced in environmentally friendly ways."	No	<p>The embodied carbon within solar panels and associated transport from China is considered within ES Chapter 13: Climate Change [APP/6.2]. The assessment has assumed that transport will come from Shanghai to the UK via shipping.</p> <p>The overall conclusion of this quantitative assessment has shown that the emissions generated by production and shipping of the solar panels is not significant and the overall effect of the project has been judged to be beneficial with regards to greenhouse gas emissions.</p>
	Supply Chain (general)	2, MADE & IMPORTED FROM CHINA, ETHICAL?	No	ES Chapter 13: Climate Change [APP/6.2] considers emissions from importing materials from China as a worst-case scenario.
	Supply Chain (general)	<p>Panels will need replacing 2-3 times over life of project. How is that environmental.</p> <p>Nearly 80% of solar panels are made in China - I need reassurance that these will not be."</p>	No	<p>It is hoped that panels will have a greater lifespan, but for the purposes of ES Chapter 13: Climate Change [APP/6.2] and the wider application, a replacement rate has been set out and the effect of this replacement considered with regard to the GHG emissions generated.</p> <p>The estimated replacement rates of components are set out in Table 13.3 in ES Chapter 13: Climate Change [APP/6.2]. The approximate operational life of PV Panels is 40 years. It is assumed that repowering would be undertaken once during the Scheme's operation.</p> <p>It should be noted that for the purposes of the assessment emissions rates from the current year's most recently available data have been used. However, emissions in future when panels require replacing are anticipated to be lower.</p>
	Supply Chain (general)	The carbon footprint would be greater than any gains for decades taking into account the production of the	No	The embodied carbon within solar panels and associated transport from China is considered within ES Chapter 13:



		panels & plant, the transporting of the same etc! It is all a total Greenwash.		<p>Climate Change [APP/6.2]. The assessment has assumed that transport will come from Shanghai to the UK via shipping.</p> <p>The overall conclusion of this quantitative assessment has shown that the emissions generated by production and shipping of the solar panels is not significant and the overall effect of the project has been judged to be beneficial with regards to greenhouse gas emissions.</p>
Supply Chain (general) - emails		<p>It is pertinent to ask where the solar panels and other infrastructure will be sourced from. At the public meeting in Castle Acre village hall the commitments were vague and patronising when everybody knows they will be manufactured in China using fossil fuel energy, and quite possibly slave labour, before being shipped halfway round the world - also using fossil fuel - [REDACTED] Trebles all round!</p>	No	<p>China is responsible for around 75% of all solar equipment manufacturing. For the purposes of the assessment and to represent a realistic conservative scenario of GHG emissions, it has been assumed that all panels will come from China.</p> <p>The embodied carbon within solar panels and associated transport from China is considered within ES Chapter 13: Climate Change [APP/6.2]. The assessment has assumed that transport will come from Shanghai to the UK via shipping.</p> <p>The overall conclusion of this quantitative assessment has shown that the emissions generated by production and shipping of the solar panels is not significant and the overall effect of the project has been judged to be beneficial with regards to greenhouse gas emissions.</p> <p>IGP are committed to Global Anti-Slavery and Human Trafficking and their policy can be found IGP's website.</p> <p>Island Green Power Limited opposes modern slavery and human trafficking in all forms, wherever in the world it may occur. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.</p> <p>Island Green Power Limited has a zero-tolerance approach to slavery and human trafficking in its supply chain as well as in its own operations. It is our Policy to conduct all our business with honesty, integrity and transparency. We are committed to acting professionally, ethically and fairly in all our business dealings and relationships wherever we operate; and to implementing and enforcing effective processes to identify and prevent slavery and human trafficking in our supply chain.</p> <p>Island Green Power Limited will cease business relationships with any such persons who, in the reasonable opinion of the Board, fail to address modern slavery or human trafficking within the organisation.</p> <p>IGP is a signatory of the Solar Energy UK supply chain statement, which commits the company to a transparent, sustainable supply chain free of human rights abuses.</p>



	Supply Chain (general)	The booklet only has three mentions of an ethical supply chain, but saying there is one, doesn't tell us what it is.	No	<p>IGP are committed to Global Anti-Slavery and Human Trafficking and their policy can be found on IGP's website.</p> <p>Island Green Power Limited opposes modern slavery and human trafficking in all forms, wherever in the world it may occur. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.</p> <p>Island Green Power Limited has a zero-tolerance approach to slavery and human trafficking in its supply chain as well as in its own operations. It is our Policy to conduct all our business with honesty, integrity and transparency. We are committed to acting professionally, ethically and fairly in all our business dealings and relationships wherever we operate; and to implementing and enforcing effective processes to identify and prevent slavery and human trafficking in our supply chain.</p> <p>Island Green Power Limited will cease business relationships with any such persons who, in the reasonable opinion of the Board, fail to address modern slavery or human trafficking within the organisation.</p>
	Waste and recycling	As for sustainability, I'm sure as new technology is changing so rapidly the panels will need replacing . Will the old panels go straight to landfill .	No	<p>The Applicant recognises that it is necessary to build some flexibility into the design of the Scheme when submitting the DCO Application, so that the detailed design of the Scheme can be informed by technical considerations, post-consent work, and take advantage of innovations in technology. This is particularly important to maintain flexibility amid the rapid pace of change in solar PV and battery storage technology, whilst ensuring a robust and comprehensive assessment of potential effects. Where such flexibility or optionality is required, this is explained in Sections 3.3 to 3.6 of ES Chapter 5: The Scheme [APP/6.1].</p> <p>Replacement of panels is considered within the application. The estimated replacement rates of components are set out in Table 13.3 in ES Chapter 13: Climate Change [APP/6.2]. It is expected that the operational (working) life of PV panels is around 40 years and that all the PV panels will likely be replaced at least once during the 60-year operation of the project. The PV panels are anticipated to be replaced over a maximum of 12 to 24 months.</p> <p>The best available technology will be reviewed at the time of replacement, and the most efficient solution installed.</p> <p>It is anticipated that the Scheme will generate Waste from Electrical and Electronic Equipment (WEEE) during both operation and maintenance phases, and a significant amount during decommissioning. This includes photovoltaic panels, batteries, substation equipment, and</p>



				<p>smaller quantities from supporting electrical infrastructure. These items will be recovered and recycled by an authorised reprocessor in compliance with the WEEE Regulations 2013.</p> <p>Section 2.11 in the oOEMP [APP/7.8] states that waste components (e.g. faulty or damaged PV Panels, batteries, cables, connectors and mounting structures) would be removed and recycled as far as practical and in accordance with legislation and guidance applicable at the time.</p> <p>The oOEMP [APP/7.8] and oDS [APP/7.10] state that the Applicant is committed to maximising the recycling and reuse of Scheme components at the end of their operational life. Waste is discussed further in ES Chapter 17: Other Environmental Matters [APP/6.2], which concludes that no significant effects have been identified above for receptors during any phase of the Scheme once embedded mitigation is taken into account; no additional mitigation measures for the Scheme are required when considered in isolation.</p>
	Waste and recycling	I have serious concerns over disposal and recycling of the PV and battery components, particularly in light of the current systems for less toxic waste.	No	<p>It is anticipated that the Scheme will generate Waste from Electrical and Electronic Equipment (WEEE) during both operation and maintenance phases, and a significant amount during decommissioning. This includes photovoltaic panels, batteries, substation equipment, and smaller quantities of supporting electrical infrastructure. These items will be recovered and recycled by an authorised reprocessor in compliance with the WEEE Regulations 2013.</p> <p>Section 2.11 in the oOEMP [APP/7.8] states that waste components (e.g. faulty or damaged PV Panels, batteries, cables, connectors and mounting structures) would be removed and recycled as far as practical and in accordance with legislation and guidance applicable at the time.</p> <p>The oOEMP [APP/7.8] and oDS [APP/7.10] state that the Applicant is committed to maximising the recycling and reuse of Scheme components at the end of their operational life. Waste is discussed further in ES Chapter 17: Other Environmental Matters [APP/6.2], which concludes no significant effects have been identified above for receptors during any phase of the Scheme once embedded mitigation is taken into account, no additional mitigation measures for the Scheme are required when considered in isolation.</p>
	Waste and recycling	Will the old panels go straight to landfill .	No	<p>It is anticipated that the Scheme will generate Waste from Electrical and Electronic Equipment (WEEE) during both operation and maintenance phases, and a significant amount during decommissioning. This includes</p>



				<p>photovoltaic panels, batteries, substation equipment, and smaller quantities from supporting electrical infrastructure. These items will be recovered and recycled by an authorised reprocessor in compliance with the WEEE Regulations 2013.</p> <p>Section 2.11 in the oOEMP [APP/7.8] states that waste components (e.g. faulty or damaged PV Panels, batteries, cables, connectors and mounting structures) would be removed and recycled as far as practical and in accordance with legislation and guidance applicable at the time.</p> <p>The oOEMP [APP/7.8] and oDS [APP/7.10] state that the Applicant is committed to maximising the recycling and reuse of Scheme components at the end of their operational life. Waste is discussed further in ES Chapter 17: Other Environmental Matters [APP/6.2], which concludes that no significant effects have been identified above for receptors during any phase of the Scheme once embedded mitigation is taken into account; no additional mitigation measures for the Scheme are required when considered in isolation.</p>
	Carbon footprint	<p>This project appears as green as bringing waste wood from North America in oil powered ships to burn at Ferry Bridge (this is apparently good for the atmosphere as we dont take account of the CO2 from transportation)!!</p>	No	<p>The embodied carbon within all transport associated with the scheme for materials from shipping and HGV movements from China is considered within ES Chapter 13: Climate Change [APP/6.2]</p> <p>The overall conclusion of this quantitative assessment has shown that the emissions generated by production and shipping of the solar panels is not significant and the overall effect of the project has been judged to be beneficial with regards to greenhouse gas emissions.</p>
	Carbon footprint	<p>Although being supportive the UKs ambition to reach net zero by 2050 and recognise that Norfolk may offer favourable conditions for solar energy. However we remain uncertain about the overall carbon benefit of large-scale solar farms, as there is no comparison of emissions form construction and decommissioning versus the savings generated.</p>	No	<p>Overall GHG emissions from construction, operation and decommissioning are considered within ES Chapter 13: Climate Change [APP/6.2]. The assessment has assumed that transport will come from Shanghai to the UK via shipping.</p> <p>The overall conclusion of this quantitative assessment has shown that the emissions generated by production and shipping of the solar panels are not significant and the overall effect of the project has been judged to be beneficial with regard to greenhouse gas emissions.</p>
	Carbon footprint	<p>There is the significant carbon footprint associated with shipping solar parts internationally.</p>	No	<p>The embodied carbon associated with all transport for the scheme's materials from shipping and HGV movements from China is considered in ES Chapter 13: Climate Change [APP/6.2].</p> <p>The overall conclusion of this quantitative assessment has shown that the emissions generated by production and shipping of the solar panels are not significant and the</p>



				overall effect of the project has been judged to be beneficial with regard to greenhouse gas emissions.
	Carbon footprint	PV panels probably sourced from China are undoubtedly have extremely damaging effects on the environment and those associated with mineral extraction and their production.	No	<p>The embodied carbon associated with all transport for the scheme's materials from shipping and HGV movements from China is considered in ES Chapter 13: Climate Change [APP/6.2].</p> <p>The overall conclusion of this quantitative assessment has shown that the emissions generated by production and shipping of the solar panels are not significant and the overall effect of the project has been judged to be beneficial with regard to greenhouse gas emissions.</p>
	Carbon footprint	Manufacturing panels is not energy efficient or will not reduce carbon unless of course you plan to make them by employing locals and using locally resourced materials !	No	ES Chapter 13: Climate Change [APP/6.2] has considered emissions from importing materials from China as a worst-case scenario.
	Carbon footprint	The solar panels are sourced from China? these are not produced in environmentally friendly ways.	No	<p>The embodied carbon associated with all transport for the scheme's materials from shipping and HGV movements from China is considered in ES Chapter 13: Climate Change [APP/6.2].</p> <p>The overall conclusion of this quantitative assessment has shown that the emissions generated by production and shipping of the solar panels are not significant and the overall effect of the project has been judged to be beneficial with regard to greenhouse gas emissions.</p>
	Carbon footprint	<p>Panels will need replacing 2-3 times over life of project. How is that environmental.</p> <p>Nearly 80% of solar panels are made in China - I need reassurance that these will not be.</p>	No	<p>It is hoped that panels will have a greater lifespan, but for the purposes of ES Chapter 13: Climate Change [APP/6.2] and the wider application, a replacement rate has been set out, and the effect of this replacement on GHG emissions has been considered.</p> <p>The estimated replacement rates of components are set out in Table 13.3 in ES Chapter 13: Climate Change [APP/6.2]. The approximate operational life of PV Panels is 40 years. It is assumed that repowering would be undertaken once during the Scheme's operation.</p> <p>It should be noted that for the purposes of the assessment, emissions rates from the current year's most recently available data have been used. However, emissions in the future, when panels require replacement, are anticipated to be lower.</p>
	Carbon footprint	The need to then import food to replace the crops we will lose, because of the conversion from local agricultural land to a solar park will, in itself, cause its own carbon footprint and negate any possible benefits of the proposed Drovers Solar farm.	No	For the purpose of the Climate Change assessment (ES Chapter 13: Climate Change [APP/6.2]), it has been assumed that there are no emissions from the existing use of land. This is considered a conservative approach as



				there will be emissions associated with agricultural activities and land management from the existing use.
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10 Indicative layout

Topic	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Indicative layout	Indicative area for solar PV panels	<p>Approx 1 million 3-4 metre posts to hold the Solar Panels will destroy the archaeology and the whole site will blight the view and history of Castle Acre.</p> <p>The proposed site forms part of the open rural setting that gives Castle Acre its distinctive historic character. Large-scale ground-mounted solar infrastructure is entirely out of keeping with this setting, breaching NPPF Paragraph 174, which recognises the intrinsic character and beauty of the countryside and the need to protect valued landscapes.</p>	No	<p>Impacts from piling for the Ground Mounted PV Modules will be at a very low level, typically less than 0.5% by area, with the exact amount depending upon the separation between rows. Furthermore, the nature of the archaeology within the site is not so dense that every pile will coincide with archaeological deposits. The archaeology within the site has been assessed and much of it is considered capable of absorbing such a low impact without compromising its integrity or legibility. In areas where this is not the case a mitigation strategy will be agreed with Norfolk Historic Environment Service. Refer to ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] for further details.</p> <p>The Applicant also notes 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, including in relation to Castle Acre.</p>
	Indicative area for solar PV panels	<p>60 years is too long, technology is advancing fast but we locals would be stuck with this sea of solar farm kit for its duration, there are more wildlife considerations thsn what can be met with some wildflower planting; the orojecg is too large, the sub station should be near Narford Hall (the land owners), not near the A1065 or access roads to the villages; the Roman and Norman historic ways should not be tampered with, the water pressure is already low in this area and large scale solar industry requirements for fire prevention and cooling systems is not acceptable as it will add to the problem</p>	No	<p>The Statement of Need [APP/5.4] explains that government's analysis concludes that "A secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar" (Overarching National Policy Statement for Energy, EN-1, Para 3.3.20). As solar panels and electrical infrastructure have become larger and more efficient, solar is now, and is expected to remain, a leading low-cost generation technology.</p> <p>The Applicant recognises that it is necessary to build some flexibility into the design of the Scheme, when submitting the DCO Application, so that the detailed design of the Scheme can be informed by technical considerations, post-consent work, and take advantage of innovations in technology. This is particularly important to maintain flexibility amid the rapid pace of change in solar PV and battery storage technology, whilst ensuring a robust and</p>



				<p>comprehensive assessment of potential effects. Where such flexibility or optionality is required, this is explained in Sections 3.3 to 3.6 of ES Chapter 5: The Scheme [APP/6.1].</p> <p>ES Chapter 12: Water Resources [APP/6.2] includes the anticipated water demand during construction and operation. Additional demand during construction will be met by using tankers to bring water to the site. During operation, panel cleaning will use deionised water, which will also be brought to the site rather than sourced from the local mains. If a fire were to occur, the site will have a stored emergency water supply which firefighters could use.</p>
	Indicative area for solar PV panels	I am concerned re the size and siting of the large solar farms currently being proposed for Norfolk.	No	<p>The Applicant notes this comment, but recognises that the quantity of new generation capacity required in the UK to meet its net zero targets and consumer demand is enormous. Thus, the size of the Scheme reflects the urgent national need for renewable energy generation and storage. Further justification for the Scheme can be found in the Statement of Need [APP/5.4].</p> <p>There are several factors which contributed to the selection of the proposed Site. Norfolk represents an appropriate location within the UK to construct a solar farm, as the area benefits from higher levels of solar irradiance compared to other parts of the UK.</p> <p>The Statement of Need [APP/5.4] also demonstrates that the proposed connection point is appropriate and that the Scheme will unlikely cause any grid constraints or curtailment in the area as a result of connecting at this location.</p> <p>The Applicant is cognisant 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].</p>
	Indicative area for solar PV panels	<p>Solar Panels and Local Economy Concerned about environmental impacts if solar panels are not implemented correctly.</p> <p>CRV hybrid panels (from Norfolk and Bournemouth) are seen as promising. Technology still developing, but better than older systems.</p>	No	<p>The Applicant is seeking flexibility in its design to ensure that, if consented, the best available technology at the time of construction can be used to deliver the Scheme. The construction of the Scheme is not due to commence until 2031, and if consent is granted, the detailed design would be undertaken to allow for any advances in technology to be incorporated into the Scheme.</p> <p>Where such flexibility or optionality is required, this is explained in Sections 3.3 to 3.6 of ES Chapter 5: The Scheme [APP/6.1].</p>



	Indicative area for solar PV panels	Your consultation is flawed. You are unable to tell me exactly which solar panels you are proposing; if they will be moving or fixed or even what the arrangement might be within your proposed site.	No	<p>The Applicant is seeking flexibility in its design to ensure that, if consented, the best available technology at the time of construction can be used to deliver the Scheme. An illustrative layout of a Single Axis Tracker Scheme has been provided in ES Appendix 5.1 Illustrative Technical Information: [APP/6.3]</p> <p>Table 5-1 in ES Chapter 5: The Scheme [APP/6.1] outlines the Scheme parameters used for the ES. This identifies the potential use of single-axis trackers and fixed south-facing PV arrays. Various factors (such as electrical design) inform the number and arrangement of PV Panels in each table. Flexibility is required to accommodate future technology developments at the detailed design stage.</p>
	Indicative area for solar PV panels	South facing static solar panels preferred as these are lower	No	<p>The Applicant is seeking flexibility in its design to ensure that, if consented, the best available technology at the time of construction can be used to deliver the Scheme.</p> <p>Table 5-1 in ES Chapter 5: The Scheme [APP/6.1] outlines the Scheme parameters used for the ES. This identifies the potential use of single-axis trackers and fixed south-facing PV arrays. Various factors (such as electrical design) inform the number and arrangement of PV Panels in each table. Flexibility is required to accommodate future technology developments at the detailed design stage</p>
	Indicative area for solar PV panels	PV panels (page 30) info rows of panels are okay but are to be total eye sore with the silver coloured frames. Ok is fixed and tracker panel that follow the sun. But environmentally coloured to blend in with the landscape of National Grid pylons. What about noise, humming, EM waves - do these panels and their cells generate noise as well as energy?	No	<p>The Applicant notes these comments. Regarding noise from PV panels, it should be noted that they do not generate any noise. Panels may be mounted on Single Axis Tracker (SAT) motors which would generate negligible levels of noise beyond 20m for a few seconds over an hour, but such noise would be inaudible at typical separation distances.</p>
	Indicative siting zone for BESS & Customer Substation	I am concerned about potential thermal runaway in the battery energy storage system (if Lithium based, for example) causing severe permanent contamination of the area, with a risk of hazardous emitted fumes to local communities from incinerating batteries that could cause health damage to the community. The plans so far do not discuss the battery technology to be used, nor the spatial location of the batteries. This is a very serious issue that has not been properly addressed in the proposal documents so far.	No	<p>The BESS and components used to construct the facility will be certified to UL 9540 (2023) (Ref 3-4) and/or BS EN IEC 62933-5-2 (Ref 3-5) standards. Future standards which supersede these standards will be used as appropriate. BESS Containers would have installed fire detection, explosion prevention, and suppression systems in accordance with National Fire Protection Association (NFPA) 855 requirements and National Fire Chiefs Council guidance, as confirmed in the oBSMP [APP/7.14]. The current 2023 version of NFPA 855 (Ref 3-6) is due to be updated in 2026 and the Applicant will ensure that the requirements set out in the updated document are implemented for the Scheme through the oBSMP [APP/7.14].</p> <p>Other 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]. Provision would also be made for fire water containment, which is</p>



					considered further in ES Chapter 11: Water Resources [APP/6.2] . It should be noted that most BESS only operate at between 80-90% of capacity to provide an engineering margin that mitigates the probability of over-charging the cells. The Applicant has prepared an oBSMP [APP/7.14] in support of this application. The aim of the oBSMP [APP/7.14] is to define key safety objectives and provide the basis for the management processes and procedures required.
	Indicative BESS Substation	siting & zone for Customer	In relation to 1 (c), any trust I have in the project will be dependent on where the proposed substations are. There is a proposed zone in which the two substations are potentially positioned. If they are NOT placed next to each other, and both south of Bartholemew’s Hills Plantation, then that will be a disgrace, and can only be a cost saving measure, however you try and dress it up.	Yes	The Applicant notes these comments and 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.
	Indicative BESS Substation	siting & zone for Customer	The battery storage system must be carefully and diligently designed to reduce a risk of thermal runaway to negligible probability.	No	The Applicant recognises the importance of BESS safety procedures and management processes, and has prepared oBMP [APP/7.14] in support of this application.
	Indicative BESS Substation	siting & zone for Customer	I believe the whole site, especially the potential Substation and BESS should be moved westwards well away from the A1065, this gateway route to North Norfolk.	No	The Applicant has chosen to locate the National Grid Substation, Customer Substation and BESS with Fields 27 and 24 to the south of Bartholemew’s Hills Plantation which enables the infrastructure to be located in the context of the existing woodland blocks which will be reinforced through tree belt planting. Locating the infrastructure further west would require a longer diversion of the existing overhead line.
	Indicative BESS Substation	siting & zone for Customer	The battery energy storage system should be spatially dispersed to avoid a risk of catastrophic thermal runaway whose consequences could cause permanent contamination and poisoning of the environment (carcinogenic organics, Nickel dust, HF (Hydrofluoric Acid) et al.). The reports are silent about this issue that could be very significant in an event of a serious accident occurring.	No	Fire safety measures, including spacing requirements between the BESS Containers and between the BESS Compound and other infrastructure, have also been included in the oBSMP [APP/7.14] . Provision would also be made for fire water containment, which is considered further in ES Chapter 11: Water Resources [APP/6.2] . Further details of the BESS Compound are contained within ES Chapter 5: The Scheme [APP/6.1] .
	Indicative BESS Substation	siting & zone for Customer	Substation and battery storage are in the worst possible location to destroy Castle Acre as a tourist destination.	Yes	The Applicant has chosen to locate the National Grid Substation, Customer Substation and BESS with Fields 27 and 24 to the south of Bartholemew’s Hills Plantation, reducing the visibility of this infrastructure from Castle Acre.



	Indicative siting zone for BESS & Customer Substation	No solar panels or any other infrastructure such as battery of substation should be located in grid field No. 33 and 35 since they will have an impact on the setting of Castle Acre priory due to being visible. Also, nothing should be visible from Chimney Street in Castle Acre.	Yes	The Applicant has chosen to locate the National Grid Substation, Customer Substation and BESS within Fields 27 and 24 to the south of Bartholemew's Hills Plantation, reducing the visibility of this infrastructure from Castle Acre. The solar PV Arrays have been removed from Field 35 and the northern extents of Field 33.
	Indicative siting zone for BESS & Customer Substation	<p>The proposed location of the two substations is potentially the most criminal of all the destructive proposals. If you stand at the top of the hill in Castle Acre and look due south down Priory field with Castle Acre Priory on your right, you look across the valley at the proposed site. If there are only solar panels in the proposed sites up to existing pylons, these might be low enough to be obscured by enhanced hedgerows, so not irrevocably spoiling one of the great views in England (except for the pylons, of course). If the substations are placed north of the Bartholemew's Hills Plantation they will be clearly visible from Castle Acre.</p> <p>The former Head of English Heritage, Simon Thurley, refers to Castle Acre Priory (an English heritage site) thus: "In my opinion the most beautiful ruins in England - no question. https://www.instagram.com/p/CGK8Zzkn1SG/.</p> <p>He is right, and unquestionably the best view of the Priory is from the top of the hill in Castle Acre looking down at the Priory and the valley of the Nar chalk stream. Any wilful decision to place ugly, tall and utterly obtrusive infrastructure such as substations in that view would be a national disgrace, and I'm sure [redacted] would agree. The solution is obviously to put the substations south of the Bartholemew's Hills Plantation where they are visible by not one single abode. Any decision to put the two substations anywhere other than beside each other and hidden from South Acre and Castle Acre by the existing belt of trees would imply a focus on the bottom line above all else.</p> <p>Substations do NOT need to be directly beside the pylons that will be used to transport the electricity, so they could be placed to the south of the belt of trees as per the southern end of the indicative siting zones for both National Grid and Customer Substations.</p>	Yes	<p>The Applicant notes this comment and confirms that the National Grid Substation, Customer Substation and BESS with Fields 27 and 24 to the south of Bartholemew's Hills Plantation, which the Applicant considers to be the most appropriate siting, reducing the visibility of this infrastructure from Castle Acre. The solar PV Arrays have been removed from Field 35 and the northern extents of Field 33.</p> <p>The illustrative summer and winter photomontages and parameter-based photowires demonstrate that potential views of the proposed substations from Castle Acre are extremely limited. The substations would not be perceptible from publicly accessible locations within Castle Acre due to screening provided by existing woodland within the north of the Site.</p> <p>(see Figure 6.12 and Figure 6.13 Parameter Based Winter and Summer Photomontages and Figure 6.14 and Figure 6.15 Winter and Summer Photomontages Illustrative Scheme [APP/6.3])</p>
	Indicative siting zone for BESS & Customer Substation	Originally the substation was going to be further away, and now you've changed the plans for it to be much closer to our doorstep here in South Acre. We do not want the substation on the road to South Acre. It will be hugely disruptive and an eye sore, especially from Castle Acre.	Yes	The Applicant has located the National Grid Substation, Customer Substation and BESS within Fields 27 and 24 to the south of Bartholemew's Hills Plantation, reducing the visibility of this infrastructure from Castle Acre.



	Indicative siting zone for BESS & Customer Substation	i am very concerned about the proposed siting of the batteries and substations. There is likely to be at least a hum if not louder noise coming from these systems and sound travels a long. Castle Acre houses are in a straight line from the proposed siting of these systems and I know from past experience that such noise can be a nuisance, especially at night.	No	The Applicant notes this and refers to ESAppendix 10.3: Construction and Noise Modelling [APP/6.4] , which assesses low-frequency noise and applies tonal penalties for any potential 'hum' or tone from the transformers. The non-significant effects for day and night (relative to absolute levels), therefore, suggest considering these factors as a conservative approach.
	Indicative siting zone for BESS & Customer Substation	<p>I am strongly of the view that fields 33, 34 and 35 should be excluded from the proposals. These fields are on the sensitive Nar Valley slopes & highly visible from the South Acre Road, Castle Acre & parts of the valley floor.</p> <p>Its an inappropriate location for substations & other grid connection infrastructure. Development in these fields extends the ZTU unnecessarily.</p> <p>Fields 19, 20, 21 & 22 are visually very sensitive forming a significant ridge/high ground visible from the A1065 travelling both north & south. More significant mitigation is needed in the form of more extensive landscape to define the ridge. Alternatively solar panels might not be located on the high ground?</p> <p>The landscape strategy seems rather uninformed overall with an overreliance on infilling gaps in existing hedging</p>	Yes	<p>The Applicant notes this. Based on comments received and conclusions of the PEIR, the options for siting the substation and other grid infrastructure have been refined, with both the National Grid Substation and Customer Substation located within Field 27 and to the south of Bartholomew's Hills Plantation. As such, the National Grid, Customer Substation and BESS are screened by the existing woodland in views from Castle Acre and South Acre Road. The Bare Earth and Obstructed Zones of Theoretical Visibility were rerun to reflect the revised positioning of the National Grid and Customer Substation and inform the LVIA. The conclusions to the visual impact of the Scheme are presented in ES Chapter 6: Landscape and Visual [APP/6.2].</p> <p>With regards to Fields 19, 20, 21 & 22, comments are noted. Measures have been taken to retain existing landscape features and strengthen existing hedgerows by gapping up with species-rich hedgerow planting. This approach reinforces and protects the existing landscape fabric associated with the vegetated field boundaries and connects to larger-scale mitigation measures on the Site, around the National Grid and Customer Substation, comprising new woodland belt planting, as reflected in the Green Infrastructure Strategy Plans forming part of the oLEMP [APP/7.11].</p>
	Indicative siting zone for BESS & Customer Substation	Its an inappropriate location for substations & other grid connection infrastructure. Development in these fields extends the ZTU unnecessarily.	No	The Applicant notes this. Based on comments received and conclusions of the PEIR, the options for siting the substation and other grid infrastructure have been refined, with both the National Grid Substation and Customer Substation located within Field 27 and to the south of Bartholomew's Hills Plantation. The Bare Earth and Obstructed Zones of Theoretical Visibility were rerun to reflect the revised positioning of the National Grid and Customer Substation and inform the LVIA. The conclusions to the visual impact of the Scheme are presented in ES Chapter 6: Landscape and Visual [APP/6.2] .
	Indicative siting zone for BESS & Customer Substation	Substation and BESS has to be located as far as possible away from houses and out of sight. Proposed location 33 could be visible from South Acre and southside of Castle Acre including from the priory. That is unacceptable. Page 39 suggests it will be visible. Consultation event I attended should have	No	The Applicant notes this and refers to ES Figure 5.1: Concept Masterplan [APP/6.3] which locates the Substations and BESS as far as reasonably practicable from surrounding receptors to the middle of Fields 27 and 24. The Scheme design has evolved with consideration of distances of noise



		been more transparent on the height of the substation and BESS and the noise generated. As main access to site is from A1065, the substantial BESS can be located further towards Swaffham.		sources from receptors to reduce noise impacts as far as reasonable practicable The height of the National Grid Substation, Customer Substation and BESS were set out within the PEIR. ES Chapter 5: The Scheme [APP/6.1] sets out the height parameters for these elements.
	Indicative siting zone for BESS & Customer Substation	Substation and BESS far too close to Castle Acre / South Acre. Would be visible from priory and from south facing houses in Castle Acre. Needs to be moved further south so not possibly seen from these points. [Illegible] near A1065 preferable as this is a busy road in any case so the damage to the amenity has already happened.	Yes	The Applicant has located the National Grid Substation, Customer Substation and BESS with Fields 27 and 24 to the south of Bartholemew's Hills Plantation, reducing the visibility of this infrastructure from Castle Acre.
	Indicative siting zone for BESS & Customer Substation	No exact information has been provided on what the substation and batteries will look like and their precise locations.	No	The Applicant is seeking flexibility in its design to ensure that, if consented, the best available technology at the time of construction can be used to deliver the Scheme. The construction of the Scheme is not due to commence until 2031, and if consent is granted, the detailed design will be undertaken to allow for any advances in technology to be incorporated into the Scheme. ES Chapter 5: The Scheme [APP/6.1] includes an example image of a BESS arrangement with associated infrastructure. The preceding sections also provide example images of substations.
	Indicative siting zone for BESS & Customer Substation	You cannot tell me exactly where your 10A battery will be; only a possible area in which it might be positioned. You are unable to tell me where your 4HA transformer will be; only a possible area in which it might be positioned	No	The Applicant is seeking flexibility in its design to ensure that, if consented, the best available technology at the time of construction can be used to deliver the Scheme. The construction of the Scheme is not due to commence until 2031, and if consent is granted, the detailed design would be undertaken to allow for any advances in technology to be incorporated into the Scheme.
	Indicative siting zone for BESS & Customer Substation	We are supportive of the developer's overall proposals, but important aspects remain unresolved in South Acre, particularly the final location of the substations (fields 33 and 35), access arrangements, and the working area (11) indicated in Masterplan 2.	Yes	The Applicant has located the National Grid Substation and Customer Substation with Field 27 to the south of Bartholemew's Hills Plantation, reducing the visibility of this infrastructure from Castle Acre. Two points of access will be taken from the western side of the A1065 to provide construction and maintenance access, with a further temporary access point from the eastern side of the A1065 to provide construction access for the Grid Connection Infrastructure.
	Indicative siting zone for BESS & Customer Substation	From the perspective of South Acre, we would strongly prefer the substations to be located in fields 26 and 27, with direct access from the A1065. This option would help to:	Yes	The Applicant has located the National Grid Substation and Customer Substation within Field 27 to the south of Bartholemew's Hills Plantation, reducing the visibility of this infrastructure from Castle Acre. Two points of access will



		<p>Preserve the natural landscape character in field marked with point 8 and the adjacent agricultural land (marked as point 3), which are closer to our community.</p> <p>Reduce the visual and acoustic impact on South Acre, particularly during construction. Using the benefit from the existing natural screening in that area (point 8), where mature trees already help reduce visibility from key viewpoints especially the panoramic southern view from the higher part of the Castle ruins, from where the substation is currently visible in the developer's visual simulations.</p>		<p>be taken from the western side of the A1065 which will provide access for construction and maintenance.</p>
	Indicative siting zone for National Grid Substation	<p>Substation should be in the Western corner near Narford Hall, with extra pylons there, if necessary</p> <p>The energy produced by the scale proposed cannot be efficiently sent along the National grid, storage batteries do not store for weeks and months, the system is only partially efficient and for a few months of the year but has a 12 month effect on local wildlife, residents and visitors.</p>	Yes	<p>The Applicant notes these comments but disagrees. Locating the BESS, National Grid Substation, and Customer Substation within Fields 24 and 27 south of Bartholomew's Hill Plantation provides the most appropriate location and makes use of existing mitigation, thereby reducing environmental impacts.</p> <p>The Statement of Need [APP/5.4] also demonstrates that the proposed connection point is appropriate and that the Scheme will unlikely cause any grid constraints or curtailment in the area as a result of connecting at this location. While the Applicant notes the comment that battery storage is not long-term, this is also addressed in the Statement of Need, which sets out how the BESS provides the needed flexibility, as recognised in the National Policy Statements.</p> <p>Mitigation measures associated with the programme of replacement activities will be outlined within the oOEMP [APP/7.8].</p>
	Indicative siting zone for National Grid Substation	<p>the sub station should be near Narford Hall (the land owners), not near the A1065 or access roads to the villages</p>	Yes	<p>The Applicant notes this suggestion; however, it has located the National Grid Substation and Customer Substation within Field 27 to the south of Bartholomew's Hills Plantation to reduce the visibility of this infrastructure from Castle Acre.</p>
	Indicative siting zone for National Grid Substation	<p>Substations do NOT need to be directly beside the pylons that will be used to transport the electricity, so they could be placed to the south of the belt of trees as per the southern end of the indicative siting zones for both National Grid and Customer Substations.</p>	Yes	<p>The Applicant has located the National Grid Substation and Customer Substation within Field 27 to the south of Bartholomew's Hills Plantation.</p>
	Indicative siting zone for National Grid Substation	<p>Based on Indicative Masterplan 2, we understand that there are two possible locations being considered for both the Customer Substation & BESS and the National Grid Substation: either in fields 33 and 35 or in fields 26 and 27, with access proposed via Bartholomew Hills, and directly from the A1065 at the</p>	Yes	<p>The Applicant has located the National Grid Substation and Customer Substation with Field 27 to the south of Bartholomew's Hills Plantation, which reduces the visibility of this infrastructure from Castle Acre and enables the infrastructure to be located in the context of the existing</p>



		<p>highlighted point, respectively. Additionally, potential working areas are identified as point 11.</p> <p>From the perspective of South Acre, we would strongly prefer the substations to be located in fields 26 and 27, with direct access from the A1065. This option would help to:</p> <p>Preserve the natural landscape character in field marked with point 8 and the adjacent agricultural land (marked as point 3), which are closer to our community.</p> <p>Reduce the visual and acoustic impact on South Acre, particularly during construction. Using the benefit from the existing natural screening in that area (point 8), where mature trees already help reduce visibility from key viewpoints - especially the panoramic southern view from the higher part of the Castle ruins, from where the substation is currently visible in the developer's visual simulations</p>		woodland blocks which will be reinforced through tree belt planting.
	Indicative siting zone for National Grid Substation	<p>Yes, kindly move the location of the substation away from the north eastern corner to the western end of the planned area of solar farm construction</p>	Yes	<p>The Applicant has located the National Grid Substation and Customer Substation in Field 27 to the south of Bartholemew's Hills Plantation, enabling the infrastructure to be sited within the context of the existing woodland blocks, which will be reinforced through tree belt planting. Locating the infrastructure further west would require a longer diversion of the existing overhead line.</p>
	Indicative siting zone for National Grid Substation	<p>Re Plan 2 - the North part of the farm. Large area of infrastructure siting for substation for National Grid. The lie of the land - its height and slopes to rivers with areas of woodland that needs to be maintained or even enhanced. Area 11 - very close to heritage village.</p> <p>Robustly follow mitigation principles.</p>	Yes	<p>The Applicant has located the National Grid Substation and Customer Substation in Field 27 to the south of Bartholemew's Hills Plantation, enabling the infrastructure to be sited within the context of the existing woodland blocks, which will be reinforced through tree belt planting.</p> <p>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.</p>
	Indicative siting zone for National Grid Substation	<p>Where is the proposed location of the substation? and how large will it be? and how tall?</p>	No	<p>The Applicant has located the National Grid Substation within Field 27 to the south of Bartholemew's Hills Plantation, enabling the infrastructure to be situated within the context of the existing woodland blocks and reinforced through tree belt planting. The National Grid Substation will be up to 13m in height as described in ES Chapter 5: The Scheme [APP/6.1].</p>



	Indicative area for mitigation, enhancement and/or retained agricultural buildings	<p>We would like to see a much stronger visual and acoustic mitigation plan, particularly at the northern edge of the site. This should include:</p> <p>Planting of tall, mature-species tress lines and even higher hedgerows that are suitable for effective screening.</p> <p>A clear long-term maintenance plan, with a commitment to replant any failed trees during the operational life of the site.</p> <p>Specific design and placement of buffer zones to prevent noise from travelling down toward the river valley, where it would directly affect the tranquil setting of South Acre.</p> <p>We are very grateful for the opportunity to comment and hope these suggestions can be taken into account during the design refinement phase. As well as any other suggestion through this feedback form.</p>	No	<p>The Applicant notes this and, in terms of noise and vibration, refers to ES Chapter 10: Noise and Vibration [APP/6.2], which assesses noise to a conservative criterion at the nearest receptors and includes buffer zones for receptor and noise-emitting plant (tree lines and foliage have negligible noise screening properties and are not considered in terms of noise assessment). The Scheme is expected to have non-significant effects on receptors closer than South Acre valley; therefore, noise levels in the valley would be even lower than those assessed and below the absolute criteria for an adverse effect.</p> <p>The Applicant also notes that a Design Approach Document [APP/5.7] forms part of the DCO Application and sets out measures to retain and enhance existing vegetation, including woodland / copses, veteran trees, scrub and hedgerows /hedgerow trees.</p> <p>The oLEMP [APP/7.11] sets out how mitigation and planting would be maintained throughout the lifespan of the Scheme.</p> <p>The Applicant welcomes the suggestions and thanks the consultee for their engagement.</p>
	Indicative area for mitigation, enhancement and/or retained agricultural buildings	The disruption to wildlife and changes to wildlife corridors could increase the number of deer on the roads, already an issue in the area without it being exacerbated.	No	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, as set out in ES Chapter 7: Ecology and Biodiversity [APP/6.2] . 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.
	Indicative area for mitigation, enhancement and/or retained agricultural buildings	We would like hedges reinforced and planted asap. We would like to ensure our beautiful wild chalk stream - The River Nar - is not contaminated.	Yes	<p>The Applicant notes this and has developed a comprehensive green infrastructure strategy as set out in the oLEMP [APP/7.11], which includes details of advanced planting to be undertaken during Winter 25/26.</p> <p>ES Chapter 12: Water Resources [APP/6.2] sets out the effects and proposed mitigation regarding water resources, and considers the River Nar in its assessment. No significant adverse effects are identified.</p>
	Indicative area for mitigation, enhancement and/or retained agricultural buildings	Hedges and forest periphery should be included to try to hide the solar farm from view in the landscape, and absorb any acoustic noise generated by the solar farm.	No	<p>The Applicant notes this and in terms of noise, it should be noted that hedges and foliage have negligible properties in noise shielding or absorbing, an acoustic barrier has been included in the design of the Scheme to attenuate noise from the BESS and substations, refer to ES Chapter 10: Noise and Vibration [APP/6.2].</p> <p>In terms of using existing woodland to screen the development, this is being done. For example, the</p>



				Applicant has located the National Grid Substation within Field 27 to the south of Bartholemew's Hills Plantation, enabling the infrastructure to be situated within the context of the existing woodland blocks and reinforced through tree belt planting.
	Indicative area for mitigation, enhancement and/or retained agricultural buildings	Cooperative Movement (see https://www.uk.coop) small plant growers and livestock keeps should be allowed to cultivate and maintain ground around the solar panels to allow for biodiversity, custom artisan crops and provide local employment to the surrounding community	No	The Applicant notes this comment. 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).
	Indicative area for mitigation, enhancement and/or retained agricultural buildings	Is the proposed mitigation (landscape buffer or green corridor) area confirmed? If so, will you start to plant as a matter of priority so that by the time the construction is finished the mitigation zone will have had a head start?	Yes	The Applicant notes this and has developed a comprehensive green infrastructure strategy as set out in the oLEMP [APP/7.11] , which includes details of advanced planting to be undertaken during Winter 25/26.
	Indicative area for mitigation, enhancement and/or retained agricultural buildings	The only thing you actually seem to be consulting on is the mitigation of the things that your proposal damages.	No	The Applicant notes this comment but disagrees. A consultation was undertaken on all aspects of the Scheme as evidenced by the Consultation Report [APP/5.1] . The Applicant sought feedback on the proposed mitigation measure and the Scheme design to ensure the community could feed into the iterative design process.
	Indicative area for mitigation, enhancement and/or retained agricultural buildings	We would like hedges reinforced and planted asap.	Yes	The Applicant notes this and has developed a comprehensive green infrastructure strategy as set out in the oLEMP [APP/7.11] , which includes details of advanced planting to be undertaken during Winter 25/26.
	Indicative area for mitigation, enhancement and/or retained agricultural buildings	All zones agreed for landscape mitigation should be deemed as permanent 'legacy' landscape - permanent beyond the lifetime of the solar farm. Include palces for education & interpretations with topics of landscape change, climate change, energy & biodiversity... encourage access for education.	Yes	When the operation and maintenance phase of the Scheme ends, the Solar PV Site would be decommissioned and the land returned to the landowner, except for the National Grid Substation, which would remain. After the decommissioning phase, the landowners would decide how the land would be used and managed. However, 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.



				<p>The Scheme would be designed to provide education and interpretation of the solar farm site as set out within the oLEMP [APP/7.11]. Opportunities for the local community to engage with and learn about the natural environment will be provided. This will include the provision of informal, low-key interpretation boards at appropriate strategic points across the Order limits to allow the community to learn and engage with the local history of the Site and Nar Valley, and the Site's ecology. Information will also be provided on the solar farm, climate change and the benefits of renewable energy.</p>
	Indicative area for mitigation, enhancement and/or retained agricultural buildings	Investment in a quiet buffer zone between any site operations and South Acre, combining visual screening with acoustic management and a formal commitment to long-term planting and maintenance. Could include native hedgerow planting and low traffic path features.	No	<p>The Applicant notes these comments and confirms that hedgerows or foliage has negligible effect on reducing noise, mitigation measures such as acoustic barriers and machinery placement have been considered in ES Chapter 10 Noise and Vibration [APP/6.2] to reduce noise impacts to non-significant effects.</p>
	Existing Utilities 400kv Overhead	<p>Planning, Zoning & Community Impact</p> <p>Why was this location selected? Is one of the reasons the existing pylons?</p>	No	<p>The Applicant has followed a step-by-step site selection process, which confirms the location of the Scheme is suitable for a large-scale solar farm. This has included avoiding sensitive landscapes and environmental designations and consideration of alternative sites. For further details, refer to ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1].</p> <p>There are several factors which contributed to the selection of the proposed Site. Norfolk represents an appropriate location within the UK to construct a solar farm, as the area benefits from higher levels of photovoltaic power and irradiance compared to other parts of the UK.</p> <p>The Statement of Need [APP/5.4] also demonstrates that the proposed connection point is appropriate and that the Scheme will unlikely cause any grid constraints or curtailment in the area as a result of connecting at this location.</p>
	Existing Utilities 400kv Overhead	The presence of overhead power lines - a longstanding eyesore - appears to make the location attractive for TDSF enabling relatively straightforward connectivity to the National Grid. This, however, suggests that all and any costly corners are being cut; that expediency is what's now going to scar the rural landscape of Norfolk for generations.	No	<p>The Applicant notes this comment but disagrees, noting efforts have been made throughout the design process to reduce and minimise effects and deliver benefits through the Scheme design.</p> <p>The Applicant also notes the need to deliver solar at speed, given the clear and urgent national need for low-carbon energy generation.</p>
	Existing Utilities 400kv Overhead	The only reason it is here is that it is close to powerline 4vv and there is a compliant landowner.	No	<p>The Applicant has followed a step-by-step site selection process, which confirms that the location of the Scheme is suitable for a large-scale solar farm. This has included the avoidance of sensitive landscapes and environmental designations in confirming site suitability and consideration of alternative sites. For further details, refer to ES Chapter</p>



				<p>4: Reasonable Alternatives and Design Evolution [APP/6.1].</p> <p>There are several factors which contributed to the selection of the proposed Site. Norfolk represents an appropriate location within the UK to construct a solar farm, as the area benefits from higher levels of photovoltaic power and irradiance compared to other parts of the UK.</p> <p>The Statement of Need [APP/5.4] also demonstrates that the proposed connection point is appropriate, and the Scheme will be unlikely to cause any grid constraints or curtailment in the area, as a result of connecting at this location.</p>
	Fencing	<p>I live here BECAUSE it is rural. I enjoy the countryside, the trees, the hedgerows, the wildlife., the footpaths. I was told there will still be access to footpaths but how can we enjoy walking along these when we will be walking along a path with fencing either side and solar panels. Now we can walk along footpaths and know if we cannot continue for reasons like flooding or fallen trees, we can take ourselves off the path but when you have fenced us in, we won't be able to do that. Walking in nature has been proven to help our mental health and wellbeing. It gives us a sense of freedom. I don't want to walk along a path where our beautiful countryside has been industrialised.</p>	Yes	<p>The Applicant notes this and has increased the minimum buffers to Fincham Drove and Petticoat Drove from 15m to 25m. The hedges will be gapped up to restore the historical character of the Drovers. The Applicant has developed a comprehensive green infrastructure strategy as set out in the oLEMP [APP/7.11], which includes provision of new hedgerows adjacent to the existing Public Rights of Way.</p> <p>The Applicant within the oPRoWPPMP [APP/7.12] has committed to specific duties, such as maintaining stiles and gates, keeping paths clear of obstructions, and ensuring hedgerow and aligning vegetation do not encroach on the PRoW.</p>
	Fencing	<p>As to movement, the farm will restrict movements by fencing off, certainly don't see how this is going to enhance the lives of wildlife. Fencing out deer, badgers, foxes etc. can only restrict these creatures lives: These animals have been roaming the landscape for thousands of years - long before man became the top predator</p>	No	<p>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, which are retained and enhanced as part of the embedded mitigation, providing movement corridors for deer and foxes.</p> <p>The detailed fencing strategy for the Site has been sensitively designed to allow permeability across the Site by Badgers, such that freedom of movement will remain, in addition to connectivity to foraging resources within the wider landscape while created habitats develop. Where appropriate, Badger security fencing will incorporate specific design measures such as gaps, gates or other features, (particularly associated with existing vegetated corridors and key commuting routes) in order to ensure continued permeability and access to foraging areas across the Site for Badger.</p>
	Fencing	<p>I cannot see how fencing off footpaths is improving access to walking? How do you make that fit? And as for nature recovery? How do you think you are assisting in that?</p>	No	<p>The Applicant does not propose closing any footpaths but may use temporary diversions during construction if all other management measures to keep routes open would be unsuitable. The Scheme includes proposed enhancements and improvements to the local footpath</p>



				<p>network, including approximately 3.5km of new permissive paths and an area identified for publicly accessible amenity space at the edge of the plateau.</p> <p>The Applicant is committed to supporting nature recovery and biodiversity enhancement. The draft Local Nature Recovery Strategy principles, where appropriate, have informed the approach to biodiversity enhancements across the Site. The oLEMP [APP/7.11] sets out the specific strategies and priorities identified in the draft LNRS that are relevant to the Site and how they have been incorporated into the Scheme.</p> <p>The Biodiversity Net Gain Assessment Report [APP/7.4] submitted with the DCO Application demonstrates significant net gains for Biodiversity as a result of the Scheme.</p> <p>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/7.4], and provides a number of faunal enhancement measures, together resulting in a betterment for biodiversity as a result of the Scheme.</p>
	Fencing	We are losing huge swathes of land which according to your brochure will be fenced, and therefore much less animal and wildlife movement compared to now	No	<p>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, which are retained and enhanced as part of the embedded mitigation, providing movement corridors for wildlife, including deer.</p>
	Fencing	Residential neighbours have the setting of their property altered and industrialized. Boundaries are delineated by security fencing and intrusive CCTV..	No	<p>The Applicant notes this, and appropriate offsets to Keepers Cottage have been incorporated into the Scheme's design and assessed in ES Appendix 6.7: Residential Visual Amenity Assessment [APP/6.4].</p>
	Fencing	Dunno what fencing you have in mind, but wood and wire would be less intrusive than the big green prison style fencing.	No	<p>The Applicant notes this and has committed to using wood-and-wire fencing around the perimeter of the Solar PV Arrays. Palisade fencing would be required around the National Grid and Customer Substations, BESS, and Conversion Units, where both health and safety and security are considerations.</p>
	Fencing	<p>I would like to understand the impact of the proposed deer proof fencing on wildlife movement corridors across the site.</p> <p>I welcome that these are discussions with West Acre estate in relation to its 'rewilding' strategy. The</p>	No	<p>The Applicant notes this and has increased the minimum buffers to Fincham Drove and Petticoat Drove from 15m to 25m, creating 50m wide routes through the Site, amplifying their role as key green infrastructure corridors between the</p>



		proposals would be significantly improved if connections for wildlife between the two projects were refined on plan along with wider valley floor to plateau GI connections.		Nar Valley / West Acre Rewilding project and the green infrastructure assets to the south of the Site.
	Fencing	<p>It will be important that final scheme details are made available to local communities. In particular in relation to the following:</p> <ul style="list-style-type: none"> - LUIA judgements, mitigations & utilisations - Detailed final landscape layout & specifications - Landscape management strategy - Detailed solar panel & fencing layouts - Detailed biodiversity strategy & BNG - A full agreed scheme of all community benefit 	No	<p>The Applicant notes these comments and has prepared an ES and a suite of management plans to support this application.</p> <p>The Applicant has also prepared a Statement of Need [APP/5.4], which provides evidence of the substantial benefits of large-scale ground-mounted solar electricity generation, including security of supply and affordability.</p> <p>The Applicant also recognises the importance of local community benefits and is proposing a community benefit fund as part of the Scheme, should the Scheme receive development consent. This will be independently administered by a local foundation and will be available to local initiatives providing community services, including local energy schemes. The wider effects of the Scheme on the local community, in terms of socio-economic aspects, are assessed in ES Chapter 14: Socio-Economics [APP/6.2].</p>
	Fencing	Transitory animals have their traditional routes blocked and in particular, deer will be diverted onto roads as the fencing excludes them from the solar compounds.	No	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, which are retained and enhanced as part of the embedded mitigation, providing movement corridors for deer.
	Fencing	How can wildlife move through the site? it will be fenced off like the other solar farms in the area	No	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, which are retained and enhanced as part of the embedded mitigation, providing movement corridors for wildlife.
	Security measures and/or infrastructure (including lighting)	Given South Acre's close proximity to the proposed substation and working areas, we would welcome further detail on how noise and lighting will be managed during both construction and operational phases. These aspects remain uncertain at this stage, and therefore cannot be properly assessed from our perspective. The planning documents note that the specific technologies to be used for drilling, excavation, scabbing or other high-noise activities are yet to be determined, as well as the location of the	No	The Applicant notes this and in terms of noise refers to ES Chapter 10: Noise and Vibration [APP/6.2] which outlines embedded and additional mitigation measures to manage noise to non-significant effects, these measure will be outlined and implemented in the construction (oCEMP [APP/7.6]) and operation (oOEMP [APP/7.8]) management plans which will be secured through a requirement of the DCO.



		generator. For this reason, we strongly encourage the developer to ensure that strict requirements are set for all contractors, with a clear exception that noise and lighting are kept to an absolute minimum.		
	Security measures and/or infrastructure (including lighting)	Similarly I can't find a Site Security Plan (e.g. for trespass, criminal damage, sabotage, etc). Can I also see a copy of this please? Presumably you will have already consulted with Police, Fire, and Ambulance service and created a generic Multi-agency Major Incident Plan for the site? Have you agreed RVP's, Marshalling Areas, Casualty/Survivor Reception Centres, Body Collection Points, Radio Communications boosters, etc?	No	<p>The Applicant notes that ES Chapter 5: The Scheme [APP/6.1] sets out security measures proposed as part of the Scheme, including CCTV and security fencing.</p> <p>The Applicant also notes that engagement with East of England 'blue light' partners has been ongoing, the details of which are set out in this Consultation Report [APP/5.1].</p>
	Security measures and/or infrastructure (including lighting)	Securiy fencing and lighting would be necessary but destroy the rural landscape and dark skies.	No	<p>The Applicant notes this and has confirmed that the Solar PV Arrays will not require lighting.</p> <p>The Scheme would be largely unlit, except for the Customer Substation and National Grid Substation, which would include motion-sensing lighting used solely for security and maintenance.</p>
	Security measures and/or infrastructure (including lighting)	What happens if movement sensitive lighting is triggered by wildlife (bats, elks - does this mean light pollution!)	No	<p>During the construction phase, temporary lighting will use directional fittings to minimise outward light spill and glare (e.g., via light hoods/cowls that direct light below the horizontal plane), and lighting is to be directed towards the middle of the Site rather than towards the boundaries. These measures will limit light pollution during times when the lighting is in use.</p> <p>During the operational phase, motion-sensing lighting would be provided within the Customer Substation, the National Grid Substation, and the BESS Compound to maintain safe working conditions in the winter months. These areas are fenced with palisade fencing and are therefore unlikely to trigger motion-sensitive lighting by accident.</p> <p>Control measures are detailed in the oCEMP [APP/7.6] and oOEMP [APP/7.8].</p>
	Security measures and/or infrastructure (including lighting)	HALF THE TIME IT'S NIGHT TIME: MORE CONSIDERATION NEEDS TO BE GIVEN TO EMPHASISING AND REFINING THE PLANNING TOWARDS MITIGATION OF LIGHT POLLUTION.	No	<p>All routine maintenance activities would be scheduled for daylight hours, so far as practicable. Focussed task-specific lighting would only be required in the event of emergency works or equipment failure requiring night-time working.</p> <p>Motion-sensing security lighting would be provided within the Customer Substation, the National Grid Substation, and within the BESS Compound to maintain safe working conditions in winter months, for security purposes, and for maintenance activities.</p>



	Security measures and/or infrastructure (including lighting)	<p>We therefore ask the developer to formally commit to:</p> <p>A clear lighting strategy that avoids motion-triggered systems and uses downward-shielded fixtures to minimise light intrusion in our rural setting.</p>	No	<p>All routine maintenance activities would be scheduled for daylight hours, so far as practicable. Focussed task-specific lighting would only be required in the event of emergency works or equipment failure requiring night-time working.</p> <p>Motion-sensing security lighting would be provided within the Customer Substation, the National Grid Substation, and within the BESS Compound to maintain safe working conditions in winter months, for security purposes, and for maintenance activities.</p> <p>A sensitive lighting strategy as part of the detailed OEMP will specify how this artificial lighting will be installed and used, which will serve to mitigate adverse impacts on ecological receptors which are adversely impacted by lighting, such as bats.</p>
	Security measures and/or infrastructure (including lighting)	<p>The site gives a risk of release of pollutants into the water, soil and air. There is also a risk to noise including vibration and light pollution.</p> <p>There is a risk of increased light pollution, from site lighting and also from glint and glare from solar panels. This goes against the Dark Skies policy in place in Castle Acre.</p>	No	<p>The Applicant notes this and, with respect to noise and vibration, refers to ES Chapter 10: Noise and Vibration [APP/6.2], which assesses vibration from construction and states that vibration from the operation of the plant is negligible at short distances, as close as 10m from the plant. Therefore, the risk of noise-induced vibration outside the site is very low.</p> <p>The Applicant also notes that the Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation, which would only include motion-sensing lighting and be used only for security and maintenance purposes, as set out in ES Chapter 5: The Scheme [APP/6.1].</p> <p>ES Chapter 12 Water Resources [APP/6.2] concludes that the Scheme is not anticipated to result in any residual adverse effects on water receptors across the Scheme's construction, operational and decommissioning phases.</p>
	Security measures and/or infrastructure (including lighting)	<p>However, we have concerns over the proposals for siting the sub-station and BESS in fields 24, 26, 27 and 35 (Indicative masterplan 2). These are areas where it is stated that new lighting will be required. These fields include or are very close to the locations where some of the highest amount of bat activity was recorded, as noted in appendix 7.2 (paragraph 5.3.9). As such, we recommend looking for alternative locations for infrastructure requiring lighting to minimise impact on nocturnal wildlife.</p>	No	<p>The National Grid Substation, Customer Substation, and BESS would be located only in Fields 24 and 27. Bat activity in these areas was restricted to the boundary hedgerows and areas of woodland. Appropriate buffers will be incorporated into these features, and lighting associated with the Customer Substation, National Grid Substation, and BESS will be limited to the minimum requirements for Health and Safety as part of embedded mitigation, such that the retained hedgerows and woodland, the features being used by bats, will not be subject to lighting and therefore not impacted.</p> <p>These measures are set out within oCEMP [APP/7.6] and would be secured through the CEMP by way of requirement in the DCO.</p>



	Security measures and/or infrastructure (including lighting)	<p>Lighting</p> <p>We recommend that the best practice guidelines according Bat Conservation Trust are followed (see Artificial Lighting Guidance - Buildings, planning and development - Bat Conservation Trust) .</p> <p>Visible lighting should be avoided on solar farms to reduce impacts to nocturnal wildlife such as bats, as well as reducing landscape impacts. We would like to see a commitment to the retention of dark corridors for bats. If lighting is necessary it must be minimised and directed away from hedges / woodland / scrub.</p>	No	<p>Permanent lighting is not required on the Solar PV Site during the operational phase. Motion-sensing security lighting will be provided within the Customer Substation and within the BESS Compound, to be used only for maintenance and security purposes. A sensitive lighting strategy as part of the detailed OEMP(s) will specify how this artificial lighting will be installed and used, thereby mitigating adverse impacts on ecological receptors, such as bats.</p> <p>The Scheme will strengthen existing key movement corridors through the planting up of gaps along existing hedgerows and tree lines, as well as through the creation of new hedgerows and Tree Lines to improve connectivity throughout the Scheme. The creation of diverse habitats, including new grassland habitats, will improve potential foraging opportunities. This is detailed in the oOEMP [APP7.8].</p>
	Security measures and/or infrastructure (including lighting)	<p>I notice that once installed this solar array will become part of our Critical National Infrastructure. What overt security measures will be in place to prevent/detect attacks to the array? Will there be 24/7 human security as well as any technical surveillance?</p>	No	<p>As detailed in the oOEMP [APP/7.8], the Solar PV Site will receive several security risk management threat assessments during the development, construction, operation, and ultimately decommissioning phases. These security risk management threat assessments are conducted by suitable, qualified, and experienced persons and will determine security risks.</p> <p>The boundary of the Solar PV Site will be secured by both fencing and Closed-Circuit Television (CCTV) equipment. Cameras would be placed on poles up to 3m high. Perimeter fencing will be deer wire mesh and wooden post fencing with a maximum height of 2.5m. All new access tracks will be secured by gates set back from the public highway.</p> <p>Other potential security measures to be included comprise:</p> <ul style="list-style-type: none"> • Detection systems such as beam break, image detection etc. to raise alarm when fence breached • Audio announcement when intruder detected to warn alarm triggered and police on way • Barriers/locked gates at main entrances to the Solar PV Site • Steel doors on substation buildings • Buried cables as much as possible • Remote monitoring; and • Alarm response contract with keyholder/security company.



	Security measures and/or infrastructure (including lighting)	Paragraph 198 of the NPPF that relates to development being appropriate for its location, referring specifically to noise and light pollution and draws attention to intrinsically dark landscapes and nature conservation. This stands in line with the Norfolk County Council Environmental Lighting Zones Policy which identifies the site in an area of Rural Dark Landscape and therefore requires protection.	No	<p>The Applicant notes this and, with respect to noise and vibration, refers to ES Chapter 10: Noise and Vibration [APP/6.2], which has considered the NPPF policy and related NPSE and NPS policies for assessing noise.</p> <p>Permanent lighting is not required on the Solar PV Site during the operational phase. Motion-sensing security lighting will be provided within the Customer Substation and within the BESS Compound, to be used only for maintenance and security purposes. A sensitive lighting strategy as part of the detailed OEMP(s) will specify how this artificial lighting will be installed and used.</p>
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11 Landscape and visual impact

Topic	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Landscape and visual impact	Landscape and visual impact of solar PV development and associated infrastructure	Solar panels do not change with the seasons - they just replace a natural, changing and varied environment with a monotonous and bleak landscape.	No	<p>The Applicant notes these comments but disagrees, having sought to retain and enhance features such as existing vegetation wherever possible to retain the fabric of the Site and aid integration of the Scheme into its context</p> <p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme.</p> <p>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.</p>
	Landscape and visual impact of solar PV development and associated infrastructure	Concerns: countryside appearance will be unnatural, comprising semi industrial looking infrastructure. Burden of solar panel farms should be spread fairly so the harm in the appearance is not concentrated in one area of East Anglia.	No	<p>Then Applicant notes these comments but disagrees, having sought to retain and enhance features such as existing vegetation wherever possible to retain the fabric of the Site and aid integration of the Scheme into its context.</p> <p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme and sets out the proposed mitigation measures to reduce the impacts on visual receptors.</p> <p>ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] describes the consideration of reasonable alternatives undertaken by the Applicant in relation to the Site for the Scheme, the layouts, and the choice of technology. It is supported by the Planning Statement [APP/5.5], which provides an appraisal of alternative sites and demonstrates consideration of</p>



				relevant policy and its applicability to the Applicant's site evaluation process.
	Landscape and visual impact of solar PV development and associated infrastructure	Large solar farms are a blight on the beautiful country side with its inherent wildlife and unique archaeological heritage.	No	<p>The Applicant notes this comment but disagrees. ES Chapter 6: Landscape and Visual [APP/6.2] has assessed effects with relation to visual amenity and sets out proposed mitigation measures to reduce adverse effects.</p> <p>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.</p>
	Landscape and visual impact of solar PV development and associated infrastructure	The rural character of Castle Acre and surrounding area gives a strong sense of remoteness and tranquillity. It will dramatically alter the natural beauty and character of the landscape and detract from the scenic and historic views.	No	ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme. There are no significant visual effects on views from Castle Acre.
	Landscape and visual impact of solar PV development and associated infrastructure	<p>There will be an impact aesthetically on the area being relatively low lying with an undulating landscape and of a rural outlook. We are concerned about the outlook from the ancient Peddars Way long distance path and this should, as far as possible be ameliorated. The views from Peddars Way looking northward to Castle Acre should be carefully considered. The site is also within the Breckland National Character area and this should be recognized in the design to minimize impacts.</p> <p>The need to assess the possible issue of dazzle to road users</p>	No	<p>The Applicant notes that ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely effects from Peddars Way long-distance path.</p> <p>Short- and medium-term visual effects on this route would be medium-scale, limited to the extent of this route where it runs through/adjacent to the Site. These effects would be of low magnitude, of moderate significance, and adverse. The visual effect upon this route would be significant, in the short and medium term, where it runs through the Site and up to approximately 300m beyond the Site.</p> <p>However, the Applicant notes that following the application of mitigation measures such as mitigation planting and landscape management, the effects would be reduced to not significant in the long term.</p> <p>The Glint and Glare Assessment considers nearby road users within 1km of the solar panel areas and concludes that, following embedded mitigation, no significant impact is predicted for road users. Advance planting will be installed along the site boundary bordering the A1065 in order to screen potential reflections.</p>
	Landscape and visual impact of solar PV development and associated infrastructure	The panels whilst needed will not enhance our views.	No	<p>The Applicant notes this comment. ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme.</p> <p>While the Applicant acknowledges there would be moderate significant adverse effects upon landscape character in the long term, this would be within the Site</p>



				only. There are judged to be no significant adverse landscape effects outside of the Site, in the long term.
	Landscape and visual impact of solar PV development and associated infrastructure	The proposed installation would be seen from the Castle Acre Priory. On maps it is easy to show hedgerows but it does not show elevations and what can be seen from higher lying ground.	No	<p>The illustrative summer and winter photomontages and parameter-based photowires demonstrate that potential views of the proposed substations from Castle Acre are extremely limited.</p> <p>The substations would not be perceptible from publicly accessible locations within Castle Acre due to screening provided by existing woodland to the north of the Site.</p> <p>(see Figure 6.12 and Figure 6.13 Parameter Based Winter and Summer Photomontages and Figure 6.14 and Figure 6.15 Winter and Summer Photomontages Illustrative Scheme [APP/6.3])</p>
	Landscape and visual impact of solar PV development and associated infrastructure	I particularly value the view from the lane from Swaffham to West Acre. It makes you feel that you are completely away from it all and in the midst of nature, the farming community and wildlife. It is quiet and unspoilt. I don't think that it will be like that once there are acres of solar panels and building to support the grid.	No	<p>The Applicant notes this comment and confirms ES Chapter 6: Landscape and Visual [APP/6.2] takes into account the impacts on users of PRoW. An Amenity and Recreation Assessment (ARA) is a separate assessment to the LVIA and is included in ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4].</p> <p>It assesses the overall experience of the amenity and recreational resources. There are no significant effects upon PRoW users within the Site in the long term.</p>
	Landscape and visual impact of solar PV development and associated infrastructure	You cannot put a load of solar panels in a field and make it scenic or beautiful.	No	<p>The Applicant notes this but disagrees. 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 on PRoW users within the Site, primarily through the implementation of appropriate vegetation management regimes, the offset of new development from PRoW, and the planting of new hedgerows, trees, woodland, and scrub. The LVIA acknowledges that there would be moderately significant adverse effects on landscape character in the long term, but only within the Site. It is judged that there are no significant adverse landscape effects outside the Site in the long term.</p>
	Landscape and visual impact of solar PV development and associated infrastructure	Landscape and visual - beautiful field and views will be lost forever. You cannot make solar panels look like waving wheat or barley. You also will increase the traffic in this area taking away the beautiful quiet of the area.	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme.</p> <p>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.</p>



				<p>ES Chapter 9: Transport and Access [APP/6.2] concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse transport and access-related effects expected across the Scheme's construction, operational and decommissioning phases of the Scheme.</p> <p>ES Chapter 10: Noise and Vibration [APP/6.2] assesses the potential effects of traffic during the construction, operational, and decommissioning phases of the Scheme, concluding that there would be no significant adverse effects.</p>
	Landscape and visual impact of solar PV development and associated infrastructure	I have put Disagree because whatever you put in place or say that you will put these things in place, the whole area will be completely changed for the environment, diversity, social etc. You cannot put a load of solar panels in a field and make it scenic or beautiful	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme.</p> <p>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.</p>
	Landscape and visual impact of solar PV development and associated infrastructure	PV panels (page 30) info rows of panels are okay but are to be total eye sore with the silver coloured frames. Ok is fixed and tracker panel that follow the sun. But environmentally coloured to blend in with the landscape of National Grid pylons. What about noise, humming, EM waves - do these panels and their cells generate noise as well as energy?	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] considers a worst-case Single Axis Trackers given their larger scale. The colour of proposed buildings and infrastructure will be approved by the relevant planning authority in accordance with the requirements in the Draft DCO.</p> <p>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.</p>
	Landscape and visual impact of solar PV development and associated infrastructure	Presumably the risks presented by "Glint & Glare" at road level will be mitigated with extensive planted screenage. What measures are there to prevent Glint & Glare risks to the pilots of light aircraft, helicopters, microlights, etc who frequently pass over Swaffham and the A1065 on a daily basis?	No	<p>ES Chapter 16: Other Environmental Matters [APP/6.2] concludes that, with embedded mitigation measures in place, there is no potential for significant glint and glare effects as a result of the Scheme's construction, operational and decommissioning phases.</p> <p>Industry guidance and best practice is to assess glint and glare towards pilots on the final approach to an airfield, as this is the most sensitive period of flight. As such, modelling has been carried out for approach paths at RAF Marham and Great Friar Thornes Farm Airfield. Pilots flying over the site will maintain sufficient separation from the panels and have sufficient time to respond to any glare; glint and glare impacts would not be considered a safety risk.</p>
	Landscape and visual impact of solar PV development and associated infrastructure	The solar farm will ruin the tranquil ancient setting of Castle Acre and cause noise and visual disturbance.	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme. The embedded mitigation measures limit the adverse visual and recreational impact upon receptors</p>



				<p>within Castle Acre, primarily through the implementation of appropriate vegetation management regimes and the planting of new hedgerows, trees, woodland and scrub. The substations and BESS would not be perceptible from Castle Acre. Solar PV Arrays would only be perceptible in fields north of Bartholomew's Hill's Plantation woodland, and would sit below the wooded skyline. New Grid Connection Infrastructure would be visible alongside existing pylons and overhead lines. There are judged to be no significant adverse visual effects upon visual receptors within Castle Acre in the long term, as assessed within Visual Receptor Group 5: Castle Acre, as part of ES Chapter 6: Landscape and Visual [APP6.2].</p> <p>ES Chapter 10: Noise and Vibration [APP/6.2] assesses the potential effects of traffic during the construction, operational, and decommissioning phases of the Scheme, concluding that there would be no significant adverse effects.</p>
	Landscape and visual impact of solar PV development and associated infrastructure	Landscape and visual - beautiful field and views will be lost forever. You cannot make solar panels look like waving wheat or barley. You also will increase the traffic in this area taking away the beautiful quiet of the area.	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme.</p> <p>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.</p>
	Landscape and visual (general)	Landscape and visual and glint and glare - from the suggested view parts the latter would not blend in with the cultural heritage views proposed/suggested.	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme.</p> <p>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.</p>
	Landscape and visual impact of solar PV development and associated infrastructure	Landscape and visual: even with the proposed hedging the solar panels will be visible from historic places such as Castle Acre Priory. This would negatively impact the historic setting.	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme. The embedded mitigation measures limit the adverse visual and recreational impact upon receptors within Castle Acre, primarily through the implementation of appropriate vegetation management regimes and the planting of new hedgerow, trees, woodland and scrub. The substations and BESS would not be perceptible from Castle Acre.</p> <p>Solar PV Arrays would only be perceptible in fields north of Bartholomew's Hill's Plantation woodland and would sit below the wooded skyline. New Grid Connection Infrastructure would be visible alongside existing pylons and overhead lines. There are judged to be no significant adverse visual effects upon visual receptors within Castle</p>



				<p>Acre in the long term, as assessed within Visual Receptor Group 5: Castle Acre, as part of ES Chapter 6: Landscape and Visual [APP/6.2]. The Scheme has been visualised within Figures 6.12 and 6.13 Parameter Based Winter and Summer Photowires and Figures 6.14 and 6.15 Winter and Summer Photomontages Illustrative Scheme [APP/6.3].</p> <p>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</p>
	Landscape and visual impact of solar PV development and associated infrastructure	Should this development go ahead, whatever mitigation or enhancement measures that are taken to screen the unsightly array from the A1065 and from local residences must be effective all year round and in keeping with the local environment.	Yes	<p>Mitigation measures are reflected in Figure 5.8, Green Infrastructure Parameter Plan, and are detailed in the oLEMP [APP/7.11].</p> <p>Hedgerow screening along the A1065 will be gapped up and strengthened with further hedgerow trees during the operational lifetime of the Scheme.</p>
	Landscape and visual impact of solar PV development and associated infrastructure	Plant trees to reduce visual impact of solar panels	Yes	<p>Mitigation measures are reflected in Figure 5.8 Green Infrastructure Parameter Plan and are detailed in the oLEMP [APP/7.11], including the introduction of additional hedgerow trees and woodland belts to provide screening for the solar panels.</p>
	Landscape and visual impact of solar PV development and associated infrastructure	Will any solar panels be visible from local roads, or will they be screened from view with planting?	Yes	<p>Mitigation measures are reflected in Figure 5.8 Green Infrastructure Parameter Plan and are detailed in the oLEMP [APP/7.11], including the introduction of additional hedgerow trees and woodland belts to provide screening for the solar panels.</p>
	Landscape and visual impact of solar PV development and associated infrastructure – emails	4 m high Solar panels tho few in number would be highly visible, unacceptably intrusive and a questionably necessity in such an extensive overall array.	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the landscape and visual impacts of the scheme and has considered worst-case single-axis trackers given their larger scale compared to fixed panels.</p> <p>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.</p>
	Landscape and visual impact of solar PV development and associated infrastructure	<p>Landscape and visual amenity:</p> <p>One of the comments I have received from constituents is about the proximity to the very exceptional landscape of the Nar Valley and the Priory and Castle at Castle Acre. This is a tourist hotspot, and the surrounding landscape consists of open, undulating large arable fields. If these fields were lost under photovoltaics the landscape integrity would be</p>	Yes	<p>The Applicant notes these comments with regard to the landscape of the Nar Valley and the Priory and Castle</p> <p>Measures have been taken to revise the Scheme's layout and to concentrate most of the Scheme beyond the ridgeline. This is further described in the ES Chapter 5: The Scheme [APP/6.1], reflected in ES Figure 5.1</p>



		lost. Many people have also commented to me that the primary benefit they enjoy from living in the area is the enjoyment of the open vistas of the agricultural landscape which they access on a daily basis through the network of public rights of way.		Concept Masterplan [APP/6.3] and assessed in ES Chapter 6 Landscape and Visual [APP/6.2] . 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.
	Landscape and visual impact of solar PV development and associated infrastructure	Landscape and visual amenity: Screening the development with hedges and trees does not mitigate the damage to this enjoyment. The development proposals need to address the issue of the landscape context of rights of way, to avoid disruption to visual amenity. In this respect I am pleased to see your statement under the environmentally led design principle that the setting of heritage assets along the Nar Valley will be respected and your stated approach will be to enhance people's experience of the plateau and river corridor by reinforcing their characteristics, such as maintaining open views towards the valley floor, protecting key sightlines from important PRoW, and carefully limiting the location of solar PV panels.	Yes	Consideration has been given to the landscape context of PRoW with a minimum buffer/offset of 15m, as set out in ES Chapter 5: The Scheme [APP/6.1] . Measures have been taken through an iterative design process to revise the layout as referred and achieve good design, Scheme outcomes through Design Principles and Parameters [APP/5.8] . The document submitted as part of the DCO Application provides the principles and maximum parameters for the detailed design of the Scheme, and the principles secured by a requirement in the draft DCO [APP/3.1] . When the detailed design for the Scheme is submitted for approval to the relevant planning authorities, those details must accord with the Design Principles and Parameters [APP/5.8] .
	Landscape and visual impact of solar PV development and associated infrastructure	The proposed scale and extent of the solar array will create a significant alteration to the open rural character, especially from nearby public rights of way and minor roads. The large-scale installation of solar panels across thousands of acres introduces an extensive, low-profile but visually distinct feature. The uniform, reflective nature of PV panels is incongruous with the more organic patterns of field and hedgerow found here. The reflective surfaces and the sheer extent of the development would contrast with the traditional farmland. This could significantly alter the sense of openness and rural tranquillity valued in the countryside.	No	ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme. 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.
	Public access in across Scheme	I would like to see a model of how the site will look, with the new footpaths, you can not show how the character and identity will be reinforced, as it is green countryside and solar panels will take that identity away. I do not want the wildlife disturbed at all.	No	Permissive routes proposed within the Scheme are detailed within the oPRoWPPMP [APP/7.12] .
	Landscape and visual (general)	In addition the proposal does not recognise 'the intrinsic character and beauty of the countryside' as required by NPPF (Dec 2024) para. 187b. Although the proposal does include planting, screening, minimal lighting etc. it still proposes to alter the intrinsic character of the countryside site through the	No	ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme during its operational lifetime. Measures have been taken through the scheme's outcomes, design



		imposition of solar arrays and several alien structures. Although the claim is these will be temporary, the reality is that this development would lead to these harms being felt for 60 years, plus the time taken to construct and decommission the site (if indeed it was decommissioned at that point.)		principles, and parameters to minimise the impact of the development on landscape character. The Applicant also notes that the Policy Compliance Document [APP/5.6] sets out compliance with all relevant planning policies.
	Landscape (general) and visual	The common conception of Norfolk is that, in the words of Noel Coward, it's very flat. This part of Norfolk, however, is not. The northern tip of Breckland (the broken land) is, as one leaves Swaffham on the A1065 heading North towards Fakenham, a vista of beautiful rolling countryside, a scene of productive farmland, hedges and woods soon to be utterly destroyed by TDSF and its four-metre high solar panels of bleak modernity which you had sufficient contempt to illustrate with sheep grazing between them. The message being a savagely ridiculous claim to the trust of simple locals that what is to be undemocratically imposed upon them is, somehow, a continuation of the agricultural tradition. You are happy, it seems, to create a desert and call it peace.	No	ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme. The Scheme retains the majority of trees, hedgerows and woodland within the Site. The embedded mitigation measures limit the adverse landscape and visual impacts upon receptors within the study area. This is primarily through the implementation of appropriate vegetation management regimes, offsetting new development from visual receptors and the planting of new hedgerows, trees, woodland and scrub. In the long term, all embedded mitigation measures serve to mitigate potential significant adverse visual effects. The Scheme has been visualised from several locations within the study area, including Figures 6.12 and 6.13 Parameter Based Winter and Summer Photowires and Figures 6.14 and 6.15 Winter and Summer Photomontages Illustrative Scheme [APP/6.3] .
	Landscape (general) and visual	2. Failure to Conserve and Enhance Landscape Character NPPF Paragraph 187(a) requires that decisions protect and enhance "valued landscapes" and the natural environment. The proposed development introduces significant industrial infrastructure, including extensive arrays of panels, fencing, access roads, and substations, in a rural and open landscape.	No	The Applicant also notes that the Policy Compliance Document [APP/5.6] sets out compliance with all relevant planning policy, including NPPF Section 15: Conserving and enhancing the natural environment. Paragraph 187A. ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme and this includes giving consideration to landscape value.
	Landscape (general) and visual	Breckland District Council's Landscape and Settlement Character Assessment and the Breckland Design Guide provide frameworks for understanding and integrating development within the local landscape. The Breckland Landscape and Settlement Character Assessment identifies a key landscape type relevant to The Drove Farm. The solar farm lies within the Wayland Plateau Farmland landscape type. Characterized by gently rolling farmland with open, expansive views, mature trees, scattered woodlands, and a patchwork of arable fields. The area has a rural, agricultural feel with a low density of settlements.	No	The Applicant notes these comments; however, disagrees. The Wayland Plateau Farmland Landscape Character Area (E4) lies to the south east of the scheme and outside of the study area defined for the Drovers Solar Farm. ES Chapter 6: Landscape and Visual [APP/6.2] drew on the Breckland District Landscape Assessment (2007).



	Landscape and visual impact (general)	Visual Impact How tall will the panels and associated infrastructure (inverters, substations) be?	No	Details of the infrastructure are referred to in ES Chapter 5: The Scheme [APP/6.1] .
	Landscape and visual (general)	You have to mitigate the visual, audible and environmental impact of the eventual site, and as a minimal requirement this means planting hedgerows and belts of trees NOW so that they have a chance to grow before the construction phase. I know that this is the responsibility of the landlord before decisions are made, but you are in partnership with him, so it is incumbent on you to persuade him.	Yes	Measures are being taken to gap existing hedgerows within the Site during the winter of 2025, as shown in Figure 7.11 of the Advanced Planting Plan appended to the oLEMP [APP/7.11] .
	Landscape and visual (general)	A very important part of this is the escarpment to the south, rising from the River Nar. Such views are very rare in Norfolk and this is greatly valued. There is much dissent for this solar farm within the village and most of this is based on the fear that the bucolic view of the hill will be lost. Any steps by you to mitigate this would be greatly appreciated by all!	Yes	ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme based on a refined scheme that has relocated much of the proposed infrastructure to the south of Bartholomew's Hill Plantation.
	Landscape and visual impact (general)	The character and gentle beauty of the area will be lost, when you are covering a massive section of it in solar panels it can't be helped! Where you are building is an extremely peaceful and pretty area	No	ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme, including its aesthetic and perceptual qualities such as tranquillity. 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.
	Landscape and visual (general)	Negative Impact on the Natural Environment and Heritage The Drovers Solar Farm, located north of Swaffham, threatens to spoil a historically rich and visually stunning rural landscape. This area is integral to the beauty and heritage of the region, and the planned solar farm will cause irreversible damage to this setting.	No	ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme, including the landscape north of Swaffham. 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.
	Landscape and visual (general)	Can you design the grass areas so to provide habitat for hares. These are present at the moment. South facing static solar panels preferred as these are lower. Cultural heritage protection means views of panels/etc should not be possible at all from the priory which is the largest ruined ecclesiastical building in Norfolk. Castle Acre and South Acre are very attractive villages that offer something to visitors.	No	The visual impact of the scheme on Castle Acre and South Acre has been considered as part of ES Chapter 6: Landscape and Visual [APP/6.2] . The proposed grassland habitat considered suitable for hares is reflected in Green Infrastructure Parameter Plan appended to the oLEMP [APP/7.11] . The Applicant further notes that ES Chapter 8: Cultural Heritage and Archaeology



		Negative visual impacts on these villages and priority will harm tourism in the area.		[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.
	Landscape and visual impact (general)	Visual impact. The repurposing of agricultural land into large-scale energy production sites represents a significant shift with long lasting consequences for the local landscape. The infrastructure required: cabling, substations, and battery storage will result in the loss of fields and meadows, altering the character of the countryside. This has major implications for the character and land use designation of the area as well as the likelihood of further development downstream. There has also been local concern about the adequacy of proposed measures to mitigate the visual impact of solar farm which must be addressed in the next phase of the plans.	No	<p>The Applicant notes this comment but disagrees. ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the landscape and visual impacts of the Scheme, and mitigation measures are reflected in Figure 5.8, Green Infrastructure Parameter Plan in the oLEMP [APP/7.11].</p> <p>The Scheme retains the majority of trees, hedgerow and woodland within the Site. The embedded mitigation measures limit the adverse landscape and visual impacts upon receptors within the study area. This is primarily achieved through the implementation of appropriate vegetation management regimes, offsetting new development from visual receptors, and the planting of new hedgerows, trees, woodland, and scrub. In the long term, all embedded mitigation measures serve to mitigate potential significant adverse visual effects.</p> <p>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.</p> <p>The Scheme has been visualised from several locations within the study area, including Figures 6.12 and 6.13 Parameter Based Winter and Summer Photowires and Figures 6.14 and 6.15 Winter and Summer Photomontages Illustrative Scheme [APP/6.3].</p>
	Landscape and visual impact (general)	<p>How are 2 fields of National Grid and 3 fields of customer substations going to be completely hidden from view? Will it be visible from the walk along Fincham Drove, the Roman road</p> <p>How are you going to ensure that standing on the keep of Castle Acre Castle you will only be able to see the views that have been in place since it was built, to ensure the historic surrounding remains, in keeping with Castle Acre Neighbourhood Plan? Destroying the views around Castle Acre will have a detrimental effect on tourism in the village including local businesses and holidays homes.</p> <p>No mitigation can improve on what is here now.</p>	Yes	<p>Figure 5.1 Concept Masterplan and Figure 5.8 Green Infrastructure present the revised scheme layout and proposed mitigation measures, providing screening from Fincham Drove through the gapping up of existing hedgerows and strengthening hedgerows with hedgerow trees, as referred to in Figure 5.8 Green Infrastructure Parameter Plan detailed further in the oLEMP [APP/7.11]</p>



	Landscape and visual impact (general)	I believe the solar farm will dramatically change local landscape character to something new. This should be acknowledged. Existing character & identity will not be retained/protected.	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme.</p> <p>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.</p>
	Landscape and visual impact (general)	The impact on a rural area such as this would be too severe in terms of damage from construction, damage from ongoing maintenance activities and visual impact on an area of natural beauty.	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme.</p> <p>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.</p>
	Landscape and visual impact (general)	I enjoy the simple beauty of the Norfolk countryside around Swaffham, the changing patterns of colours in the fields etc. I do not want to have to look at acres of solar panels.	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme.</p> <p>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.</p>
	Landscape and visual impact (general)	This particular area of farmland is beautifully scenic and unspoilt. There are hedgerows and quiet lanes connecting these villages. My concern would be that b) A solar farm would totally change the look and nature of the area for ever c) that this area would become an eyesore for the inhabitants and visitors that visit Swaffham, Castle Acre and West Acre	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme.</p> <p>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.</p>
	Landscape and visual impact (general)	Far too big and will be intrusive even with trees around the edge.	No	<p>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.</p> <p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme, and mitigation measures are reflected in Figure 7.11, Green Infrastructure Parameter Plan [APP/6.3], and are detailed further in the oLEMP [APP/7.11].</p>



	Landscape and visual impact (general)	<p>The solar farm will encroach on some outstanding natural beauty, around castle acre in particular and the ancient Nar river valley.</p> <p>Whilst not against solar farms in general, I don't think this is the best location</p>	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme, including the Nar Valley.</p> <p>The Applicant notes that the Site Evaluation Report in Appendix 1 of the Planning Statement [APP/5.5] demonstrates that the Site is suitable for the proposed development, having been selected following a comprehensive assessment of environmental, technical, and planning considerations.</p>
	Landscape and visual impact (general)	<p>The rural character of Castle Acre and surrounding area gives a strong sense of remoteness and tranquillity. It will dramatically alter the natural beauty and character of the landscape and detract from the scenic and historic views.</p>	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme, including a sense of remoteness and tranquillity where appropriate.</p> <p>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.</p>
	Landscape and visual impact (general)	<p>The rolling countryside in this part of Norfolk is particularly scenic; your proposed solar farm would completely trash that.</p>	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme. The Applicant notes that measures have been taken to mitigate effects through the design of the Scheme.</p> <p>These measures are reflected in Figure 5.8 Concept Masterplan and Figure 5.8 Green Infrastructure Parameter Plan in the oLEMP [APP/7.11].</p> <p>The Design Principles, Parameters and Commitments [APP/5.8] document outlines the approach to mitigation and principles by which the Scheme was designed.</p> <p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme.</p> <p>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.</p>
	Landscape and visual impact (general)	<p>The aesthetic of rolling countryside, rare in much of Norfolk is an environmental plus which your proposal destroys.</p>	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme. The Applicant notes that measures have been taken to mitigate effects through the design of the Scheme.</p> <p>These measures are reflected in Figure 5.1 Concept Masterplan [APP/6.3] and Green Infrastructure</p>



				Parameter Plan in the oLEMP [APP/7.11] .
	Landscape and visual impact (general)	If there was a prize for the worst possible site, with regard to spoiling beautiful rural historic landscape, you would win hands down!!	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme. The Applicant notes that measures have been taken to mitigate effects through the design of the Scheme.</p> <p>These measures are reflected in Figure 5.1 Concept Masterplan [APP/6.3] and Green Infrastructure Parameter Plan [in the oLEMP [APP/7.11].</p>
	Landscape and visual impact (general)	The project would have an overall adverse impact on the local environment and community and would reduce biodiversity through the clearance of what is a natural area. It would have an adverse impact on the character of the area which is of a traditional rural nature.	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme.</p> <p>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.</p>
	Landscape and visual impact (general)	How can the character and identity of a beautiful and entirely unspoilt rural area be enforced by the construction of Europe's largest solar farm, including massive substations?	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme. The Applicant notes that measures have been taken to mitigate effects through the design of the Scheme.</p> <p>These measures are reflected in Figure 5.2 Concept Masterplan [APP/6.3] and Green Infrastructure Parameter Plan in the oLEMP [APP/7.11].</p>
	Landscape and visual impact (general)	I regard this example of creeping industrial development as a tragedy in its proximity to South Acre Church and the nar valley.	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme, including in relation to the Nar Valley.</p> <p>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.</p> <p>There are judged to be no significant adverse visual effects upon visual receptors within Castle Acre in the long term – as assessed within Visual Receptor Group 5: Castle Acre.</p> <p>(see Figure 6.12 and Figure 6.13 Parameter Based Winter and Summer Photomontages and Figure 6.14 and Figure 6.15 Winter and Summer Photomontages Illustrative Scheme [APP/6.3])</p>



	Landscape and visual impact (general)	Solar farms will destroy the visual identity of the historic and agricultural landscape of Norfolk. They would change the identity from tranquil rural to industrial.	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme.</p> <p>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.</p>
	Landscape and visual impact (general)	These proposals are unsightly and unwelcome.	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme.</p> <p>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.</p>
	Landscape and visual impact (general)	Too large, too visible from neighbouring villages and access to Swaffham (A 1065)	No	<p>The Statement of Need [APP/5.4] and Planning Statement [APP/5.5], submitted as part 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.</p> <p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme on visual receptor groups and receptors, including local roads such as the A1065.</p>
	Landscape and visual impact (general)	The areas involved , especially towards westacre, narford, Southacre and Castle acre are inappropriate. They are historic areas with natural beauty to the landscape,	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme.</p> <p>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.</p>
	Landscape and visual impact (general)	<p>There is also a lack of graphics to show the visual impact and the extent to which this could be mitigated over time - e.g. after 1 year, 5 years, 10 years.</p> <p>The wide-angle nature of the graphics on show at the local events appears to be designed to minimise the visual impacts.</p>	Yes	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme and includes a series of visualisations, both in the form of photowires and photomontages, depicting the Scheme in summer after 1 and 15 years.</p> <p>(see Figure 6.12 and Figure 6.13 Parameter Based Winter and Summer Photomontages and Figure 6.14 and Figure 6.15 Winter and Summer Photomontages Illustrative Scheme [APP/6.3])</p>



	Landscape and visual impact (general)	WITH REFERENCE TO ABOVE COMMENTS ON LIGHT POLLUTION, SUBSTATIONS AND BATTERIES etc. NEED TO BE SHIELDED FROM VIEW/INSULATED FROM THE NATURAL ENVIRONMENT.	No	As referred to in ES Chapter 5: The Scheme [APP/6.1] , lighting is not required during the operational phase of the Scheme. Focused task-specific lighting would be required only in the event of emergency works / equipment failure, and motion-sensing security lighting would be provided within the Customer and National Grid Substations and the BESS compound.
	Landscape and visual impact (general)	Landscape and visual: the project would significantly degrade what is currently an area of natural beauty.	No	ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme. 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.
	Landscape and visual impact (general)	The proposed site forms part of the open rural setting that gives Castle Acre its distinctive historic character. Large-scale ground-mounted solar infrastructure is entirely out of keeping with this setting, breaching NPPF Paragraph 174, which recognises the intrinsic character and beauty of the countryside and the need to protect valued landscapes.	Yes	ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme based on a refined scheme that has relocated much of the proposed infrastructure to the south of Bartholomew's Hill Plantation. The Applicant also notes that the Policy Compliance Document [APP/5.6] sets out compliance with all relevant planning policies.
	Landscape and visual impact (general)	I cannot see any way that the proposals can be altered to retain more productive farmland and avoid the awful sight of acres and acres of solar panel arrays.	Yes	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 within the Scheme is justified, given the economic and other benefits of the land. ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme based on a refined scheme that has relocated much of the proposed infrastructure to the south of Bartholomew's Hill Plantation. Mitigation measures referred to in Green Infrastructure Parameter Plan in the oLEMP [APP/7.11] , seek to retain grassland under solar PV Arrays, with the option for grazing retained.
	Landscape and visual impact (general)	Landscape and visual: even with the proposed hedging the solar panels will be visible from historic places such as Castle Acre Priory. This would negatively impact the historic setting."	Yes	Figure 5.1 Concept Masterplan [APP/6.3] , Green Infrastructure Parameter Plan , and the oLEMP [APP/7.11] present the revised Scheme layout and proposed mitigation measures.



	Landscape and visual impact (general)	The proposed installation would be seen from the Castle Acre Priory. On maps it is easy to show hedgerows but it does not show elevations and what can be seen from higher lying ground.	Yes	The Scheme is illustrated from specific viewpoints in Figures 6.12 and 6.13 Parameter-Based Winter and Summer Photowires and Figures 6.14 and 6.15 Winter and Summer Photomontages Illustrative Scheme [APP/6.3] .
	Landscape and visual impact (general)	The view from priory road is iconic and the consultation meeting made it clear that it would be affected.	Yes	The Applicant notes that the Scheme has been refined, with much of the infrastructure proposed relocated to the south of Bartholomew's Hill Plantation. The refined Scheme and proposed mitigation measures are reflected in Figure 5.1 Concept Masterplan [APP/6.3] and Green Infrastructure Parameter Plan and are detailed further in the oLEMP [APP/7.11] .
	Landscape and visual impact (general)	Everyone loves a beautiful visual landscape. It's only human to...	No	ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme. 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.
	Landscape and visual impact (general)	We've selected landscape and visual, glint and glare, and cultural heritage as the most important environmental considerations for South Acre.	No	ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme. 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.
	Landscape and visual impact (general)	We also note the potential impact of glint and glare, especially in relation to panoramic views from Castle Acre and nearby footpaths. We ask for commitment to appropriate screening and panel orientation that avoids reflective disturbance in sensitive visual corridors.	Yes	The Applicant notes that the Scheme has been refined, with much of the infrastructure proposed relocated to the south of Bartholomew's Hill Plantation. The refined Scheme and proposed mitigation measures are reflected in Figure 5.1 Concept Masterplan [APP/6.3] and Green Infrastructure Parameter Plan and are detailed further in the oLEMP [APP/7.11] .
	Landscape and visual impact (general)	It will be important that final scheme details are made available to local communities. In particular in relation to the following: - Detailed final landscape layout & specifications	No	The Scheme design has been developed within a framework provided by the design principles and scheme parameters and has adopted the principles of a "Rochdale Envelope" giving the Applicant a degree of flexibility and optionality in the design as described in ES Chapter 5 The Scheme [APP/6.1] . Information on the final landscape layout, specifications, information on solar



		- Detailed solar panel & fencing layouts		panels and fencing will be approved by the relevant planning authority in accordance with the relevant requirements in the draft DCO [APP/3.1] post consent.
	Landscape and visual impact (general)	Visual and National Security Concerns The proposed site would be visible from the air for about 5 miles in a straight line. Concern about the visual impact from a national security point of view. Notes proximity to RAF Marham, home of the stealth bombers" fears the project could act as a geographic marker for adversaries.	No	<p>The Applicant notes these comments but disagrees. Whilst the proposed site will be visible from the air, this is not considered to be a significant visual impact. A Glint and Glare Assessment has been conducted which considers aviation activity in the area, including at RAF Marham.</p> <p>The Applicant has consulted with the MOD regarding RAF Marham and the MOD have not raised any concerns regarding the site acting as a visual reference point for potential adversaries.</p>
	Landscape and visual impact (general)	What will the site look like from nearby gardens or upper-floor windows? Will you provide photomontages or 3D visuals?	No	<p>Visualisations are provided to support the LVIA. These are included both as photowires and as illustrative photomontages.</p> <p>Refer to Figure 6.12 and Figure 6.13 Parameter-Based Winter and Summer Photomontages and Figure 6.14 and Figure 6.15 Winter and Summer Photomontages Illustrative Scheme [APP/6.3]</p>
	Landscape and visual impact (general)	Will any visual or acoustic impact assessments be published for public review?	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme.</p> <p>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.</p>
	Landscape and visual impact (general)	There is no independent assessment of the overall landscape value of the site. You have only identified (scoped) elements in the landscape that your proposals affect and have to be mitigated.	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme, giving consideration to the relative value of each relevant landscape character area within the study area in accordance with good practice guidance.</p> <p>It should be noted that the study area does not include national valued landscapes (National Parks, the Broads or National Landscapes).</p>
	Landscape and visual impact (general)	NPPF Paragraph 193 adds that planning permission should be refused for development resulting in significant harm to a landscape which cannot be adequately mitigated.	No	<p>The Applicant notes that the Scheme has been refined, with much of the infrastructure proposed relocated to the south of Bartholomew's Hill Plantation.</p> <p>The refined Scheme and proposed mitigation measures are reflected in Figure 5.1 Concept Masterplan [APP/6.3] and Green Infrastructure Parameter Plan</p>



				<p>and are detailed further in the oLEMP [APP/7.11].</p> <p>The Applicant also notes that the Policy Compliance Document [APP/5.6] sets out compliance with all relevant planning policies.</p>
	Landscape and visual impact (general)	<p>This development would result in substantial visual harm. Views from nearby villages and public footpaths will be affected, potentially reducing the visual quality of the countryside. No robust Landscape and Visual Impact Assessment (LVIA) appears to accompany the proposal, and any claimed mitigation through screening or planting is unlikely to reduce the visual harm during the 60-year operational period.</p>	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme, giving consideration to the relative value of each relevant landscape character area within the study area in accordance with good practice guidance.</p>
	Landscape and visual impact (general)	<p>This proposal would introduce industrial-scale infrastructure into a rural, visually sensitive setting, resulting in significant and irreversible landscape harm. This is not consistent with the aim to protecting valued landscapes under the NPPF and other planning guidance.</p>	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme, giving consideration to the relative value of each relevant landscape character area within the study area in accordance with good practice guidance.</p> <p>It should be noted that the study area does not include national valued landscapes (National Parks, the Broads or National Landscapes).</p> <p>The Applicant also notes that the Policy Compliance Document [APP/5.6] sets out compliance with all relevant planning policies.</p>
	Landscape and visual impact (general)	<p>Policy GEN 02 – Promoting High Quality and Sustainable Design This policy requires development to contribute to the distinctive character and amenity of the area. The proposed industrial-scale development would significantly alter the rural landscape and is incompatible with the local character of the Breckland countryside. The visual intrusion would be especially acute from local rights of way and nearby properties.</p>	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme.</p> <p>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.</p> <p>Figure 5.8 Green Infrastructure Parameter Plan [APP/5.8] and supporting OLEMP [APP/7.11] outline measures have been taken to reflect and enhance local landscape character.</p>
	Landscape and visual impact (general)	<p>Policy ENV 05 – Protection and Enhancement of the Landscape ENV 05 requires that proposals ‘have particular regard to maintaining the aesthetic and biodiversity qualities of natural and man-made features within the landscape.’ The site of The Drovers Solar Farm forms part of an open, undeveloped rural setting that contributes to the area's landscape value. No sufficient landscape impact assessment has been</p>	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme, taking into account the scale and sensitivity of the development.</p> <p>While the Applicant acknowledges there would be moderate significant adverse effects upon landscape character in the long term, this would be within the Site</p>



		presented to justify the scale and sensitivity of this development.		only. It is judged that there are no significant adverse landscape effects outside the Site in the long term.
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12 Land use and agriculture

Topic	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Land use and agriculture	Agricultural land use	Norfolk is primarily an agricultural county, producing food for the nation. The proposed solar farms across the County will mean loss of productive arable farmland; adversely effect the rural landscape and its value to the tourism economy; destroy the tranquillity of the countryside; negatively impact of the setting of the heritage assets and potential archaeological sites (also important for tourism); disrupt access routes and pathways and destroy existing habitats for wildlife.	No	<p>Appendix 1: Site Evaluation Report to the Planning Statement [APP/5.5] presents the reasoning for why the Scheme and Order limits are located in the Site's particular location.</p> <p>As outlined in ES Chapter 4: Alternative and Design Evolution [APP/6.2], Norfolk is a suitable location within the UK for constructing a solar farm, as the area benefits from higher levels of photovoltaic power and irradiance compared to other parts of the UK. Flat or gently south-facing slopes are most suitable and beneficial for solar. Topography, which is generally flat or gently undulating, is most suitable for solar energy from both a constructability and operational perspective, ensuring that the Site can produce a large amount of electricity. This factor has influenced the focus on the Norfolk area as the preferred location of the Scheme. The general topography surrounding the Site is flat or has limited gradients, making it particularly suitable for solar energy. In addition, Norfolk benefits from large areas of land characterised by a generally sparse settlement pattern. Such characteristics provide the opportunity for utility-scale solar development, which can contribute to delivering net zero.</p> <p>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.</p> <p>The Applicant 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. 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.</p> <p>The Applicant also notes that ALC surveys set out in ES Chapter 11: Soils and Agriculture [APP/6.2] have confirmed that 51.7% of the Order limits comprise BMV land. Although the Scheme does include BMV land, the</p>



				<p>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.</p> <p>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].</p>
	Agricultural land use	I support solar energy completely but taking 3,000 acres of productive land out of the food supply chain is more than ridiculous.	No	<p>The Applicant 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. 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.</p> <p>The Applicant also notes that ALC surveys set out in ES Chapter 11: Soils and Agriculture [APP/6.2] have confirmed that 51.7% of the Order limits comprise BMV land. The Applicant further confirms that ALC was an important factor for the Applicant when evaluating the proposed Site.</p> <p>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.</p> <p>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].</p> <p>The Statement of Need [APP/5.4] and Planning Statement [APP/5.5], submitted in support of the DCO Application, set out further justification for the Scheme and its proposed scale within the context of the clear and urgent national need for low-carbon energy generation.</p>



	Agricultural land use	This proposal will deny extremely valuable farm land from producing food for 60 years!	No	<p>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.</p> <p>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.</p> <p>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.</p> <p>ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] also provides a summary of the reasonable alternative options the Applicant has considered for the Scheme, including the initial selection of the Site and throughout the design development. Further appraisal of the use of BMV land, and why this is justified, is set out in the Planning Statement [APP/5.5].</p> <p>With taking the site out of any intensive farming practices for 60 years, the Applicant anticipates the biodiversity across the site and soil health is likely to improve therefore securing a more meaningful contribution to food production once the scheme is decommissioned.</p>
	Agricultural land use	It is planned on good agricultural land, which goes against the aims of green energy planning.	No	<p>The Applicant notes this comments but confirms only 51.7% of the site is BMV land, as set out in set out in ES Chapter 11: Soils and Agriculture [APP/6.2].</p> <p>The Applicant also notes that the Policy Compliance Document [APP/5.5] submitted as part of the DCO Application sets out the Scheme's compliance with relevant national and local planning policy, including the</p>



				justification for the use of BMV land in the context of the urgent national need for renewable energy generation.
	Agricultural land use	Too big and should not be using agricultural land.	No	<p>The Applicant notes this comment, but recognises that amount of new generation capacity required in the UK to meet its net zero targets and consumer demand is significant. Thus, the size of the Scheme reflects the urgent national need for renewable energy generation and storage.</p> <p>The Assessments set out in ES Chapter 11: Soils and Agriculture [APP/6.2] confirm 51.7% of the Order Limits is BMV land, which we believe can be justified given the wider benefits of the scheme and the sequential approach to site selection.</p>
	Agricultural land use	My concern would be that a) we would be losing prime farmland that would never return to producing food, thus reducing our capability to feed ourselves	No	<p>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 within the Scheme is justified, given the economic and other benefits of the land.</p> <p>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. 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 use.</p>
	Agricultural land use	Much needed farming space being occupied. Animals natural habitats ruined in process etc the list goes on.	No	<p>The Applicant notes that the Scheme seeks to protect the existing sensitive ecological receptors at the site through careful design and provision of a number of mitigation measures. In addition, the Scheme delivers a BNG well in excess of 10%, and provides a number of faunal enhancement measures, together resulting in a betterment</p>



				for biodiversity, as set out in Biodiversity Net Gain Assessment Report [APP/7.4] .
	Agricultural land use	<p>In a country with a large population and limited land available for all demands, there are many competing requirements. We cannot hope to be self sufficient in food but we live in a volatile world which is likely to become more difficult as climate change impacts increase, with rising migration from seriously impacted areas, so need to retain as much productive land as possible. I am quoting here from our MP speaking in parliament ""There is three times more grade 5 agricultural land in the UK than grade 1 land, with grade 5 being the lowest quality land, as mentioned earlier, and grade 1 being the best, yet solar installations occupy 20 times more grade 1 land than grade 5 land."" To protect our food productivity there should be more strict planning rules applied to only use less productive land. I realise the choices of land are made according to planning policy using the ALC but this is outdated and does not reflect the productivity of land in the Brecks which with irrigation is very productive although it is sandy and low grade (3-5) on the ALC classification. Vegetables produced are those which will be affected adversely in the Mediterranean countries as they become more dry and hot and less able to grow crops so installing panels in the medium term is not a sensible option.</p>	No	<p>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.</p> <p>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.</p> <p>Although the Scheme includes land with potential arable value, the Applicant has sought to minimise the amount of BMV land by adopting a sequential approach to site selection and can justify its inclusion given the significant wider benefits 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.</p> <p>ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] also provides a summary of the reasonable alternative options the Applicant has considered for the Scheme, including the initial selection of the Site and throughout the design development. Further appraisal of the use of BMV land and the justification for it is set out in the Planning Statement [APP/5.5].</p>
	Agricultural land use	<p>My concern involves the local South Acre countryside itself, being mortally scarred and taking farmland, or rewilded, or otherwise, habitat out of production.</p>	No	<p>Mitigation measures are reflected in Green infrastructure Parameter Plan detailed in the oLEMP [APP/7.11]. These measures have been included within the Scheme to ensure any visual impacts of the proposals are minimised. The proposed grassland habitat alongside other wildlife improvements are also reflected on Green Infrastructure Parameter Plan and described further in the oLEMP [APP/7.11].</p>
	Agricultural land use	<p>I believe solar panels should be placed on buildings not fertile farmland. It will displace fertile farmland vital to local and national food production, as well as threatening associated livelihoods and Norfolk's agricultural heritage and farming skills.</p>	No	<p>The Applicant is supportive of rooftop solar installations as part of the nation's generation mix. However, a mix of technologies will be required to meet our Net Zero targets and large-scale solar plays an important role in enabling renewable energy to be delivered at speed and at the required scale.</p>



				<p>The Statement of Need [APP/5.4] further sets out the national new renewable energy infrastructure required to help achieve the UK Government's net-zero and energy security objectives. The Scheme will make a meaningful contribution to this transition while supporting local employment and supply chain opportunities during construction and operation.</p> <p>The overall loss of employment arising from the conversion of agricultural land is expected to be negligible, as set out in ES Chapter 14: Socio-Economics [APP/6.2]. 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.</p> <p>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).</p>
	Agricultural land use	Concerned at loss of good agricultural land, and the size of the proposed solar scheme upon biodiversity and an area I consider to be of outstanding natural beauty.	No	<p>Although the Scheme includes BMV land, the Applicant has sought to minimise its use by adopting a sequential approach to site selection and can justify its inclusion given the significant wider benefits the Scheme will bring.</p> <p>The Applicant notes that mandatory Biodiversity Net Gain remains to be implemented (currently anticipated for May 2026), although the Scheme will deliver over 10% BNG as calculated under the Statutory BNG metric. The Biodiversity Net Gain Assessment Report [APP/7.4] has been submitted with the DCO Application.</p>
	Agricultural land use	the proposed development would cover yet more of the Norfolk countryside. Not only are these solar farms an eye sore but they take valuable farmland away from food production.	No	<p>Solar irradiation in North Norfolk is above the UK average, and given that the opportunities to bring large-scale solar schemes located in this area to grid are limited, it is clear that the development of this Scheme, which makes use of existing and available capacity on the NETS is needed to deliver to the urgent need for significant new renewable generation capacities to connect in the next decade to support the drive towards net zero.</p> <p>Using this available and currently underutilised generation connection and the capacity within the transmission lines to which it connects is critical to support the urgent deployment of low-carbon generation assets required to decarbonise the UK's electricity system.</p> <p>Although the Scheme includes land with potential arable value, the Applicant has sought to minimise the amount of BMV land by adopting a sequential approach to site</p>



				selection and can justify its inclusion given the significant wider benefits 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.
	Agricultural land use	I am concerned that any solar farm development makes full use of the land it occupies hence the concern for development on Norfolk's agricultural land. The consultation materials are provided too late.	No	<p>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.</p> <p>Although the Scheme includes land with potential arable value, the Applicant has sought to minimise the amount of BMV land by adopting a sequential approach to site selection and can justify its inclusion given the significant wider benefits the Scheme will bring.</p> <p>The Applicant acknowledges the comment around the timing of materials, but remains confident that the information issued for the consultation provided adequate time for community involvement.</p>
	Agricultural land use	Please do not refer to these power installations as 'farms'. They are industrial business developments. This one would be in what has been unspoilt countryside. See section 6.	No	The Applicant acknowledges this comment but disagrees with the principle. Overall, there will be a biodiversity net gain across this site with mitigation measures as outlined in Green Infrastructure Parameter Plan and detailed in the oLEMP [APP/7.11] . These measures have been included in the Scheme to minimise any visual impacts of the proposals.
	Agricultural land use	CONCERNS: LOSS OF AGRICULTURAL LAND	No	The Applicant notes this comment, but 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.
	Agricultural land use	Solar farms and their associated infrastructure must not be sited directly on areas of existing high value	No	The site in question is of significant value to the pursuit of energy generation, which is much needed in the country. The amount of new generation capacity required in the UK to meet its net zero targets and consumer demand is significant.
	Agricultural land use	We cannot lose any more countryside.	No	<p>The Applicant notes this but reiterates that whilst 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).</p> <p>When the operation and maintenance phase of the Scheme ends, the Solar PV Site would be</p>



				decommissioned and the land returned to the landowner, except for the National Grid Substation, which would remain. After the decommissioning phase, the landowners would decide how the land would be used and managed.
	Agricultural land use	Our second concern is the shrinking amount of land available for agriculture. Should we not be more self-sufficient? Particularly with what is going on in the world. Food is a basic requirement. Electricity is not.	No	The Applicant notes this comment, but also points to energy security as being another priority of this government. The balance of the two issues needs to be appropriately weighed, and we believe that, in the context of this site representing less than 0.01% of the UAA, it will not have a significant impact on national food production and security.
	Agricultural land use	. You cannot replace the farming that would have taken place in the area and the way of life that currently happens.	No	The Applicant is not seeking to replace farming across this site. Whilst 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).
	Agricultural land use	7. It will never be Farmland again.	No	<p>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.</p> <p>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.</p> <p>After the decommissioning phase, the landowners would choose how the land is to be used and managed</p>
	Agricultural land use	We want the old green spaces. All of them.	No	<p>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.</p> <p>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</p>



				<p>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.</p> <p>After the decommissioning phase, the landowners would choose how the land is to be used and managed.</p> <p>The Applicant also notes that the design of the Scheme has sought to retain, buffer and enhance the existing on-site green infrastructure where practicable. The minimum buffers to existing onsite features are set out within the Design Principles, Parameters and Commitments document [APP/5.8]. 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]</p>
	Agricultural land use	<p>I appreciate that solar farms can generate a lot of electricity, but why are they being concentrated in the East of England, the area that produces far more arable crops than anywhere else in the country. We are told that we are a pre-war generation; should we find ourselves at war in the future, we would find it incredibly difficult to import food; so we need to become as near to being self-sufficient as possible. Covering up acres and acres of arable land with solar panels is contrary to this. And even if one day we become carbon neutral in this country, it will only make the very tiniest difference to the quantity of carbon produced in the world.</p>	No	<p>Figure 6-2 of the Statement of Need [APP/5.4] illustrates UK solar irradiance and in particular that irradiance is higher in the east and the south of the country than in other areas.</p>
	Agricultural land use	<p>It is the industrialisation of a rural landscape, the ruination of productive arable land. (I will not call this development a 'farm'. I wish you would stop doing so-it is misleading).</p>	No	<p>The Applicant acknowledges this comment but disagrees with the principle. Overall, there will be a biodiversity net gain across this site with mitigation measures as outlined in Green infrastructure Parameter Plan and detailed in the oLEMP [APP/7.11]. These measures have been included within the Scheme to ensure any visual impacts of the proposals are minimised.</p> <p>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 and can justify its inclusion given the significant wider benefits that the Scheme will bring.</p>
	Agricultural land use	Agricultural Land and Food Security:	No	<p>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]</p>



		In my view it is remiss that protection of the agricultural economy and food security is not a design principle. I have a particular concern about the disproportionate impact of large solar farms such as this on Best & Most Valuable (BMV) agricultural land in the constituency. As you will be aware, the East of England's agricultural output totalled £4.4 billion in 2024, with poultry worth £836 million, wheat £725 million and fresh vegetables £458 million. There is mention, under the design principle on Environmentally led design, that "Fields comprising entirely Grade 1 or a combination of Grade 1 & 2 ALC land will not be considered for solar PV panels or associated development." Whilst this is welcome, the Best and Most Versatile (BMV) Agricultural Land also includes Grade 3a and it is of concern that about 60% of the development site is BMV. Government policy is to protect BMV agricultural land from significant, inappropriate or unsustainable development proposals.		<p>have confirmed that approximately 54% of the Order limits comprises of BMV land. On that basis, the Scheme demonstrates compliance with NPS EN-1, NPS EN-3 and local policy.</p> <p>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.</p> <p>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.</p> <p>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].</p>
	Agricultural land use	Loss of prime agricultural land. At a time when we need (and the Government have made clear they want to see) increased local food production and food security, solar panels should not be built on our best agricultural land. Energy security should not come at the expense of food security. We do however welcome the decision to exclude field 32, which comprised entirely of Grade 1 and Grade 2 ALC land, a decision that should be mirrored across all solar proposals.	No	The Applicant acknowledges the support for exclusion of Grade 1 and Grade 2 ALC land. 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 and can justify its inclusion given the significant wider benefits that the Scheme will bring. We also believe that given the context of this site representing less than 0.01% of the UAA, it will not have a significant impact on national food production and security and as such solar PV is appropriate here.
	Agricultural land use	With agriculture I feel it's very important as a country we are self sufficient as possible.	No	The Applicant agrees and the pursuit of renewable energy generation is another step towards ensuring self-sufficiency.
	Agricultural land use	I write on behalf of CPRE Norfolk to voice serious concerns about the proposed development of The Drovers Solar Farm. Located in Norfolk on land north of Swaffham and south of Castle Acre, West Norfolk. The proposal is for a new solar farm on 1,130 hectares of mainly arable agricultural land, with photovoltaic panels spanning across the operational area (825 ha), as well as associated infrastructure, including a substation, Battery Energy Storage System (BESS), fencing, and biodiversity and landscape mitigation.	No	The Applicant notes the concern raised but 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.
	Agricultural land use	1. Inappropriate Use of Agricultural Land The proposed solar farm is located on greenfield	No	A Planning Statement [APP/5.5] and Policy Compliance Document [APP/5.6] , provide detailed evidence of



		<p>agricultural land. National planning guidance makes clear that the use of Best and Most Versatile (BMV) agricultural land should be avoided for large-scale solar development.</p> <p>NPPF Paragraph 187 states that planning decisions should contribute to and enhance the natural and local environment by protecting <i>‘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.’</i></p> <p>In addition NPPF paragraph 125b states that <i>‘planning policies and decisions should recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production’.</i></p>		<p>compliance with relevant national and local policy documents, including the NPPF.</p> <p>The Applicant also notes that the Policy Compliance Document [APP/5.6] confirms that the use of BMV land as part of the Scheme is justified, considering the economic and other benefits of the land. It also sets out compliance with the NPPF.</p>
	Agricultural land use	<p>CPRE Norfolk is concerned that through providing solar energy this land is then largely lost to food production.</p> <p>The proposal would lead to the loss of good quality agricultural land. Natural England identifies the sites as grade 3 and 4 agricultural land, presently used for growing arable commodity crops. Where solar farms are granted permission CPRE Norfolk would expect these to be sited on poorer quality land. Where proposals affect agricultural land, they should be refused where the land is graded at 1, 2 or 3a, in line with footnote 65 of the NPPF (Dec 2024) which states: <i>‘where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.’</i></p> <p>The NPPF defines the best and most versatile land (BMV) as land in grades 1, 2 and 3a of the Agricultural Land Classification.</p>	No	<p>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.</p> <p>Although the Scheme includes land with potential arable value, the Applicant has sought to minimise the amount of BMV land by adopting a sequential approach to site selection and can justify its inclusion given the significant wider benefits 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.</p> <p>The Applicant also notes that it has engaged with Natural England throughout the pre-application process, the details of which are provided in this Consultation Report [APP/5.1]. Natural England response to consultation and the Applicant’s consideration is provided in Consultation Report Appendix G: Section 42 – Responses Received and Applicants Responses [APP/5.2]</p>
	Agricultural land use	<p>Government guidance in its ‘Guide to assessing development proposals on agricultural land’ (updated 5 February 2021) is clear about the need to protect agricultural land and soil. These policies aim to protect <i>‘the best and most versatile (BMV) agricultural land from significant, inappropriate or unsustainable development proposals.’</i> It goes on to state that ‘your decision should avoid unnecessary loss of BMV land.’ As the majority of the development is of BMV land, this</p> <p>development is well beyond the 20ha threshold for ‘smaller losses’ of BMV land, and is unnecessary as there are other sites of lower grade agricultural, or non-agricultural land available, if not in the immediate</p>	No	<p>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.</p> <p>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 and can justify its inclusion given the significant wider benefits that the Scheme will bring.</p> <p>ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] also provides a summary of the reasonable alternative options that the Applicant has</p>



		vicinity, certainly in the wider area, not to mention the many available roof spaces on current or planned residential and commercial buildings. The introduction of grazing sheep would not be an adequate or appropriate use of BMV land given the need to maximise food production.		considered for the Scheme, including the initial selection of the Site and throughout the development of the design.
	Agricultural land use	Planning Practice Guidance (PPG) on renewable energy (Paragraph 013 Reference ID: 5-013-20150327) further reinforces that local planning authorities should seek to focus solar farm developments on <i>‘previously developed and non-agricultural land,’</i> and that <i>‘where a proposal involves greenfield land, it should be shown that the use of any such land is necessary and that poorer quality land has been used in preference to higher quality land.’</i>	No	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
	Agricultural land use	The scheme provides no credible evidence that the use of this agricultural land is essential, or that alternative brownfield or lower-grade land has been considered. If the land is found to be Grade 2 and 3a or better, it qualifies as BMV, and its permanent loss would be contrary to national guidance.	No	<p>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 and can justify its inclusion given the significant wider benefits that the Scheme will bring. When the operation and maintenance phase of the Scheme ends, the Solar PV Site would be decommissioned and the land returned to the landowner. After the decommissioning phase, the landowners would choose how the land is to be used and managed, but this does not mean a permanent loss of farmland.</p> <p>Section 11.8 of ES Chapter 11: Soil and Agriculture [APP/6.2] sets out that by following the measures within the oSMP [APP/7.13], soils will not be permanently affected.</p> <p>The Scheme is temporary and reversible in nature and therefore will not affect the long-term agricultural resource. Upon decommissioning, all land, including the BESS Area and Customer Substation but excluding the National Grid Substation and grid connection infrastructure, will be returned to its previous use and condition as far as is practicable. The decommissioning measures outlined in the oDS are secured by Requirement 20 in Schedule 2 of the draft DCO [APP/3.1].</p>
	Agricultural land use	<p>8. Loss of Best and Most Versatile Agricultural Land</p> <p>The proposed site may comprise Grade 3 quality land, classifying it as Best and Most Versatile (BMV). Policy guidance at both national and local levels advocates against the irreversible loss of BMV land unless there is no alternative. The Breckland Local Plan (ENV 01) emphasises the need to maintain and protect soil quality.</p>	No	<p>he 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.</p> <p>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 and</p>



				can justify its inclusion given the significant wider benefits that the Scheme will bring.
	Agricultural land use	Additionally, the land earmarked for the solar farm is not "low yield" as suggested. It is actively used for food production (wheat, maize, barley, etc.) and supports livestock grazing. This land is essential for local food security, and its loss would have long-term consequences.	No	<p>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.</p> <p>Furthermore, solar farms provide diversification for landowners/farmers, by adding an index-linked, consistent income stream to their business that is not dependent on agriculture. It provides longer-term security against volatility in wholesale food commodity markets and yields, offering support to their wider farming business/operations.</p>
	Agricultural land use	Agriculture - Obviously whatever you do there won't be any farming in these areas	No	Whilst 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).
	Agricultural land use (solar PV development and associated infrastructure areas)	Norfolk has prime agricultural land, which should continue to be used for food and farming. Solar panels should only be put on land which is so poor quality it cannot be farmed.	No	<p>Section 6.4 of the Statement of Need [APP/5.4] explains that available land, available grid infrastructure and sufficient solar irradiance are essential inputs to site selection for large-scale solar schemes, and these considerations have been taken into account in the development of the proposals for the Scheme.</p> <p>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 and can justify its inclusion given the significant wider benefits that the Scheme will bring.</p>
	Agricultural land use (solar PV development and associated infrastructure areas)	It seems insane to use Solar panels on farm land that should be used for farming, especially in the current geo political environment, when there are so many other ways they can be used to generate electricity that do not impact the physical environment and nature.	No	<p>The Statement of Need [APP/5.4] explains that government's analysis concludes that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar.</p> <p>The Statement of Need [APP/5.4] concludes from analysis that the energy per acre produced from large-scale ground-mounted solar schemes is likely to be greater than that from crop-to-biogas applications, and of a similar order of magnitude to onshore wind, while its environmental effects may be felt over a significantly smaller geography.</p>
	Agricultural land use (solar PV development and associated infrastructure areas)	I repeat this solar installation should not use agricultural land.	No	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 and



				can justify its inclusion given the significant wider benefits that the Scheme will bring.
	Agricultural land use (solar PV development and associated infrastructure areas)	Your plan to cover agricultural land with solar panels is wrong from the outset. It follows that the designs are in the wrong place. This is a flawed project from word go.	No	The Statement of Need [APP/5.4] explains that available land, available grid infrastructure and sufficient solar irradiance are essential inputs to site selection for large-scale solar schemes, and these considerations have been taken into account in the development of the proposals for the Scheme.
	Agricultural land use (solar PV development and associated infrastructure areas)	Since I completely disagree with covering arable farm land with solar panels, there is no point in commenting on your design principles.	No	The Applicant notes this comment.
	Agricultural land use (solar PV development and associated infrastructure areas)	Agricultural land and soils - the loss of productive agricultural land - even of ALC classification 3b, 4 or 5 is concerning given the reliance that the UK has on imported food. The applicant is requested to fully investigate the possibilities for agrivoltaics as used elsewhere in the world and regenerative agriculture co located panels. This should include chickens, pigs and sheep husbandry. East Anglia is a very important area for agricultural production and the impact on national food production should be documented and considered as part of the assessment of the costs and benefits of the proposals in the wider sense. This aspect needs to be carefully considered also in terms of community acceptance.	No	The Applicant notes the comments but also points to energy security as being another priority of this government. The balance of the two issues needs to be appropriately weighed and we believe in the context of this site representing less than 0.01% of the UAA, it will not have a significant impact on national food production and security. The Applicant does, however, note that it is not currently considering agrivoltaics.
	Agricultural land use (solar PV development and associated infrastructure areas)	I think the best way to improve community benefits would be to put solar panels on every house in Swaffham, Castle Acre and West Acre. In that way we could still have low cost and efficient energy but also keep our green fields for the potential to grow our own food, enjoy the countryside and a way of life. Why can't this be considered before carving up virgin sites?	No	The Applicant agrees that domestic solar should also be pursued, but domestic solar is not able to meet the national urgent need for new generation on its own. Therefore, rooftop solar should come forwards as well as, rather than instead of, large-scale ground mounted schemes such as this scheme.
	Food security	We need the farmland to produce sustainable food production. Tourism is also important and these sites will impact on that.	No	The Scheme equates to less than 0.01% of the UAA of the UK in 2024 and as such is not expected to have a significant impact on national food production and security. ES Chapter 14: Socio-Economics [APP/6.2] assesses the impact of the Scheme on local tourism and businesses. It 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.



	Food security	When war next comes to the UK we will need every scrap of land to feed ourselves.	No	The Applicants notes this comment but also expects energy generation to have a similar priority in future planning for the nation.
	Food security	We need agriculture land to feed our population. A solar farm on agriculture land means more food would have to be imported which isn't a good move.	No	The Scheme equates to less than 0.01% of the UAA of the UK in 2024 and as such is not expected to have a significant impact on national food production and security.
	Food security	I accept the need for increasing use of solar power, but I cannot see the logic of using prime Norfolk farmland which would be better utilised for food production. The need for self sufficiency in food is as important as the need for greener energy.	No	<p>The acceptance of need for increasing use of solar power is noted by the Applicant. Solar irradiation in North Norfolk is above the UK average, and given that the opportunities to bring large-scale solar schemes located in this area to grid are limited, it is clear that the development of this Scheme, which makes use of existing and available capacity on the NETS is needed to deliver to the urgent need for significant new renewable generation capacities to connect in the next decade to support the drive towards net zero.</p> <p>Using this available and currently underutilised generation connection and the capacity within the transmission lines to which it connects is critical to support the urgent deployment of low-carbon generation assets required to decarbonise the UK's electricity system.</p> <p>Although the Scheme includes BMV land, the Applicant has sought to minimise its use by adopting a sequential approach to site selection and can justify its inclusion given the significant wider benefits the Scheme will bring.</p>
	Food security	This particular area of farmland is beautifully scenic and unspoilt. There are hedgerows and quiet lanes connecting these villages. My concern would be that a) we would be losing prime farmland that would never return to producing food, thus reducing our capability to feed ourselves	No	Ultimately, the Solar PV Site would also be decommissioned once operations cease and the land returned to its original use and condition as far as practicable and returned to the landowner therefore any long term use of this site for food generation will not be lost.
	Food security	Having looked into the matter extensively I have come to the conclusion that this is nothing more than corporate money making at the expense of our food production, countryside/native wildlife and our own wellbeing.	No	The Scheme equates to less than 0.01% of the UAA of the UK in 2024 and as such is not expected to have a significant impact on national food production and security. The Scheme will also realise a biodiversity net gain across this site with mitigation measures as outlined in Green infrastructure Parameter Plan and detailed in the oLEMP [APP/7.11] . These measures have been included within the Scheme to ensure any visual impacts of the proposals are minimised and the countryside is not impacted upon.
	Food security	Covering useful agricultural land with solar panels is simply the WRONG thing to do. Land which is being and could be used to grow food is vital to our national food security. We already import around 60% of our food in the UK. Taking land out of agriculture for solar	No	These comments are noted by the Applicant but the UK Government Food Security Report, published in December 2021, also implies that solar farms do not in any way present a risk to the UK's food security.



		farms, when there are better alternatives, is a terrible waste of one of our most precious natural resources.		
	Food security	I accept we need energy security, but we also need food security.	No	The Applicant agrees and believes this site will not have any adverse impacts on the food security of the nation.
	Food security	Loss of quality agricultural land for the production of food and subsequent impact upon national food security;	No	The UK Government Food Security Report, published in December 2021, also implies that solar farms do not in any way present a risk to the UK's food security.
	Food security	I don't think the government should cover huge swathes of farm land in solar panels, when with the state of world affairs food security could become a problem.	No	The Applicant notes these comments but suggests the balance between food security and energy security needs to be appropriately weighed.
	Food security	We need our best land to be productive. 60% of our food is imported is this environmentally sustainable? The amount of arable land in the UK is in decline. Land is being taken out of cultivation at a rate of almost 100,000 acres per annum. At the same time yields are declining as is land quality due to the effect of global warming. So, production potential is already diminished and we cannot afford to lose further parcels of arable land to development that has no need to be there.	No	The UK Government Food Security Report, published in December 2021, also implies that solar farms do not in any way present a risk to the UK's food security. The report is explicit and states: " <i>The biggest medium to long-term risk to the UK's domestic production comes from climate change and other environmental pressures like soil degradation, water quality and biodiversity.</i> " With that in mind it should also be noted that this site represents less than 0.01% of the UAA and is not expected to have a significant impact on national food production and security.
	Food security	Agriculture should be prioritised for food security purposes	No	The Applicant notes this comment and whilst higher grade agricultural land should be prioritised for food security, only 51.7% of this site comprises BMV. This, alongside the urgent need to meet the UK's energy generation requirements and the wider benefits of the scheme, we believe the use of the site for PV solar to be appropriate.
	Food security	Your plan clearly removes agricultural land from production in a time of parlous food security.	No	The Applicant notes these comments and whilst the Scheme does include BMV land, the wider benefits justify the approach taken to the site and we recognise that the use of the site for energy generation will not result in any significant impact on national food security.
	Food security	<p>Loss of Essential Farmland</p> <p>The land earmarked for the solar farm is currently productive farmland. Removing over 2,000 acres from agricultural use poses a significant risk to our local and national food security, especially given the growing need to strengthen domestic food supply chains. These supply chains have been severely challenged over recent years with the war in the Ukraine and with world peace looking more and more uncertain, the need to provide our own food for our own UK population will become more important.</p>	No	The Applicant notes these comments. The UK Government Food Security Report, published in December 2021, also implies that solar farms do not in any way present a risk to the UK's food security. The report is explicit and states: " <i>The biggest medium to long-term risk to the UK's domestic production comes from climate change and other environmental pressures like soil degradation, water quality and biodiversity.</i> " Furthermore, solar farms provide diversification for landowners/farmers, by adding an index-linked, consistent income stream to their business that is not dependent on agriculture. It provides longer-term security against volatility in wholesale food commodity



				markets and yields, offering support to their wider farming business/ operations.
	Food security	My understanding of government policy was that, in addition to energy security, the desire was for greater food security in an increasingly uncertain world. Yet TDSF will clearly remove agricultural land from production. In its place will be an eyesore of 4m high solar panels covering the landscape for 825 hectares.	No	<p>The Applicant notes these comments. It is correct to say that there is a need for greater food security alongside energy security. It should be noted that the land used for the Scheme represents less than 0.01% of the UK's UAA in 2024 and, as such, is not expected to have a significant impact on national food production and security.</p> <p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme, and mitigation measures have been taken, reflected in Green infrastructure Parameter Plan, and detailed in the oLEMP [APP/7.11] to provide screening during the operational lifetime of the Scheme.</p>

13 Needs case

Topic	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Needs Case	General support for the Scheme	We are supportive of the developer's overall proposals, but important aspects remain unresolved in South Acre, particularly the final location of the substations (fields 33 and 35), access arrangements, and the working area (11) indicated in Masterplan 2.	No	<p>The Applicant notes the support of the proposals. The details of the application are now submitted with the application including indicative locations of substations, access arrangements and working areas.</p> <p>The Applicant notes that the National Grid and Customer Substations, and the BESS, are now located in Fields 24 and 27, south of Bartholomew's Hill Plantation. The Works Plan [APP/2.3], along with the ES Figure 5.1: Concept Masterplan [APP/6.3], show the location of the proposed access points and the extents of the working area for the Grid Connection Infrastructure.</p>
	General support for the Scheme	Thank you for sending on details of your public 'collaborative consultation.' I am broadly supportive of your pending application. However, as you know, I am very much aware of the local historic landscape and community concerns and sensitivities around such a scale of development in rural Norfolk.	No	<p>The Applicant notes these comments and the broad support of the proposals.</p> <p>The Design Approach Document [APP/5.7] sets out how the Scheme's design has evolved in response to consultation feedback and environmental survey and assessment work.</p> <p>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 phase.</p>



	General support for the Scheme	I am resident in Castle Acre. I am in favour of your proposals for the Drove Solar Farm. BUT subject to your addressing the following two points	No	The Applicant notes these comments and acknowledges that the respondent's support for the Scheme is conditional on the two points raised. These comments are responded to in Consultation Report Appendix H: Section 47 – Responses Received and Applicants Response [APP/5.2] in Connectivity and Landscape and Visual Impact.
	General support for solar / renewables	Yes home generated power is a must for the future. Humans need to avoid misusing the many aspects of this unique area - keep developments in a balance way, using our knowledge unequivocally using our actions to support this project.	No	The Applicant notes these comments and has prepared a Statement of Need [APP/5.4] , which sets out the justification for the Scheme within the context of the clear and urgent national need for low-carbon, home-grown energy. The Design Approach Document [APP/5.7] sets out the Project Level Design Principles that have guided the detailed design of the Scheme. This includes commitments to respond to the character of the Site, respect the setting of heritage assets, and support the objectives of Norfolk's Green Infrastructure Strategy. These principles were developed in consultation with local stakeholders, communities and technical specialists, and continue to ensure the Applicant is taking an "environmentally-led" approach.
	General support for solar / renewables	I believe solar power is an inevitable outcome to ensure renewable energy in Norfolk, but you only get one chance to get it right!	No	The Applicant notes this comment and has prepared a Statement of Need [APP/5.4] , which sets out the justification for the Scheme within the context of the clear and urgent national need for low-carbon, renewable energy generation.
	General support for solar / renewables	I am generally supportive of the solar farms but have concerns about the cumulative impact of many large solar farms also proposed adjacent to each other in this part of Norfolk.	No	The Applicant is cognisant 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] . ES Chapter 18: Summary of Effects [APP/6.2] , which concludes that there are both significant adverse and beneficial effects. The Applicant considers that cumulative effects should be afforded neutral weight in the planning balance, as set out in the Planning Statement [APP/5.5] .
	General support for solar / renewables	Although being supportive the UK's ambition to reach net zero by 2050 and recognise that Norfolk may offer favourable conditions for solar energy.	No	The Applicant notes these comments and has detailed the initial site evaluation and selection process in ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] . Norfolk is a good location for a solar farm, as the area benefits from higher levels of photovoltaic power and



				irradiance than other parts of the UK. Further details can be found in Section 7.4 of the Statement of Need [APP/5.4] .
	General support for solar / renewables	We support effective and suitable solar energy generation projects, to avoid delay in the delivery of low carbon energy and meet net zero by 2050. They must be designed, operated and built in the right location and in the right way, to contribute to nature's recovery. In particular:	No	<p>The Applicant notes these comments and has prepared a Statement of Need [APP/5.4], which sets out the justification for the Scheme within the context of the clear and urgent national need for low-carbon, home-grown energy.</p> <p>In addition, the Scheme has been guided by the Applicant's Global Design Principles, which include a commitment to nature recovery. Using this framework, a set of Project Level Design Principles were developed to facilitate this commitment at a Scheme level. This includes a pledge to 'Review and incorporate initiatives set out in the Local Nature Recovery Strategy where practicable', and explore local opportunities to complement local rewilding projects. Further details can be found in the Design Approach Document [APP/5.7]</p>
	General support for solar / renewables	I support solar panels 100% but lets have some sensible thinking/	No	The Applicant notes this comment and has prepared a Statement of Need [APP/5.4] , which sets out how and why the construction, operation, maintenance, and decommissioning Scheme address all relevant aspects of government policy in relation to the Development Consent Order (DCO) Application for the Scheme.
	General support for solar / renewables	However, I am not against the plan, I have seen big sites in Cambridge they aren't pretty, but the sheep seem happy.	No	<p>The Applicant notes this comment. ES Chapter 6: Landscape and Visual [APP/6.2] identifies and proposes measures to address the potential impacts and likely significant effects on landscape and visual receptors, during the Construction, Operation and Decommissioning Phases.</p> <p>Details of the general site arrangements for the operation and maintenance phase of the Scheme can be found in the oOEMP [APP/7.8].</p>
	General support for solar / renewables	I am sympathetic to the endeavours of your company to establish sustainable renewable energy infrastructure for the benefit of the United Kingdom, going into the future.	No	The Applicant notes this comment and has prepared a Statement of Need [APP/5.4] , which sets out the justification for the Scheme and, within the national context, of the clear and urgent national need for home-grown renewable energy, to meet current net zero targets and support energy security.
	General support for solar / renewables	I am broadly supportive of the push to diversify our national energy generation options and recognise that this will sometimes mean significant landscape change. However I sense that this is not a majority view locally so if the application is accepted by PINs I suspect there will be considerable interest in fully	No	The Applicant notes these comments and welcomes engagement from local stakeholders and other interested parties during Examination, should the Planning Inspectorate accept the DCO application upon submission.



		scrutinising the Consultation Report and completed EIA.		
	General support for solar / renewables	Whilst CPRE Norfolk generally supports solar generation of electricity, particularly when it is situated on south-facing roof spaces, this needs to be weighed against any harms, so that the benefits can be justified. In this case we feel that this is not the case due to the following reasons.	No	The Applicant notes this comment and thanks CPRE Norfolk for responding to the consultation. A Statement of Need [APP/5.4] has been prepared, outlining the critical benefits of the Scheme, including supplying low-cost, secure energy to the nation.
	General support for solar / renewables	I agree that the provision of solar in Norfolk is part of a national sustainable energy mix	No	The Applicant notes this comment and recognises that the Government's policy view is that "We need a diverse mix of electricity infrastructure to come forward, so that we can deliver a secure, reliable, affordable and net zero consistent system during the transition to 2050 for a wide range of demand, decarbonisation, and technology sources"; and that "a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar" (NPS EN-1, Paragraphs 3.3.19-3.3.20).
	General opposition	this is too big, right along daily access roads between Swaffham and Castle Acre , not discretely tucked in a vadt exoansf of unfrequented land or ali g [vast extent of unfrequented land] long stretches of motorway.	No	The Applicant notes these comments and has detailed the initial site evaluation and selection process in ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] . The likely significant effects of the Scheme on transport and access have been assessed in ES Chapter 9: Transport and Access [6.2] . This includes the A1065, which the Applicant acknowledges serves as an important link for local and regional traffic movements. Traffic surveys to establish baseline traffic levels within the Study Area were undertaken in October 2024 and August 2025, in consultation with Norfolk County Council (NCC). The surveys concluded that the sensitivity to the A1065 link is "Low". Further details can be found in Section 9.6.
	General opposition	Too large, too visible from neighbouring villages and access to Swaffhcm (A 1065) and for vital yourivm, local ramblers and pilgrims to Walsingham.	No	The Applicant notes these comments and has detailed the initial site evaluation and selection process in ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] . ES Chapter 14: Socio-Economics [APP/6.2] An assessment of potential effects upon changes to local tourism assets during the operational phase of the Scheme. It is expected that the overall impact of the Scheme on local tourism assets, residents, and businesses would be minimal.
	General opposition	the project is too large	No	The Applicant notes this comment, but recognises that quantity of new generation capacity required in the UK to meet its net zero targets and consumer demand is enormous. Thus, the size of the Scheme reflects the urgent national need for renewable energy generation and



				<p>storage. Further justification for the Scheme can be found in the Statement of Need [APP/5.4].</p> <p>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 Applicant's site evaluation process.</p>
	General opposition	<p>The lease is also 60 years- unacceptable that 2 generations will experience this immediately in their daily lives. I cannot see any benefits</p>	No	<p>The Applicant notes these comments and refers to NPS EN-3 [Ref 2, Para. 2.10.65], which recognises that although “[a]n upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time-periods of operation.” The Applicant notes that a number of recently granted solar DCOs have a 60-year time limit, which is the proposed time limit for the Scheme.</p> <p>The Applicant has prepared a Statement of Need [APP/5.4] which provides evidence on the substantial benefits brought forward by large-scale ground-mounted solar electricity generation generally, including security of supply and affordability benefits.</p> <p>The Applicant also recognises the importance of local community benefits and is committed to engaging with local stakeholders and communities to deliver initiatives, should the DCO application be granted consent.</p>
	General opposition	<p>Mitigate for loss of visitors, distress leading to mental health effects from noise and visual impact, poor transport links to Downham Market, Fakenham, Narborough, Kings Lynn and Swaffham, poor public toilet facilities in all the villages, reduced property values, improve school technology and science attainments locally with guaranteed training, jobs and apprenticeships</p>	No	<p>The Applicant notes these comments and refers to ES Chapter 10: Noise and Vibration [APP/6.4] which outlines the proposed embedded and additional mitigation measures to reduce/manage noise impacts to not significant effects. These measures will be implemented in the relevant management plans for construction, operation, and decommissioning, and will be secured through a requirement of the DCO.</p>
	General opposition	<p>There are currently 3 national consultations being undertaken by the National Energy Systems Operator (NESO): the Centralised Strategic Network Plan (CSNP), the Strategic Spatial Energy Plan (SSEP) and the Regional Energy Strategic Plan (RESP). It is hoped that these consultations will produce a national plan for infrastructure, identifying suitable sites for national infrastructure developments. Until these consultations have been reported, no decisions regarding national infrastructure development proposals should be made. There needs to be a</p>	No	<p>The SSEP is proposed to inform the CSNP and eleven RESPs. It “will be a GB-wide plan, mapping potential zonal locations, quantities and types of electricity and hydrogen generation and storage.” The SSEP is proposed to be “optimised for cost across demand and high-level network needs, as well as environmental, societal, and other spatial interests.”</p> <p>However, “The SSEP will not identify or recommend specific projects to be delivered”</p>



		<p>coherent, strategic national over-view, a masterplan, for this type of development.</p> <p>Energy infrastructure should be constructed for the national good, not for the benefit of private developers and shareholders.</p> <p>The proposed Drovers Solar development seems to be based solely on the convenience of the site for the developer and a compliant landowner, not on any strategic energy plan.</p>		<p>It therefore remains for applicants to propose new energy infrastructure projects that they assess to be viable within the strategic framework set by government.</p> <p>Section 6.4 of the Statement of Need [APP/5.4] explains that available land, available grid infrastructure and sufficient solar irradiance are essential inputs to site selection for large-scale solar schemes, and these considerations have been taken into account in the development of the proposals for the Scheme.</p> <p>Section 7.2 of the Statement of Need [APP/5.4] explains the contribution of the Scheme within the context of the current 2035 regional capacity ranges for solar as established in the government's Clean Power 2030 Action Plan (Dec 2024) and the current pipeline of projects, prior to the potential for pipeline attrition to occur.</p> <p>Further, by virtue of this DCO Application, the Applicant has demonstrated its assessment of the Scheme's suitability and its commitment to bringing the Scheme to fruition. The Applicant has submitted evidence of its readiness to NESO to inform its position in a reordered connections queue.</p>
	General opposition	<p>Please do not refer to these power installations as 'farms'. They are industrial business developments. This one would be in what has been unspoilt countryside. See section 6.</p>	No	<p>The Applicant notes this comment but disagrees. It is common practice to call solar projects of this nature, and the Applicant also notes that the Scheme is called 'The Drovers Solar Farm'.</p>
	General opposition	<p>Those points were pure sophistry to help get the project through.</p>	No	<p>The Applicant notes this comment but remains confident in the level of consultation undertaken and the accessibility of the information presented.</p>
	General opposition	<p>I believe decarbonisation and energy security can be achieved by other less invasive means without the adverse impact on the countryside that this project would cause.</p>	No	<p>The ES Statement of Need [APP/5.4] provides evidence to support the suitability of the proposed location of the Scheme, and demonstrates that the proposed connection point is appropriate.</p> <p>Chapter 8 of the ES Statement of Need [APP/5.4] also provides evidence that solar generation contributes to security of supply as part of a multi-technology aggregated generation portfolio.</p>
	General opposition	<p>I am against using the limited land of this country for solar farms regardless of design.</p>	No	<p>The utilised agricultural area (UAA) in the UK was 16.8 million hectares (ha) 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.</p>
	General opposition	<p>I totally disagree with the principles behind the project, see my response to Question 1 (d)</p>	No	<p>The Applicant acknowledges this comment but remains confident that the Project Level Design Principles will continue to positively drive design-related decision-making</p>



				<p>throughout the lifecycle of the Scheme to secure the best outcomes at detailed design.</p> <p>The Applicant has prepared a Design Approach Document (DAD) [APP/5.7] in support of the DCO application, which sets out the design decisions taken at each step of the Scheme's development, and the rationale for these decisions, as well as the mechanisms by which good design will be secured post consent.</p>
	General opposition	<p>I have put Disagree because whatever you put in place or say that you will put these things in place, the whole area will be completely changed for the environment, diversity, social etc. You cannot put a load of solar panels in a field and make it scenic or beautiful.</p>	No	<p>Table 3: Design Principles in the DAD [APP/5.7] outlines how the Applicant has embedded mitigation in the Project Level Design Principles.</p> <p>Key design changes have included removing substation and Battery Energy Storage Scheme (BESS) infrastructure from sensitive areas to mitigate impacts on the Nar Valley's landscape, heritage, and communities; and enhancing former droves that run through the Site, amplifying their role as green infrastructure corridors and reinforcing their legibility. These changes demonstrate how the Design Principles, which include application of the mitigation hierarchy and a landscape-led approach, have led to good design outcomes.</p>
	General opposition	<p>I consider the project is unsuitable in such an outstandingly beautiful and vulnerable site.</p>	No	<p>The Applicant disagrees with this statement and believes that the measures outlined in the application demonstrate how any impacts can be appropriately mitigated through the scheme. Refer to Design Approach Document (DAD) [APP/5.7] for further details about how the Applicant has embedded areas for mitigation and enhancement into the Scheme.</p>
	General opposition	<p>1, ENVIRONMENTAL EYESORE, 2, MADE & IMPORTED FROM CHINA, ETHICAL? 3, NONE 4, NO COMMENT. 5, IT MAKES A MOCKERY OF DECARBONISATION, MANUFACTURING & IMPORTING PANEL & INFRASTRUCTURE. TOTAL GREENWASH! 6. No gains whatsoever by spoiling what is already there! 7. It will never be Farmland again.</p>		<p>Large-scale solar schemes in the UK are efficient in comparison to other technologies in terms of the energy they generate over their lifetime on a per unit area basis.</p> <p>IGP is a signatory of the Solar Energy UK supply chain statement, which commits the company to a transparent, sustainable supply chain free of human rights abuses.</p> <p>Efforts to provide specific benefits in locally impacted communities are set out in the oSSCEP [AP/7.15] (for employment and economy), in the oLEMP [APP/7.11] (for landscape and ecological improvements) and through the provision of community benefits such as new permissive access routes, or through the community benefit fund (separate to the DCO process).</p> <p>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</p>



				<p>Substation and Grid Connection Infrastructure, which would remain in situ.</p> <p>After the decommissioning phase, the landowners would choose how the land is to be used and managed.</p>
	General opposition	Your masterplan is to make lots of money! I am not convinced for one moment [REDACTED] about the environment!	No	<p>The Design Approach Document [APP/5.7] sets out the design evolution of the Scheme which responds to consultation feedback and environmental baseline and assessment work undertaken as part of the Environmental Impact Assessment process.</p> <p>The Applicant's wider design principles require its projects (among other considerations) to: consider the surrounding landscape; make a positive contribution to the local environment, by creating new habitats and delivering a measurable net gain for biodiversity throughout operation; and ensure the installation remains temporary and reversible. The Applicant believes that its application demonstrates how it has applied these (and other) principles to the design of the Scheme.</p>
	General opposition	I do not accept the premise of your design proposals.	No	<p>The Applicant has prepared a Design Approach Document [APP/5.7] in support of the DCO application, which sets out the design decisions taken at each step of the Scheme's development, the rationale for these decisions, and the mechanisms by which good design will be secured post-consent.</p>
	General opposition	The idea of 'supporting nature recovery' is frankly absurd when you are taking a perfectly fine piece of nature and destroying it in order to add this solar farm in the first place. This is similar to new build developments destroying a field and the homes of wildlife in favour of building a housing area and then adding a small area of grass to the estate which in turn gets a park that no one wants built on it when the local council needs to spend its money at the end of the year.	No	<p>The Applicant notes this, and, where appropriate, the draft Local Nature Recovery Strategy principles have informed the approach to biodiversity enhancements across the Site. The oLEMP [APP/7.11] sets out the specific strategies and priorities identified in the draft LNRS that are relevant to the Site and how they have been incorporated into the Scheme.</p> <p>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.</p>
	General opposition	Again, see my response to Q 1(d)	No	<p>The Applicant notes this comment and has responded to the feedback received.</p>
	General opposition	Far too large	No	<p>The Applicant notes this comment, but recognises that quantity of new generation capacity required in the UK to meet its net zero targets and consumer demand is enormous. Thus, the size of the Scheme reflects the urgent national need for renewable energy generation and</p>



				<p>storage. Further justification for the Scheme can be found in the Statement of Need [APP/5.4].</p> <p>The Applicant notes this comment and confirms that the maximum design parameters for the Scheme are defined in the ES Chapter 5: The Scheme [APP/6.1].</p> <p>The land included within the Order limits reflects the area necessary to deliver the Scheme within these parameters, and the design has been developed to ensure that only the land required for construction and operation is utilised.</p>
	General opposition	See comments above...the Nar Valley is a sensitive SSSI....it is clearly inappropriate to build a solar farm here.	No	<p>A full assessment of direct and indirect effects on River Nar SSSI, has been undertaken with the ES Chapter 7: Ecology and Biodiversity [APP/6.2], which concludes that no significant adverse effects are anticipated as a result of any phase of the Scheme.</p>
	General opposition	Wholly reject the entire plan	No	<p>The Applicant notes this objection.</p> <p>The Statement of Need [APP/5.4] sets out the national new renewable energy infrastructure that is required to help achieve the UK Government's net zero and energy security objectives. The Scheme will make a meaningful contribution to this transition while supporting local employment and supply chain opportunities during construction and operation.</p>
	General opposition	Not impressed by the size. Pig farming is re-locatable & fits into a crop cycle. Solar farms are a permanent structure and a 100m buffer zone makes little to no difference given the size of the proposed farm, and all this to power just 115k homes?	No	<p>The Applicant notes that the Scheme is considered a temporary development with a 60-year operational life.</p> <p>Table 5.2 in ES Chapter 5: The Scheme [APP/6.1] outlines the minimum offsets and buffers required for existing landscape features. The buffers/offsets will be a minimum, and for example, may be increased to deliver further mitigation or enhancements and/or respond to root protection areas where required.</p>
	General opposition	If the plan is so great, why would you need to provide mitigation?	No	<p>The Applicant acknowledges this comment but notes that any proposal of this nature would always require an element of mitigation to ensure potential impacts are appropriately addressed.</p> <p>Table 3: Design Principles in the Design Approach Document [APP/5.7] outlines how the Applicant has embedded mitigation in the Project Level Design Principles.</p>
	General opposition	See above. The scale of the proposal is of serious concern.	No	<p>The Applicant notes this comment, but recognises that quantity of new generation capacity required in the UK to meet its net zero targets and consumer demand is enormous. Thus, the size of the Scheme reflects the urgent national need for renewable energy generation and</p>



				storage. Further justification for the Scheme can be found in the Statement of Need [APP/5.4] .
	General opposition	All are caused for concern.	No	The Applicant notes this comment and has responded accordingly throughout this document.
	General opposition	Make your area smaller. Have small areas only. See my initial response at start of this survey.	No	<p>ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] provides a summary of the reasonable alternative options the Applicant has considered for the Scheme, including the initial selection of the Site and throughout the design development.</p> <p>Appendix 1 – Site Evaluation Report to the Planning Statement [APP5.5] further confirms how the Applicant's site evaluation involved a balance of factors</p> <p>The Statement of Need [APP/5.4] and Planning Statement [APP/5.5], both submitted in support of the DCO Application, set out a detailed and compelling case as to why the Scheme is urgently required and at the proposed scale. This assessment of alternatives is set in the context of the clear and urgent need for the Scheme.</p>
	General opposition	Stop thinking about money and think about people and their lives and how they want to enjoy this beautiful county. We want our trees to be safe, our wildlife to have freedom of movement to thrive.	No	<p>The Applicant notes these comments. The Applicant has made every effort to ensure any landscape or ecological impacts of the Scheme are appropriately mitigated and measures are put in place to encourage wildlife to continue to thrive across the site.</p> <p>The Applicant also notes that IGP, as a developer, is guided by a set of Design Principles that aim to deliver renewable energy solutions that create lasting value for communities while protecting the environment, fostering economic growth, and supporting energy independence.</p>
	General opposition	The best mitigation is to pick a better suited area.	No	The Applicant disagrees with this statement and believes that the measures outlined in the application demonstrate how any impacts can be appropriately mitigated through the Scheme.
	General opposition	<p>It's up to you, not us to suggest solutions Our solution would be not to build the thing in the first place.</p> <p>Those are the issues, you suggest the solutions seeing as this is entirely your project.</p>	No	The Applicant acknowledges these comments but notes that consultation with local stakeholders, communities and technical specialists is a statutory requirement of the Planning Act 2008. Details about how the Applicant has engaged with stakeholders and considered feedback to inform the detailed design are provided in this Consultation Report [APP/5.2] .
	General opposition	Covering such a large area cannot benefit the local environment.	No	<p>The Applicant disagrees with this statement.</p> <p>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</p>



				Biodiversity Net Gain Assessment Report [APP/7.4] has been submitted with the DCO Application.
	General opposition	The development should not go ahead. No mitigations would help with the huge problem of it being in totally the wrong place	No	<p>The Applicant notes this comment but believes measures outlined within the application demonstrate how any impacts can be appropriately mitigated through the scheme.</p> <p>Refer to Design Approach Document (DAD) [APP/5.7] for further details about how the Applicant has embedded areas for mitigation and enhancement into the Scheme.</p>
	General opposition	Clearly ALL of the above would be reasons for NOT building a solar farm plus all that goes with your project.	No	The Applicant has prepared a Statement of Need [APP/5.4] , which sets out the justification for the Scheme.
	General opposition	Not to continue with the project.	No	The Applicant notes this suggestion but will be submitting this DCO Application to the Planning Inspectorate for consideration.
	General opposition	Reduce the size of the main solar farm block.	No	The maximum design parameters for the Scheme are set out in ES Chapter 5: The Scheme [APP/6.1] , and the layout has been developed to ensure that only the areas necessary to deliver the required generating capacity are used.
	General opposition	I cannot accept the idea of a solar farm being “new green space”.	No	The Applicant acknowledges this comment. A Green Infrastructure Strategy has been developed to support the landscape character opportunities and draft LNRS and Norfolk BAP objectives. Further information can be found within the oLEMP [APP/7.11] .
	General opposition	None. It should not be developed at all.	No	The Applicant notes this comment. 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.
	General opposition	Totally against the plan.	No	The Applicant notes this comment. 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.
	General opposition	<p>The proposal for this farm should be highly contested.</p> <p>Local authorities are required to have a renewables policy. That policy should, however, reflect the circumstances of the area. The government has published many policy papers dealing with renewable energy. These concentrate very largely on off-shore wind rather than solar as a source of renewable energy. The utilisation of rooftops within cities would be a far better placement for these panels.</p>	No	<p>The Applicant notes these comments but disagrees with the suggestion that the Scheme should be contested.</p> <p>Domestic solar is not able to meet the national urgent need for new generation on its own. Therefore, rooftop solar should come forwards as well as, rather than instead of, large-scale ground mounted schemes such as this scheme. Further details about how and why the Scheme addresses all relevant aspects of government policy,</p>



				<p>including the current suite of National Policy Statements (NPSs), can be found in the Statement of Need [APP/5.4]</p> <p>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..</p>
	General opposition	Make these farms smaller & more unobtrusive.	No	<p>Noted but the Applicant asserts that a significant capacity of low carbon solar generation is urgently needed in the UK, and that the Scheme will, if consented, provide an essential progression to meeting the governmental objectives of delivering sustainable development to enable decarbonisation.</p>
	General opposition	<p>I would like you to re-consider the whole project. I would like the whole community to benefit from solar panels not just the Drovers Solar Farm. Presumably this will make a lot of money fro someone or a group of business people. This community does not need our environment taken away, but solar panels on individual houses so that people can individually reduce their energy use and each help the environment.</p>	No	<p>The Applicant is committed to ensuring the Scheme delivers lasting benefits to the local area including by creating job opportunities, generating business rates, and direct funding for important causes through a Community Benefit Fund.</p> <p>There are currently no mandatory or legislative frameworks in the UK to support community benefits but voluntary guidance does exist. There are no current plans to provide subsidised energy or rebates to the local community directly as a result of the Scheme.</p> <p>That said, the Applicant proposes a community benefit fund as part of the Scheme, should the Scheme receive development consent. This will be independently administered by a local foundation and will be available for local initiatives to provide community services, including local energy schemes. The wider effects of the Scheme on the local community, in terms of socio-economic aspects, are assessed in ES Chapter 14: Socio-Economics [APP/6.2]..</p> <p>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.</p>
	General opposition	Stop this scheme now!	No	<p>The Applicant notes this objection but will be submitting this DCO application to the Planning Inspectorate for consideration.</p>



	General opposition	I'm sorry to appear negative but this is definitely not the right place for a solar farm.	No	<p>The Applicant has followed a step-by step site selection process which confirms the location of the Scheme is suitable for a large scale solar farm. This has included the avoidance of sensitive landscape and environmental designations in confirming site suitability and consideration of alternative sites. For further details refer to ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1].</p>
	General opposition	<p>I appreciate that solar farms can generate a lot of electricity, but why are they being concentrated in the East of England, the area that produces far more arable crops than anywhere else in the country. We are told that we are a pre-war generation; should we find ourselves at war in the future, we would find it incredibly difficult to import food; so we need to become as near to being self-sufficient as possible. Covering up acres and acres of arable land with solar panels is contrary to this.</p>	No	<p>The utilised agricultural area (UAA) in the UK was 16.8 million hectares (ha) 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.</p> <p>Figure 6-2 in the Statement of Need [APP/5.4] presents a map of the solar irradiance across the UK. Figure 6-2 shows that the solar resource at the Scheme's location (marked by the green point) is higher than the UK average. This evidence supports the suitability of the location of the Scheme.</p> <p>Further information on site selection for the Scheme can be found in ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1].</p> <p>In addition, the land is not being entirely removed from farming, as sheep grazing may still take place on most of the Sites, allowing it to continue contributing to food production. Furthermore, soil health is expected to improve over the Scheme's 60-year lifespan as the land transitions away from intensive arable farming.</p> <p>IGP develops renewable energy projects across the UK and has been offered grid connections in the east of England.</p>
	General opposition	This whole project appears to be about project and making money.	No	<p>The Applicant notes this comment. The Statement of Need [APP/5.4] sets out the national new renewable energy infrastructure to help achieve the UK Government's net zero and energy security objectives. The Scheme will make a meaningful contribution to this transition while supporting local employment and supply chain opportunities during construction and operation.</p> <p>The Applicant is also committed to ensuring that local communities benefit from the Scheme and continues to engage with stakeholders and the Norfolk Community Foundation to shape and deliver an appropriate package of community benefits.</p>
	General opposition	This development is unwelcome in our area. It will not supply us with power. There is no amount of greenwash that can justify this. The site may be very	No	<p>The Applicant notes these comments but does not agree that the Scheme is inappropriate for the area. The power generated will feed into the national grid and contribute to</p>



		<p>convenient for the developer but is wholly inappropriate for this area.</p> <p>The farmer selling you the land gets rich(er), IGP gets richer. We get a view of plant machinery and buildings that support the panels.</p>		<p>meeting the UK's energy needs, benefitting the wider country, including the local area. As is standard for renewable energy projects, the developer will enter into a commercial agreement with the landowner.</p> <p>The Scheme has been designed to minimise effects on the surrounding landscape and community, with appropriate mitigation secured through the DCO. This includes careful siting of infrastructure, extensive planting, and measures to reduce landscape and visual impacts. The Applicant considers that the Site is suitable for accommodating the Scheme within the defined parameters set out in the ES and that the design reflects a sensitive response to its surrounding</p>
	General opposition	<p>In relation to 1 (b), Norfolk should have some farms, as should every other county, but the size and scale of the proposed farms either side of the A1065 is entirely out of proportion with the landscape.</p>	No	<p>The Applicant notes this comment, but recognises that quantity of new generation capacity required in the UK to meet its net zero targets and consumer demand is enormous. Thus, the size of the Scheme reflects the urgent national need for renewable energy generation and storage. Further justification for the Scheme can be found in the Statement of Need [APP/5.4].</p> <p>There are several factors which contributed to the selection of the proposed Site. Norfolk represents a good location within the UK to construct a solar farm as the area benefits from higher levels of photovoltaic power and irradiance compared to other parts of the UK.</p> <p>The Statement of Need [APP/5.4] also demonstrates that the proposed connection point is appropriate, and the Scheme will be unlikely to cause any grid constraints or curtailment in the area, as a result of connecting at this location.</p>
	General opposition	<p>I am writing as a resident of Castle Acre to raise my concerns about the proposed solar park near Swaffham and Castle Acre, which would span over 2,000 acres of agricultural land.</p> <p>While I fully support clean energy initiatives, I believe this particular development raises serious issues regarding land use, food security, and technological inefficiency.</p>	No	<p>The Applicant notes these concerns and has prepared an ES [APP/6.1 – 6.5] which assesses the likely significant impacts of the Scheme on Soils and Agriculture as part of the Environmental Impact Assessment (EIA). Refer to ES Chapter 11: Soils and Agriculture [APP/6.2].</p> <p>The Applicant conducted an Agricultural Land Classification (ALC) survey as part of ongoing assessments, which identified a small amount of Grade 2 land on the eastern edge of the Site. This informed the detailed design of the scheme and the location of proposed infrastructure by removing larger portions of higher-grade land from development, such as Field 32, which contains a mixture of Grade 1 and Grade 2 ALC.</p> <p>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</p>



				<p>been assessed as having a negligible effect, which is not considered to be significant.</p> <p>The Applicant recognises that it is necessary to build some flexibility into the design of the Scheme, when submitting the DCO Application, so that the detailed design of the Scheme can be informed by technical considerations, post-consent work, and take advantage of innovations in technology. This is particularly important to maintain flexibility amid the rapid pace of change in solar PV and battery storage technology, whilst ensuring a robust and comprehensive assessment of potential effects. Where such flexibility or optionality is required, this is explained in Section 3.3 to Section 3.6 of ES Chapter 5: The Scheme [APP/6.1].</p> <p>The Applicant also notes that DEFRA has identified that climate change is a far greater threat to UK food security. Their research suggests that climate change impacts under a medium-emissions scenario could reduce the proportion of 'best and most versatile' arable farmland by around 2.3 million hectares in England alone.</p>
	General opposition	This proposed solar farm fails the local community, fails the environment and fails the future.	No	<p>The Applicant notes these comments but does not agree with the conclusions. A Statement of Need [APP/5.4] has been prepared, which provides evidence on the substantial benefits brought forward by large-scale ground-mounted solar electricity generation generally, including security of supply and affordability benefits.</p> <p>The Applicant also recognises the importance of local community benefits and is committed to engaging with local stakeholders and communities to deliver initiatives, should the DCO application be granted consent.</p> <p>The Applicant also remains committed to ongoing dialogue with the local community throughout all stages to ensure that the benefits of the Scheme are realised locally. The Community Relations channels will also remain open throughout the consenting process.</p> <p>The Applicant further notes that a Community Liaison Manager will be appointed as a temporary facilitator of communications between communities and the Scheme's operators.</p> <p>The Design Approach Document [APP/5.7] sets out the Project Level Design Principles, which have guided the detailed design of the Scheme. This includes commitments to respond to the character of the Site, respect the setting of heritage assets, and support the objectives of Norfolk's Green Infrastructure Strategy. These principles were developed in consultation with local stakeholders, communities and technical specialists and continue to</p>



				ensure the Applicant is taking an “environmentally-led” approach.
	General opposition	Let the following stand as an example of my major concerns about GREENWASHING: Do the developers really think that a solar industrial unit will somehow improve our ability to do this?	No	The Applicant notes this comment but does not agree that the Scheme constitutes greenwashing. The Statement of Need [APP/5.4] sets out the justification for the Scheme within the context of the clear and urgent national need for low-carbon, home-grown energy.
	General opposition	There is no amount of greenwash that can justify this. The site may be very convenient for the developer but is wholly inappropriate for this area.	No	The Applicant has followed a step-by-step site selection process, which confirms that the location of the Scheme is suitable for a large-scale solar farm. This has included avoiding sensitive landscapes and environmental designations when confirming site suitability and considering alternative sites. For further details refer to ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] .
	General opposition	Conclusion CPRE Norfolk welcomes the expansion of renewable energy but stress the importance of scale, siting, and landscape sensitivity. We want to see new renewable energy projects done well, in a way that minimises impacts on the Norfolk countryside. This proposal fails on all three counts. These losses do not justify any potential benefits brought by the development and therefore we ask that this proposal is withdrawn.	No	The Applicant thanks CPRE for responding to the consultation and notes its conclusions. However, the Applicant remains confident that the site selection process confirms the suitability of the Site with regard to scale, location and landscape sensitivity. Section 6.4 of the Statement of Need [APP/5.4] explains that available land, available grid infrastructure and sufficient solar irradiance are essential inputs to site selection for large-scale solar schemes, and these considerations have been taken into account in the development of the proposals for the Scheme. The Design Approach Document [APP/5.7] further sets out the Project Level Design Principles which have guided the detailed design of the Scheme. This includes commitments to respond to the character of the Site, respect the setting of heritage assets, and support the objectives of Norfolk’s Green Infrastructure Strategy. These principles were developed in consultation with local stakeholders, communities and technical specialists and continue to ensure the Applicant is taking an “environmentally-led” approach.
	General opposition for Solar / Renewables	I am completely against solar farms because they are taking agricultural land out of production; negating the skills and traditions of farming and the management of the landscape by generations of farming families; altering the character of the countryside, diminishing its natural beauty and appeal and destroying its aesthetic, heritage and environmental integrity.	No	ES Chapter 11: Soils and Agriculture [APP/6.2] has assessed the potential effects of the Scheme on local farming businesses, food production and the wider rural economy. The assessment reviews current farming practices and potential farming practices and assesses the effects of changes to farming activities throughout the whole life of the project. The Applicant recognises that a number of farming businesses operate on the Site, including pig farming, poultry rearing, sheep grazing, and arable farming. All farm enterprises are considered to be of medium or low sensitivity, with the overall effect of the



				<p>Scheme assessed as not significant. There are no effects of severance.</p> <p>The Applicant also notes that the Scheme is considered a temporary development with a 60-year design life.</p> <p>Upon completion of the Scheme's operation and maintenance phase, 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. After the decommissioning phase, the landowners would decide how the land would be used and managed.</p>
	General opposition for Solar / Renewables	Enough of Norfolk has been destroyed by new developments. I moved to the countryside to be surrounded by the countryside, not fields of giant solar panels. The nation does not need 'clean' electricity, it needs more farmland to sustain a ridiculous quantity of people.	No	<p>The Applicant notes these comments and has prepared a Statement of Need [APP/5.4], which sets out the justification for the Scheme within the context of the clear and urgent national need for low-carbon, home-grown energy.</p> <p>The Applicant is cognisant 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].</p>
	General opposition for Solar / Renewables	I am completely against losing any further land to solar farms.	No	<p>The utilised agricultural area (UAA) in the UK was 16.8 million hectares (ha) 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.</p>
	General opposition for Solar / Renewables	Our countryside is a precious finite resource and mustn't be wasted on Solar Farms. When war next comes to the UK we will need every scrap of land to feed ourselves.	No	<p>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.</p>
	General opposition for Solar / Renewables	Solar will never be able to generate sufficient energy to power all those data centres needed for AI so what's the point in covering the country in solar panels.	No	<p>Section 6.8 of the Statement of Need [APP/5.4] compares the efficiency of solar generation with other established technologies and notes that efficiency is still improving, and the input fuel is free of carbon and costs nothing. This supports the government's view that "solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector" (NPS EN-3, Para 2.10.9).</p>



				Overarching National Policy Statement for Energy EN-1 (as designated) sets out the Government's view that a diverse mix of electricity infrastructure is needed to come forward to deliver a secure, reliable, affordable and net zero consistent energy system during the transition to 2050, and that such a system, in 2050, is likely to be composed predominantly of wind and solar.
	General opposition for Solar / Renewables	<p>Existing infrastructure's ability handle this (road and grid);</p> <p>Manufacture of components involves modern-day slavery practices overseas;</p> <p>Fast-moving technology updates will render system obsolete within it's lifetime;</p> <p>The productivity will not deliver supply commensurate with scale of impact - it is simply not a very effective way of manufacturing energy.</p>	No	<p>Chapter 7 of the Statement of Need [APP/5.4] concludes that the proposed location of the Scheme is appropriate for large-scale solar including for existing grid suitability reasons.</p> <p>Section 6.8 of the Statement of Need [APP/5.4] compares the efficiency of solar generation with other established technologies and notes that efficiency is still improving, and the input fuel is free of carbon and costs nothing. This supports government's view that "solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector" (NPS EN-3, Para 2.10.9).</p> <p>Further, Section 6.5 of the Statement of Need [APP/5.4] provides an analysis of low carbon energy yield per acre of solar and selected other generation technologies.</p>
	General opposition for Solar / Renewables	<p>The power production relies on the sun, we need most power in the winter when there is much less.</p>	No	<p>Photovoltaic (PV) panels, are made up of cells which convert the solar irradiance to electrical energy. Whilst the intensity of solar irradiance is impacted by the time of day and season, solar farms only require minimum levels of irradiance to operate at an optimum level.</p> <p>Norfolk represents a good location within the UK to construct a solar farm as the area benefits from higher levels of photovoltaic power and irradiance compared to other parts of the UK. Further details can be found in Section 7.4 of the Statement of Need [APP/5.4].</p> <p>The Scheme incorporates Battery Energy Storage Systems (BESS) to ensure that surplus energy generated is stored and then released to the national grid during periods of higher demand. Refer to ES Chapter 5: The Scheme [APP/6.1] for a full description of the Scheme.</p>
	General opposition for Solar / Renewables	<p>! Where you are building is an extremely peaceful and pretty area. I think some people will be put off walking near solar panels, great to see some permissive paths put in though. Nature I think will miss the working of the land, ploughing brings worms and insects to the surface, crops provide cover, harvest leaves grains behind...</p>	No	<p>Given the proposals include large areas of new grassland, hedgerow and planting, opportunities for wildlife to forage and find shelter will be increased at the site as a result of the Scheme.</p> <p>The Scheme will retain existing public rights of way and introduce new ones with ample space and enhancements so these can be enjoyed by users.</p> <p>The Applicant within the oPRoWPPMP [APP/7.12] has committed to specific duties, such as maintaining stiles and</p>



				gates, keeping paths clear of obstructions, and ensuring hedgerow and aligning vegetation do not encroach on the PRow.
	General opposition for Solar	Solar farms can't possibly reinforce the character of the local area - they will fundamentally alter it, however much mitigation is put in place.	No	<p>As outlined in Section 6.3 of the Design Approach Document [APP/5.7] the design of the Scheme has been guided by a set of masterplanning strategies, which considered the Site in its wider context and focused on three core themes of Place, Movement and Biodiversity.</p> <p>The Applicant is cognisant of the landscape character of the local area, and sought to reinforce the character and experience of the River Nar valley slopes and associated plateau. This included strengthening, reinstating and providing new hedgerows and retaining existing blocks of woodland.</p> <p>The strategy also set out to enhance people's experience of the valley corridor from the edge of the plateau by maintaining and directing views to the valley floor, keeping vistas open from key routes and limiting the location of solar infrastructure.</p>
	Alternative technologies generation	<p>People should be allowed to put as many panels on their roof as possible and sell excess to the grid.</p> <p>The only people who will be in favour of this plan are the landowners and the council. Between Sporle and Cambridge there is a possible 8,000 acres being taken out of productivity for solar panels and lakes. An [illegible] person would suggest putting desalination plants in.</p>	No	<p>The Applicant recognises the value of rooftop solar, but contends that domestic solar alone is not able to meet the national urgent need for new generation on its own and should be proposed in addition to large scale solar projects like this one..</p> <p>Throughout the pre-application process, the Applicant has closely engaged with relevant landowners and local authorities. The Applicant is committed to continuing discussions with these stakeholders as the application progresses.</p> <p>The Applicant is cognisant 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].</p>
	Alternative technologies generation	Build more nuclear capacity, put PV on the thousands of industrial and farm buildings currently without it, but don't trash the last few areas of Norfolk's beautiful open spaces to provide power for London.	No	Chapter 8 of the Statement of Need [APP/5.4] provides evidence that solar generation contributes to security of supply as part of a multi-technology aggregated generation portfolio.
	Alternative technologies generation	We should be using wind turbines on better quality land, as farming can continue around them.	No	Overarching National Policy Statement for Energy EN-1 (as designated) sets out the Government's view that a diverse mix of electricity infrastructure is needed to come forward to deliver a secure, reliable, affordable and net zero consistent energy system during the transition to



				2050, and that such a system, in 2050, is likely to be composed predominantly of wind and solar.
	Alternative technologies	generation	<p>It seems insane to use Solar panels on farm land that should be used for farming, especially in the current geo political environment, when there are so many other ways they can be used to generate electricity that do not impact the physical environment and nature. The point of Solar panels is to generate power with minimum impact to the environment... so solar farms seem to be an enormous contradiction and are working at cross purposes with the environment</p>	<p>No</p> <p>The Government's view is that "solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector" (NPS EN-3, Para 2.10.9).</p> <p>Further, "NPS EN-1 establishes a critical national priority for nationally significant low carbon infrastructure" (which includes large-scale solar). Further, "The urgent need for CNP Infrastructure to achieve 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 mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure, and it should be progressed as quickly as possible" (NPS EN-1 3.3.63).</p> <p>The ES [APP/6.1-6.5] assess the likely significant impacts on a range of environmental receptors.</p> <p>The Applicant believes the embedded mitigation and enhancement measures outlined within the application demonstrate how any impacts can be appropriately mitigated through the scheme.</p>
	Alternative technologies	generation	<p>Government investment in nuclear had made this kind of development unnecessary; and</p> <p>The productivity will not deliver supply commensurate with scale of impact - it is simply not a very effective way of manufacturing energy.</p>	<p>No</p> <p>Overarching National Policy Statement for Energy EN-1 (as designated) sets out the Government's view that a diverse mix of electricity infrastructure is needed to come forward to deliver a secure, reliable, affordable and net zero consistent energy system during the transition to 2050, and that such a system, in 2050, is likely to be composed predominantly of wind and solar.</p>
	Alternative technologies	generation	<p>Wind turbines+++ should be the priority. Solar is not effective in the winter. Buildings +++ rather than countryside should be used first for solar panels.</p>	<p>No</p> <p>Overarching National Policy Statement for Energy EN-1 (as designated) sets out the Government's view that a diverse mix of electricity infrastructure is needed to come forward to deliver a secure, reliable, affordable and net zero consistent energy system during the transition to 2050, and that such a system, in 2050, is likely to be composed predominantly of wind and solar.</p>
	Alternative technologies	generation	<p>As above....much more appropriate to have wind turbines at this site.</p>	<p>No</p> <p>Overarching National Policy Statement for Energy EN-1 (as designated) sets out the Government's view that a diverse mix of electricity infrastructure is needed to come forward to deliver a secure, reliable, affordable and net zero consistent energy system during the transition to 2050, and that such a system, in 2050, is likely to be composed predominantly of wind and solar.</p>



	Alternative technologies	generation	<p>Wind power would generate power at times of year when we need more electricity.</p> <p>We are losing huge swathes of land which according to your brochure will be fenced, and therefore much less animal and wildlife movement compared to now</p>	No	<p>The Applicant recognises the importance of a multi-technology, aggregated generation portfolio to meet the nation's urgent energy demands.</p> <p>The Scheme incorporates Battery Energy Storage Systems (BESS) to ensure that surplus energy generated is stored and then released to the national grid during periods of higher demand. Refer to ES Chapter 5: The Scheme [APP/6.1] for a full description of the Scheme.</p> <p>The Applicant is committed to designing fencing that integrates with the local environment and allows wildlife to move. The Applicant has prepared a fencing strategy to ensure that, from an early stage, consideration was given to retaining key movement corridors through the Site for people and wildlife. This strategy included routes to maintain the continuity of wildlife corridors through hedgerows and woodlands beyond the Site.</p> <p>Refer to Design Principles, Parameters and Commitments [APP/5.8] for the detailed design of the Scheme and the outline Landscape Environmental Management Plan (oLEMP) [APP/7.11]. The fencing would be designed to permit the passage of wildlife, either through a clearance at ground level or via mammal gates, and would not be constructed through existing hedgerows wherever practicable. Perimeter fencing around the Solar PV Arrays would likely comprise wooden post and wire mesh fencing to minimise visual impact on the local environment.</p>
	Alternative technologies	generation	Solar farms inefficient compared to offshore winds.	No	Large-scale solar schemes in the UK are efficient in comparison to other technologies in terms of the energy they generate over their lifetime on a per unit area basis.
	Alternative technologies	generation	Wind turbines would be much more appropriate here.	No	When compared to onshore wind, the energy production from land under solar is of a similar order of magnitude while the environmental effects of solar schemes may be felt over a significantly smaller geography.
	Alternative technologies	generation	<p>East Anglia has always had wind power from windmills. Wind turbines on the land as nearby at Swaffham & N.Pickenham would be the most appropriate way forward instead of a solar farm here in the Nar Valley.</p>	No	<p>The Applicant considered alternative generation technologies as part of the initial assessment of sites and design alternatives. Refer to ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1].</p> <p>Section 2.10 of NPS EN-3 relates specifically to Solar Photovoltaic generation, and paragraphs 2.10.19 to 2.10.48 list factors influencing site selection. The proposed Site's initial evaluation was in accordance with these key site selection factors outlined in section 2.10 of NPS EN-3. The site evaluation involved a balance of these factors, including irradiance, topography, network connection,</p>



				proximity to residential dwellings, agricultural land classification, accessibility, and environmental constraints.
	Alternative technologies	generation	Solar farms, like windfarms, should be offshore.	No The Applicant notes this comment. 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.
	Alternative technologies	generation	Wind power would generate power at times of year when we need more electricity.	No Large-scale solar schemes in the UK are efficient in comparison to other technologies in terms of the energy they generate over their lifetime on a per unit area basis. The Scheme incorporates BESS to ensure that surplus energy generated is stored and then released to the national grid during periods of higher demand. Refer to ES Chapter 5: The Scheme [APP/6.1] for a full description of the Scheme.
	Alternative technologies	generation	Let's not bother retrofitting solar panels to Britain's housing stock or industrial infrastructure - these are owned by many different people and companies and therefore might be a difficult undertaking. We don't want difficulty, we have no time for that which is challenging; we want simple and straightforward solutions irrespective of the environmental impact which, anyway, we won't be able to see from London.	No The Applicant respectfully disagrees with these comments, as it is supportive of rooftop solar installations as part of the nation's generation mix. As the comment identifies, rooftop installation is more complex. The Applicant notes, for example, efforts underway by Solar Energy UK and the Warehousing Association to redraft standard commercial building lease terms to facilitate rooftop solar installation on larger logistics buildings, but understands that renewed terms will take a number of years to become common across the country. As such, widespread rooftop solar installation remains a longer-term option.
	Alternative technologies	generation	Suggests hydroelectric power on the River Nar could be a good alternative if solar isn't viable. Tidal power from river stretches along the coast might also be worth exploring.	No The Applicant considered alternative generation technologies as part of the initial assessment of sites and design alternatives. The potential for hydroelectric power on the River Nar was not assessed during the site selection process. Refer to ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] .
	Alternative technologies	generation	A Call for Delayed Approval Until Technology Improves Given the fast pace of innovation in solar energy, I urge you to delay this development until more efficient solar technology becomes available and more sustainable or efficient alternatives can be considered.	No The Applicant recognises that it is necessary to build some flexibility into the design of the Scheme when submitting the DCO Application, so that the detailed design can be informed by technical considerations, post-consent work, and take advantage of technological innovations. This is particularly important to maintain flexibility amid the rapid pace of change in solar PV and battery storage technology, whilst ensuring a robust and comprehensive assessment of potential effects. Where such flexibility or optionality is required, this is explained in Section 3.3 to Section 3.6 of ES Chapter 5: The Scheme [APP/6.1] .



	Alternative technologies	transmission	<p>Substation should in the Wrstern cirnef near Narford Hall, with extra pilons there, if necessary</p> <p>The energy produced by the scale proposed cannot be efficiently sent along the National grid, storage batteries do not store for weeks and months, the system is only partially efficient and for a few months of thf year but has a 12 month effect on local wildlife, residents and visitors .</p>	No	<p>The Applicant has chosen to locate the National Grid Substation, Customer Substation, and BESS in Fields 27 and 24 to the south of Bartholemew's Hills Plantation, reducing the visibility of this infrastructure from Castle Acre. The solar PV Arrays have been removed from Field 35 and the northern extents of Field 33.</p>
	Alternative technologies	transmission	<p>Poor Efficiency and Land Use</p> <p>The solar panels typically used in such farms are only about 20% efficient, compared to rooftop solar panels which can reach 80%. This means that, theoretically, a similar amount of energy could be produced using only a quarter of the land if more efficient technology were employed. In the meantime, we are risking a vast and valuable agricultural resource for a sub-optimal energy return</p>	No	<p>The Applicant agrees that domestic solar should also be pursued, but it cannot meet the national urgent need for new generation on its own. Therefore, rooftop solar should come forward rather than large-scale ground-mounted schemes such as this one.</p> <p>The utilised agricultural area (UAA) in the UK was 16.8 million hectares (ha) 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.</p>
	Site selection alternatives)	(including alternatives)	<p>There are better places to install Solar Farms than on farmland and countryside (on commercial buildings roofs, like supermarkets, DIY warehouses, office blocks, etc. etc).</p>	No	<p>The Applicant supports the continued development of rooftop solar in the UK, however Section 6.3 of the Statement of Need [APP/5.4] concludes that smaller scale solar, including rooftop solar, must be considered as additional to, as opposed to instead of, the need for large-scale solar because of reasons associated with pave, affordability and total potential deliverable and effective capacity.</p> <p>The government has clarified that its Clean Power 2030 and 2035 capacity ranges for solar do not seek to prioritise or constrain rooftop solar deployment, and apply to large-scale solar only. The 2035 large-scale solar capacity range is 45-69GW.</p>
	Site selection alternatives)	(including alternatives)	<p>Enabling 115k homes to have their own solar panels and battery storage would be the best environmental solution</p>	No	<p>The Applicant supports rooftop solar installations as part of the nation's generation mix. Rooftop installation is more complex, as it involves multiple small sites with varying ownership and tenancy. As such, widespread rooftop solar installation remains a longer-term option.</p> <p>Further, the Applicant observes that even if 115,000 homes were to have both solar and energy storage installed, variations in local weather and occupants' energy demands would still result in demand on the National Grid. As it would connect to the Grid, this Scheme would provide clean, secure generation that could meet this continuing demand.</p>
	Site selection alternatives)	(including alternatives)	<p>There are huge competing demands for the use of land in the UK - new homes, growing food, space for nature, and generating the energy we all use in our</p>	No	<p>The utilised agricultural area (UAA) in the UK was 16.8 million hectares (ha) in 2024. The agricultural land taken for the Scheme represents less than 0.01% of the UAA and</p>



		daily lives. Putting solar panels on the millions of roofs across the country would save farmland from industrialisation; this should be adopted as the national strategy.		is not expected to have a significant impact on national food production and security. The Applicant agrees that domestic solar should also be pursued, but domestic solar is not able to meet the national urgent need for new generation on its own. Therefore, rooftop solar should come forward, rather than instead of, large-scale ground-mounted schemes such as this scheme.
	Site selection (including alternatives)	If you were to create small pockets of these solar farms you would have a greater chance of getting public approval but instead you are creating bad feeling by taking away large area of nature from us. To be honest at the consultation I was near to tears as the place I love is being damaged by your solar farms	No	The Applicant notes these comments but confirms that 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.
	Site selection (including alternatives)	Different location	No	The Applicant has followed a step-by-step site selection process, which confirms the location of the Scheme is suitable for a large-scale solar farm. This has included the avoidance of sensitive landscapes and environmental designations in confirming site suitability and consideration of alternative sites.
	Site selection (including alternatives)	Loss of good land, solar can be generated over car parks etc.	No	The Applicant agrees that domestic solar should also be pursued, but it cannot meet the national urgent need for new generation on its own. Therefore, rooftop solar should come forwards as well as, rather than instead of, large-scale ground-mounted schemes such as this scheme
	Site selection (including alternatives)	People should be allowed to put as many panels on their roof as possible and sell excess to the grid.	No	The Applicant agrees that domestic solar should also be pursued, but it cannot meet the national urgent need for new generation on its own. Therefore, rooftop solar should come forwards as well as, rather than instead of, large-scale ground-mounted schemes such as this scheme
	Site selection (including alternatives)	Should be built on brownfield, industrial, contaminated or previously developed land NOT on high quality agricultural land. Solar on rooftops should be a priority.	No	The Applicant supports the continued development of rooftop solar in the UK, however Section 6.3 of the Statement of Need [APP/5.4] concludes that smaller scale solar, including rooftop solar, must be considered as additional to, as opposed to instead of, the need for large-scale solar because of reasons associated with pave, affordability and total potential deliverable and effective capacity. The government has clarified that its Clean Power 2030 and 2035 capacity ranges for solar do not seek to prioritise or constrain rooftop solar deployment, and apply to large-scale solar only. The 2035 large-scale solar capacity range is 45-69GW. 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.
	Site selection (including alternatives)	Too big and should not be using agricultural land. Another project either side of Sporle is also being proposed. Solar panels should be on top of all new builds and existing commercial buildings.	No	<p>The Applicant has followed a step-by-step site selection process, which confirms the location of the Scheme is suitable for a large-scale solar farm. This has included the avoidance of sensitive landscapes and environmental designations in confirming site suitability and consideration of alternative sites. For further details, refer to ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1].</p> <p>The Applicant is cognisant 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].</p> <p>The Applicant supports the continued development of rooftop solar in the UK; however, Section 6.3 of the Statement of Need [APP/5.4] concludes that smaller-scale solar, including rooftop solar, must be considered as additional to, as opposed to instead of, the need for large-scale solar.</p>
	Site selection (including alternatives)	<p>The solar farm will encroach on some outstanding natural beauty, around castle acre in particular and the ancient Nar river valley.</p> <p>Whilst not against solar farms in general, I don't think this is the best location.</p>	No	<p>The Design Approach Document [APP/5.7] sets out the Project Level Design Principles, which have guided the detailed design of the Scheme. This includes commitments to respond to the character of the Site, respect the setting of heritage assets, and support the objectives of Norfolk's Green Infrastructure Strategy. These principles were developed in consultation with local stakeholders, communities, and technical specialists, and continue to ensure that the Applicant is taking an environmentally-led approach.</p> <p>In response to the consultation, the Applicant has located the National Grid Substation, Customer Substation, and BESS in Fields 27 and 24 to the south of Bartholemew's Hills Plantation, reducing the visibility of this infrastructure from Castle Acre.</p>
	Site selection (including alternatives)	<p>I realise the choices of land are made according to planning policy using the ALC but this is outdated and does not reflect the productivity of land in the Brecks which with irrigation is very productive although it is sandy and low grade (3-5) on the ALC classification.</p> <p>Warehousing in the UK could provide up to 15GW of power according to the UK Warehouse Association, our local high school car park is having solar panels installed above the parking, housing in the UK is still being built without solar panels and many industrial</p>	No	<p>The Applicant supports the continued development of rooftop solar in the UK; however, Section 6.3 of the Statement of Need [APP/5.4] concludes that smaller-scale solar, including rooftop solar, must be considered additional to, rather than instead of, the need for large-scale solar.</p>



		buildings (which would have capacity to use the power) could have solar installations. I am aware that more flexibility in the National Grid would be needed to utilise some of these options but a more integrated system is needed where panels and batteries are installed at the point of use. Incentivisation is needed for this.		
	Site selection (including alternatives)	I believe solar panels should be placed on buildings not fertile farmland. It will displace fertile farmland vital to local and national food production, as well as threatening associated livelihoods and Norfolk's agricultural heritage and farming skills.	No	<p>The Applicant supports the continued development of rooftop solar in the UK; however, Section 6.3 of the Statement of Need [APP/5.4] concludes that smaller-scale solar, including rooftop solar, must be considered as additional to, as opposed to instead of, the need for large-scale solar.</p> <p>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.</p> <p>The Applicant recognises that a number of farming businesses operate on the Site, including pig farming, poultry rearing, sheep grazing, and arable farming. All farm enterprises are considered to be of medium or low sensitivity, with the overall effect of the Scheme assessed as not significant. There are no effects of severance.</p> <p>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.</p>
	Site selection (including alternatives)	I feel there are far more appropriate places to build a solar farm of this size in Norfolk. Not in this very special area of beauty which has a very active ecosystem, which will only disrupted, not created.	No	<p>The Applicant has followed a step-by-step site selection process, which confirms that the location of the Scheme is suitable for a large-scale solar farm. This has included the avoidance of sensitive landscapes and environmental designations in confirming site suitability and consideration of alternative sites</p> <p>The Applicant is committed to supporting nature recovery and biodiversity enhancement. The draft Local Nature Recovery Strategy principles, where appropriate, have informed the approach to biodiversity enhancements across the Site. The oLEMP [APP/7.11] sets out the specific strategies and priorities identified in the draft LNRS that are relevant to the Site and how they have been incorporated into the Scheme.</p>



				<p>The Biodiversity Net Gain Assessment Report [APP/7.4] submitted with the DCO Application demonstrates significant net gains for Biodiversity as a result of the Scheme.</p> <p>ES Chapter 7: Ecology and Biodiversity [APP/6.2] identifies and proposes measures to address the potential impacts and likely significant effects on Ecology and Biodiversity during the lifetime of the Scheme.</p>
	Site selection (including alternatives)	<p>The UK (including Norfolk) is covered in domestic and commercial roofs and car parks that are crying out for the installation of solar energy panels. These are suitable sites for solar energy panels, often in the very places that the energy itself is most needed. These suitable sites should be thoroughly used and exploited FIRST.</p>	No	<p>The Applicant supports the continued development of rooftop solar in the UK; however, Section 6.3 of the Statement of Need [APP/5.4] concludes that smaller-scale solar, including rooftop solar, must be considered additional to, rather than instead of, the need for large-scale solar.</p>
	Site selection (including alternatives)	<p>Solar panels should go on roofs, not only of domestic dwellings but also warehouses and farm buildings. They could provide shade to car parks, as has been done in other countries.</p> <p>The efficiency of solar panels is questionable. I have solar panels on my house and during the months March - October I feed more power into the grid than I use, but in the winter the panels do not produce that much and that is the time that I need more power for heating. This would be true also for large scale solar energy production: plenty produced in the summer but not in the winter and no amount of battery storage will redistribute the surplus from the summer to when energy is needed on the winter. To quote enormous figures (500MWac) of production is misleading.</p>	No	<p>The Applicant supports the continued development of rooftop solar in the UK; however, Section 6.3 of the Statement of Need [APP/5.4] concludes that smaller-scale solar, including rooftop solar, must be considered additional to, rather than instead of, the need for large-scale solar.</p> <p>Section 6.8 of the Statement of Need [APP/5.4] compares the efficiency of solar generation with other established technologies and notes that efficiency is still improving, and the input fuel is free of carbon and costs nothing. This supports the government's view that "solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector" (NPS EN-3, Para 2.10.9).</p> <p>Further, Section 6.5 of the Statement of Need [APP/5.4] provides an analysis of low-carbon energy yield per acre of solar and selected other generation technologies.</p>
	Site selection (including alternatives)	<p>I do not believe farm land should be used for solar panels. Solar panels should be on rooves, buildings , large super markets warehouses, anywhere where they can work and do not impact the environment.</p>	No	<p>The Applicant agrees that rooftop solar should also be pursued, but domestic solar alone cannot meet the national urgent need for a new generation. Therefore, rooftop solar should come forward rather than large-scale ground-mounted schemes such as this one.</p>
	Site selection (including alternatives)	<p>Buildings +++ rather than countryside should be used first for solar panels.</p>	No	<p>The Applicant agrees that domestic solar should also be pursued, but it cannot meet the national urgent need for new generation on its own. Therefore, rooftop solar should come forward, rather than instead of, large-scale ground-mounted schemes such as this scheme.</p>



	Site selection (including alternatives)	There are many better places to locate solar than the Nar Valley, why not focus on industrial buildings, car parks, and non-green spaces?	No	The Applicant has followed a step-by step site selection process which confirms the location of the Scheme is suitable for a large scale solar farm. This has included the avoidance of sensitive landscape and environmental designations in confirming site suitability and consideration of alternative sites. For further details refer to ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] .
	Site selection (including alternatives)	The former Department of Energy and Climate Change estimated that there were 600,000 acres of south facing commercial roof-space in the UK. These are where solar panels should be located.	No	The Applicant supports the continued development of rooftop solar in the UK, however Section 6.3 of the Statement of Need [APP/5.4] concludes that smaller scale solar, including rooftop solar, must be considered as additional to, as opposed to instead of, the need for large-scale solar because of reasons associated with panel, affordability and total potential deliverable and effective capacity. Government has clarified that its Clean Power 2030 and 2035 capacity ranges for solar do not seek to prioritise nor constrain rooftop solar deployment, and apply to large-scale solar only. The 2035 large-scale solar capacity range is 45-69GW.
	Site selection (including alternatives)	Should all be on rooftops.	No	The Applicant agrees that rooftop solar should also be pursued, but domestic solar is not able to meet the national urgent need for new generation on its own. Therefore, rooftop solar should come forwards as well as, rather than instead of, large-scale ground mounted schemes such as this scheme.
	Site selection (including alternatives)	I am not opposed to solar farms but this chosen site seems inappropriate.	No	The Applicant has followed a step-by step site selection process which confirms the location of the Scheme is suitable for a large scale solar farm. This has included the avoidance of sensitive landscape and environmental designations in confirming site suitability and consideration of alternative sites. For further details refer to ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] .
	Site selection (including alternatives)	A fundamental rethink about location and other possible alternatives is needed - not tinkering around the edges.	No	The Applicant has followed a step-by step site selection process which confirms the location of the Scheme is suitable for a large scale solar farm. This has included the avoidance of sensitive landscape and environmental designations in confirming site suitability and consideration of alternative sites. For further details refer to ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] .
	Site selection (including alternatives)	IT IS THE WRONG LOCATION FULL STOP.	No	The Applicant has followed a step-by step site selection process which confirms the location of the Scheme is suitable for a large scale solar farm. This has included the avoidance of sensitive landscape and environmental designations in confirming site suitability and consideration



				of alternative sites. For further details, refer to ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] .
	Site selection (including alternatives)	USE A BROWN FIELD SITE SOMEWHERE ELSE.	No	<p>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 Council. It was determined that within the brownfield registers of King's Lynn and West Norfolk Council and Breckland Council, no brownfield land meets the provision of the 2 - 4 acres per MW, as stated within the NPS EN3 at paragraph 2.10.17, for a 500 MW utility-scale solar farm in proximity to the Site.</p> <p>For further details about site selection, refer to ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1].</p>
	Site selection (including alternatives)	I think the best way to improve community benefits would be to put solar panels on every house in Swaffham, Castle Acre and West Acre. In that way we could still have low cost and efficient energy but also keep our green fields for the potential to grow our own food, enjoy the countryside and a way of life. Why can't this be considered before carving up virgin sites?	No	The Applicant agrees that domestic solar should also be pursued, but that it cannot meet the national urgent need for new generation on its own. Therefore, rooftop solar should come forward rather than large-scale ground-mounted schemes such as this one.
	Site selection (including alternatives)	This is an inappropriate site for a solar development of this size/scale. There are other places and landscapes where a development like this could have a more positive impact on both the landscape and the local economy. Semi-industrialised agricultural grey field sites, and brownfield sites, seem more suitable for such a development.	No	The Applicant has followed a step-by-step site selection process, which confirms the location of the Scheme is suitable for a large-scale solar farm. This has included the avoidance of sensitive landscapes and environmental designations in confirming site suitability and consideration of alternative sites. For further details, refer to ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] .
	Site selection (including alternatives)	Let's not bother utilising the many and extensive Second World War airfields of East Anglia. These haven't, most of them, even been used for wind turbine sites despite the primary reason for their original siting as airfields being the predictable presence of wind. It is all too clear that those in authority are taking a piecemeal approach when, surely, a strategic panoramic approach is called for. Why should local people suffer because of the indolence of authority?	No	<p>The Applicant notes this point, which concerns national planning policy. The Applicant also notes that there is no policy which requires current or former airfields to be used for energy infrastructure, and that many former airfields have already been returned to agricultural use, adapted for other purposes, or turned over to civil aviation, which means that they are not necessarily more available for development than other sites.</p> <p>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.</p>



	Site selection (including alternatives)	<p>This is not a suitable site for a solar 'farm' of this size. It is on a wholly rural and historic landscape on the top of a hill, with north facing slopes, overlooking an historic valley. It is a comprehensive industrialisation of a rural landscape.</p> <p>There is no national, regional or local plan or planning indicating that this is a suitable site. The only reason it is here is that it is close to powerline 4v and there is a compliant landowner. There are other places where your development could have a positive impact. Places where you could make something of high visual impact without any mitigation measures. A place you could be proud of. A place that people would want to visit. Places that need the development and the jobs, places where your development would enhance, not destroy, the landscape. I suggest the huge area around the Walpole Hub, the area around Wisbech/Spalding and beyond, and the area in North Lincolnshire around Goole and Scunthorpe.</p>	No	<p>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. Larger infrastructure has been located south of Bartholemew's Plantation, and so this 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].</p> <p>The Applicant also thanks the commenter for the suggestions as to further development locations, while noting that its parent company has already brought forward projects in the North of Lincolnshire as suggested. As to the areas around Wisbech and Spalding, the Applicant notes that rates of economic inactivity in the South Holland and Fenland districts are in line with the national average, and in both cases are lower than in Breckland, suggesting that neither area is more in need of the jobs.</p>
	Site selection (including alternatives)	<p>There are viable alternatives for renewable energy generation that do not require the sacrifice of productive agricultural land. Encouraging solar panels on industrial sites, carparks, and other non-agricultural areas would reduce the need to repurpose rural landscapes for solar farms.</p>	No	<p>The Applicant supports a multi-technology generation portfolio. Domestic solar should also be pursued, but that this is not able to meet the national urgent need for new generation on its own. Therefore, rooftop solar should come forwards as well as, rather than instead of, large-scale ground mounted schemes such as this scheme.</p>
	Site selection (including alternatives)	<p>3. Lack of Consideration for Sequential and Lower-Impact Alternatives</p> <p>National planning law expects that renewable energy infrastructure should be developed in the most appropriate locations, balancing environmental, agricultural, and visual impacts. However: There is no evidence that alternative non-agricultural sites have been assessed in a meaningful sequential approach.</p>	No	<p>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.</p>
	Site selection (including alternatives)	<p>Recent studies, including by SolarQ UK, show that the UK's solar targets can be met without sacrificing productive farmland, by prioritising rooftops, car parks, and brownfield sites. The developer has not justified why these alternatives have been dismissed.</p>	No	<p>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.</p> <p>The Applicant is supportive of rooftop or carpark solar installations as part of the nation's generation mix. However, such installations are more complex, as they involve multiple small sites with a mix of ownership and tenancy. As more urban locations, they can also be constrained by the availability of suitable grid connections.</p>



				<p>As such, widespread rooftop and car park solar installation remains a longer-term option.</p> <p>Further, the Applicant observes that variations in local weather and local energy demands would still result in demand on the National Grid. As it would connect to the Grid, this Scheme would provide clean, secure generation that could meet this continuing demand.</p> <p>Rooftop installation is more complex. The Applicant notes, for example, efforts underway by Solar Energy UK and the Warehousing Association to redraft standard commercial building lease terms to facilitate rooftop solar installation on larger logistics buildings, but understands that renewed terms will take a number of years to become common across the country. As such, widespread rooftop solar installation remains a longer-term option.</p>
	Site selection (including alternatives)	<p>The way forward must be based on the potential to harness technological advances in solar energy production which have minimal impacts on the landscape. It will become possible to “harvest” solar power from all manner of artificial surfaces including road surfaces, warehouse and factory roofs etc and these methodological breakthroughs, together with other new approaches such as producing hydrogen from plastic waste, will ultimately make farmland consuming, landscape destroying commercial photovoltaic solar farms redundant. CPRE Norfolk wants to see more effort, ingenuity and resources put into these new methods of producing renewable energy and, once again, when and where possible, with maximum input from the local community. Research carried out by the UCL Energy Institute for CPRE confirmed that installing solar panels on existing rooftops and other land such as car parks could provide at least 40-50GW of solar energy in England by 2035 and by 2050, with further investment, that there is potential to generate 117GW of low carbon electricity from roofs and other developed spaces - i.e. well in excess of the government’s 2035 national target.</p>	No	<p>The Applicant recognises that it is necessary to build some flexibility into the design of the Scheme when submitting the DCO Application, so that the detailed design of the Scheme can be informed by technical considerations and post-consent work, and can take advantage of technological innovations. This is particularly important to maintain flexibility amid the rapid pace of change in solar PV and battery storage technology, whilst ensuring a robust and comprehensive assessment of potential effects. Where such flexibility or optionality is required, this is explained in Section 3.3 to Section 3.6 of ES Chapter 5: The Scheme [APP/6.1].</p> <p>Section 6.8 of the Statement of Need [APP/5.4] compares the efficiency of solar generation with other established technologies and notes that efficiency is still improving, and the input fuel is free of carbon and costs nothing. This supports the government’s view that “solar is a key part of the government’s strategy for low-cost decarbonisation of the energy sector” (NPS EN-3, Para 2.10.9).</p> <p>The Applicant is aware of the cited UCLEI research. However, even the CPRE’s summary of this research acknowledged that “ground-mounted solar projects will be needed in the short term to hit national decarbonisation.”</p> <p>Moreover, the research does not say that the numbers are practically or quickly deliverable, noting that its assessment was of technical potential but that further analysis would be needed “to construct swift, robust and balanced development pathways for solar PV capacity in different urban and rural situations.” The UCLEI researchers’ conclusions therefore confirm the Applicant’s view that the potential for widespread rooftop solar is a longer-term option.</p>



14 Operational phase

Topic	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Operational Phase	Access to, and maintenance of, the solar PV panels and associated infrastructure	The impact on a rural area such as this would be too severe in terms of damage from construction, damage from ongoing maintenance activities and visual impact on an area of natural beauty.	No	<p>The Applicant notes these comments. During operation, maintenance activities will be limited in scale and frequency, typically involving periodic inspections, vegetation management, and equipment servicing. These activities will be carefully managed and monitored to avoid damage to local roads, land, or habitats.</p> <p>The oOEMP [APP/7.8] sets out the environmental principles to be followed during the Scheme's operation. The oOEMP [APP/7.8] will serve as the basis for a detailed OEMP to be prepared prior to commencement of operations.</p> <p>The Design Approach Document [APP/5.7] sets out how good design has been embedded in the Scheme from the outset of the project, and how it will continue to be achieved through to detailed design, to ensure the Scheme delivers well-designed project outcomes and mitigates adverse effects.</p> <p>The Design Principles, Parameters and Commitments [APP/5.8] document sets out the parameters and commitments by which the EIA has been undertaken, along with the design principles which are to inform the detailed design, should the Scheme receive consent.</p> <p>The Applicant also considers that the effects of the Scheme on construction and visual impact have been fully assessed and reported in the ES [APP/6.1 – 6.5].</p>
	Scheme maintenance	As for sustainability, I'm sure as new technology is changing so rapidly the panels will need replacing.	No	<p>The Applicant expects the operational life of the solar PV panels to be 40 years or more. This means that the PV Panels are expected to be replaced only once during the operational phase. The programme of replacement activities is assessed in Chapters 6 to 16 of the ES [APP/6.1 – 6.5]</p>
	Scheme maintenance	Fast-moving technology updates will render system obsolete within it's lifetime.	No	<p>The design of the Scheme is an iterative process based on environmental assessment and consultation with statutory and non-statutory consultees.</p> <p>The Applicant notes that it is necessary to build some flexibility into the Scheme's design when submitting the DCO Application, so that the detailed design can take advantage of technological innovations. This is particularly important to maintain flexibility amid the rapid pace of change in solar PV and battery storage technology, whilst</p>



				ensuring a robust and comprehensive assessment of potential effects. Where such flexibility or optionality is required, this is explained within ES Chapter 5: The Scheme [APP/6.1] .
	Scheme maintenance	60 years is too long, technology is advancing fast but we locals would be stuck with this sea of solar farm kit for its duration.	No	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.
	Sheep grazing	Possible harmful effects to humans or the sheep grazing beneath. Not entirely convinced of the sustainability.	No	The Applicant notes that the land is currently, in part, grazed by sheep. Should consent be granted, grazing by sheep will be explored; however, the ES [APP/6.1 – 6.5] assumes that all grassland will be managed by machinery as a default position. Further details can be found in the oOEMP [APP/7.8] submitted as part of the DCO Application.
	Sheep grazing	Is there a grazing management plan? Habitat focused?	No	Should consent be granted, grazing by sheep will be explored; however, the ES [APP/6.1 – 6.5] assumes that all grassland will be managed by machinery as a default position. Further details can be found in the oOEMP [APP/7.8] submitted as part of the DCO Application.

15 People

Topic	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
People	National government and policy	The fix is clearly in. This is a done deal, the opportunity grasped by yourselves with a completely pliant Secretary of State and new planning rules that entirely subvert our democracy. Apparently, politicians are concerned about the ever lowering levels of participation in politics and voting by the general public: for all and any genuinely interested, look no further than here.	No	The Applicant notes the comments regarding the planning process. The Applicant has followed, and will continue to follow, all relevant statutory procedures and planning guidance set out by the Secretary of State and local planning authorities. The Scheme is being brought forward in a transparent manner, with opportunities for consultation and engagement provided at each stage to enable statutory and non-statutory stakeholders, as well as members of the public, to express their views. The Applicant has submitted the DCO Application for the Scheme. The final decision on whether or not to grant development consent would be made by the Secretary of



				State for Energy Security and Net Zero, in accordance with the relevant policy and legislative requirements.
	National government and policy	There are currently 3 national consultations being undertaken by the National Energy Systems Operator (NESO): the Centralised Strategic Network Plan (CSNP), the Strategic Spatial Energy Plan (SSEP) and the Regional Energy Strategic Plan (RESP). It is hoped that these consultations will produce a national plan for infrastructure, identifying suitable sites for national infrastructure developments.	No	The Applicant notes these consultations and is participating where appropriate. The Scheme will ultimately be considered as an NSIP.
	National government and policy	This development should not even be considered until the results of the consultations by the National Energy Systems Operator (NESO): the Centralised Strategic Network Plan (CSNP), the Strategic Spatial Energy Plan (SSEP) and the Regional Energy Strategic Plan (RESP) are available.	No	The Applicant notes these comments but disagrees, as whilst these consultations are underway, the pursuit of planning approval for these very projects is still required if we are to meet the clean energy targets set by the UK government.
	National government and policy	I am also very displeased that all your proposed solar farms are of a size where you know local planning have no say. You know that because this government has created a ridiculous time scale for net zero that they want to be seen to meet this goal so you know you are onto a winner and despite saying you will listen to us, we know you won't.	No	<p>The Scheme is classified as an NSIP as it has a proposed generating capacity of over 50MW. As an NSIP, the Applicant must apply for a DCO, and the decision maker for this Application is the Secretary of State for Energy Security and Net Zero.</p> <p>NPS EN-1, NPS EN-3, and NPS EN-5 provide the primary policy basis for deciding the DCO Application. Paragraphs 4.1.12 – 15 of NPS EN-1 confirm that the SoS may consider development plan documents both important and relevant to their decision-making. This notwithstanding, NPS EN-1 confirms that the NPSs constitute the primary policy documents and would take precedence over other matters in the event of a conflict, given the national significance of the infrastructure.</p> <p>The Applicant has conducted an iterative programme of consultation and engagement to inform the design of the Scheme and design evolution as detailed in Design Approach Document [APP/5.7]. This includes seeking the views of local people and host authorities as part of formal consultation on the Scheme, as described in the Consultation Report [APP/5.1].</p> <p>As part of the examination process, Local Impact Report(s) prepared by the host and neighbouring authorities would typically be informed by the relevant local planning policy context.</p>
	National government and policy	Sadly, I believe that this project under the current Government is unstoppable. Local towns and villages should get some recompense to support local communities.	No	The Planning Statement [APP/5.5] , section 5.3, outlines the Benefits of the Scheme, including three key requirements of the UK energy market: decarbonisation, electricity demand, and security of supply. Additionally, the Scheme would provide benefits to the community through enhancements to PRoWs and permissive paths, the



				<p>provision of new tree and hedgerow plantings, Biodiversity Net Gain, a community fund, and creating direct and indirect effects associated with employment, skills, and education.</p> <p>The Applicant has also committed to providing a Community Benefit Fund. This 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.</p>
	National government and policy	<p>Development Mitigation and Planning Obligations</p> <p>I have particularly raised, under the National Planning Policy Framework (2025), and the Borough Council of King's Lynn and West Norfolk's policy on archaeology and the historic landscape (Local Plan adopted, 2025), not just the assessment of the 'heritage significance' of individual assets and this total landscape (designated and non-designated heritage assets), as part of the planning process, but a later stage community mitigation.</p>	No	<p>As part of the planning policy assessment, both Table 4: NPPF and Table 5: Breckland Local Plan, within the Policy Compliance Document [APP/5.6], provide detailed evidence of compliance with relevant national and local policy documents, along with a comprehensive assessment. The Borough Council of King's Lynn and West Norfolk's Local Plan has not been included as the Scheme does not fall within the borough boundary.</p>
	National government and policy	<p>Successive ministers have done nothing in London or the South-East to either feed or mitigate the seemingly insatiable demand for electricity; so much easier to despoil other regions where the people don't count than force hard choices upon the people who somehow do</p>	No	<p>At the outset, the Applicant aimed to deliver an NSIP-scale solar farm to meet the critical national need for low-carbon and renewable energy generation. Site selection is driven primarily by:</p> <ul style="list-style-type: none"> • The availability of a suitable grid connection • Suitable topography and irradiance • The availability of land <p>ES Chapter 4: Reasonable Alternatives and Design Evolution and Appendix 1: Site Evaluation Report, part of the Planning Statement [APP/5.5], provides an overview of the site evaluation process, which the Applicant has undertaken, for both the siting of the proposed National Grid Substation and the evaluation of land available for solar development, resulting in the land that is subject to the Scheme being brought forward. The Site's suitability for National Grid Substation and solar development is due to the lack of landscape and environmental statutory designations, limited residential receptors, the absence of BMV on the published "provisional" ALC maps, and the Likelihood of BMV maps and accessibility from a major highway network.</p>
	National government and policy	<p>There is a highly concerning democratic deficit evident in this project. When the current Energy Minister asked the country for their support in 2015, the reply was a resounding no thanks. The Labour government currently indulging</p>	No	<p>The Applicant notes these comments. The points raised in this response are political in nature and whilst it is noted, we wish to assert that the national need for cleaner energy</p>



		enthusiasms enjoys a huge parliamentary majority with little more than 30% popular support and, outside Norwich, very little in Norfolk. Make no mistake, this ugly project is a gross imposition upon people here with all the appearance of political spite.		receives cross-party support in the UK and this project is well placed to help towards those ambitions.
	National government and policy	I don't think the government should cover huge swathes of farm land in solar panels, when with the state of world affairs food security could become a problem	No	<p>Solar development at scale is necessary to help meet the urgent need for homegrown, secure, renewable energy, as mandated by Government policy to address climate change and ensure energy security. The scale of development is an important factor, and maximising the generating capacity of schemes improves their economic efficiency, bringing power to market at the lowest cost possible.</p> <p>It is shown that larger schemes deliver more quickly and at a lower unit cost than multiple independent schemes which make up the same total capacity. The Statement of Need [APP/5.4], which supports the Application, provides further detail on the need and scale for the Scheme.</p> <p>The Statement of Need [APP/5.4] provides evidence that urgent and unprecedented actions are required on a global scale to halt climate change. A rapid increase in the supply of low-carbon electricity is needed for the UK to meet its legally binding climate change targets. Solar generation is a critical part of the UK's strategy to achieve net zero by 2050, a key step towards which is the government's national mission for clean power by 2030.</p> <p>Food security is not an issue addressed within the suite of Energy NPSs, the NPPF, or Local Development Plan policies. However, it is recognised as a source of national debate and has been raised in response to consultations. It is, however, referred to in the 2024 Written Ministerial Statement, which sets out that food security is an important part of our national security. The existing agricultural land use for the Scheme is predominantly agricultural, being utilised in part for pig farming, chickens, sheep and other livestock, and in part for arable crop production across agricultural fields. Given the absence of any specific policy requirement, no further consideration of this matter is provided.</p>
	National government and policy	There is no national, regional or local plan or planning indicating that this is a suitable site.	No	<p>The Scheme is classified as an NSIP as it has a proposed generating capacity of over 50MW. As an NSIP, the Applicant must apply for a DCO and the decision maker for this Application is the Secretary of State for Energy Security and Net Zero.</p> <p>NPS EN-1, NPS EN-3, and NPS EN-5 provide the primary policy basis for deciding the DCO Application. Paragraphs 4.1.12 – 15 of NPS EN-1 confirm that the SoS may consider development plan documents both important and relevant to their decision-making. This notwithstanding,</p>



				<p>NPS EN-1 confirms that the NPSs constitute the primary policy documents and would take precedence in the event of a conflict between the NPSs and other matters, given the national significance of the infrastructure.</p> <p>The Scheme seeks to make the most efficient use of land, balancing the need to maximise the grid capacity and avoid unacceptable impacts. More information about how the Applicant has approached the design of the Scheme is set out within the Planning Statement [APP/5.5] and the Design Approach Document [APP/5.6].</p> <p>The Policy Compliance Document [APP/5.6] offers detailed evidence of compliance with relevant national and local policy documents, along with a thorough assessment.</p> <p>As part of the examination process, Local Impact Report(s) prepared by the host and neighbouring authorities would typically be informed by the relevant local planning policy context.</p>
	National government and policy	<p>Overview:</p> <p>In my role as the UK's Member of Parliament for the South West Norfolk constituency, within which IGP is proposing the Drovers Farm Solar generation application, I am responding to the statutory consultation, for which your company agreed to an extended deadline ending on 18 July 2025.</p> <p>I recognise the need for energy security, I support the net zero ambitions of my Government and the need to develop renewable energy, but we must approach these challenges and their solutions pragmatically with due regard for local communities, and recognise the implications. A very large number of my constituents who live in communities near to the proposal have expressed concerns to me about your proposal. I share many of these and have highlighted some key issues below. I will also be making representations to the Secretary of State for Energy and Net Zero at the appropriate time.</p>	No	<p>The Applicant notes these comments and welcomes the recognition of the need for energy security. The Applicant also acknowledge the concerns expressed by the constituents highlighted and has set out across these tables our responses to the issues raised.</p>
	Climate change/Net zero	<p>I believe decarbonisation and energy security can be achieved by other less invasive means without the adverse impact on the countryside that this project would cause.</p>	No	<p>The Applicant notes these comments but disagrees as in order for us to meet the UK's clean energy ambitions a mix of solutions including utility scale solar will be required.</p>
	Climate change/Net zero	<p>5, IT MAKES A MOCKERY OF DECARBONISATION, MANUFACTURING & IMPORTING PANEL & INFRASTRUCTURE. TOTAL GREENWASH!</p>	No	<p>The Applicant notes this comment but disagrees, noting that as set out in ES Chapter 13: Climate Change [APP/6.2] the Scheme would result in a net reduction in GHG emissions.</p>



	Climate change/Net zero	Fire risk is also an issue, I feel that as climate change is happening, we are seeing very dry summers in Norfolk, and an increased risk of fire. I don't see anything to address this.	No	The conclusions of the Battery Fire Plume Assessment can be found in Appendix 1 of the oBSMP [APP/7.14] , which may inform fire safety protocols and decision-making.
	Climate change/Net zero	A massive [REDACTED] is to be taken over charming, rolling West Norfolk countryside, the gateway to North Norfolk, for no better reason than its declared necessity: for energy security this project brings infinitesimally closer; and a climate emergency this project makes net zero difference to.	No	<p>The Applicant notes these comments but contests the principle that the Scheme will make no different to the climate emergency. If approved, The Scheme would contribute a significant amount of energy generated through a clean energy source, which may otherwise have been delivered through more climate-harming means of generation.</p> <p>The Applicant's Climate Change assessment, including Lifecycle Greenhouse Gas (GHG) Impact Assessment, In-Combination Climate Impacts (ICCI) Assessment, and Climate Change Resilience, is set out in ES Chapter 13: Climate Change [APP/6.2].</p> <p>These assessments conclude that the construction and decommissioning of the Scheme will result in a not significant effect on the global climate while the operation of the Scheme will result in a significant beneficial effect on the global climate, due to the clean energy it produces, thereby providing a net reduction in GHG emissions compared to a scenario without the Scheme based on forecast UK grid average energy emissions available from the Department for Energy Security and Net Zero for the year 2033.</p>
	Planning regulations	<p>The National Planning Policy Framework expects local authorities to protect and enhance valued landscapes and sites of biodiversity and recognise the character and beauty of the countryside and the benefits of the best and most versatile farmland in their policies and decisions.</p> <p>The proposed solar farm raises significant concerns regarding its impact on the local landscape, scenic views, and tourism, particularly in relation to the ancient, fortified Norman planned settlement of Castle Acre with a Grade 1 listed Priory, Gatehouse, Castle, Bailey Gate and Church as well as the Roman Peddars way, an important historical and recreational route. All attract visitors who come to enjoy the region's historic and unspoiled landscapes and thereby contribute to the local tourism economy.</p>	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme, and measures have been taken to mitigate effects through the scheme design, scheme outcomes and design principles and parameters reflected in Figure 5.1 Concept Masterplan [APP/6.3] and Green Infrastructure Parameter Plan to the oLEMP [APP/7.11].</p> <p>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.</p>
	Planning regulations	This proposal would cause substantial and unjustified harm to the historic, archaeological, ecological, and visual landscape of Castle Acre, a village of exceptional heritage significance. While the need for renewable energy is acknowledged, this development	No	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



		fails the tests set out in the NPPF and planning law and does not represent sustainable development.		heritage-related effects expected across the Scheme's construction, operational and decommissioning phases. The embedded and additional mitigation measures 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 draft DCO [APP/3.1] .
	Planning regulations	The proposed development conflicts with several key principles and policies of national planning law and local plans, as set out below.	No	The Applicant notes these comments but contests any conflict with relevant policies and refers to the Policy Compliance Document [APP/5.6] included within the DCO Application.
	Planning regulations	National Planning Policy Framework (NPPF Dec 2024) and associated national policy and guidance NPPF Paragraph 193 adds that planning permission should be refused for development resulting in significant harm to a landscape which cannot be adequately mitigated.	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
	Planning regulations	Summary 1 The Drovers Solar Farm proposal fails to meet key national policy requirements: • It risks permanent loss of productive agricultural land. • It causes unacceptable landscape and visual impacts. • It fails to consider lower-impact, sequentially preferable alternatives. • It provides no clear community or biodiversity benefit. • It lacks compliance with the Environment Act and net gain obligations.	No	The Applicant notes these comments but contests any conflict with relevant policies and refers to the Policy Compliance Document included within our DCO submission. Efforts to provide specific benefits in locally impacted communities are set out in the oSSCEP [APP/7.15] (for employment and economy), in the oLEMP [APP/7.11] (for landscape and ecological improvements) and through the provision of community benefits such as new permissive access routes, or through the community benefit fund (separate to the DCO process).
	Planning regulations	Conflict with the Breckland Local Plan (2023)	No	The Applicant notes this point but contests any conflict with relevant policies and refers to the Policy Compliance Document [APP/5.6] included within the DCO Application.
	Planning regulations	This proposal fails to meet key requirements set out in the adopted Breckland Local Plan.	No	The Applicant notes this point but contests any conflict with relevant policies and refers to the Policy Compliance Document [APP/5.6] included within the DCO Application.
	Planning regulations	7. Core Policies Summary 2 The Drovers Solar Farm proposal fails to meet key local policy requirements: • It conflicts with several core policies in the	No	The Applicant notes these comments but contests any conflict with relevant policies and refers to the Policy Compliance Document [APP/5.6] included within the DCO Application.



		<p>Breckland Local Plan (GEN 02, ENV 05, ENV 06, ENV 01, and EC 06).</p> <ul style="list-style-type: none"> It fails to demonstrate need or appropriateness for the use of greenfield and potentially BMV land. It fails to meet the expectations for low-impact renewable energy development. 		
	Impact on local business	Farming employment lost.	No	<p>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 number of workers on-site is somewhere in the range of 10-15 Full Time Equivalent (FTE) jobs.</p> <p>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).</p>
	Impact on local business	<p>I believe solar panels should be placed on buildings not fertile farmland. It will displace fertile farmland vital to local and national food production, as well as threatening associated livelihoods and Norfolk's agricultural heritage and farming skills.</p>	No	<p>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 number of workers on-site is somewhere in the range of 10-15 FTE jobs.</p> <p>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).</p>
	Impact on local business	<p>Both my husband & I are in favour of solar panels. We are also in favour of small solar farms in order to assist farmers with a guaranteed income.</p> <p>I could go on</p>	No	<p>The Applicant notes these comments and welcomes the support for solar.</p>
	Impact on local business	<p>DS F will critically affect the local economy here, impacting on both farming and tourism.</p>	No	<p>The Applicant notes these comments but disagrees with the statement and has set out how the Scheme benefits the local area within the DCO Application.</p>
	Impact on local business	<p>Community previously benefitted from local strawberry farming the value of that land was lost. Local electrician (now retired) helped with technical aspects of past projects.</p>	No	<p>The Applicant notes these comments but maintains that the Scheme, as proposed, will also bring benefit to the local community.</p>



	Impact on local business	You cannot replace the farming that would have taken place in the area and the way of life that currently happens.	No	The Applicant notes these comments but believes that farming will not be replaced as a result of the Scheme. Whilst 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). Ultimately, the Solar PV Site would also be decommissioned once operations cease and the land returned to its original use and condition as far as practicable and returned to the landowner
	Impact on tourism	Tourism is also important and these sites will impact on that.	No	The Applicant contests any impact to tourism as a result of the Scheme.
	Impact on tourism	It will undermine Castle Acre's appeal as a historic tourist destination as it will be visible from the historic sites. Castle Acre castle is in a location to command the landscape and the impact of new development in the setting must be considered as per the West Norfolk Landscape Character Assessment and the Castle Acre Neighborhood Plan.	No	<p>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.</p> <p>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.</p> <p>The Applicant further 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.</p> <p>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.</p>
	Impact on tourism	Visitors to the Peddars Way, which traverses the area, will experience the visual intrusion of this industrial development in a historic and recreational landscape.	No	<p>ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely effects of the Peddars Way long-distance path.</p> <p>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.</p> <p>The Applicant also notes that the Scheme has incorporated a minimum of a 15m offset on either side of PRow that</p>



				<p>passes through the Order Limits. For Fincham Drove and Petticoat Drove this has been increased to 25m.</p> <p>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.</p>
	Impact on tourism	<p>Castle Acre and South Acre are very attractive villages that offer something to visitors. Negative visual impacts on these villages and priority will harm tourism in the area.</p>	No	<p>The visual impact of the scheme on Castle Acre and South Acre has been considered as part of ES Chapter 6: Landscape and Visual [APP/6.2].</p> <p>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.</p>
	Impact on tourism	<p>How are you going to ensure that standing on the keep of Castle Acre Castle you will only be able to see the views that have been in place since it was built, to ensure the historic surrounding remains, in keeping with Castle Acre Neighborhood Plan? Destroying the views around Castle Acre will have a detrimental effect on tourism in the village including local businesses and holidays homes.</p>	No	<p>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.</p> <p>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.</p> <p>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.</p>
	Impact on tourism	<p>Substation and battery storage are in the worst possible location to destroy Castle Acre as a tourist destination.</p>	No	<p>The visual impact of the scheme on Castle Acre and South Acre has been considered as part of ES Chapter 6: Landscape and Visual [APP/6.2].</p> <p>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.</p>
	Impact on tourism	<p>Cultural heritage protection means views of panels/etc should not be possible at all from the priority which is the largest ruined ecclesiastical building in Norfolk. Castle Acre and South Acre are very attractive villages that offer something to visitors.</p>	No	<p>The ES Chapter 14: Socio-Economics [APP/6.2] An assessment of potential effects upon changes to local tourism assets during the operational phase of the Scheme. It is expected that the Scheme's overall impact on local tourism assets, residents, and businesses would be minimal.</p>



		Negative visual impacts on these villages and priority will harm tourism in the area.		
	Impact on tourism	Mitigate for loss of visitors, distress leading to mental health effects from noise and visual impact, poor transport links to Downham Market, Fakenham, Narborough, Kings Lynn and Swaffham, poor public toilet facilities in all the villages, reduced property values, improve school technology and science attainments locally with guaranteed training, jobs and apprenticeships	No	<p>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.</p> <p>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.</p> <p>Specific benefits in locally impacted communities are set out in the oSSCEP [AP/7.15] (for employment and economy), in the oLEMP [APP/7.11] (for landscape and ecological improvements) and through the provision of community benefits such as new permissive access routes, or through the community benefit fund (separate to the DCO process).</p>
	Impact on tourism	It will lead to the industrialisation of an important agricultural area and impact on the tourism industry. " " " "	No	The ES Chapter 14: Socio-Economics [APP/6.2] An assessment of potential effects upon changes to local tourism assets during the operational phase of the Scheme. It is expected that the overall impact of the Scheme on local tourism assets, residents, and businesses would be minimal.
	Scheduled monuments / archaeology / heritage sites	If you cared about cultural heritage you wouldn't be building this eye sore opposite Castle Acre's 12th C monastic ruins and castle, the best preserved Norman village in the country.	No	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.
	Scheduled monuments / archaeology / heritage sites	<p>I do not consider this location to be suitable for what seems to be a large solar farm.</p> <p>Reasons: too near historic place of interest, and dwellings, increased heavy traffic flow through Swaffham.</p>	No	<p>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.</p> <p>ES Chapter 9: Transport and Access [APP/6.2] concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse transport and access-related effects expected across the Scheme's construction, operational and decommissioning phases of the Scheme.</p>
	Scheduled monuments / archaeology / heritage sites	I believe the developments location adjacent to the A1065 will be detrimental to the wider landscape and	No	The Applicant notes that ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] concludes that, with embedded and additional mitigation



		the setting of Castle Acre Conservation Village and its heritage assets.		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.
	Scheduled monuments / archaeology / heritage sites	If there was a prize for the worst possible site, with regard to spoiling beautiful rural historic landscape, you would win hands down!!	No	<p>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.</p> <p>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.</p> <p>While the Applicant acknowledges that there would be moderate significant adverse effects on landscape character in the long term, these would be confined to the Site only. It is judged that there are no significant adverse landscape effects outside the Site in the long term.</p> <p>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 Applicant's site evaluation process.</p>
	Scheduled monuments / archaeology / heritage sites	Solar farms may have merit but the Norfolk proposals are very worrying. Drovers in particular is a threat to an ancient SSSI and iconic view of a fine ruin.	No	<p>The visual impact of the scheme on the local area, including the SSSI has been considered as part of ES Chapter 6: Landscape and Visual [APP/6.2].</p> <p>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.</p>
	Scheduled monuments / archaeology / heritage sites	Proximity to historic heritage sites and sssi environment. .	No	<p>The visual impact of the scheme on heritage assets in the local area and the SSSI has been considered as part of the ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] and ES Chapter 6: Landscape and Visual [APP/6.2].</p> <p>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.</p>



				<p>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.</p>
	Scheduled monuments / archaeology / heritage sites	<p>Solar farms are hugely inefficient and will dramatically alter views of the countryside and the key features that punctuate it. The historic Peddars way will be ruined in favour of supplying energy to areas that will not suffer the negatives of being surrounded by these monstrosities.</p>	No	<p>The Applicant notes that ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely effects from Peddars Way long-distance path.</p> <p>Short- and medium-term visual effects on this route would be medium-scale, limited to the extent of this route where it runs through/adjacent to the Site. These effects would be of low magnitude, of moderate significance, and adverse.</p>
	Scheduled monuments / archaeology / heritage sites	<p>approx 1 million 3-4 metre posts to hold the Solar Panels will destroy the archaeology and the whole site will blight the view and history of Castle Acre.</p> <p>The proposed site forms part of the open rural setting that gives Castle Acre its distinctive historic character. Large-scale ground-mounted solar infrastructure is entirely out of keeping with this setting, breaching NPPF Paragraph 174, which recognises the intrinsic character and beauty of the countryside and the need to protect valued landscapes.</p>	No	<p>The Applicant notes that archaeological trial trench evaluation has been undertaken and is provided in ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4].</p> <p>The visual impact of the scheme on heritage assets in the local area has also been considered in the ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] and ES Chapter 6: Landscape and Visual [APP/6.2].</p> <p>The Applicant acknowledges that moderate significant adverse landscape effects are predicted in the long term, but only within the Site, and notes that ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] concludes that, with embedded and additional mitigation in place, no significant residual adverse heritage effects are expected during construction, operation, or decommissioning.</p> <p>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.</p>
	Scheduled monuments / archaeology / heritage sites	the Roman and Norman historic ways should not be tampered with	No	<p>The Applicant notes that archaeological trial trench evaluation has been undertaken and is provided in ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4]. This work ensures archaeological features are appropriately considered and safeguarded.</p>
	Scheduled monuments / archaeology / heritage sites	<p>Ruining the context of the many important heritage assets in the immediate vicinity. I hope that these plans are most closely scrutinised. The notion of amelioration and compensation let alone benefits do</p>	No	<p>The visual impact of the scheme on heritage assets in the surrounding area has been considered in ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] and ES Chapter 6: Landscape and Visual [APP/6.2].</p>



		sound hollow when the loss of amenity would be profound.		The Applicant acknowledges that moderate significant adverse landscape effects are predicted in the long term, but only within the Site, and notes that ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] concludes that, with embedded and additional mitigation in place, no significant residual adverse heritage effects are expected during construction, operation, or decommissioning.
	Scheduled monuments / archaeology / heritage sites	The rural character of Castle Acre and surrounding area gives a strong sense of remoteness and tranquility. It will dramatically alter the natural beauty and character of the landscape and detract from the scenic and historic views.	No	<p>The visual impact of the scheme on Castle Acre and the surrounding area been considered as part of the ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] and ES Chapter 6: Landscape and Visual [APP/6.2].</p> <p>The Applicant acknowledges that moderate significant adverse landscape effects are predicted in the long term, but only within the Site, and notes that ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] concludes that, with embedded and additional mitigation in place, no significant residual adverse heritage effects are expected during construction, operation, or decommissioning.</p>
	Scheduled monuments / archaeology / heritage sites	<p>Landscape and visual -that, as far as possible, areas of historic and landscape significance are screened in a way that is sympathetic to the landscape or not subjected to adverse visual impact. See comments at 2a) on Peddars Way.</p> <p>Cultural heritage and archaeology “ as mentioned above the cultural heritage and archaeology should be protected and where possible enhanced for example by community benefit grants.</p>	No	<p>The Applicant notes that ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely effects from Peddars Way long-distance path.</p> <p>Short- and medium-term visual effects on this route would be medium-scale, limited to the extent of this route where it runs through/adjacent to the Site. These effects would be of low magnitude, of moderate significance, and adverse.</p> <p>The visual effect upon this route would be significant, in the short and medium term, where it runs through the Site and up to approximately 300m beyond the Site.</p> <p>However, the Applicant notes that following the application of mitigation measures such as mitigation planting and landscape management, the effects would be reduced to not significant in the long term.</p>
	Scheduled monuments / archaeology / heritage sites	I regard this example of creeping industrial development as a tragedy in its proximity to South Acre Church and the nar valley.	No	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.
	Scheduled monuments / archaeology / heritage sites	<p>I understand the area concerned is already a natural area.</p> <p>In my opinion a solar farm would not enhance the character of the historic village Castle Acre.</p>	No	<p>The Applicant notes these comments but points to the visual impact of the scheme as considered under ES Chapter 6: Landscape and Visual [APP/6.2].</p> <p>While the Applicant acknowledges there would be moderate significant adverse effects upon landscape character in the long term, this would be within the Site</p>



				only. It is judged that there are no significant adverse landscape effects outside the Site in the long term.
	Scheduled monuments / archaeology / heritage sites	This is a unique heritage setting in a chalk stream valley with nationally significant heritage assets - I would be hard pressed to think of a less suitable site!	No	<p>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.</p> <p>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.</p>
	Scheduled monuments / archaeology / heritage sites	The areas involved , especially towards westacre, narford, Southacre and Castle acre are inappropriate. They are historic areas with natural beauty to yhe landscape,	No	<p>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, layouts and choice of technology.</p> <p>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.</p>
	Scheduled monuments / archaeology / heritage sites	I consider the proposed solar farm and plan to be very destructive to a unique heritage and ecological area. This is an area that should be protected from such a proposition. It has 1000s of years of history and a vibrant and delicate eco balance.	No	The Applicant notes that the visual impacts of the Scheme on the surrounding area have been considered in ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] and ES Chapter 6: Landscape and Visual [APP/6.2] .
	Scheduled monuments / archaeology / heritage sites	Totally the wrong area in so many ways; historically, visually, Environmentally, agricultural sustainabiliity, ethically and impactfullness.	No	<p>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, layouts and choice of technology.</p> <p>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.</p>
	Scheduled monuments / archaeology / heritage sites	. The project would be too close to Castle Acre which is of historic significance.	No	<p>The Applicant has undertaken appropriate measures to ensure the right distances have been designed into the Scheme to protect any sensitive receptors.</p> <p>The visual impact of the scheme on heritage assets in Castle Acre has been considered as part of the ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] and ES Chapter 6: Landscape and Visual [APP/6.2].</p>



				The Applicant acknowledges that moderate significant adverse landscape effects are predicted in the long term, but only within the Site, and notes that ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] concludes that, with embedded and additional mitigation in place, no significant residual adverse heritage effects are expected during construction, operation, or decommissioning.
	Scheduled monuments / archaeology / heritage sites	The solar farm will ruin the tranquil ancient setting of Castle Acre and cause noise and visual disturbance.	No	Any noise will be mitigated to levels that are acceptable in line with relevant guidance and criteria, which have been based on human response and the likelihood of nuisance perception. The visual impact of the scheme has been considered as part of ES Chapter 6: Landscape and Visual [APP/6.2] .
	Scheduled monuments / archaeology / heritage sites	This proposal would cause substantial and unjustified harm to the historic, archaeological, ecological, and visual landscape of Castle Acre, a village of exceptional heritage significance. While the need for renewable energy is acknowledged, this development fails the tests set out in the NPPF and planning law and does not represent sustainable development.	No	The Applicant notes this and confirms the visual impact of the Scheme on heritage assets in Castle Acre has been considered as part of the ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] and ES Chapter 6: Landscape and Visual [APP/6.2] . 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.
	Scheduled monuments / archaeology / heritage sites	. Cultural heritage protection means views of panels/etc should not be possible at all from the priority which is the largest ruined ecclesiastical building in Norfolk.	No	The Applicant notes this but confirms the visual impact of the scheme on heritage assets has been considered as part of ES Chapter 6: Landscape and Visual [APP/6.2] . 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.
	Scheduled monuments / archaeology / heritage sites	I think it is self evident that the priory should not be affected, neither should South Acre Church or the Peddars Way.	No	The Applicant notes these comments and the visual impact of the scheme on South Castle Acre as well as Peddars Way has been considered as part of ES Chapter 6: Landscape and Visual [APP/6.2] . 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.
	Scheduled monuments / archaeology / heritage sites	Cultural Heritage - Swaffham, West Acre and Castle Acre are all steeped in history. You won't be able to improve on ruins or shape solar panel fields to provide	No	The Applicant notes that the visual impacts of the Scheme on Swaffham, West Acre and Castle Acre are assessed in ES Chapter 8: Cultural Heritage and Archaeology



		historical interest. I think it will take away the wonderful historical nature of these villages.		[APP/6.2] and ES Chapter 6: Landscape and Visual [APP/6.2]. The Applicant acknowledges that moderate significant adverse landscape effects are predicted in the long term, but only within the Site, and notes that ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] concludes that, with embedded and additional mitigation in place, no significant residual adverse heritage effects are expected during construction, operation, or decommissioning.
	Scheduled monuments / archaeology / heritage sites	Likewise Castle Acre Priory is a heritage site of almost unparalleled significance.	No	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.
	Scheduled monuments / archaeology / heritage sites	I live in Castle Acre, a place of great historical interest and beauty. As well as the people that live here, many of whom have settled here specifically for those reasons, the village is visited by people from the surrounding area who also appreciate its unique beauty	No	The visual impact of the scheme on Castle Acre has been considered as part of ES Chapter 6: Landscape and Visual [APP/6.2] . 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.
	Scheduled monuments / archaeology / heritage sites	If you cared about cultural heritage you wouldn't be building this eye sore opposite Castle Acre's 12th C monastic ruins and castle, the best preserved Norman village in the country.	No	The visual impact of the scheme on Castle Acre has been considered as part of ES Chapter 6: Landscape and Visual [APP/6.2] . 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.
	Scheduled monuments / archaeology / heritage sites	Clearly ALL of the above would be reasons for NOT building a solar farm plus all that goes with your project. The Nar Valley is a historic conservation area - There is a medieval Lepers Hospital on the edge of Southacre plus multiple sites of antiquity locally.	No	The Applicant notes that the visual impacts of the Scheme are assessed in ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] and ES Chapter 6: Landscape and Visual [APP/6.2] . The Applicant acknowledges that moderate significant adverse landscape effects are predicted in the long term, but only within the Site, and notes that ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] concludes that, with embedded and additional mitigation in place, no significant residual adverse heritage effects are expected during construction, operation, or decommissioning.
	Scheduled monuments / archaeology / heritage sites	Should this development go ahead, there needs to be ongoing support for the local churches, historic sites and communities in South Acre and Castle Acre.	No	These comments are noted by the Applicant and will be taken into account in the community benefit fund consideration. Ultimately, whether these initiatives are



		These communities will be sorely blighted by the scale of the development, their once peaceful rural lives and environment irrevocably altered.		selected to benefit from the fund will be determined independently by a local foundation.
	Scheduled monuments / archaeology / heritage sites	<p>Negative Impact on the Natural Environment and Heritage</p> <p>The Drovers Solar Farm, located north of Swaffham, threatens to spoil a historically rich and visually stunning rural landscape. This area is integral to the beauty and heritage of the region, and the planned solar farm will cause irreversible damage to this setting.</p>	No	<p>The visual impact of the scheme on the local area has been considered as part of ES Chapter 6: Landscape and Visual [APP/6.2].</p> <p>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.</p>
	Scheduled monuments / archaeology / heritage sites	<p>Polyfocal villages, hamlets and farms, field boundaries, deeply cut lanes and commons have been in place for at least a thousand years or so. Your development is large scale, and it cannot be denied will impact on the experience of that rural historic assets and this historic landscape.</p>	No	<p>The Applicant notes that the visual impacts of the Scheme are assessed in ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] and ES Chapter 6: Landscape and Visual [APP/6.2].</p> <p>The Applicant acknowledges that moderate significant adverse landscape effects are predicted in the long term, but only within the Site, and notes that ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] concludes that, with embedded and additional mitigation in place, no significant residual adverse heritage effects are expected during construction, operation, or decommissioning.</p>
	Scheduled monuments / archaeology / heritage sites	<p>I have argued that community engagement and a mitigation strategy that enables local people to continue to experience and better understand this historic landscape is important.</p>	No	<p>The Applicant notes these comments and has developed a comprehensive green infrastructure strategy as set out in the oLEMP [APP/7.11], which includes the provision of new hedgerows adjacent to the existing PRoW.</p> <p>The Applicant within the oPRoWPPMP [APP/7.12] has committed to specific duties, such as maintaining stiles and gates, keeping paths clear of obstructions, and ensuring hedgerows and aligning vegetation do not encroach on the PRoW.</p>
	Scheduled monuments / archaeology / heritage sites	<p>Likewise, the proposed area for the solar farm includes more than one ancient Roman road (Fincham Drove, particularly). What plans are proposed to make sure that there is no damage to this or other ancient byways?</p>	No	<p>The Applicant notes this comment and confirms that archaeological trial trench evaluation has been undertaken and is provided in ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4].</p>
	Scheduled monuments / archaeology / heritage sites	<p>Cultural heritage and visual impact. The information booklet notes that within the 5-km Study Areas surrounding the Site, there are 151 designated heritage assets. There are also several other archaeological features, including the Peddars Way. The impact on heritage assets and archaeological sites, such as Castle Acre Priory needs to be</p>	No	<p>The visual impact of the scheme on Castle Acre and South Acre has been considered as part of ES Chapter 6: Landscape and Visual [APP/6.2]</p> <p>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)</p>



		considered, and extra mitigation taken where possible.		residual adverse heritage related effects expected across the Scheme's construction, operational and decommissioning phases.
	<i>Scheduled monuments / archaeology / heritage sites</i>	The setting of our small parish - including St. George's Church (Grade 1 listed) - is highly sensitive. The churchyard and surrounding landscape contribute significantly to both our sense of place and the broader heritage character of the area. We are concerned about how views from and toward the church, as well as from Castle Acre across the valley, may be affected by the development.	No	<p>The visual impact of the scheme on Castle Acre and South Acre has been considered as part of ES Chapter 6: Landscape and Visual [APP/6.2].</p> <p>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.</p>
	Human mental health - post construction	<p>"If you were to create small pockets of these solar farms you would have a greater chance of getting public approval but instead you are creating bad feeling by taking away large area of nature from us. To be honest at the consultation I was near to tears as the place I love is being damaged by your solar farms.</p> <p>Stop thinking about money and think about people and their lives and how they want to enjoy this beautiful county. We want our trees to be safe, our wildlife to have freedom of movement to thrive.</p>	No	<p>The Applicant acknowledges the approach outlined but reiterates that, to achieve the UK government's clean energy targets, a mix of rooftop, small-scale, and utility-scale solar schemes will be required.</p> <p>The measures to support habitats and wildlife across the Scheme are also outlined in the application, alongside specific issues around landscaping in the oLEMP [APP/7.11] (for landscape and ecological improvements).</p>
	Human mental health - post construction	Having looked into the matter extensively I have come to the conclusion that this is nothing more than corporate money making at the expense of our food production, countryside/native wildlife and our own wellbeing.	No	The Applicant notes the comments but contests the principles outlined. This Scheme will generate much-needed clean energy, ultimately increase the biodiversity across the site and will not have any significant impact on the food production of the UK.
	Human mental health - post construction	Mitigate for loss of visitors, distress leading to mental health effects from noise and visual impact	No	The Applicant notes the comments and refers to ES Chapter 15: Human Health [APP/6.2] , which identifies and proposes measures to address potential impacts and likely significant effects on Human Health during the construction, operation, and decommissioning Phases of the Scheme.
	Human health and safety - post construction	<p>Safety and Fire Risk:</p> <p>This is a very dry part of the UK, and prolonged periods of drought are becoming more prevalent with climate change. This, together with the remote rural location of many of these communities and of your proposed development, exacerbates the risk. You will understand that this has resulted in a very particular concern from local communities about fire risk; your proposal needs to specifically address this.</p>	No	The Applicant notes these comments and included within the application are a range of fire safety measures that meet the requirements of the Scheme.



	Electro Magnetic Fields (EMFs)	What about noise, humming, EM waves - do these panels and their cells generate noise as well as energy?	No	Any noise will be mitigated to levels that are acceptable in line with relevant guidance and criteria, which have been based on human response and the likelihood of nuisance perception
	Electro Magnetic Fields (EMFs)	We therefore ask the developer to formally commit to: Ongoing exposure to magnetic fields monitoring, with publicly available data at regular intervals around the substation boundary.	No	The Applicant notes the comments and points to ES Chapter 15: Human Health [APP/6.2] , which identifies and proposes measures to address the potential impacts and likely significant effects on Human Health, during the construction, operation and decommissioning phases of the Scheme.
	Electro Magnetic Fields (EMFs)	An assessment of noise occurring when 4, 6, 7 components are in operation - perceived by humans and a potential amount of electromagnetic sound waves created when farm is in operation. Not needed for construction? Latter detrimental to health.	No	Any noise will be mitigated to levels that are acceptable in line with relevant guidance and criteria, which have been based on human response and likelihood of nuisance perception
	Noise and vibration - post construction	We therefore ask the developer to formally commit to: A robust noise management plan, not only in the planning phase but with accountable oversight during each stage of development.	No	The Applicant notes this. Best practice measures, embedded mitigation measures and additional mitigation where applicable are outlined in the ES Chapter 10: Noise and Vibration [APP/6.2] and will be incorporated in the environmental management plans, including noise management, which will be secured through a requirement of the DCO.
	Noise and vibration - post construction	The current site has natural beauty and wildlife. I can't see many folk who would like to wander around a solar farm listening to the hum of battery cooling fans and transformers.	No	The Applicant notes this. PRoW has been assessed in the ES [APP/6.1 – 6.5] , and mitigation measures, such as an acoustic barrier, have been proposed to meet the criterion and prevent non-significant effects at PRoW.
	Noise and vibration - post construction	The sound from the battery packs whilst being told it will be mitigated- definition ""action of reducing the severity, seriousness or painfulness of something "" Am happy to see that new hedgerows will be put in place but is this really enough.	No	The Applicant notes this and confirms that noise will be mitigated to levels acceptable in line with relevant guidance and criteria, which are based on human response and the likelihood of nuisance perception, details of which are further set out in ES Chapter 10: Noise and vibration [APP/6.2] .
	Noise and vibration - post construction	i am very concerned about the proposed siting of the batteries and substations. There is likely to be at least a hum if not louder noise coming from these systems and sound travels a long. Castle Acre houses are in a straight line from the proposed siting of these systems and I know from past experience that such noise can be a nuisance, especially at night.	No	The Applicant notes this and confirms the ES noise assessment (ES Chapter 10: Noise & vibration [APP/6.2]), a further assessment of low-frequency noise, and, where appropriate, tonal penalty corrections.
	Noise and vibration - post construction	The solar farm will ruin the tranquil ancient setting of Castle Acre and cause noise and visual disturbance.	No	The Applicant notes this and confirms that the noise assessment has been based on a conservative lower absolute limit, predicted levels at Castle Acre are at a level to possibly be just audible but unlikely to cause nuisance and are assessed to be not significant.



	Noise and vibration - post construction	An assessment of noise occurring when 4, 6, 7 components are in operation - perceived by humans and a potential amount of electromagnetic sound waves created when farm is in operation. Not needed for construction? Latter detrimental to health.	No	The Applicant notes this and confirms the noise assessment has predicted levels with all machinery operating simultaneously at 100% capacity, which provides a worst-case scenario unlikely to happen in practice. These worst-case levels have been assessed to have non-significant effects. Therefore, noise in practice will be lower than that presented in the ES Chapter 10: Noise and vibration [APP/6.2] .
	Noise and vibration - post construction	<p>I would like to make sure any potential noise impacts are fully addressed.</p> <p>It will be important that final scheme details are made available to local communities. In particular in relation to the following:</p> <ul style="list-style-type: none"> - LUIA judgements, mitigations & utilisations - Detailed final landscape layout & specifications - Landscape management strategy - Detailed solar panel & fencing layouts - Detailed biodiversity strategy & BNG - A full agreed scheme of all community benefit 	No	The Applicant notes this and confirms potential noise impacts have been addressed in ES Chapter 10 Noise and Vibration [APP/6.2] and mitigated where necessary to non-significant effects.
	Noise and vibration - post construction	<p>Noise & Health</p> <p>What noise levels will be generated by inverters or other equipment, and at what hours?</p> <p>Will there be any low-frequency noise or humming, particularly at night or during peak output?</p> <p>Have you carried out an independent noise impact assessment? Can this be shared?</p>	No	<p>Solar Inverters (Conversion Units) noise is generally localised and reduces below the significance criteria at typical distance for all the assessed receptors. They are expected to operate during daylight only and have been assessed against absolute limits applicable to both day and early hours of night periods.</p> <p>Low frequency noise has been carried out for operational noise and predicted to be much lower than criterion limits.</p> <p>Noise assessment has been undertaken by Hoare Lea (independent acoustic consultants) and are available in the ES Chapter 10 Noise and Vibration [APP/6.2] and associated technical appendices.</p>
	Noise and vibration - post construction	During construction and decommissioning there will be an increased level of noise from traffic and heavy plant. Following this we are informed there will be a constant hum from the substation. Castle Acre is a peaceful tranquil area, a constant hum will not only destroy this and also impact adversely on the footpaths and rights of way adjacent to the infrastructure. The hum could cause constant vibration through the soil which could have a negative effect on wildlife and any undiscovered archaeology.	No	The Applicant notes this and confirms the noise assessment included character rating/penalties such as tonal characteristics associated with transformer or substation noise. The predicted levels were expected to be in compliance with the significance criteria. Construction noise from traffic and HGV have been included the noise assessment. Vibration effects are expected to be imperceptible at typical separation distances of receptors or PROW from the scheme components.



	Noise and vibration - post construction	Inverters can overheat in extremely hot weather requiring the use of noisy fans to provide cooling.	No	The Applicant notes this and confirms the cooling fans are temperature controlled and will operate based on the required cooling, the noise assessment has been based on all fans operating at 100% capacity which is unlikely to be the case in practise. Therefore, the assessment results consider the scenario of hot weather and full fan operational noise.
	BESS safety (including fire risk)	I am concerned about potential thermal runaway in the battery energy storage system (if Lithium based, for example) causing severe permanent contamination of the area, with a risk of hazardous emitted fumes to local communities from incinerating batteries that could cause health damage to the community. The plans so far do not discuss the battery technology to be used, nor the spatial location of the batteries. This is a very serious issue that has not been properly addressed in the proposal documents so far.	No	The Applicant acknowledges these comments and points to the oBSMP [APP/7.14] which has been submitted with the application which includes measures regarding the design of the BESS to reduce the risk of fire and manage any potential fire events.
	BESS safety (including fire risk)	I am also concerned about fire risks, this is a very dry part of the UK, and we are seeing more local incidents of fire year on year.	No	The conclusions of the Battery Fire Plume Assessment can be found in Appendix 1 of the oBSMP [APP/7.14] , which may inform fire safety protocols and decision making. Other 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] .
	BESS safety (including fire risk)	The solar farm should allow the land to be later recovered and returned to its former agricultural purpose, provided that contamination does not occur as a result of thermal runaway and contamination arising from the battery energy storage arrangement. The battery storage system must be carefully and diligently designed to reduce a risk of thermal runaway to negligible probability.	No	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. After the decommissioning the phase, the landowners would choose how the land is to be used and managed within agricultural use. Fire safety measures include spacing requirements between the BESS Containers and between the BESS Compound and other infrastructure, which are also included in the oBSMP [APP/7.14] . Further details of the BESS compound are contained within ES Chapter 5: The Scheme [APP/6.3] .
	BESS safety (including fire risk)	Have concerns about battery storage. We understand that fires can last for days and toxic fumes (including cyanide) are emitted, should these batteries catch fire. Quite a worry we feel. We understand that fire brigades are having to be retrained in dealing w/ these types of fires & it can take several days to put them out. This part of East Anglia is a very dry area and in	No	The conclusions of the Battery Fire Plume Assessment are presented in Appendix 1 of the oBSMP [APP/7.14] and may inform fire safety protocols and decision-making. Fire safety measures include spacing requirements between the BESS Containers and between the BESS



		summer everything is tinder dry & susceptible to wild fire.		Compound and other infrastructure, which are also included in the oBSMP [APP/7.14] .
	BESS safety (including fire risk)	<p>I think that its difficult to tell about the environmental impacts until the farm is built - the risk of fire and the chemicals stored onsite to minimise the risk could pose a large threat to the environment if they leaked, or needed to be used.</p> <p>Nature recovery would be a great outcome, but if lots of chemical sprays are used, then this is unlikely.</p> <p>The details provided so far, do not fully explain who these outcomes are calculated or acheived.</p>	No	<p>Should a fire occur in the BESS elements of the Scheme, water will not be directly applied to the affected BESS container; therefore, there is reduced potential for water contamination, and the volume of water required during a firefighting event is reduced.</p> <p>Further details can be found in the oDS [APP/7.10], prepared by the Applicant as part of the DCO Application.</p>
	BESS safety (including fire risk)	The battery energy storage system should be spatial dispersed to avoid a risk of catastrophic thermal runaway whose consequences could cause permanent contamination and poisoning of the environment (carcinogenic organics, Nickel dust, HF (Hydrofluoric Acid) et al.). The reports are silent about this issue that could be very signifiant in an event of a serious accident occurring.	No	The Applicant notes these comments and points to the oBSMP [APP/7.14] , which has been submitted with the application, which includes measures regarding the design of the BESS to reduce the risk of fire and manage any potential fire events.
	BESS safety (including fire risk)	<p>I am concerned for the maintenance of clean water within the river Nar and the acquifers that feed it, if there were to be a fire within your planned battery storage area.</p> <p>I am unclear what measures you can take to prevent noxious chemicals and or heavy metals entering the acquifer should a fire occur.</p>	No	<p>An oBSMP [APP/7.14] has been submitted, which includes measures regarding the design of the BESS to reduce the risk of fire and manage any potential fire events.</p> <p>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.</p>
	BESS safety (including fire risk)	Lithium-ion battery storage represents a huge fire risk.	No	<p>The conclusions of the Battery Fire Plume Assessment can be found in Appendix 1 of the oBSMP [APP/7.14], which may inform fire safety protocols and decision-making.</p> <p>Further details of the BESS compound are contained within ES Chapter 5: The Scheme [APP/6.1].</p>
	BESS safety (including fire risk)	I mention below issues that must be taken into account.	No	The Applicant notes that an oBSMP [APP/7.14] has been submitted which includes measures regarding the design



	<p>Whereas solar panels are relatively benign apparatus that perform their electrical energy generating function from sunlight substantially without noise and usually without major disruption of soil structure, the same cannot be said of the battery storage systems that will be accompanying the solar panels of the solar farm.</p> <p>If the batteries are based on Lithium chemistry, there is a potential risk of thermal runaway occurring that has been encountered at some solar farms around the world with severely negative consequences. Thermal runaway in Lithium batteries may potentially cause release of toxic chemicals that are damaging to human life and may give rise to lasting health problems when inhaled.</p> <p>The batteries to be used should ideally be Vanadium flow batteries. If Lithium batteries are to be used, they should be based on Lithium Iron Phosphate chemistries. The batteries should be configured in spatially isolated blocks that are easier to control in an event of thermal runaway occurring. Good access should be provided to the batteries for emergency fire crews and related emergence services to gain access. Fire extinguishing systems should be provided to allow firefighting to be implemented swiftly in an event of thermal runaway. The batteries must be isolated from causing fires in neighbouring fields and crops in an event of thermal runaway.</p> <p>The batteries should be located remotely from where people are resident, housing, access roads and so forth.</p> <p>My advice and feedback above must be taken very seriously.</p> <p>By comparison, poor implementation decisions were made many years ago by TEPCO when engaging Westinghouse to construct the Fukushima Dai'ichi nuclear facility in Japan. Poor implementation decisions resulted in the Dai'ichi facility being unduly exposed to natural catastrophic events such as tsunamis. In year 2011, there was a tsunami that damaged the facility which subsequently suffered multiple core meltdowns, Hydrogen explosion and widespread radioactive material contamination of Fukushima prefecture in Japan. The cost of the radioactive damage is estimated to be Trillions \$\$ (USD) and the contamination is effectively permanent (i.e. long half-life contamination involved, such as MOX fuel fragments ("hot particles") including Plutonium (Pu-239)).</p> <p>Mutatis mutandis, serious thermal runaway events in the storage batteries of the Drovers Solar Farm could,</p>		<p>of the BESS to reduce the risk of fire and manage any potential fire events.</p> <p>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 be to apply water to adjacent BESS enclosures to keep them cool and further prevent their overheating. As water will not be directly applied to affected BESS container, there is reduced potential for water to become contaminated and the volume of water required during a firefighting event is reduced.</p>
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		<p>in a worst case situation, cause serious damage and pollute the area around Swaffham and Sporle in a quite hideous manner.</p> <p>The mitigate potential problems, the batteries must be mounted on well-drained land, the batteries must be implemented in a spatially-distributed array of battery units to reduce a risk of thermal runaway from propagating from one battery unit to another, and the battery units must be located well away from residential areas. Please take into account that Lithium batteries in thermal runaway eject Hydrogen Fluoride gas (HF), various dangerous organic materials and metallic dust. These ejected materials from batteries in thermal runaway may cause severe inhalation problems in humans and other animals, and heavy metals in the batteries (e.g. Nickel) if burnt may cause toxic contamination of ground, result in permanent soil degradation.</p> <p>If of help, I am willing to have a technical discussion with your technical department to review your designs and assist to ensure that the facility at the Drovers Solar Farm is adequately implemented.</p> <p>In an event that a serious accident occurs at the Drovers Solar Farm, I reserve the right to go to insurance companies and the national press to mention the contents of this e-mail.</p>		
	BESS safety (including fire risk)	<p>Battery Energy Storage Systems (BESS). Battery storage systems pose several dangers including fire hazards due to thermal runaway and the release of toxic gases. These risks necessitate robust safety measures and careful site planning to mitigate potential harm to nearby communities and the environment. We note the plans say 'the BESS unit would be allowed to self-consume, with firefighting water being captured in a dedicated tank or managed through dual-function Sustainable Drainage Systems (SuDS) structures.' Further explanation and reassurance is needed.</p>	No	<p>The conclusions of the Battery Fire Plume Assessment are presented in Appendix 1 of the oBSMP [APP/7.14] and may inform fire safety protocols and decision-making.</p>
	BESS safety	<p>the water pressure is already low in this area and large scale solar industry requirements for fire prevention and cooling systems is not acceptable as it will add to the problem</p>	No	<p>The Applicant notes these comments but anticipates that the Scheme will be supplied by a combination of Anglian Water Mains, the landowners' existing agricultural supply, and a water-tanking option.</p> <p>There will be two dedicated water supply tanks on-site for use in a firefighting event. As such, any impacts on existing water infrastructure will be mitigated. Further details are within the oBSMP [APP/7.14].</p>



16 Project design

Topic	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Project design	Project Principles Level Design	<p>I am concerned about the design we are asked to comment on being a different outcome when its eventually built, as is often the case in planning, minor amendments are often put through that completely change the initial design and impact on local residents.</p>	No	<p>The Applicant notes these concerns.; however, after the DC O Application is submitted, the Planning Inspectorate will determine whether it meets the standards required for acceptance. If the application is accepted for examination, members of the public and stakeholders will have the opportunity to register as Interested Parties, enabling them to provide written representations and, if they wish, to present their views orally at hearings.</p> <p>The Applicant further notes that a series of outline management plans will be submitted as part of the DCO Application, including an oOEMP [APP/7.8] and an oOTMP [APP/7.9]. These plans set out the measures proposed to mitigate the potential impacts and effects of the Scheme. The final versions of these plans will be substantially in accordance with them and will be secured by way of requirement in the DCO.</p>
	Project Principles Level Design	<p>In particular:</p> <p>Solar developments should be planned with the grid network as part of a national spatial strategy and their specific location informed by the local nature recovery strategy.</p> <p>The Drovers Solar Farm should be an exemplar of ecology-led design, construction, operation, and decommissioning to protect, restore and enhance nature, healthy functioning ecosystems, and ecological connectivity. It should leave the natural environment in a measurably better state and make a significant and meaningful contribution to the creation of a Nature Recovery Network in Norfolk.</p>	No	<p>The Applicant has been engaged in ongoing discussions with National Grid Electricity Transmission (NGET), the Transmission Operator, throughout the development of the Scheme.</p> <p>The Applicant also notes that Island Green Power (IGP) has established a set of Design Principles which apply to all of its projects, one of which relates to 'Biodiversity net gain and nature recovery'.</p> <p>These design principles have been further refined by the Applicant into a set of 'Project Level Design Principles'. These principles have been used to inform the Scheme design, and included a principle to 'Review and incorporate initiatives set out in the Local Nature Recovery Strategy where practicable'.</p> <p>Further information on how the Scheme has considered the issues raised can be found within the Design Approach Document [APP/5.7]. The oLEMP [APP/7.11] sets out the objectives for the detailed design and how these are relevant to the draft Local Nature Recovery Strategy,</p> <p>The Design Principles, Parameters and Commitments [APP/5.8] document, submitted as part of the DCO Application, sets out the minimum buffers that will be incorporated into the detailed design should the Scheme be granted consent. These are secured by Requirement 5 in the draft DCO [APP/3.1].</p>



	Project Principles	Level Design	The solar farm should allow the land to be later recovered and returned to its former agricultural purpose, provided that contamination does not occur as a result of thermal runaway and contamination arising from the battery energy storage arrangement. The battery storage system must be carefully and diligently designed to reduce a risk of thermal runaway to negligible probability.	No	<p>Upon completion of the Scheme's operation and maintenance phase, 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 in situ. After the decommissioning phase, the landowners would choose how the land is to be used and managed.</p> <p>An oBSMP [APP/7.14] has been submitted, which includes measures regarding the design and management of the BESS to reduce the risk of fire.</p>
	Project Principles	Level Design	Even the full list of the Project Level Design Principles cannot disguise the industrialisation of the landscape and the historic and natural environment.	No	The Applicant notes this comment but disagrees. 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
	Project Principles	Level Design	<p>Environmentally led design - the visual intrusion of the solar farm and its associated infrastructure is unacceptable. The design is not 'environment led' because it is industrial in its scale and use of materials.</p> <p>No exact information has been provided on what the substation and batteries will look like and their precise locations.</p> <p>No exact information has been provided on whether extra pylons will be required; how many and their locations.</p>	No	<p>A Landscape and Visual Impact Assessment [APP/6.2] has been undertaken, which assesses the impacts of the Scheme, which is supported by illustrative photomontages from locations agreed with the local planning authority during the pre-application stage.</p> <p>The Applicant notes that the ES Chapter 5: The Scheme [APP/6.1] describes the proposed National Grid Substation, Customer Substation and BESS.</p> <p>The Applicant notes that since the statutory consultation, the locations of the National Grid Substation, Customer Substation and BESS have been refined and are now proposed to be located in</p> <p>The Applicant notes that ES Chapter 5: The Scheme [APP/6.1] sets out that up to 10 additional pylons may be required as part of the Grid Connection Infrastructure.</p>
	Project Principles	Level Design	<p>Efficient infrastructure & ethical supply chain - installing the panels and infrastructure will cause disruption on the rural road network as construction, operation and decommissioning all involve actions which cause physical changes to the local topography, Peace and quiet will be destroyed by industrial grade traffic and light pollution.</p> <p>With a large-scale solar farm such as The Drovers, up to 100 inverters will be required which will produce a sound pressure level of 74db per inverter as a persistent hum. In hot weather, inverters can overheat so noisy fans might be needed.</p>	No	<p>The Applicant notes these concerns; however, an assessment of the effects on the road network during construction, operation, and decommissioning is provided in ES Chapter 9: Transport and Access [APP/6.2], which concludes that there are no significant effects associated with the Scheme. The Applicant notes that the assessments undertaken take full account of the Scheme's rural nature.</p> <p>The Applicant notes that with regard to the local topography, the Scheme has been designed to minimise ground disturbance and avoid extensive earthworks wherever practicable.</p> <p>ES Chapter 10: Noise and Vibration [APP/6.2] assesses the Scheme's noise impacts. Following the implementation</p>



		<p>China alone is responsible for 87% of global emissions produced by solar manufacturing, particularly regarding pollution and waste.</p> <p>The production of solar panels in the Xinjiang region has been linked to the alleged exploitation of Uyghur Muslims who are detained in camps and have no choice but to work on the production of the panels.</p> <p>There is the significant carbon footprint associated with shipping solar parts internationally.</p>		<p>of embedded and additional mitigation measures, as detailed within the chapter, it is concluded that there would be no significant effects.</p> <p>The Applicant further notes that the embodied carbon within solar PV Arrays and associated transport from China is considered within the ES Chapter 13: Climate Change [APP/6.2]. The assessment has assumed that transport will come from Shanghai to the UK via shipping.</p> <p>The overall conclusion of this quantitative assessment is that the emissions generated by the production and shipping of the solar PV Arrays are not significant, and the Scheme's overall effect on greenhouse gas emissions has been judged beneficial.</p> <p>Furthermore, every effort will be made to ensure that there is no modern slavery within the supply chain of materials.</p>
	Project Principles	Level Design	<p>Social value & community benefits - 'community benefits' are being offered as a conciliatory gesture but can never compensate for the loss of productive farmland; the visual intrusion and the adverse impact on heritage and wildlife.</p>	<p>No</p> <p>The Applicant notes these comments but disagrees. 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.</p> <p>The Applicant notes the Policy Compliance Document [APP/5.6] and confirms that the use of BMV land as part of the Scheme is justified, given the economic and other benefits of the land. The Statement of Need [APP/5.4] and Planning Statement [APP/5.5], submitted in support of the DCO Application, further 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.</p> <p>The Applicant notes that potential effects relating to visual intrusion, heritage, and wildlife have been fully assessed within the ES [APP/6.1 – 6.5] submitted as part of the DCO Application.</p> <p>Visual effects are assessed in ES Chapter 6: Landscape and Visual [APP/6.2]; effects on cultural heritage are assessed in ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]; and effects on wildlife and habitats are assessed in ES Chapter 7: Ecology and Biodiversity [APP/6.2].</p>
	Project Principles	Level Design	<p>Decarbonisation & energy security - Lithium-ion batteries present a huge fire risk. Lithium-Ion battery explosions are a risk in relation to residential homes, listed buildings and protected Ancient Monuments.</p> <p>Security fencing and lighting would be necessary but destroy the rural landscape and dark skies.</p>	<p>No</p> <p>The Applicant notes that to date in the UK, there have only been 4 reported BESS fires over a cumulative operating time of in excess of 720 years (DESNZ REPD Jul 2025 databases refer). None of these incidents extended beyond a single BESS, and in all of these incidents, there was no propagation from the affected BESS to any other infrastructure. None of these events caused harm to any</p>



				<p>The global supply chain is vulnerable because of China’s dominance in the global solar market.</p> <p>China has significant control over the price of solar panels and has the ability to massively change global prices if it decides to. This puts other countries in a weakened position where they are reliant on China’s solar supply.</p>		<p>individuals, be they FRS personnel in attendance or third parties. No environmental impact has been recorded for any of these 4 incidents. Government analysis by DESNZ, Ofgem and NESO shows that fires at BESS sites were less likely than those at non-domestic buildings. The latest five-year annual average fire incidence rate for BESS is 0.7% and for non-domestic buildings is 0.8%, this data demonstrates that batteries are less hazardous than other non-domestic infrastructure.</p> <p>The Applicant notes that the Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation, which would each include motion-sensing lighting used solely for security and maintenance purposes.</p>
	Project Principles	Level	Design	<p>Biodiversity net gain & nature recovery - I consider that the negstive effects outweigh any attempts in the design principles to convince that there will be 'biodiversity net gain'.</p>	No	<p>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.</p>
	Project Principles	Level	Design	<p>Transitory animals have their traditional routes blocked and in particular, deer will be diverted onto roads as the fencing excludes them from the solar compounds.</p> <p>Bird and bat deaths are frequently recorded on existing solar farms as they mistake the glass for water.</p> <p>Habitats for ground-nesting birds will be destroyed.</p> <p>27% of rare priority species that are already supported on farmland in Norfolk. It is misleading to imply that solar farms will do more for nature recovery. In fact, there will be disruption to established habitats, displacing birds, insects, and bats, including species protected in law and those dependent on arable land.</p> <p>How ironic that the Environment Act 2021 includes a nature recovery strategy and nature recovery networks and even charges parish councils with producing their own plans for increased biodiversity, when our rural landscape is being industrialised by solar panels.</p>	No	<p>The Applicant notes the comments regarding transitory animals. 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. ES Chapter 7: Ecology and Biodiversity [APP/6.2] outlines the ecological surveys undertaken to date by the Applicant, along with consideration of likely significant effects and potential mitigation and enhancement measures to be incorporated into the design of the Scheme.</p> <p>In regard to potential for birds and bats to mistake solar panels for water bodies ('the lake effect') resulting in potential harm or mortality, the paper Solar photovoltaic energy development and biodiversity conservation: Current knowledge and research gaps (Gomez-Catasus et al., 2024) concludes “there is little evidence proving this causal factor”.</p> <p>Ground nesting, and wintering birds are fully considered within ES Chapter 7: Ecology and Biodiversity [APP/6.2]. The Applicant also notes that land has been identified to the north of the Scheme for Skylark and Curlew mitigation.</p>
	Project Principles	Level	Design	<p>Sustainability, durability & reversibility - It is highly unlikely that the land could return to agriculture in 40 / 60 years time because of soil contamination from chemical leaching: the bases of the posts left in the</p>	No	<p>When the operation and maintenance phase of the Scheme ends, the Solar PV Site would be decommissioned and the land returned to the landowner.</p>



		ground; the intrusive infrastructure; the lack of new-generation farmers and especially tenant farmers.		<p>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. within agricultural use.</p> <p>After the decommissioning the phase, the landowners would choose how the land is to be used and managed, within agricultural use.</p>
	Project Principles	<p>We support the principle of environmentally led design, particularly when integrated thoughtfully with the local landscape and heritage setting.</p> <p>We remain neutral on the social value and biodiversity benefits at this stage these outcomes will depend on delivery, and more detail is needed to assess their depth and local relevance.</p> <p>We've selected "require more information" on several principles because key aspects of the project are still to be defined, and it is difficult to fully assess their merit at this stage. For example, there are no clear ways for the community to evaluate progress on decarbonisation, sustainability, or reversibility, and we would welcome more detail on how these will be measured and communicated over time. As for design flexibility, this remains to be demonstrated - particularly in relation to the final location of the substations and their overall impact on South Acre, including noise, visibility, disruption during construction and decommissioning, and the long term effect on property values, as few people will feel comfortable living near electrical substations. We would like to see how the community input will be meaningfully incorporated into the final design to address these concerns in a way that reflects the unique setting and vulnerability of our small parish.</p>	Yes	<p>The Applicant welcomes the comments relating to environmentally led design.</p> <p>notes that it 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.</p> <p>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 with Field 27 and/or Field 24. The location of these elements of the Scheme is shown on the Works Plan [APP/2.3].</p> <p>A number of changes have been made to the Scheme's design and to the details within the supporting management plans. The Consultation Report [APP/5.1] provides further information on how community input has shaped the Scheme.</p>
	Project Principles	<p>Overview:</p> <p>I am pleased to note that IGP has set out the following project level Design Principles in its consultation brochure.</p> <p>Environmentally led design</p> <p>Social value & community benefits Efficient infrastructure & ethical supply chain: the design will</p>	No	<p>The Applicant notes this comment and further information on how these design principles have influenced the design evolution of the Scheme and how they are secured within the application can be found within the Design Approach Document [APP/5.8]</p>



		<p>optimise energy generation and export capacity within the constraints of the Site, making efficient use of the land and available grid connection</p> <p>Design flexibility: the design will allow for resilience and adaptation to future climate change</p> <p>Decarbonisation & energy security: the Project will aim to reduce carbon emissions throughout all phases of its lifecycle.</p> <p>Biodiversity net gain & nature recovery: the design will aim to integrate the Project into the local environment and allow the movement of wildlife through the Site</p> <p>Sustainability, durability & reversibility: the Project would prioritise sustainable resource management during all phases.</p>		
	Project Principles	<p>The design principles are admirable. But the masterplan & design generally lacks the detail necessary to prove that proposals will align with stated principles. For example there are no detailed calculations relating to the stated aim of a minimum 10% biodiversity net gain.</p> <p>It seems unreasonable to expect comments in relation to 'efficient infrastructure', 'social value', 'design flexibility' & decarbonisation if there is no evidence provided?"</p>	No	<p>The Applicant welcomes the comment regarding the design principles. Further information on how these design principles have influenced the Scheme's design evolution and how they are secured within the application can be found in the Design Approach Document [APP/5.8].</p> <p>The design principles have been embedded in various documents to ensure they continue to be considered in the detailed design if the Scheme were to be consented.</p> <p>The Applicant notes that mandatory Biodiversity Net Gain remains to be implemented (currently anticipated for May 2026), although the Scheme will deliver over 10% BNG as calculated under the Statutory BNG metric. The Biodiversity Net Gain Assessment Report [APP/7.4] has been submitted with the DCO Application.</p> <p>The Applicant notes that it welcomes further engagement from interested parties during the Examination stage.</p>
	Masterplanning strategies	<p>Nature recovery is already being enhanced in the area by re-wilding which has already proven to be controversial, as it has stopped access across public rights of way. No-one goes to the countryside to walk around areas covered in solar panels, with a sub station humming .</p>	No	<p>The alignment of existing PRoW within the Site has been incorporated into the Scheme's design. As such, the alignment of PRoW will be unaffected by the Scheme during its operation and maintenance phase.</p> <p>All PRoW will have a minimum 15m buffer to any infrastructure associated with the Scheme (including fencing).</p>
	Masterplanning strategies	<p>It is impossible for a project of this scale to 'reinforce the character and identity of the local area' when sited in a rural, unindustrialised landscape. There has been no independent assessment of the overall landscape value of the site, there are no independent visuals of what effect the panels, transformer and battery will</p>	Yes	<p>The Scheme has increased the minimum offset from 15m to 25m to Fincham Drove and Petticoat Drove to support the legibility of these historic routes through the Order Limits.</p> <p>The Green Infrastructure Strategy has been developed to support the landscape character opportunities and draft</p>



		have on the landscape- impossible, I suppose, as you don't know where they are going to be positioned.		LNRS and Norfolk BAP objectives. Further information can be found within the oLEMP [APP/7.11] . A Landscape and Visual Impact Assessment [APP/6.2] has been undertaken, which assesses the impacts of the Scheme, which is supported by illustrative photomontages from locations agreed with the local planning authority during the pre-application stage.
	Masterplanning strategies	As to movement, the farm will restrict movements by fencing off, certainly don't see how this is going to enhance the lives of wildlife. Fencing out deer, badgers, foxes etc. can only restrict these creatures lives: These animals have been roaming the landscape for thousands of years - long before man became the top predator	Yes	The Scheme has increased the minimum offset from 15m to 25m to Fincham Drove and Petticoat Drove to support the legibility of these historic routes through the Order Limits.
	Masterplanning strategies	I don't think that the addition of thousands of solar panels to the countryside can ever enhance the character or identity of an area, nor do I think it will improve the experience of walking in the countryside, although more footpaths is always to be encouraged and if hedges and trees are still in place, then hopefully birds, insects and animals will also remain.	No	A Green Infrastructure Strategy has been developed to support the landscape character opportunities and draft LNRS and Norfolk BAP objectives. Further information can be found within the oLEMP [APP/7.11] . Permissive paths, providing circa 3.5km of new pedestrian routes have been incorporated within the Scheme. Further information can be found within the oPRoWPPMP [APP/7.12] .
	Masterplanning strategies	the identity of the local countryside is farmland and woodland. How can solar panels reinforce and enhance this? impossible.	No	A Green Infrastructure Strategy has been developed to support the landscape character opportunities and draft LNRS and Norfolk BAP objectives. Further information can be found within the oLEMP [APP/7.11] .
	Masterplanning strategies	The idea of 'supporting nature recovery' is frankly absurd when you are taking a perfectly fine piece of nature and destroying it in order to add this solar farm in the first place. This is similar to new build developments destroying a field and the homes of wildlife in favour of building a housing area and then adding a small area of grass to the estate which in turn gets a park that no one wants built on it when the local council needs to spend its money at the end of the year.	No	A Green Infrastructure Strategy has been developed to support the landscape character opportunities and draft LNRS and Norfolk BAP objectives. Further information can be found within the oLEMP [APP/7.11] . A Biodiversity Net Gain Assessment Report [APP/7.4] has been submitted as part of the DCO Application which demonstrates that biodiversity net gains in habitat and hedgerow units will significantly exceed 10%.
	Masterplanning strategies	How is the character and identity of ANY area reinforced by 825 hectares of 4m-high PV panels? Unless you believe the area to utterly irredeemable in the first place - is that what you're saying? Improving access and active travel: I'm sure there are people who love walking a post-apocalyptic landscape but I'm certainly not one.	No	A Green Infrastructure Strategy has been developed to support the landscape character opportunities and draft LNRS and Norfolk BAP objectives. Further information can be found within the oLEMP [APP/7.11] . 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



				<p>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].</p> <p>Permissive paths, providing circa 3.5km of new pedestrian routes, have been incorporated within the Scheme. Further information can be found within the oProWPPMP [APP/7.12].</p>
	Masterplanning strategies	<p>I agree that the provision of solar in Norfolk is part of a national sustainable energy mix.</p> <p>I have concerns that the masterplan landscape strategy as currently described is not robust enough a cumulative impacts with adjacent solar farms (proposed) is unresolved.</p>	No	<p>The Applicant has been consulting with the Applicant for the High Grove Solar Farm and measures for further collaboration pre-construction have been secured within the management plans.</p> <p>ES Chapter 17: In-Combination Effects [APP/6.2] considers the potential in-combination effects on different receptor groups.</p>
	Masterplanning strategies	We cannot see how any of this will reinforce the character of the area - let's be real here	No	<p>A Green Infrastructure Strategy has been developed to support the landscape character opportunities and draft LNRS and Norfolk BAP objectives. Further information can be found within the oLEMP [APP/7.11].</p>
	Masterplanning strategies	I would like to see a model of how the site will look, with the new footpaths, you cannot show how the character and identity will be reinforced, as it is green countryside and solar panels will take that identity away. I do not want the wildlife disturbed at all.	No	<p>A Landscape and Visual Impact Assessment [APP/6.2] has been undertaken, which assesses the impacts of the Scheme, which is supported by illustrative photomontages from locations agreed with the local planning authority during the pre-application stage.</p>
	Masterplanning strategies	<p>Again, what does 'please indicate how far you agree that our design proposals align with our Masterplanning Strategies, at this stage' even mean? Do your totally spurious design suggestions align with your totally spurious masterplans, at this arbitrary moment?</p> <p>How can the character and identity of a beautiful and entirely unspoilt rural area be "reinforced" by the construction of Europe's largest solar farm, including massive substations?</p> <p>How can there be improved access to an area that already has walking trails and which is about to be carpeted with solar panels?</p> <p>How can nature recover when it is a singularly quiet and unspoilt haven for nature and is - again - about to be entirely carpeted in solar panels, destroying endless habitats in the process?</p>	No	<p>A Green Infrastructure Strategy has been developed to support the landscape character opportunities and draft LNRS and Norfolk BAP objectives. Further information can be found within the oLEMP [APP/7.11].</p> <p>Permissive paths, approximately 3.5km, have been incorporated into the Scheme, providing improved access between Swaffham and the Nar Valley. Further details can be found within the oLEMP [APP/7.11].</p> <p>A Biodiversity Net Gain Assessment Report [APP/7.4] has been submitted as part of the Application, which demonstrates that biodiversity net gains in habitat and hedgerow units will significantly exceed 10%.</p>
	Masterplanning strategies	The solar panels will radically change the character of the local landscape, it will not reinforce any local character.	No	<p>A Green Infrastructure Strategy has been developed to support the landscape character opportunities and draft</p>



		Biodiversity supproting nature recovery, we need more detailed information to understand how this has been calculated, and how exactly plans will be implemented without being watered down by a contractor on site (as is often the case)"		LNRS and Norfolk BAP objectives. Further information can be found within the oLEMP [APP/7.11] . A Biodiversity Net Gain Assessment Report [APP/7.4] has been submitted as part of the DCO Application which demonstrates that that that biodiversity net gains in habitat and hedgerow units will significantly exceed 10%.
	Masterplanning strategies	We welcome the over-arching principles outlined in the Indicative Masterplan, particularly the intention to – To support nature recovery, the biodiversity strategy aims to strengthen the connections between these habitats creating ecological stepping stones and wildlife corridors that link the area's key biodiversity hotspots.	No	The Applicant welcomes this comment.

17 Property

Topic	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Property	Impact of Scheme on property prices	Was told house prices would not drop but I seriously would not have bought a home here if I knew that it was then going to be on the edge of a battery cell .Therefore im sure prices will drop and who will compensate us for this. I choose to live in the countryside with the low employment , poor road links and peace and quite I have not choosen to live beside a solar farm.	No	The Applicant notes that there is currently no evidence in the UK that solar farms have devalued nearby properties. Research from other countries also suggests that renewable energy projects, including solar developments, tend to have little to no impact on property values. In fact, factors such as local amenities, school catchments, and the overall housing market are generally considered to have a far greater influence on house prices than the presence of renewable energy infrastructure.
	Impact of Scheme on Property Prices	Property Value & Residential Amenity Have you assessed the potential impact on nearby property values?	No	The Applicant notes that there is currently no evidence in the UK that solar farms have devalued nearby properties. Research from other countries also suggests that renewable energy projects, including solar developments, tend to have little to no impact on property values. In fact, factors such as local amenities, school catchments, and the overall housing market are generally considered to have a far greater influence on house prices than the presence of renewable energy infrastructure.



	Proximity to residential areas (solar PV development and associated infrastructure)	This site could have been better located further away from residential areas, in particular more to the western extent of the plot.	No	<p>Appendix 6.7 of the ES: Residential Visual and Amenity Assessment [APP/6.4] has been undertaken, which identified that only Keepers Cottage, which is located within the Order limits, required a detailed assessment. Measures have been incorporated into the Scheme, such as hedgerow planting and offsets for Solar PV Arrays, to mitigate any potential impact to a level that the visual effects from this property would not exceed the Residential Visual Amenity threshold.</p> <p>ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] also provides a summary of the reasonable alternative options the Applicant has considered for the Scheme, including the initial selection of the Site and throughout the design development. Further appraisal of the use of BMV land and the justification for it is set out in the Planning Statement [APP/5.5].</p>
	Proximity to residential areas (solar PV development and associated infrastructure)	The area is too close to the connurbations of Castle Acre, South Acre and West Acre as well as Swaffham and are of massive scale in excess of that justified for this heritage countryside	Yes	<p>The Applicant notes this 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.</p> <p>This has increased the distance between the villages and the built infrastructure.</p>
	Proximity to residential areas (BESS & Customer Substation areas)	I am concerned about potential thermal runaway in the battery energy storage system (if Lithium based, for example) causing severe permanent contamination of the area, with a risk of hazardous emitted fumes to local communities from incinerating batteries that could cause health damage to the community. The plans so far do not discuss the battery technology to be used, nor the spatial location of the batteries. This is a very serious issue that has not been properly addressed in the proposal documents so far.	No	<p>The Applicant is confident that any issues around fire safety have been considered and appropriate mitigation measures put in place. For avoidance of doubt, Battery modules to be utilised in this scheme will have an in-built battery management system (which monitors parameters such as battery temperature) and would shut down the batteries immediately should any fault or overheating be detected, preventing fires from happening before they have a chance to start.</p> <p>The batteries would be constructed out of fire-resistant materials and would include sufficient separation distances to minimise any potential spread of fire between containers in the unlikely event that one should occur, and ensure a thermal runaway event does not take place.</p> <p>The Applicant has prepared oBSMP [APP/7.14] to be submitted in support of the Application.</p>
	Proximity to residential areas (BESS & Customer Substation areas)	Residential neighbours have the setting of their property altered and industrialized. Boundaries are delineated by security fencing and intrusive CCTV. Peace and quiet is destroyed by industrial grade traffic and light pollution. Inverters can overheat in extremely	No	<p>Appendix 6.7 of the ES: Residential Visual and Amenity Assessment [APP/6.4] has been undertaken, which identified that only Keepers Cottage which is located within the Order Limits required a detailed assessment. Measures have been incorporated into the Scheme, such as hedgerow planting and offsets of Solar PV Arrays, to mitigate any potential impact to such a level that the visual</p>



		hot weather requiring the use of noisy fans to provide cooling.		effects from this property would not be sufficient to exceed the Residential Visual Amenity threshold. ES Chapter 10: Noise and Vibration [APP/6.2] presents the conclusions of the noise modelling on nearby sensitive receptors which includes residential properties. The assessment concludes that there would be no significant noise effects as a result of the Scheme.
	Proximity to residential areas (BESS & Customer Substation areas)	Indicative Masterplan 2 Substation and BESS far too close to Castle Acre / South Acre. Would be visible from priory and from south facing houses in Castle Acre. Needs to be moved further south so not possibly seen from these points. [Illegible] near A1065 preferable as this is a busy road in any case so the damage to the amenity has already happened.	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.
	Proximity to residential areas (BESS & Customer Substation areas)	Originally the substation was going to be further away, and now you've changed the plans for it to be much closer to our doorstep here in South Acre. We do not want the substation on the road to South Acre. It will be hugely disruptive and an eye sore, especially from Castle Acre.	Yes	The Applicant notes this 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.
	Proximity to residential areas (BESS & Customer Substation areas)	i am very concerned about the proposed siting of the batteries and substations. There is likely to be at least a hum if not louder noise coming from these systems and sound travels a long. Castle Acre houses are in a straight line from the proposed siting of these systems and I know from past experience that such noise can be a nuisance, especially at night.	Yes	The Applicant notes this 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. This has increased the distance between the villages and the built infrastructure. 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.
	Proximity to residential areas (BESS & Customer Substation areas)	Substation and BESS has to be located as far as possible away from houses and out of sight. Proposed location 33 could be visible from South Acre and southside of Castle Acre including from the priory. That is unacceptable. Page 39 suggests it will be visible. Consultation event I attended should have been more transparent on the height of the substation and BESS and the noise generated. As main access to site is from A1065, the substantial BESS can be located further towards Swaffham.	Yes	Solar PV Arrays, Customer Substation and BESS have been removed from Field 35 and the northern extents of Field 33. This has increased the distance between the villages and the built infrastructure. 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.



	Proximity to residential areas (BESS & Customer Substation areas)	I live in South Acre, so this will obviously have a huge impact on my home	Yes	Solar PV Arrays, Customer Substation and BESS have been removed from Field 35 and the northern extents of Field 33. This has increased the distance between the villages and the built infrastructure.
	Financial compensation - related to impact on property	What compensation or support (if any) will be available to affected homeowners	No	The Applicant notes that there is currently no evidence in the UK that solar farms have devalued nearby properties. Research from other countries also suggests that renewable energy projects, including solar developments, tend to have little to no impact on property values. In fact, factors such as local amenities, school catchments, and the overall housing market are generally considered to have a far greater influence on house prices than the presence of renewable energy infrastructure.

18 Public recreation and access

Topic	Theme	Comment	Has this resulted in a change to the Scheme or the Applicant's evidence?	Applicant response
Public recreation and access	Impact on local amenities / recreational activities	There will be no social value to the local area. We have wonderful walks through fields and along hedgerows and of course the unique River Nar. Therefore most locals won't want to wander through a solar farm with less flora , forna and free roaming wildlife and the wonderful sound of buzzing battery packs !	No	<p>The Applicant notes that mitigation measures are proposed to minimise the visual impact on PRoW users and to ensure that PRoWs can continue to be used in a manner similar to pre-development of the Site. Further details of this mitigation are provided in the Design Approach Document [APP/5.7].</p> <p>ES Chapter 10: Noise and Vibration [APP/6.2] assesses the potential effects on PRoW during the construction, operational, and decommissioning phases of the Scheme. Following the implementation of embedded and additional mitigation measures, as detailed within the chapter, it concludes that there would be no significant adverse effects, including in relation to PRoW.</p>
	Impact on local amenities / recreational activities	Think nature will find the building of a solar farm very disruptive. Great to see some permissive paths being put in, would be lovely to see one or two more. =D particularly the stretch that runs parallel to the A1065 and the bridleway.	No	<p>The Applicant notes that the oCEMP [APP/7.6] sets out the measures proposed to mitigate potential impacts on landscape and ecological features during construction.</p> <p>The Applicant welcomes the comments regarding permissive paths and notes permissive routes proposed within the Scheme are detailed within the oPRoWPPMP [APP/7.12]</p>
	Impact on local amenities / recreational activities	The current site has natural beauty and wildlife. I cant see many folk who would like to wander around a solar farm listening to the hum of battery cooling fans and transformers.	No	<p>The Applicant notes these comments and confirms that ES Chapter 10: Noise and Vibration [APP/6.2] assesses the potential effects on PRoW during the construction, operational, and decommissioning phases of the Scheme. Following the implementation of embedded and additional mitigation measures, as detailed within the chapter, it</p>



				concludes that there would be no significant effects, including in relation to PRow.
	Impact on local amenities / recreational activities	it is ridiculous to suggest that people will wish to use footpaths and pilgrim routes surrounded by solar farm fencing, hedging, equipment. Insulting!	No	<p>The Applicant notes that mitigation measures are proposed to minimise the level of visual change for PRow users and ensure that PRowS can continue to be used in a similar manner as pre-development of the Site. Further details of this mitigation is provided in the Design Approach Document [APP/5.7].</p> <p>The Applicant also notes that all PRow will have a minimum 15m buffer to any infrastructure associated with the Scheme (including fencing).</p>
	Impact on local amenities / recreational activities	<p>Active travel? Horse riding, quad bike - e-scooter one is looking to the future.</p> <p>How will folk move in 2050? On their two legs or be powered by the energies we are generating!</p>	No	<p>The Applicant has considered the impact of the Scheme on users of PRow as well as amenity and recreation. Further information about the landscape and visual effects can be found in ES Chapter 6: Landscape and Visual [APP/6.2].</p> <p>The Applicant also notes that effects upon visual receptors take account of whether the PRow is a footpath, bridleway or restricted byway.</p> <p>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.</p>
	Cyclists	Consideration had been taken for environmental issues and the impact for local residents/cyclists/walkers.	No	An assessment of the impacts of construction traffic is included within ES Chapter 9: Transport and Access [APP/6.2] on non-motorised users, which concludes there are no significant effects.
	Cyclists	As above. By changing and adding in a few paths and cycle routes, planting hedgerows etc, this does not make up for all that would be lost in all these areas.	No	<p>The Applicant notes this comment but disagrees and has committed to enhancements as part of the Scheme.</p> <p>The design of the Scheme has sought to retain, buffer and enhance the existing on-site green infrastructure where practicable. New planting and maintenance regimes outlined within the oLEMP [APP/7.11].</p>
	Cyclists	Yes perhaps you could join forces w/ High Grove Solar Farm & provide a cycle path along the A1065 from South Acre Rd to Swaffham.	No	<p>Permissive routes proposed within the Scheme are detailed within the oPRowPPMP [APP/7.12].</p> <p>The permissive path within the Order Limits is reliant on offsite connections that are not within the control of the Applicant. The Applicant has collaborated with the promoters of High Grove Solar Farm to secure a permissive path that connects through to Swaffham.</p>
	Cyclists	Improvements to shared access tracks and rural roads, particularly around Bartholomew Hills and the	No	Permissive routes proposed within the Scheme are detailed within the oPRowPPMP [APP/7.12] .



		junction with Big Wood Lane and South Acre Road, to manage erosion, sand build-up, and safety risks for walkers and cyclists using this part of the Peddars Way.		
	Walking/hiking routes	who wants to walk through a Solar Farm. The character of the area is vistas of countryside and history not Solar Panels.	No	The Applicant has considered the impact of the Scheme on users of PRow. Further information about the landscape and visual effects can be found in ES Chapter 6: Landscape and Visual [APP/6.2] .
	Walking/hiking routes	I think some people will be put off walking near solar panels, great to see some permissive paths put in though.	No	The Applicant notes and welcomes this comment. Permissive paths, totalling approximately 3.5km, have been incorporated within the Scheme. Further details can be found within the oPRoWPPMP [APP/7.12] . The Applicant has also considered the impact of the Scheme on users of PRow. Further information about the landscape and visual effects can be found in ES Chapter 6: Landscape and Visual [APP/6.2] .
	Walking/hiking routes	There will be minimal walks, and the ones there will be are next to huge areas of fenced in panels, with less wildlife. The character of the area is open fields, rolling landscape and crops, whereas what is planned is the complete opposite.	No	The alignment of existing PRow within the Site has been incorporated into the Scheme's design. As such, the alignment of PRow will be unaffected by the Scheme during the operation and maintenance phase of the Scheme. Permissive paths, totalling approximately 3.5km, have been incorporated within the Scheme. Further details can be found within the oPRoWPPMP [APP/7.12] . ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely landscape and visual impacts of the Scheme. 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.
	Walking/hiking routes	Impact on Peddars Way.	No	The Applicant notes that ES Chapter 6: Landscape and Visual [APP/6.2] has assessed the likely effects from Peddars Way long-distance path. Short- and medium-term visual effects on this route would be medium-scale, limited to the extent of this route where it runs through/adjacent to the Site. These effects would be of low magnitude, of moderate significance, and adverse. The visual effect upon this route would be significant, in the short and medium term, where it runs through the Site and up to approximately 300m beyond the Site. However, the Applicant notes that following the application of mitigation measures such as mitigation planting and



				landscape management, the effects would be reduced to not significant in the long term.
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THE DROVES
SOLAR FARM