

The Droves Solar Farm

Chapter 1: Introduction

Prepared by: LDA Design Date: November 2025

PINS reference: EN0110013

Document reference: APP/6.1 (Original)

APFP Regulation Reg 5(2)(a)

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009





Glossary

Term	Description
33kV Sub-distribution Switch Rooms	Switch rooms within the Solar PV Site that collect the generated power from the Solar PV Arrays and convert it to 33kV.
Access Tracks	The tracks either existing or proposed, within the Site, which provide access around the Scheme.
Ancillary Buildings	The office, storage and plant buildings or containers which may be located within the Solar PV Site.
Ancillary Infrastructure	Works that are ancillary to the Scheme, including enclosure and boundary treatment, security and monitoring infrastructure, landscaping and biodiversity measures including planting, drainage and irrigation works, signage, earthworks, and access including Permissive Paths.
Applicant	The Droves Solar Farm Limited.
Associated Development	Development associated with the Scheme including but not limited to the BESS, Customer Substation, National Grid Substation, Grid Connection Infrastructure and Ancillary Infrastructure, and any other works integral to the construction, operation, maintenance and decommissioning of the Scheme.
Battery Energy Storage System (BESS)	Battery Energy Storage System (BESS), is used to describe the battery storage installation to allow for the storage, importation, and exportation of energy to the National Grid. For the purposes of the Environmental Impact Assessment, it has been assumed battery technology will be adopted for the BESS.
BESS Units	Individual battery units that are grouped together to form the BESS.
Cable Circuit	An electrical conductor necessary to transmit electricity between two points within the Scheme and may include one or more auxiliary cables for the purpose of gathering monitoring data, earthing cables, cables for auxiliary supply, optical fibre and other types of communication cables, cables connecting to direct current boxes.
Cabling	The low or medium voltage cables within the Scheme, which transmit electricity between PV Panel to Conversion Units and from there to the Customer Substation and BESS. These cables consist of 33kV (kilovolt), and 400kV cables, as well as earthing cables and optical fibre cables.



Construction Compound	An area within the Site where deliveries will be set down, managed and redistributed throughout the Construction Phase.
Conversion Units	Conversion Units incorporate the inverters, transformers and switchgear and are required to manage the electricity generated by the PV Panels. These would either be standalone equipment, or they would be housed ('integrated') together within a container.
Customer Substation	The Scheme substation comprising electrical infrastructure such as the Transformers, Switchgear and metering equipment required to facilitate the export of electricity from the Scheme to the National Grid Substation. The Customer Substation will also provide Ancillary Buildings for staff welfare and storage facilities. The Customer Substation will convert the electricity transmitted along the Cable Route Corridor up to 400kV (kilovolt) for onward transmission to the National Grid Substation via the Grid Connection Cables.
Development Consent Order (DCO)	Development consent is required pursuant to the Planning Act 2008 for Nationally Significant Infrastructure Projects. A development consent order is a statutory instrument containing powers that enable the applicant to carry out the construction, operation, maintenance and decommissioning of the Nationally Significant Infrastructure Project. Applications for DCOs are made to, and decided by, the relevant Secretary of State.
Development Consent Order (DCO) Application	The application for a Development Consent Order (DCO) to be submitted by the Applicant for the Scheme.
Fixed South Facing PV Arrays	Solar photovoltaic (PV) tables that face south and are mounted to fixed Mounting Structures in an east/west configuration.
Grid Connection Cables	The 400kV (kilovolt) cables connecting the Customer Substation to the Point of Connection.
Grid Connection Infrastructure	Underground and/or overhead lines including new pylons between the National Grid Substation and the Point of Connection.
Ground Mounted PV Modules	Solar photovoltaic (PV) modules attached to structures that are fixed to the ground which include Single Axis Tracker PV Arrays or Fixed South Facing PV Arrays.
Highway Works	Any works associated with the temporary or permanent amendments to the highway and/or highway verges to facilitate the Construction Phase, Operational Phase and Decommissioning Phase of the Scheme.
Inverter	Inverters convert the Direct Current (DC) electricity generated by the PV Panels into Alternating Current (AC), which allows the electricity generated to be exported to the national grid.



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Mounting Structures	The metal frames onto which the PV panels are attached.
National Grid Substation	The 400kV (kilovolt) substation operated by National Grid Electricity Transmission.
Nationally Significant Infrastructure Project (NSIP)	A NSIP is a large-scale development (as defined in sections 14-30A of the Planning Act 2008) such as certain new harbours, power generating stations (including wind farms), highways developments and electricity transmission lines, which require a type of consent known as 'development consent' which is governed by the Planning Act 2008.
Order limits	The land shown on the Works Plans within which the Scheme can be carried out.
Point of Connection (POC)	The National Grid Substation and associated connection into the 400kV overhead lines located at The Droves Solar Farm, which the Scheme connects to, to transfer the energy generated to the national grid system.
PV panel	Solar photovoltaic panel designed to convert solar irradiance to electrical energy. The PV panel is attached to a Mounting Structure.
PV Tables	PV panels mounted onto the Mounting Structure, forming tables, which are set out in rows either in an east/west or a north/south configuration.
Relay and Control Room	A building housing monitoring equipment for the Solar PV Site.
Scheme	A Nationally Significant Infrastructure Project (NSIP) comprising a Ground Mounted solar photovoltaic generating station with a gross electrical capacity of over 50 megawatts, with Associated Development which would allow the generation, storage and export of electricity. The Scheme is known as "The Droves Solar Farm".
Single Axis Trackers	Mounting Structures in a north/south configuration, that allow the PV Table to rotate and track the movement of the sun.
Site	Area consisting of the Solar PV Site, Associated Development, Ancillary Infrastructure and Highway Works and any other element or component that forms part of the Scheme.
Solar PV Arrays	Rows or groups of PV Tables that are connected to one another to form a Solar PV Array.
Solar PV Site	A term used to describe the land that accommodates the Solar PV Arrays, Conversion Units and 33kV Sub-distribution switch rooms.



Switchgear

A combination of electrical disconnect switches, fuses or circuit breakers used to control, protect, and isolate electrical equipment.

Temporary
Compounds

Construction
Temporary laydown areas used during construction, comprising areas of hardstanding, car parking, areas to store materials and equipment, waste management, security infrastructure including fencing, lighting and cameras.

Transformers

Transformers increase and decrease the voltage of the electricity. There would be 33kV Transformers and 400kV Transformers within the Scheme.



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Appendix 1.1: Statement of Competence



1 Introduction

1.1 Background

1.1.1 This Environmental Statement (ES) has been prepared on behalf of The Droves Solar Farm Limited (the Applicant) in relation to a Development Consent Order (DCO) application (the DCO Application) for the construction, operation and maintenance, and decommissioning of The Droves Solar Farm (hereafter referred to as the Scheme) located within an area of land to the north of Swaffham in Norfolk, (hereafter referred to as the Site) as depicted on **Figure 3.1: Scheme Location [APP/6.3].**

The Scheme

- 1.1.2 The Scheme comprises the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station and associated development, including a Battery Energy Storage System (BESS), a Customer Substation, and Grid Connection Infrastructure, including a new National Grid Substation. The Scheme would allow for the generation and export of over 50MW Alternating Current (AC) of renewable energy, connecting into the National Electricity Transmission System (NETS) overhead line that passes through the Site.
- 1.1.3 The Scheme will be located within the Order limits as described in **ES Chapter 3: Order limits and Context [APP/6.1],** which outline the maximum extent of land that will be required to facilitate the construction, operation and maintenance, and decommissioning of the Scheme, as depicted on the **Works Plan [APP/2.3]**.
- 1.1.4 The Point of Connection (PoC) will be at a new National Grid Substation situated within the Order limits, which forms part of the Scheme.
- 1.1.5 As the Scheme comprises the construction of a generating station with a capacity of over 50MW, it is defined as a Nationally Significant Infrastructure Project (NSIP) under sections 14(1)(a) and 15(2) of the Planning Act 2008 (PA2008) (Ref 1-1). It therefore must be consented by way of a DCO. The DCO Application is submitted to the Planning Inspectorate, with the decision whether to grant the DCO being made by the Secretary of State for the Department of Energy Security and Net Zero (hereafter referred to as the Secretary of State).
- 1.1.6 Further detail of the Scheme is provided in **Chapter 5: The Scheme [APP/6.1]**.
- 1.1.7 The Scheme is considered to be EIA development under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) (Ref 1-2), requiring an environmental impact assessment (EIA) to be prepared as part of the DCO Application. The Environmental Statement (ES) presents the findings of the EIA undertaken for the Scheme in accordance with the EIA Regulations and the Planning Act 2008.



The Site

- 1.1.8 The Site is located in an area of countryside to the north of Swaffham and to the south east of King's Lynn, within Norfolk, as depicted on **Figure 3.1: Scheme Location [APP/6.2].**
- 1.1.9 The Site is wholly located within the local administrative boundaries of Breckland Council (BC) and Norfolk County Council (NCC), who are the host authorities. The Site lies adjacent to the administrative boundary of the Borough Council of King's Lynn & West Norfolk (BCKLWN).
- 1.1.10 The Site is further described in Chapter 3: Order limits and Context [APP/6.1].

1.2 The EIA Regulations

- 1.2.1 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) provide the legislative framework which specify which developments are required to undergo an EIA, and categorises development relevant to the NSIP planning process as either 'Schedule 1 development' or 'Schedule 2 development'. Those developments listed in Schedule 1 must be subject to EIA, while developments listed in Schedule 2 must only be subject to EIA if they are considered "likely to have significant effects on the environment by virtue of factors such as its nature, size or location". The criteria on which this judgement must be made are set out in Schedule 3 of the EIA Regulations.
- 1.2.2 The Scheme is a Schedule 2 development under paragraph 3(a) as it constitutes "Industrial installations for the production of electricity, steam, water and hot water".
- 1.2.3 The Applicant considers that, due to the Scheme's nature, size and location, it has the potential to have significant effects on the environment and therefore constitutes EIA Development as defined by the EIA Regulations. In accordance with Regulation 8(1)(b) of the EIA Regulations, the Applicant gave notice at submission of the ES Appendix 2.1: EIA Scoping Opinion Request [APP/6.1] that an ES would be submitted in support of the DCO Application. Further details about the approach to the EIA can be found within ES Chapter 2: EIA Process and Methodology [APP/6.1].

1.3 Purpose and Structure of the Environmental Statement

- 1.3.1 Environmental impacts arising from the Scheme have been assessed as part of the EIA process, and the results are presented within this ES.
 - The baseline for the assessment has been derived from desktop and field-based surveys and studies within and around the Order limits. The general assessment methodology is explained in ES Chapter 2: EIA Process and Methodology [APP/6.1], including the approach to the cumulative assessment.



- The EIA process has considered impacts resulting from the construction, operation and maintenance (including replacement activities), and decommissioning phases of the Scheme, and considers mitigation measures to avoid, reduce or offset any likely significant adverse effects on the environment and, where possible, enhance the environment.
- 1.3.2 Where applicable, the ES has also identified residual effects, defined as effects remaining following the inclusion or adoption of mitigation measures.
- 1.3.3 The structure of this ES is outlined in Table 1-1 below. The Applicant is advised by a team of experienced and qualified environmental consultants. A **Statement of Competence** of the relevant assessors and chapter authors, as required under Regulation 14.4 of the EIA Regulations, is provided at **ES Appendix 1.1: Statement of Competence [APP/6.4]** of the ES.

Table 1-1 Structure of the Environmental Statement

Document	Organisation	
Volume 1 – Environmental Statement Introduction Chapters		
Chapter 1: Introduction		
Chapter 2: EIA Process and Methodology	LDA Design	
Chapter 3: Order limits and Context		
Chapter 4: Reasonable Alternatives and Design Evolution	DWD, LDA Design, and Humbeat Limited	
Chapter 5: The Scheme	LDA Design	
Volume 2 – Environmental Statement Aspect Chapters		
Chapter 6: Landscape and Visual	LDA Design	
Chapter 7: Ecology and Biodiversity	Aspect Ecology	
Chapter 8: Cultural Heritage and Archaeology	GHC Archaeology and Heritage and Headland Archaeology	
Chapter 9: Transport and Access	Velocity Transport Planning	
Chapter 10: Noise and Vibration	Hoare Lea	



Document	Organisation	
Chapter 11: Soils and Agriculture	Kernon Countryside Consulting Ltd	
Chapter 12: Water Resources	Raincloud Consulting Ltd	
Chapter 13: Climate	Bureau Veritas	
Chapter 14: Socio-Economics	Volterra Partners	
Chapter 15: Human Health		
Chapter 16: Other Environmental Matters – Air Quality, Glint and Glare, Electromagnetic Fields (EMF), Telecommunications, Utilities and Television Receptors, Waste, and Arboriculture	Hoare Lea, Pager Power, LDA Design, Lanpro, and Seed Arboriculture Ltd	
Chapter 17: In-Combination Effects	LDA Design	
Chapter 18: Summary of Likely Significant Effects	LDA Design	
Volume 3 – Figures		
Volume 4 – Technical Appendices		
Volume 5 – Non-Technical Summary and Commitments Register		

Information Required by the EIA Regulations

1.3.4 Table 1-2 presents the information required by Regulation 14(2) of and Schedule 4 to the EIA Regulations and sets out where this information is located within the ES.

Table 1-2 Requirements of Regulation 14(2) of and Schedule 4 to the EIA Regulations.

Requirement	Location in this ES	
1. a) a description of the location of the development.	ES Chapter 3: Order limits and Context [APP/6.1]	
1. b) a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases.		



Requirement	Location in this ES	
1. c) a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used.	ES Chapter 5: The Scheme [APP/6.1]	
1. d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise,	ES Chapter 5: The Scheme [APP/6.1]	
vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.	ES Chapter 9: Transport and Access [APP/6.2]	
	ES Chapter 10: Noise and Vibration [APP/6.2]	
	ES Chapter 11: Soils and Agriculture [APP/6.2]	
	ES Chapter 12: Water Resources [APP/6.2]	
	ES Chapter 13: Climate Change [APP/6.2]	
	ES Chapter 16: Other Environmental Matters [APP/6.2]	
2. A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.	ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]	
3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.	Section 6: Baseline Conditions of ES Chapters 6 to 16 (technical assessments) [APP/6.2]	
4. A description of the factors specified in Regulation 5(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.	ES Chapters 6 to 16 (technical assessments) [APP/6.2]	



Requirement	Location in this ES
5. A description of the likely significant effects of the development on the environment resulting from, inter alia:	ES Chapters 6 to 16 (technical assessments) [APP/6.2]
a) the construction and existence of the development, including, where relevant, demolition works.	ES Chapter 17: In- Combination Effects
b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources.	[APP/6.2]
c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste.	
d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters).	
e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources.	
f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change.	
g) the technologies and the substances used. The description of the likely significant effects on the factors specified in Regulation 5(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long term, permanent and temporary, positive and negative effects of the development.	
6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.	ES Chapters 6 to 16 (technical assessments) [APP/6.2]
7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.	ES Chapters 6 to 16 (technical assessments) [APP/6.2]
8. A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned.	If applicable within ES Chapters 6 to 16 (technical assessments) [APP/6.2]



Requirement	Location in this ES	
9. A non-technical summary of the information provided under paragraphs 1 to 8.	Non-Technical Summary [APP/6.5]	
10. A reference list detailing the sources used for the descriptions and assessments included in the ES.	ES Chapters 6 to 16 (technical assessments) [APP/6.2]	

1.4 The Applicant

- 1.4.1 The Applicant is The Droves Solar Farm Limited. The Droves Solar Farm is a 100%-owned subsidiary of Island Green Power UK Projects Limited, which is in turn a 100%-owned subsidiary of Island Green Power's UK group holding company, Island Green Power Group Limited (IGP). The Applicant is part of IGP, who are a leading international developer of utility-scale solar projects and battery storage systems', established in 2013.
- 1.4.2 IGP has successfully delivered nearly 40 solar projects worldwide that have generated more than 3GW of energy capacity. This includes 21 solar projects in the UK. These range in size from below 5MW to Nationally Significant Infrastructure Projects (NSIPs) such as Cottam, currently the UK's largest consented solar project. Cottam will generate 600MW of clean, renewable and secure electricity and includes 600MW of Battery Storage that will store then release energy as needed.
- 1.4.3 Their mission is to deliver renewable energy solutions that create lasting value for the communities they serve, protecting the environment while fostering economic growth and energy independence.
- 1.4.4 Recently, IGP's Cottam and West Burton projects have received DCOs. The Cottam Solar Project was granted development consent by the Secretary of State on 5 September 2024. The West Burton Solar Project was granted development consent by the Secretary of State on 24 January 2025.

1.5 Consultation

- 1.5.1 The DCO process sets out several statutory requirements regarding consultation. The Planning Act 2008 (Ref 1-1) requires applicants to carry out statutory consultation on their proposals ahead of submission of a DCO Application. The requirements are:
 - Section 42 of the Planning Act 2008 requires the Applicant to consult with the prescribed persons, which include consultation bodies such as Natural England, Environment Agency, Historic England, host authorities, neighbouring authorities and persons with an interest in the land and those who may be affected by the Scheme



- Section 47 of the Planning Act 2008 requires the Applicant to consult with the local community. As part of this, a Statement of Community Consultation (SoCC) must be prepared, which sets out how the applicant proposes to consult on the Scheme. The Applicant must consult with the host authorities on this document and have regard to their comments
- Section 48 of the Planning Act 2008 requires the Applicant to publicise the Scheme in the prescribed manner in a national newspaper, The London Gazette, and local newspapers. The Section 48 notice also needs to be sent to prescribed consultees; and
- Section 49 of the Planning Act 2008 requires the Applicant to have regard to any relevant responses received to the consultation and publicity that is required by Sections 42, 47 and 48 of the Planning Act 2008.

Consultation to Date

Initial Engagement and Non-Statutory Consultation

- 1.5.2 Throughout the period August 2024 to March 2025, early-stage and ongoing engagement took place with relevant stakeholders. Regular meetings were held with host authorities and other bodies, as necessary. Statutory and non-statutory consultees were also consulted.
- 1.5.3 A number of meetings have taken place with statutory and non-statutory consultees to introduce the Scheme and commence discussions on detailed matters relating to the Scheme which include:
 - Norfolk County Council, Breckland Council, Borough Council of King's Lynn & West Norfolk (Planning Officers and Members)
 - Parish Councils (Castle Acre, West Acre, Holme Hale, Little Dunham, and Swaffham)
 - The Planning Inspectorate
 - Local Member of Parliament MP for Ely and East Cambridgeshire
 - Local Member of Parliament MP for West Norfolk
 - Environment Agency
 - Historic England
 - Natural England
 - Logistics UK
 - Ministry of Defence (MOD) and Defence Infrastructure Organisation (DIO)
 - National Grid
 - Norfolk Wildlife Trust
 - · Norfolk Farming & Wildlife Advisory Group
 - · Norfolk Rivers Trust; and



- · Norfolk Biodiversity Partnership.
- 1.5.4 The Applicant held a series of early-engagement workshops with invited stakeholders, including local councils, community groups and technical consultees, to introduce the proposals and help understand key issues and potential constraints in the local area.
- 1.5.5 Two in-person workshops and three online workshops were held in September and October 2024. An additional online workshop was held in January 2025, to discuss feedback received on the materials presented as part of the early engagement. During these workshops, the Applicant team engaged collaboratively with stakeholders to help understand key issues and potential constraints in the local area.
- 1.5.6 Non-statutory consultation is described in the **Consultation Report [APP/5.1]** accompanying the DCO Application. Within each appendix for individual aspect ES chapters (**ES Appendices 6.1 to 16.1 [APP/6.4]**) there is further detail on any topic-specific consultations that have taken place with statutory consultees to date.
- 1.5.7 Following the co-design process and submission of the EIA Scoping Opinion Request, a Scoping Opinion Response [APP/6.4] was issued on 18 December 2024. In the preparation of the Scoping Report, consultation was undertaken with key stakeholders where possible. The Planning Inspectorate consulted on the EIA Scoping Opinion Request, with the prescribed consultation bodies, as listed in Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (Ref 1-3). Those responses were included with the Scoping Opinion Response issued by the Planning Inspectorate. Any key matters raised in those responses are covered in the individual aspect ES chapters. The issues raised in the Scoping Opinion Response relating to the description of the Scheme are summarised in Table 1-3 which demonstrates how the matters raised in the Scoping Opinion Response are addressed in this ES.



Table 1-3 Relevant Scoping Opinion Comments from the Planning Inspectorate relating to the description of the Scheme

Comment and Scoping Opinion ID No.	How has the comment been addressed in the ES chapter	Location of response in ES Chapter
2.0.1 "The ES should explain the factors which have influenced site selection and design, including a comparison of the environmental effects. For example, the ES should explain how the design of the Proposed Development has ensured that preference has been made for poorer quality agricultural land instead of Best and Most Versatile (BMV) agricultural land".	A comprehensive description of the site selection and design evolution is provided in ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]. This chapter provides a summary of the reasonable alternative options that the Applicant has considered for the Scheme to date, including the initial selection of the Site and throughout the development of the design. The chapter also details how the assessment of the site and design alternatives has been undertaken, detailing the factors that have been considered and the main reasons for discounting alternative design options.	ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1] ES Chapter 11: Soils and Agriculture [APP/6.1]
2.0.2 "Details on the type of switchgear used should be included as part of the ES. Should a gas insulated switchgear option be chosen for the inverters, the use of sulphur hexafluoride (SF6) should be avoided, if possible, in line with National Policy Statement (NPS) for Electricity Networks Infrastructure (EN-5)".	Details on the Scheme components are set out in ES Chapter 5: The Scheme [APP/6.1].	ES Chapter 5: The Scheme [APP/6.1].



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Comment and Scoping Opinion ID No.	How has the comment been addressed in the ES chapter	Location of response in ES Chapter
2.0.3 "The Inspectorate notes that horizontal directional drilling (HDD) may be required during construction of the Proposed Development. The ES should identify the trenching technique to be used at the relevant locations and provide details of the programme and the works, including identifying if any night-time working is anticipated. Justification should be set out for use of the preferred technique at the chosen locations, and identification of potential impacts and an assessment where likely significant effects could occur should be provided".	There may be a requirement for trenchless technology such as horizontal directional drilling (HDD) within the Site, for example, to cross beneath existing underground utilities. Where the need for trenchless technologies has been identified at crossing points or avoidance areas, feasibility studies will be carried out to identify the appropriate technology.	ES Chapter 5: The Scheme [APP/6.1].
2.0.4 "The ES should provide the exact location and extent of the BESS and other infrastructure such as site access and highway works in the description, supported by figures".	Details of the Scheme's BESS, including location and extent, and other infrastructure such as site access and Highway Works, are set out in ES Chapter 5: The Scheme [APP/6.1] and Figure 5.1: Concept Masterplan [APP/6.3].	ES Chapter 5: The Scheme [APP/6.1] and ES Figure 5.1: Concept Masterplan [APP/6.3].
2.0.5 "The ES should provide details on the approximate location and number of the construction compounds and the location of any associated temporary or permanent infrastructure such as access tracks required on the Proposed Development site, and these should be shown on a figure or plan".	Details of the Scheme's construction compounds and associated temporary/permanent infrastructure, including location and extent, is set out in ES Chapter 5: The Scheme [APP/6.1] and ES Figure 5.1 Concept Masterplan [APP/6.3].	ES Chapter 5: The Scheme [APP/6.1] and ES Figure 5-1: Concept Masterplan [APP/6.3].
2.0.6 "The ES should describe where bridge/culvert structures are proposed and demonstrate that there is sufficient detail regarding the design as to inform an assessment of effects on watercourses and ecology as appropriate".	The design process for the Site has incorporated a number of offsets from features such as drainage ditches, watercourses and water bodies, as identified in the Design Principles ,	Design Principles, Parameters and Commitments [APP/5.8]



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Comment and Scoping Opinion ID No.	How has the comment been addressed in the ES chapter	Location of response in ES Chapter
	Parameters and Commitments [APP/5.8].	ES Chapter 5: The Scheme [APP/6.1]
2.0.7 "The ES should provide a proportionate description of the activities and works which are likely to be required to decommission the Proposed Development or extend its operational life, and the anticipated duration. The ES should clarify whether the site will be returned to its current use and condition, or the infrastructure that is retained beyond the lifespan of the Proposed Development should be clearly distinguished, such as the proposed access tracks".	Details of the Scheme's decommissioning, including likely activities, works and components to be retained, is set out in Chapter 5: The Scheme [APP/6.1]. Good practice measures are set in place to ensure responsible practices are adhered to. An outline Decommissioning Strategy (oDS) has been prepared in support of the ES, which sets out the mitigation measures identified through the EIA assessments. A detailed Decommissioning Environmental Management Plan (DEMP) will be secured via a requirement in the DCO and agreed with the relevant local planning authorities, post-consent.	ES Chapter 5: The Scheme [APP/6.1] and outline Decommissioning Strategy (oDS) [APP/7.10].



Statutory Consultation

- 1.5.8 A Preliminary Environmental Information Report (PEIR) was prepared and published on 21 May 2025 to satisfy the requirement of the EIA Regulations (Ref 1-2). Preliminary environmental information is defined in Regulation 12(2) of the EIA Regulations as information:
 - "which (a) has been compiled by the applicant; and (b) is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development (and of any associated development)."
- 1.5.9 Planning Inspectorate Advice Note 7 (EIA: Process, Preliminary Environmental Information, and Environmental Statements) (Ref 1-4) notes:
 - "A good PEI document is one that enables consultees (both specialist and non-specialist) to understand the likely environmental effects of the Proposed Development and helps to inform their consultation responses on the Proposed Development during the preapplication stage."
- 1.5.10 The PEIR enabled consultees to understand the likely environmental effects of the Scheme. It presented the preliminary findings of the environmental assessments undertaken up to that point. This allowed consultees the opportunity to provide informed comments on the Scheme, the assessment process, and preliminary findings prior to the finalisation of the DCO Application and this ES.
- 1.5.11 Statutory consultation was undertaken between 21 May 2025 and 9 July 2025, during which time the Applicant hosted a series of in-person and online information events.
- 1.5.12 The issues that were raised by statutory consultees through consultation and how these have been considered and addressed within the design evolution of the Scheme and the EIA are set out in each of the technical chapters (Chapters 6 to 16) of this ES. The statutory consultation undertaken by the Applicant is also documented within the **Consultation Report** [APP/5.1] that is provided as part of the DCO Application.

Targeted Consultation

- 1.5.13 Targeted consultation was undertaken between 3 September 2025 and 1 October 2025, during which feedback was encouraged on four localised changes to the Scheme boundary.
- 1.5.14 Statutory consultees engaged under Section 42 during the statutory consultation were reengaged during targeted consultation, alongside near neighbours (defined as properties within 50m of the Scheme boundary) and those non-statutory consultees identified as most likely to have a direct interest in the proposals due to local environmental, heritage, community, and recreational interests.
- 1.5.15 The Applicant also engaged separately with Castle Acre Parish Council to discuss the promotion of the consultation within the community, given its proximity to the proposed changes.



1.5.16 Targeted consultation undertaken by the Applicant is also documented within the **Consultation Report [APP/5.1]** that is provided as part of the DCO Application.

1.6 The Droves

- 1.6.1 Droves have been used since the Iron Age, with their use peaking in the 18th and 19th centuries as the growth of towns and cities led to an increasing demand for food from rural areas. Hundreds of thousands of sheep and cattle would be herded across the land each year, but as pastureland gave way to farmland and the rail network grew, these important routes slowly fell into disuse.
- 1.6.2 Their use for herding livestock has diminished over time, but their use as routes connecting places for people remains. Three Droves cross the Site; namely, Fincham Drove, Petticoat Drove and Washpit Drove.
- 1.6.3 As part of the Scheme, the Applicant has explored ways to celebrate and enhance these historic routes where they pass through the Site, reinforcing their connection with the landscape and local communities.



References

- Ref 1-1 Planning Act 2008, 2008
- Ref 1-2 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, 2017 No. 572. (as amended)
- Ref 1-3 The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended)
- Ref 1-4 Planning Inspectorate (2020) Advice Note 7: EIA: Process, Preliminary Environmental Information and Environmental Statements.

