



## Application by The Drovers Solar Farm Limited for The Drovers Solar Farm

### The Examining Authority's written questions and requests for information (ExQ1): Issued on 13 May 2026

#### Responses are due by deadline 1: Tuesday 2 June 2026

The following table sets out the Examining Authority's (ExA's) written questions and requests for information - ExQ1. If necessary, the examination timetable enables the ExA to issue a further round of written questions in due course. If this is done, the further round of questions will be referred to as ExQ2.

Questions are set out using an issues-based framework derived from the initial assessment of principal issues provided as **annex D** to the Rule 6 Letter dated 8 April 2026. Questions have been added to the framework of issues set out there as they have arisen from representations and to address the assessment of the application against relevant policies.

Column 2 of the table indicates which interested parties (IPs) and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Each question has a unique reference number which starts with 1 (indicating that it is from ExQ1) and then has an issue number and a question number. For example, the first question on air quality and emissions issues is identified as Q1.1.1. When you are answering a question, please start your answer by quoting the unique reference number.

You should respond to the questions by using the **Have your say** function on the [project page of the National Infrastructure website](#) and selecting 'Responses to Examining Authority's First Written Questions (ExQ1)' when asked.

If you are responding to a small number of questions, you can submit your answers by choosing 'Make a comment' and entering your answers in the 'Your comments' box. If you are answering a larger number of questions you should download a copy of the Microsoft Word version of



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the document, enter your answers and save the document using an appropriate file name. You can then submit the completed document by selecting 'Upload files'.

Microsoft Word version: [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110013-000413Examining%20Authority's%20Written%20Questions%201%20\(ExQ1\)%20\(Word\).docx](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110013-000413Examining%20Authority's%20Written%20Questions%201%20(ExQ1)%20(Word).docx)

Download a copy of this Microsoft Word version of the ExA's written questions, enter your answers and save the document using an appropriate file name. You can then submit the completed document by choosing 'Make a comment' and selecting 'Upload files'.



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## Abbreviations used:

<b>PA2008</b>	Planning Act 2008	<b>NSIP</b>	Nationally Significant Infrastructure Project
<b>AP</b>	Affected Person	<b>NWT</b>	Norfolk Wildlife Trust
<b>BESS</b>	Battery Energy Storage System	<b>oBSMP</b>	outline Battery Safety Management Plan
<b>BDC</b>	Breckland District Council	<b>oCEMP</b>	outline Construction Environmental Management Plan
<b>BMV</b>	Best and Most Versatile	<b>oCTMP</b>	outline Construction Traffic Management Plan
<b>BoR</b>	Book of Reference	<b>oDS</b>	outline Decommissioning Strategy
<b>CA</b>	Compulsory Acquisition	<b>oLEMP</b>	outline Landscape and Ecological Management Plan
<b>CAPC</b>	Castle Acre Parish Council	<b>oOEMP</b>	outline Operational Environmental Management Plan
<b>dDCO</b>	draft Development Consent Order	<b>oSMP</b>	outline Soil Management Plan
<b>EA</b>	Environment Agency	<b>PRoW</b>	Public Right of Way
<b>EM</b>	Explanatory Memorandum	<b>PV</b>	Photo-voltaic
<b>ES</b>	Environmental Statement	<b>RR</b>	Relevant Representation
<b>ExA</b>	Examining Authority	<b>R</b>	Requirement
<b>HDD</b>	Horizontal Directional Drilling	<b>SoS</b>	Secretary of State
<b>NCC</b>	Norfolk County Council	<b>SoR</b>	Statement of Reason
<b>NPPF</b>	National Planning Policy Framework	<b>TP</b>	Temporary Possession
<b>NPS</b>	National Policy Statement – published in 2023 (came into force 17 January 2024)		



## **The Examination Library**

References in these questions set out in square brackets (for example [APP-010]) are to documents catalogued in the Examination Library. The Examination Library can be obtained from the following link: [XCAT01 - Examination Library template](#)

It will be updated as the examination progresses.

## **Citation of questions**

Questions in this table should be cited as follows:

Question reference: issue reference: question number, for example ExQ1 1.0.1 – refers to question 1 in this table.



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ExQ1	Question to:	Question:
<b>4. Climate change</b>		
Q4.0.1	Breckland District Council (BDC) & Norfolk County Council (NCC)	<b>Greenhouse Gas (GHG) Impact Assessment Methodology</b> Are BDC and NCC content with the methodology, assumptions and limitations used in the Lifecycle GHG impact assessment as set out in the updated Chapter 13 of the ES [AS-020]?
	NCC Response:	Norfolk County Council (NCC) have no comments to make regarding the GHG impact assessment methodology.
<b>5. Compulsory acquisition, temporary possession and other land or rights considerations</b>		
ExQ1	Question to:	Question:
Q5.0.8	The applicant Breckland District Council Norfolk County Council	<b>Possible impediments</b> (i) Is the applicant aware of any land or rights being required in addition to those sought through the dDCO [APP-018] before the proposed development can become operational? (ii) Do BDC or NCC have any concerns about whether potential impediments to the development been properly identified and addressed? Are they aware of any matters within or outside the scope of the dDCO that may have a bearing on whether the development could become operational, or may not be satisfactorily resolved, including in relation to acquisitions, consents, resources, or other agreements?
	NCC Response:	NCC has identified a significant number of parcels of land which may be, in part, controlled by NCC either as Highways land or as part of the Norfolk County Farms Estate. Unfortunately, at the time of writing, NCC has not yet been able to clearly establish the exact areas of NCC land that will be effects and remains unclear on the specific land arrangements for those different parcels of land. NCC has requested a meeting with the applicant to resolve these uncertainties so that a clear and certain response can be provided to the examining authority. However, this meeting has not been able to be arranged between the date on which the examiners questions were issued and the EXQ1 deadline. NCC will provide further comments on these specific points once the current uncertainty has been resolved.
Q5.0.9	National Highways and Norfolk County Council	<b>Highway land and interests</b> Are NCC and National Highways (NH) in their role as the Highway Authorities aware of: (i) Any reasonable alternatives to the CA or TP sought by the applicant; and/or (ii) Any areas of land or rights sought by the applicant that they consider would not be needed.
	NCC Response:	NCC has identified a significant number of parcels of land which may be, in part, controlled by NCC either as Highways land or as part of the Norfolk County Farms Estate. Unfortunately, at the time of writing, NCC has not yet been able to clearly establish the exact areas of NCC land that will be effects and remains unclear on the specific land arrangements for those different parcels of land. NCC has requested a meeting with the applicant to resolve these uncertainties so that a clear and certain response can be provided to the examining authority. However, this meeting has not been able to be arranged between the date on which the examiners questions were issued and the EXQ1 deadline. NCC will provide further comments on these specific points once the current uncertainty has been resolved.
<b>7. Draft Development Consent Order (DCO)</b>		
<b>7.2 Part 3 - Streets</b>		

Q7.2.1	Norfolk County Council	<b>Article 9 (Application of the permit scheme)</b> NCC is asked to please comment on the drafting of Article 9 of the dDCO [APP-018] and whether it raises any issues for it.
	NCC Response:	9.2(a) and 9.4. Indicates NCC unable to refuse the applicant a Street Works permit to open the highway after substantial Highway works (surfacing etc), under NRSWA Section 58. Project highway works unlikely to require significant carriageway incursion. No concerns at this stage.
Q7.2.3	The applicant Norfolk County Council	<b>Article 10 (Power to alter layout, etc., of streets)</b> With reference to Article 10 of the dDCO [APP-018], paragraph (2) confers a general power enabling the undertaker to alter the layout of any street, subject to the consent of the street authority. The ExA notes National Highways comments in its RR [RR-037]. The applicant is asked to justify why this power is necessary and has consideration been given to whether or not it should be limited to identified streets. NCC is asked to comment on the breadth of the power and whether it raises any issues for it.
	NCC Response:	The conferred power relates generally to identified streets within the Red Line Boundary limits of the scheme. The overarching Highway, and Street Authority powers remain with the local authority, who must give prior agreement for to any alterations.  Outside the RLB limits, any <u>temporary</u> alteration works to identified streets, to expedite the scheme must be agreed prior with the local HA and SA, and prescribed within the oCTMP, and CoCP. Statement must be made by the applicant concerning removal of these works post contract.  NCC would also recommend that the street works in schedule 5 should also be subject to NCC consent, unless other protective provisions or relevant highways agreement is put in place. This could be achieved by amending Article 10 (4) to refer to paragraphs (1) and (2).
<b>7.5 Schedule 2 - Requirements</b>		
Q7.5.6	Breckland District Council Norfolk County Council	<b>R18 - Skills, supply chain and employment</b> Could the councils confirm if they are content with the wording for R18 regarding the Skills, supply chain and employment?
	NCC Response:	NCC welcomes the inclusion of a draft Requirement to secure the preparation of an Employment, Skills and Supply Chain Strategy (ESSCS) prior to commencement. The Requirement appropriately provides for approval by NCC, in consultation with the County Council's Skills and Employment Team, and ensures the detailed ESSCS is prepared in accordance with the Outline Strategy.  It will be important that the detailed ESSCS includes clear targets, delivery arrangements and monitoring mechanisms, and that it is developed in continued engagement with the County Council to ensure alignment with local labour market priorities and the Council's Employment and Skills Framework.
<b>10. Land and Soil</b>		
<b>ExQ1</b>	<b>Question to:</b>	<b>Question:</b>
Q10.0.9	Breckland District Council Norfolk County Council	Policy Compliance Document [APP-044] refers to paragraph 2.10.68 of NPS EN-3 stating that the nature and extent of decommissioning of a site can vary and generally it is expected that underground cabling will be dug out to ensure that prior use of the site can continue. In relation to the decommissioning of underground cables, the outline Decommissioning Strategy [APP-190] states that currently, the most environmentally acceptable option is leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. (i) Do the parties have any comments on the applicant's suggested approach and whether it strikes an appropriate balance between the potential magnitude and duration of impacts during decommissioning and the longer-term implications for future site use? (ii) Should the oDS [APP-190] require the underground cables and ducting to be removed?

	NCC Response:	Removal of both cable and piles is one of the factors we believe contribute to making impacts on below-ground of both installation and removal of panels and cables more than negligible. A suitable level of pre-construction archaeological mitigation will be required in panel areas.
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**13. Noise and Vibration**

Q13.0.3	The applicant Norfolk County Council National Highways Breckland District Council	<p><b>Equality Impact Assessment – Noise and Vibration effects at The Splashes Campsite (Traveller Site)</b></p> <p>Paragraph 7.4.10 of the Equality Impact Assessment (EqIA) [APP-182] determines that in relation to the noise and vibration effects at The Splashes Campsite (Traveller Site), no additional equality specific measure is appropriate or required.</p> <p>(i) Could the applicant provide more detail on the assumption regarding the “<i>very short duration of works</i>” quoted in paragraph 7.4.8, EqIA?</p> <p>(ii) How would the applicant secure the specific restrictions in the dDCO, as identified in paragraph 7.4.7, EqIA, ie these activities would be temporary, of short duration, and confined to normal working hours, with no evening or night-time activity expected?</p>
	NCC Response:	NCC defers matters regarding noise and vibration to the district council who have statutory duty for this area.

**14. Population**

Q14.0.4	The applicant Norfolk County Council Breckland District Council	<p><b>Proposed new permissive routes</b></p> <p>ES Chapter 14: Socio-Economics [APP-063], paragraph 14.7.4 includes that “<i>In addition to this, a number of new permissive routes are proposed, of approximately 4.7km in total, which would link to the existing PRow network within the study area to provide recreational benefits. This total number can be broken down to approximately 1.2km new offsite permissive route provision and approximately 3.5km new onsite permissive route provision (as will be secured within the outline Operational Environmental Management Plan (oOEMP) [APP/7.8] submitted as a requirement of the DCO Application.</i>” (i) Could the applicant provide further details of the 1.2km of offsite permissive route provision to include how this would be secured?</p> <p>(ii) Could the Councils confirm if they are content with the proposed new permissive routes?</p>
	NCC Response:	Yes. However, NCC consider it important to secure these beyond the timescale of the development.

**15. Transport and access**

ExQ1	Question to:	Question:
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Q15.0.6	Norfolk County Council	<p><b>Cumulative traffic using the A1065</b>                  Regarding cumulative traffic for other NSIPs using the A1065, with reference to ES Appendix 9.1 [APP-162], Table 9-21 (page 6), the applicant signposts that the future baseline is discussed within Section 9.6 and the approach to cumulative assessment within Section 9.11 of ES Chapter 9: Transport and Access [APP/6.2] [APP-058].</p> <p>Could NCC advise whether it agrees with the applicant's future baseline and approach to cumulative assessment as referenced above?</p>
	NCC Response:	<p>Yes, NCC are happy that the effects are unlikely to be significant based on the information currently available. As per my previous correspondence, continued coordination between High Grove Solar, your team and the Highway Authority will be essential as both applications progress.</p>
<b>16. Other Planning Matters</b>		
Q16.0.4	Breckland District Council Norfolk County Council	<p><b>Mitigation for cumulative effects from waste in the decommissioning stage</b>                  Regarding waste in the decommissioning phase, paragraph 16.9.147, ES Chapter 16 Other Environmental Matters [APP-065], includes:  <i>"Together, the cumulative magnitude of impact to hazardous waste void capacity is therefore considered to be minor. Due to the receptor's very high sensitivity, the effect is a cumulative moderate or large adverse effect, which is considered significant."</i></p> <p>Additional mitigation described in paragraph 16.9.148 [APP-065] includes:  <i>"The Decommissioning Waste Management Strategy must ensure that hazardous waste handling capabilities are assessed based on up-to-date information at the time of drafting prior to decommissioning works being undertaken. Where significant cumulative effects on hazardous waste handling facilities from decommissioning of multiple NSIPs are assessed as likely to occur, a coordinated approach between site operators of those relevant NSIPs should be secured ahead of the commencement of decommissioning activities."</i></p> <p>The mitigation / enhancement measures and monitoring requirements, described for Waste in Table 11 Other Environmental Matters in the oDS [APP-190], would include a decommissioning waste management strategy to ensure decommissioning waste streams are sent to waste recycling and handling facilities that have sufficient capacity to handle waste arisings from the proposed development without adversely impacting upon their capacity to handle waste arisings for all other waste streams in the authority area.</p> <p>(i) Could BDC advise if they have any comments or concerns regarding the proposed mitigation measures for the effects from waste, particularly for the cumulative effects during the decommissioning stage?                  The ExA notes NCC's comments in relation to Minerals and Waste in its RR [RR-043].                  Do NCC have any further comments or concerns regarding the proposed mitigation measures for the effects from waste, particularly for the cumulative effects during the decommissioning stage?</p>
	NCC Response:	<p>NCC, as the Waste Planning Authority for Norfolk, notes the additional mitigation described, including the Decommissioning Waste Management Strategy and we have no further comments or concerns to raise regarding the proposed mitigation measures for the effects from waste, including the cumulative effects during the decommissioning stage.</p>